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November 11, 2024

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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

IPR2025-01400
CrowdStrike EX1068 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
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Dated: November 27, 2024

/ *Joshua R. Nightingale* /

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