

June 23, 2026

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**Re: *Tir Technologies Ltd. v. Meta Platforms, Inc.*, C.A. No. 8:25-cv-02345 (C.D. Cal.);
Meta Platforms, Inc. v. Tir Technologies Ltd., IPR2026-00346, IPR2026-00347**

Counsel:

Meta Platforms, Inc. (“Meta”) hereby stipulates that, if IPR2026-00346 and IPR2026-00347 are instituted, Meta will not pursue in *Tir Technologies Ltd. v. Meta Platforms, Inc.*, C.A. No. 8:25-cv-02345 (C.D. Cal.) the specific invalidity ground that Meta raised, or could have reasonably raised, in those *inter partes* review proceedings under §§ 102 or 103 against the asserted claims of the respective patent at issue. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020) (precedential). Moreover, Meta stipulates that, if IPR2026-00346 and IPR2026-00347 are instituted, Meta will not pursue in this district court litigation any invalidity ground based on system prior art that is both corresponding to and commensurate with the printed publications asserted in the specific invalidity ground that it raised in those *inter partes* review proceedings.

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Accordingly, this stipulation ensures that IPR2026-00346 and IPR2026-00347 would be “true alternatives” to the district court proceeding (*Sotera*, Paper 12, 18-19) because Meta agrees not to pursue any grounds after institution in the district court that are within the scope of the statutory estoppel (i.e., any grounds that the statute would preclude Meta from pursuing after Final Written Decision, for example, if the district court were to stay the IPR pending Final Written Decision), as well as system art that is both corresponding to and commensurate with the printed publications asserted. However, if institution of IPR2026-00346 and IPR2026-00347 is subsequently vacated, or IPR2026-00346 and IPR2026-00347 is terminated after institution without reaching a Final Written Decision, Meta will no longer be bound by this stipulation.

Sincerely,

/s/ Sarah E. Piepmeier

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