From: Nicholas Stephens
Sent: Thursday, March 19, 2026 6:21 PM
To: Michael W. Doell; Robert Rando
Cc: IPR49649-0058IP1
Subject: Petitioner Stipulation (IPR2026-00222)

Counsel,

Petitioner Tesla, Inc. (Tesla) filed a petition for *inter partes* review (IPR) with the Patent Trial and Appeal Board (PTAB) in the subject proceeding (IPR2026-00222).

Tesla hereby stipulates that, if IPR is instituted in IPR2026-00222 ("the instituted IPR"), then in *Bulletproof Property Management, LLC v. Tesla, Inc. et al.*, Case No. 1:25-cv-00665 (W.D. Tex.) ("the Texas Litigation"), Tesla will not advance against the claims challenged in the instituted IPR: (i) the specific grounds asserted in the instituted IPR, (ii) any ground that reasonably could have been raised in the instituted IPR (i.e., any ground that reasonably could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any other ground based on a combination of system art with any prior art reference asserted as the basis of a ground in the instituted IPR. *See Sotera Wireless, Inc. v. Masimo Corporation*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020); *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025).

In so stipulating, Tesla seeks to avoid multiple proceedings in different forums addressing the validity of the claims challenged in the instituted IPR based on the same grounds or prior art. For avoidance of doubt, this stipulation shall only apply to the extent IPR is instituted in this proceeding and institution is not later vacated, reversed, or otherwise withdrawn including by rehearing or Director Review.

Respectfully,
Nicholas Stephens

Counsel for Petitioner Tesla

Nicholas Stephens
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TESLA 1102
Tesla, Inc. v. Bulletproof Prop. Mgmt., LLC
IPR2026-00222