

Nicholas Jepsen

From: Nicholas Jepsen
Sent: Friday, February 27, 2026 5:55 PM
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Cc: IPR30693-0329IP1; PTAB Inbound; AXF-PTAB; Daniel Gopenko; Ahmed Davis
Subject: Petitioner Stipulation - IPR2026-00223

Counsel,

Petitioner Strategy Inc (“Strategy”) filed a petition for *inter partes* review (IPR) with the Patent Trial and Appeal Board (PTAB) in the subject proceeding (IPR2026-00223).

Strategy hereby stipulates that, if IPR is instituted in this proceeding (IPR2026-00223), then in *Web3AI Technologies, LLC v. Strategy Inc*, Case No. 2:25-cv-00260-AWA-DEM (“the Virginia Litigation”), Strategy will not advance against the claims challenged in the instituted IPR: (i) the specific grounds asserted in the instituted IPR, (ii) any ground that could have been reasonably raised in the instituted IPR (i.e., any ground that could have been reasonably 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 any prior art reference asserted as the basis of a ground in the instituted IPR with any system prior art. *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, Strategy 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apply to the extent IPR is instituted in this proceeding and institution is not later vacated, reversed, or otherwise withdrawn including by rehearing or Director Review.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 Jepsen

Nicholas Jepsen
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