

October 29, 2025

VIA E-MAILReza Mirzaie
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
e-mail: rmirzaie@raklaw.com**Re: *Cobblestone Wireless, LLC v. Apple Inc.*, Case No. 7:24-cv-00232 (W.D. Tex.)**

Counsel:

Apple Inc. (“Petitioner” or “Apple”) filed a petition for *inter partes* review (IPR2025-01496) with the Patent Trial and Appeal Board (PTAB) to address the patentability of claims 1-4, 6, 8-12, 14-17, and 19-23 of U.S. Patent 8,891,347.

Apple hereby stipulates that, if the PTAB institutes review in this proceeding, and said institution is not later vacated, reversed, or otherwise withdrawn by rehearing or Director Review, in *Cobblestone Wireless, LLC v. Apple Inc.*, Case No. 7:24-cv-232-ADA (“the Texas Litigation”), Apple will not pursue the specific grounds asserted in *inter partes* review in this proceeding (as reproduced in the table below), or any other ground that could have been reasonably raised in this proceeding (i.e., any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications). See *Sotera Wireless, Inc. v. Masimo Corporation*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020).

Claims	Ground
1, 6, 8, 14-15, 19	§ 103 over Hardacker
2-4, 6, 9-12, 12, 20-23	§ 103 over Hardacker in view of Medbo
1-2, 8, 12, 15-17, 19-20, 23	§ 103 over Wallace
2-4, 16, 20-22	§ 103 over Wallace in view of Medbo

Apple also stipulates that, if the PTAB institutes review in this proceeding, and said institution is not later vacated, reversed, or otherwise withdrawn by rehearing or Director Review, Apple will not pursue in the Texas Litigation combinations of the prior art asserted in this proceeding (as reproduced in the Appendix below) with any other type of prior art, including unpublished system

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prior art, nor will it pursue any unpublished system art corresponding to the prior art asserted in this proceeding. *See Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025).

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute (or withdraws institution of IPR2025-01496), the conditions supporting the above stipulations will be unmet and the stipulations null and void.

Sincerely,

A handwritten signature in blue ink, appearing to be "K. Post", with a long horizontal flourish extending to the right.

Kevin J. Post
Attorney for Apple Inc.

Enclosure

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Appendix – Prior Art References Used in the Listed Grounds

Reference Name	Details
Hardacker	U.S. Patent Pub. 2010/0159855
Medbo	U.S. Patent Pub. 2014/0010274
Wallace	U.S. Patent No. 6,473,467