

September 18, 2026

Mark D. Selwyn

VIA EMAIL (JMCMANIS@AZALAW.COM)

+1 650 858 6031 (t)
+1 650 858 6100 (f)
mark.selwyn@wilmerhale.com

Jason S. McManis
AHMAD, ZAVITSANOS & MENSING, PLLC
1221 McKinney Street, Suite 2500
Houston, Texas 77010

Re: *Mobility IP Holdings, Inc. v. Apple Inc.*, Case No. 7:26-cv-00075 (W.D. Tex.)

Counsel:

Apple Inc. (“Apple”) is filing a petition for *inter partes* review (IPR2026-00500) with the Patent Trial and Appeal Board (PTAB) to address the patentability of claims 1–25 of U.S. Patent No. 8,151,345.

I write to inform you that Apple hereby stipulates that, if the PTAB institutes and maintains institution of review in IPR2026-00500, Apple will not pursue in the above-captioned District Court litigation for U.S. Patent No. 8,151,345 the specific invalidity grounds asserted in IPR2026-00500, or any other ground that could have been reasonably raised in IPR2026-00500 (i.e., any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications). *See Sotera Wireless, Inc. v. Masimo Corporation*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020). Apple also stipulates that, if the PTAB institutes and maintains institution of review in IPR2026-00500, Apple will not pursue in the above-captioned District Court litigation as invalidity grounds for U.S. Patent No. 8,151,345 combinations of the prior art references asserted as part of a ground in this proceeding, as listed below, with unpublished system prior art or any other type of prior art. *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025). Accordingly, Apple hereby stipulates that, if the PTAB institutes and maintains institution of review in IPR2026-00500, Apple will not pursue in the above-captioned District Court litigation for U.S. Patent No. 8,151,345 combinations of any of the Huomo, Kisliakov, Linehan, Peart, Ryan, or Hulbert references asserted as part of the grounds of IPR2026-00500 with unpublished system prior art or any other type of prior art.

In so stipulating, Apple seeks to avoid multiple proceedings in different forums addressing the validity of the instituted claims based on the same grounds or prior art. The tables in attached Appendix A list the grounds and ground references asserted in IPR2026-00500.

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For the sake of clarity and to avoid any doubt, if the PTAB declines to institute (or withdraws institution of) IPR2026-00500, the conditions supporting the above stipulations will be unmet and the stipulations null and void.

Sincerely,

/s/ Mark D. Selwyn

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Enclosure: Appendix A

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Appendix A – Grounds and Prior Art References

Ground	'345 Patent Claims	Basis for Rejection
1A	23	§103 – Huomo in view of Kisliakov and Linehan
1B	24-25	§103 – Huomo in view of Kisliakov, Linehan, and Peart
2A	23-25	§103 – Ryan in view of Kisliakov and Peart
3A	11-12	§103 – Ryan in view of Hulbert
3B	13-22	§103 – Ryan in view of Hulbert and Peart
3C	1-10	§103 – Ryan in view of Hulbert, Peart, and Kisliakov

Ground Reference Name	Ground Reference Details
Huomo	U.S. Patent No. 8,538,332 to Huomo et al.
Kisliakov	U.S. Patent Appl. Pub. No. 2003/0212896 to Kisliakov
Linehan	U.S. Patent No. 7,103,575 to Linehan
Peart	U.S. Patent No. 8,001,054 to Peart et al.
Ryan	U.S. Patent No. 7,213,766 to Ryan et al.
Hulbert	U.S. Patent Appl. Pub. No. 2009/0187687 to Hulbert et al.