

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

PEER GLOBAL INC.,
Patent Owner.

Case No. IPR2026-00438
U.S. Patent No. 11,966,559

NOTICE OF PETITIONER'S STIPULATION

Petitioner Apple Inc. stipulates that, if the PTAB institutes *inter partes* review, it will not pursue in *Peer Global Inc. v. Apple Inc.*, No. 7:26-cv-00033 (W.D. Tex.) (the “Litigation”) the specific grounds asserted in the Petition or any other ground that reasonably could have been 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). *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential). Moreover, if the PTAB institutes *inter partes* review, Petitioner will not rely on any invalidity ground under §§ 102 or 103 in the Litigation based on a prior art product or system corresponding to (or based on) the prior art relied on in the Petition.

Respectfully submitted,

Date: September 25, 2026

By: /Joshua L. Goldberg/
Joshua L. Goldberg, Lead Counsel
Reg. No. 59,369

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Notice of Petitioner's Stipulation** was served electronically via email on September 25, 2026, in its entirety on the following:

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Patent Owner has consented to service by email.

Dated: September 25, 2026

Respectfully submitted,

/Daniel E. Doku/

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