JONES DAY

110 NORTH WACKER DRIVE • SUITE 4800 • CHICAGO, ILLINOIS 60606
TELEPHONE: +1.312.782.3939 • JONESDAY.COM

DIRECT NUMBER: +1.312.269.4236
JAMARLOTT@JONESDAY.COM

November 11, 2024

BY E-MAIL & ORIGINALS VIA UPS

Timothy Devlin
tdevlin@devlinlawfirm.com
Jim Lennon
jlennon@devlinlawfirm.com
Jason M. Shapiro
jshapiro@devlinlawfirm.com
Devlin Law Firm LLC
1526 Gilpin Ave.
Wilmington, DE 19806
Stellar-DLF_Intl@devlinlawfirm.com
dlflitparas@devlinlawfirm.com

Timothy E. Grochocinski
tim@nelbum.com
Charles Austin Ginnings
austin@nelbum.com
NELSON BUMGARDNER CONROY PC
745 McClintock Road, Suite 340
Burr Ridge, Illinois 60527
stellar@nelbum.com

Re: *Stellar, LLC v. Motorola Solutions, Inc. et al.*, No. 4:23-cv-750-SDJ

Counsel:

Motorola Solutions, Inc. and Watchguard Video, Inc. ("Motorola") hereby stipulate that, for each of the *inter partes* review ("IPR") proceedings listed below, if the Patent Trial and Appeal Board ("PTAB") institutes IPR, then Motorola will not pursue as to the challenged claims any ground raised or that reasonably could have been raised during the IPR in the above-captioned litigation, EDTX 4:23-cv-750-SDJ.

- IPR2024-01205, challenging claims 1-20 of U.S. Patent No. 7,593,034
- IPR2024-01206, challenging claims 1-13 of U.S. Patent No. 9,485,471
- IPR2024-01207, challenging claims 1-22 of U.S. Patent No. 8,692,882
- IPR2024-01208, challenging claims 1-23 of U.S. Patent No. 9,912,914

Motorola v. Stellar
Motorola Exhibit 1043

IPR2025-01399
CrowdStrike EX1048 Page 1

To avoid any doubt, for each of the IPR proceedings listed above, if the PTAB declines institution, then Motorola reserves the right to pursue the grounds of the denied petition or any other grounds in the parallel litigation.

Sincerely,

John A. Marlott

John A. Marlott

cc: Motorola-JD@jonesday.com

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that I caused to be served on the counsel for Patent Owner a true and correct copy of Petitioner's Exhibit 1043 by electronic means at the following email addresses for counsel of record:

Stellar-DLF_Intl@devlinlawfirm.com
dlflitparas@devlinlawfirm.com

Dated: November 27, 2024

/ *Joshua R. Nightingale* /

Joshua R. Nightingale
Reg. No. 67,865
JONES DAY
500 Grant Street, Suite 4500
Pittsburgh, PA 15219
Telephone: (412) 394-7950
Email: jrnightingale@jonesday.com

Attorney for Petitioner