

Juliette P. White, USB #9616
Patrick J. Neville, USB #17497
PARSONS BEHLE & LATIMER
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
Telephone: 801.532.1234
Facsimile: 801.536.6111
JWhite@parsonsbehle.com
PNeville@parsonsbhleh.com
ecf@parsonsbehle.com

Attorneys for Defendant Plaid Inc. – Additional Counsel Listed in Signature

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SECURE AUTHENTICATION
TECHNOLOGIES LLC,

Plaintiff,

vs.

PLAID INC.,

Defendant.

STIPULATION BY THE PARTIES

Case No. 2:25-cv-00514

The Honorable Dale A. Kimball

Magistrate Judge Jared C. Bennett

Plaintiff Secure Authentication Technologies LLC (“**Plaintiff**”) and Defendant Plaid Inc. (“**Defendant**,” and collectively the “**Parties**”), by and through their undersigned counsel, hereby stipulate the following:

In its April 1, 2026, Memorandum Decision and Order (Dkt. 44), this Court determined that U.S. Patent No. 11,315,090 (the “**090 Patent**”) is directed to an abstract idea and ineligible for patent protection under 35 U.S.C. § 101. The Court further found that any amendment would be futile. *See* Dkt. 44. As a result, the Court entered an Order and Judgment dismissing Plaintiff’s Complaint (Dkt. 1) with prejudice. *See* Dkt. 45.

To avoid the additional expense and costs to all parties associated with further litigation relating to the '090 Patent, the Parties have agreed to the following terms:

1. Plaintiff will not appeal the Court's Judgment or its Memorandum Decision and Order (Dkt. 44) dismissing Plaintiff's action with prejudice.

2. In exchange, Defendant will not seek attorneys' fees pursuant to 35 U.S.C. § 285.

Submitted this 14th day of April, 2026.

PARSONS BEHLE & LATIMER

/s/ Patrick J. Neville

Juliette P. White

Patrick J. Neville

201 South Main Street, Suite 1800

Salt Lake City, Utah 84111

JWhite@parsonsbehle.com

PNeville@parsonsbehle.com

GIBSON DUNN & CRUTCHER LLP

Brian M. Buroker (*pro hac vice*)

Hannah L. Bedard (*pro hac vice*)

1700 M St NW,

Washington, DC 20036

Telephone: 202.955.8500

BBuroker@gibsondunn.com

HBedard@gibsondunn.com

Brian Rosenthal (*pro hac vice*)

200 Park Ave.

New York, NY 10166

Telephone: 212.351.4000

BRosenthal@gibsondunn.com

Jaysen S. Chung (*pro hac vice*)

One Embarcadero Center, Suite 2600

San Francisco, CA 94111

Telephone: 415.393.8200

JSChung@gibsondunn.com

Attorneys for Defendant Plaid Inc.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Todd M. Briggs

Stephen Q. Wood (Utah Bar No. 12403)

stephenwood@quinnemanuel.com

2755 East Cottonwood Parkway, Suite 520

Salt Lake City, Utah 84121

Tel: (801) 515-7300

Fax: (801) 515-7400

Todd M. Briggs

toddbriggs@quinnemanuel.com

555 Twin Dolphin Drive, 5th Floor

Redwood Shores, California 94065

Tel: (650) 801-5000

Fax: (650) 801-5100

Jonathan E. Pickhardt

jonpickhardt@quinnemanuel.com

295 5th Avenue, 9th Floor

New York, New York 10016

Tel: (212) 849-7000

Fax: (212) 849-7100

Christopher R. Sabbagh

chrissabbagh@quinnemanuel.com

700 Louisiana Street, Suite 3900

Houston, Texas 77002

Tel: (713) 221-7000

Fax: (713) 221-7200

Attorneys for Plaintiff Secure Authentication Technologies LLC