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Subject: Vusura Technology LLC v. Cisco Systems, Inc., No. 2:25-CV-00871-JRG
Date: Tuesday, June 2, 2026 4:07:24 PM

Counsel,

As you are aware from service emails from Cisco's counsel at Duane Morris, on February 24, 2026, Cisco filed an *inter partes* review (IPR) petition (IPR2026-00255) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1-25 of U.S. Patent No. 11,227,303 ("the '303 Patent").

I write to inform you that, given Director Squires' new guidance in his decisions that he designated as informative on May 13, 2026, Cisco hereby withdraws the indefiniteness positions that it raised for the '303 Patent in its January 9, 2026 invalidity contentions, and hereby stipulates that it will not pursue in this district court litigation any indefiniteness ground under 35 U.S.C. § 112 against any claim of the '303 Patent.

Cisco also hereby stipulates that, if the PTAB institutes IPR2026-00255, Cisco will not pursue in this district court litigation the specific invalidity ground that it raised in the IPR petition against the '303 Patent, nor any other invalidity ground that Cisco raised or could have reasonably raised in the IPR petition under §§ 102 or 103 against the asserted claims of the '303 Patent. *Sotera Wireless, Inc. v. Masimo Corp.*, Case IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020) (precedential). Moreover, Cisco stipulates that, if the PTAB institutes IPR2026-00255, Cisco will not pursue in this district court litigation any invalidity ground based on system prior art corresponding to the printed publication asserted in the specific invalidity ground that it raised in the IPR petition.

In so stipulating, Cisco seeks to avoid a situation in which multiple proceedings address the validity of the asserted claims of the '303 Patent based on the same or overlapping prior-art grounds, and to minimize the potential for inconsistent outcomes in the parallel IPR and district court proceedings. Instead, through this stipulation, Cisco expresses its preference that only the PTAB address the grounds of §§ 102 or 103 invalidity raised or that could have reasonably been raised in the IPR petition for the challenged claims of the '303 Patent.

Regards,

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