

NEW YORK
SAN FRANCISCO
WASHINGTON, DC

Taeg Sang Cho
New York
Direct: 212-351-1060
TCho@desmaraisllp.com

March 20, 2026

Via Email

Christopher J. Schwegmann
Lynn Pinker Hurst & Schwegmann, LLP
cschwegmann@lynnllp.com

Re: *Search and Share Techs., LLC. v. X Corp.*, No. 1:25-cv-01540 (W.D. Tex.)

Dear Mr. Schwegmann:

On behalf of X Corp. in the above-referenced case (“Litigation”), we write regarding the following petitions for *inter partes* review (“IPR”) that X Corp. filed with the Patent Trial and Appeal Board:

AIA Review Number	Challenged Patent	Challenged Claims
IPR2026-00235	U.S. Patent No. 11,106,744	1–20
IPR2026-00244	U.S. Patent No. 10,180,952	1–14

Consistent with *Sotera Wireless, Inc. v. Masimo Corp.*¹ and *Tesla, Inc. v. Intellectual Ventures II LLC*,² X Corp. hereby stipulates that, for each challenged patent, if the PTAB institutes IPR in response to X Corp.’s IPR Petition of that challenged patent and does not subsequently vacate institution, Petitioner will not pursue in the Litigation, with respect to the challenged claims of that patent:

- i the specific grounds raised in the instituted IPR;
- ii any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications); or
- iii any ground based on a combination of system prior art and the references asserted as part of a ground raised in the instituted IPR.

¹ *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential).

² *Tesla, Inc. v. Intellectual Ventures II LLC*, IPR2025-00217, Paper 10 at 2 (Dir. June 13, 2025).

Mr. Christopher J. Schwegmann
3/20/2026
Page 2

Very truly yours,

/s/ Taeg Sang Cho
Taeg Sang (Tim) Cho

cc: Counsel of Record