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VIA EMAIL

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Re: *Dolby Laboratories, Inc. et al v. InterDigital, Inc. et al.*, Case No. 2-26-cv-02269 (C.D. Cal.)

Counsel:

Dolby Laboratories, Inc. (“Petitioner”) has filed a petition for inter partes review (IPR2026-00252) with the Patent Trial and Appeal Board (PTAB) to address the patentability of claims 1-30 of US. Patent No. 9,185,268.

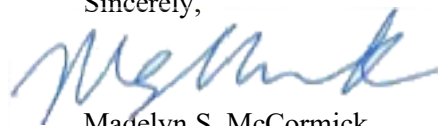
Petitioner hereby stipulates that, if the PTAB institutes review in IPR2026-00252, and the institution is not later vacated, reversed, or otherwise withdrawn by rehearing or Director Review, the Petitioner will not pursue in *Dolby Laboratories, Inc. et al v. InterDigital, Inc. et al.*, Case No. 2-26-cv-02269 (C.D. Cal.) (“the Dolby DJ Action”) the specific grounds asserted in IPR2026-00252 (as reproduced in the table below), or any other ground that could have been reasonably raised in IPR2026-00252 (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).

Claims	Ground
1-3, 5, 12-14, 20-22, 24	§103: Jones, Ollivier, Osaki
4, 23	§103: Jones, Ollivier, Osaki, Morovič
6, 7, 10, 11, 15, 16, 18, 19, 25, 26, 29, 30	§103: Jones, Yeung
9, 28	§103: Jones, Yeung, Morovič
8, 17, 27	§103: Jones, Yeung, Vetro

Petitioner also stipulates that, if the PTAB institutes review in IPR2026-00252, and the institution is not later vacated, reversed, or otherwise withdrawn by rehearing or Director Review, Petitioner will not pursue in the Dolby DJ Action combinations of prior art asserted in IPR2026-00252 (as reproduced in the Appendix below) with any other type of prior art, including unpublished system prior art, nor will it pursue any unpublished system art corresponding to the prior art asserted in IPR2026-00252. *See Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025).

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute (or withdraws, vacates, or reverses institution of IPR2026-00252), the conditions supporting the above stipulation will be unmet and the stipulation null and void.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mc Cormick', is positioned above the printed name.

Madelyn S. McCormick

Attorney for Dolby Laboratories, Inc.

Appendix – Prior Art References Used in Listed Grounds

Reference Name	Details
Jones	U.S. Pat. No. 7,053,927
Ollivier	International Pat. Pub. No. WO 2007/050091
Osaki	U.S. Pat. App. Pub. No. 2007/0058183
Morovič	Morovič, Ján & Johan Lammens, “Color Management,” Colorimetry: Understanding the CIE System, John Wiley & Sons, Ch. 7 (pp. 159-203) (2007)
Yeung	U.S. Pat. App. Pub. No. 2007/0211074
Vetro	Vetro, Anthony, “MPEG-21 Digital Item Adaptation: Enabling Universal Multimedia Access,” IEEE MultiMedia, vol. 11, no. 1, Jan-Mar. 2004, pp. 84-87