Via E-Mail

March 13, 2026

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Re: ***WeCrevention, Inc. v. Apple Inc.*****, 7-25-cv-00458 (WDTX)**

Counsel:

Apple Inc. ("Petitioner" or "Apple") filed a petition for *inter partes review* (IPR2026-00243) with the Patent Trial and Appeal Board (PTAB) to address the patentability of claims 1-6 of U.S. Patent No. 12,154,652.

I write to inform you that Apple hereby stipulates that, if the PTAB institutes and maintains institution of review in IPR2026-00243, Apple will not pursue in the above-captioned District Court litigation the specific invalidity grounds asserted in IPR2026-00243, or any other ground that could have been reasonably raised in IPR2026-00243 (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).

Apple also stipulates that, if the PTAB institutes and maintains institution of review in IPR2026-00243, Apple will not pursue in the above-captioned District Court litigation as invalidity grounds combinations of the prior art references asserted as part of a ground in this proceeding, as listed below, with unpublished system prior art or any other type of prior art. *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025). Accordingly, Apple hereby stipulates that, if the PTAB institutes and maintains institution of review in IPR2026-00243, Apple will not pursue in the above-captioned District Court litigation combinations of any of the Takahashi, Tsern, Schuette, Endo, Dono, Goto, or Youn references asserted as part of the grounds of IPR2026-00243 with unpublished system prior art or any other type of prior art.

In so stipulating, Apple seeks to avoid multiple proceedings in different forums addressing the validity of the instituted claims based on the same grounds or prior art. The tables in attached Appendix A list the grounds and ground references asserted in IPR2026-00243.

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For the sake of clarity and to avoid any doubt, if the PTAB declines to institute (or withdraws institution of) IPR2026-00243, the conditions supporting the above stipulations will be unmet and the stipulations null and void.

Sincerely,

Stephen Marshall

Digitally signed by Stephen Marshall
Date: 2026.03.11 15:06:22 -04'00'

Stephen Marshall
Attorney for Apple

Appendix A – Grounds and Prior Art References

Ground	Claims	Basis
1A	**1-6**	§102/103: Takahashi
1B	**1-6**	§103: Takahashi+Tsern+Schuette
1C	**3-6**	§103: Takahash+Endo
1D	**3-6**	§103: Takahashi+Tsern+Schuette+Endo
2A **[2A.1]**	**1-6**	§103: Dono+Goto [§103: Dono+Goto+Youn]
2B **[2B.1]**	**3-6**	§103: Dono+Goto+Endo [§103: Dono+Goto+Endo+Youn]

Ground Reference	Date(s)	Prior Art Under (Pre-AIA)
Takahashi (US2010/0290300)	(F) 4/28/2010; (P) 11/18/2010	§102(a), (b), (e)
Dono (US2011/0063927)	(F) 9/10/2010; (P) 3/17/2011	§102(a), (b), (e)
Endo (US2012/0327062)	(F) 4/5/2012; (P) 12/27/2012	§102(e)
Schuette (US2010/0142247)	(F) 12/7/2009; (P) 6/10/2010	§102(a), (b), (e)
Tsern (US2012/0327726)	(F) 2/23/2010 (provisional); 12/1/2010 (PCT); (P) 12/27/2012	§102(e)
Goto (US2012/0140578)	(F) 11/28/2011; (P) 6/7/2012	§102(a), (e)
Youn (US7738311)	(F) 11/6/2007; (P) 6/15/2010	§102(a), (b), (e)