

September 18, 2026

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Jason S. McManis
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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 (IPR2026-00501) with the Patent Trial and Appeal Board (PTAB) to address the patentability of claims 1-7 of U.S. Patent No. 10,706,412.

I write to inform you that Apple hereby stipulates that, if the PTAB institutes and maintains institution of review in IPR2026-00501, Apple will not pursue in the above-captioned District Court litigation for U.S. Patent No. 10,706,412 the specific invalidity grounds asserted in IPR2026-00501, or any other ground that could have been reasonably raised in IPR2026-00501 (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 IPR2026-00501, Apple will not pursue in the above-captioned District Court litigation as invalidity grounds for U.S. Patent No. 10,706,412 combinations of the prior art references asserted as part of a ground in this proceeding, as listed below, with unpublished system prior art or any other type of prior art.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 IPR2026-00501, Apple will not pursue in the above-captioned District Court litigation for U.S. Patent No. 10,706,412 combinations of any of the Maes, Niwa, Bjorn, or Walker references asserted as part of the grounds of IPR2026-00501 with unpublished system prior art or any other type of prior art.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 IPR2026-00501.

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For the sake of clarity and to avoid any doubt, if the PTAB declines to institute (or withdraws institution of) IPR2026-00501, 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	'412 Patent Claims	Basis for Rejection
1A	1–3	§103 – Maes
1B	1–3	§103 – Maes in view of Niwa
2	1–3	§103 – Maes in view of Bjorn
3A	1–7	§103 – Maes in view of Walker
3B	4–7	§103 – Maes in view of Niwa and Walker
3C	4–7	§103 – Maes in view of Bjorn and Walker

Ground Reference Name	Ground Reference Details
Maes	U.S. Patent No. 6,016,476 to Maes et al.
Niwa	U.S. Patent No. 6,453,301 to Niwa
Bjorn	U.S. Patent No. 6,035,398 to Bjorn
Walker	U.S. Patent No. 6,163,771 to Walker et al.