

November 11, 2025

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VIA EMAIL

Scott W. Hejny
McKool Smith P.C.
300 Crescent Court, Suite 1200
Dallas, TX 75201

Re: IPR2025-01375 - Snap, Inc. et al. v. Nokia Technologies Oy

Dear Mr. Hejny:

In connection with IPR2025-01375, Petitioner Hisense USA Corporation hereby stipulates and agrees that, if the PTAB institutes an *inter partes* review proceeding (“IPR”) for U.S. Patent No. 11,805,267 (the “’267 patent”) on the grounds presented in the petition filed on October 3, 2025, the Hisense respondents in ITC Inv. No. 337-TA-1448 and the Hisense defendants in *Nokia Technologies Oy v. Hisense Co. Ltd. et al.*, No. 1:25-cv-01871-TWT (N.D. Ga.) will not pursue any invalidity defense that the patent claims subject to the instituted IPR are invalid (1) based on the same grounds presented in the IPR petition or (2) based on any other §§ 102 or 103 ground that includes the Wada,¹ Karczewicz-I,² Karczewicz-II³, or Srinivasan⁴ prior art references used in the IPR petition. To the extent there are any prior art products or systems based on the Wada, Karczewicz-I, Karczewicz-II, or Srinivasan references, Hisense also agrees not to rely on those prior art products or systems in the parallel litigations. This stipulation and agreement is not intended and should not be construed to limit Hisense’s ability to assert invalidity of any claims of the ’267 patent on any other ground.

Sincerely,



Patrick J. McKeever

cc: Eric S. Hansen (ehansen@mckoolsmith.com)
R. Mitch Verboncoeur (mverboncoeur@mckoolsmith.com)

¹ U.S. Patent Application Publication No. 2010/0322303.

² U.S. Patent Application Publication No. 2011/0007799.

³ U.S. Patent Application Publication No. 2009/0257499.

⁴ Sridhar Srinivasan et al., An Overview of VC-1, Proceedings of SPIE, Vol. 5960 (July 2005).