

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

SECURE COMMUNICATION TECHNOLOGIES, LLC,
Patent Owner

Case IPR2026-00447
U.S. Patent No. 11,687,971

PETITIONER APPLE INC.'S *SOTERA* STIPULATION

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U.S. Patent No. 11,687,971 is currently at issue in related district court litigation *Secure Comm'n Techs., LLC v. Apple Inc.*, Case No. 1:25-cv-01579 (W.D. Tex.) ("the District Court Proceeding").

Petitioner Apple Inc. hereby stipulates that, if the Board institutes trial in this *inter partes* review proceeding, and if the Board does not subsequently vacate or reverse institution, or otherwise terminate or resolve the instituted trial prior to final written decision, Petitioner will not pursue in the District Court Proceeding any ground that the petitioner raised or reasonably could have raised in the Petition. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (P.T.A.B. Dec. 1, 2020) (precedential as to § II.A).

Respectfully submitted,

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CERTIFICATE OF SERVICE (37 C.F.R. §§ 42.6(e))

I certify that the above-captioned **PETITIONER APPLE INC.'S *SOTERA***
STIPULATION was served in its entirety on September 28, 2026, upon the
following parties via electronic mail:

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