

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

AVANT LOCATION TECHNOLOGIES LLC,
Patent Owner.

IPR2025-01260
U.S. Patent No. 8,934,922

**PETITIONER'S NOTICE OF
SOTERA PLUS STIPULATION**

Petitioner Apple Inc. ("Petitioner") hereby stipulates, broader than the stipulation made by the Petitioner in *Sotera* that, if the PTAB institutes Petitioner's Petition for IPR against U.S. Patent No. 8,934,922 (and does not subsequently vacate institution), Petitioner will not pursue in litigation against the claims challenged in IPR2025-01260: (i) the specific grounds raised in IPR2025-01260, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground based on a combination of system prior art and the references asserted as part of a ground raised in IPR2025-01260, as reflected in the table summarizing the Statutory Grounds for Challenges on page 14 of the Petition.

Moreover, Petitioner agrees that if IPR is instituted, Petitioner will not pursue in the related district court litigation any system art prior art theory that corresponds to prior art presented to the Board.

Date: October 17, 2025

HAYNES AND BOONE LLP
2801 N. Harwood St., Suite 2300
Dallas, TX 75201
Customer No. 27683

Respectfully submitted,

/Scott T. Jarratt/
Scott T. Jarratt
Registration No. 70,297
Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), that service was made on Patent Owner as detailed below.

Date of service October 17, 2025

Manner of service Electronic Service: PTAB@fabricantllp.com;
plambrianakos@fabricantllp.com;
vrubino@fabricantllp.com; jpymento@fabricantllp.com;
jostling@fabricantllp.com

Documents served **Petitioner's Notice of *Sotera* Plus Stipulation**

Persons served Peter Lambrianakos
Vincent J. Rubino, III
Julian G. Pymonto
Jacob D. Ostling
FABRICANT LLP
411 Theodore Fremd Avenue, Suite 206 South
Rye, New York 10580

/ Scott T. Jarratt /

Scott T. Jarratt
Registration No. 70,297
Lead Counsel for Petitioner