

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

AMAZON.COM, INC.,
Defendant.

Civil Action No. 1:13-cv-01795-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

APPLE, INC.,
Defendant.

Civil Action No. 1:13-cv-01796-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

ASUSTEK COMPUTER, INC. AND ASUS
COMPUTER INTERNATIONAL,
Defendants.

Civil Action No. 1:13-cv-01797-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

BLACKBERRY LTD AND BLACKBERRY
CORPORATION,
Defendants.

Civil Action No. 1:13-cv-01798-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

FUHU, INC.,
Defendant.

Civil Action No. 1:13-cv-01799-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

FUJITSU LIMITED AND
FUJITSU AMERICA, INC.
Defendants.

Civil Action No. 1:13-cv-01800-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

GOOGLE INC. AND MOTOROLA
MOBILITY LLC,
Defendants.

Civil Action No. 1:13-cv-01801-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

HISENSE USA CORPORATION,
Defendant.

Civil Action No. 1:13-cv-01983-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

HTC CORPORATION AND
HTC AMERICA, INC.,
Defendants.

Civil Action No. 1:13-cv-01802-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

HUAWEI DEVICE USA, INC. AND
FUTUREWEI TECHNOLOGIES, INC.,
Defendants.

Civil Action No. 1:13-cv-01803-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

LENOVO (UNITED STATES) INC.,
Defendant.

Civil Action No. 1:13-cv-01805-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

LG ELECTRONICS, INC.; LG ELECTRONICS,
USA, INC.; AND LG ELECTRONICS
MOBILECOMM USA, INC.,
Defendants.

Civil Action No. 1:13-cv-01806-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

MICROSOFT CORPORATION,
Defendant.

Civil Action No. 1:13-cv-01984-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

MOTOROLA SOLUTIONS, INC.,
Defendant.

Civil Action No. 1:13-cv-01807-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

SAMSUNG ELECTRONICS CO. LTD.;
SAMSUNG ELECTRONICS AMERICA, LLC;
AND SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC,
Defendant.

Civil Action No. 1:13-cv-01808-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

SONY CORPORATION; SONY ELECTRONICS,
INC.; SONY MOBILE COMMUNICATIONS
(USA) INC.; AND SONY MOBILE
COMMUNICATIONS AB,
Defendants.

Civil Action No. 1:13-cv-01809-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

TOSHIBA CORPORATION AND TOSHIBA
AMERICA INFORMATION SYSTEMS, INC.,
Defendants.

Civil Action No. 1:13-cv-01810-GMS
JURY TRIAL DEMANDED

MEMORY INTEGRITY, LLC,
Plaintiff,

v.

ZTE CORPORATION AND ZTE (USA) INC.,
Defendants.

Civil Action No. 1:13-cv-01811-GMS
JURY TRIAL DEMANDED

STIPULATION TO STAY PENDING INTER PARTES REVIEW

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for the Plaintiff Memory Integrity, LLC and the undersigned counsel for Defendants, subject to approval by the Court, THAT:

1) Each of the above-captioned actions shall be stayed pending *inter partes* review of the patent-in-suit in the following IPR Case Nos.:

- IPR2015-00158;
- IPR2015-00159;
- IPR2015-00161;
- IPR2015-00163; and
- IPR2015-00172

(collectively, “the Pending IPRs”).

2) Each Defendant agrees that it shall not, in the above-captioned actions or any subsequent proceedings, contest the validity of any claim on grounds actually raised during any of the Pending IPRs addressed in a final written decision under 35 U.S.C. § 318(a) that is not subject to further appeal; *provided that* this provision shall not apply with respect to any *inter partes* review proceeding which is terminated by settlement prior to its conclusion. For any Defendant which is or subsequently becomes a petitioner in any of the Pending IPRs, or the real party in interest or privy of a petitioner, this provision shall be in addition to, and not in replacement of, the estoppel provisions of 35 U.S.C. § 315(e).

3) The parties agree to meet and confer in good faith regarding whether or not the stays should be continued within fourteen days after decisions on institution are issued in all of the Pending IPRs. If Memory Integrity decides to reduce the claims that it will proceed on in the above-captioned actions based on the institution of one or more of the IPRs, Memory Integrity shall provide its revised list of claims at least two business days prior to the meet and confer. Within twenty-one days after decisions on institution are issued in all of the Pending IPRs,

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