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VIA E-MAIL

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Re: *The Nielsen Company LLC v. VideoAmp, Inc., Case No. 1-25-cv-00408-1 (DDE)*

Dear Counsel:

VideoAmp, Inc. (“**VideoAmp**”) has filed a petition for *inter partes* review (IPR) petition (IPR2026-00310) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1-30 of U.S. Patent No. 12,063,402 (“**the '402 Patent**”). The tables in attached Appendix A list all grounds, challenged claims, and references asserted in IPR2026-00310.

I write to inform you that VideoAmp hereby stipulates that, if the PTAB institutes review in this proceeding, unless institution is later vacated, reversed, or otherwise withdrawn by rehearing or Director Review, VideoAmp will not pursue in District Court litigation (i) the specific grounds asserted in IPR2026-00310, (ii) any other ground that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications), or (iii) any ground based on a combination of system prior art (i.e., prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2026-00310.

Sincerely,



Aamir Kazi

Appendix A – Grounds and Prior Art References Used in IPR2026-00310

Ground	Claims	Basis for Rejection (§103)
1A	1-7, 9-10, 12-16, 18-19, 21-26, 28-29	Obvious over Kerr
1B	8, 17, 27	Obvious over Kerr in view of Thomassen
1C	11, 20, 30	Obvious over Kerr in view of Parkes
2A	1-7, 9-10, 12-16, 18-19, 21-26, 28-29	Obvious over Kerr in view of Dutton
2B	8, 17, 27	Obvious over Kerr in view of Dutton and Thomassen
2C	11, 20, 30	Obvious over Kerr in view of Dutton and Parkes

List of References

Reference Name	Details
Kerr	US Patent Pub. 2016/0029155 A1 to Kerr et al.
Dutton	US Patent Pub. 2010/0331016 A1 to Dutton et al.
Thomassen	U.S. Patent Publication No. 2014/0025432 A1 to Thomassen et al.
Parkes	US Patent Pub. 2009/0164577 A1 to Parkes et al.