

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNIVERSAL SECURE REGISTRY LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 17-585 (CFC) (SRF)
)	
APPLE INC., VISA INC. and)	
VISA U.S.A., INC.,)	
)	
Defendants.)	

**STIPULATION AND ~~PROPOSED~~ ORDER STAYING
LITIGATION PENDING IPR AND CBM REVIEW PROCEEDINGS**

WHEREAS, Defendant Apple Inc. (“Apple”) has filed the following IPR and CBM Review petitions currently pending before the Patent Trial and Appeal Board: IPR2018-00809; IPR2018-00810; IPR2018-00811; IPR2018-00812; IPR2018-00813; CBM2018-00024; CBM2018-00025; and CBM2018-00026;

WHEREAS, Defendants Visa Inc., and Visa U.S.A., Inc. (with Visa Inc., “Visa”) have filed the following IPR petitions currently pending before the Patent Trial and Appeal Board: IPR2018-01350 and IPR2018-01351; and

WHEREAS, The Patent Trial and Appeal Board has instituted IPR proceedings based on the following petitions to date: IPR2018-00809; IPR2018-00810; and IPR2018-00813;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among Plaintiff Universal Secure Registry LLC (“USR”), Apple, and Visa, and subject to the approval of the Court, as follows:

1. This case is stayed until the Patent Trial and Appeal Board issues either a final written decision or a decision not to institute IPR or CBM Review on each of the following proceedings: IPR2018-00809; IPR2018-00810; IPR2018-00811; IPR2018-00812; IPR2018-

00813; IPR2018-01350; IPR2018-01351; CBM2018-00024; CBM2018-00025; CBM2018-00026 (collectively, “the PTAB proceedings”). The stay extends until the last of the final written decisions or decisions not to institute IPR or CBM Review in the PTAB proceedings has issued.

2. The parties reserve their right to seek modification of the stay for good cause. USR reserves its right to move the Court to lift the stay before all the PTAB proceedings are resolved, and Apple and Visa reserve their rights to move the Court to extend the stay until all appeals of final written decisions issued in the PTAB proceedings are resolved. All parties reserve their rights to oppose any request for modification of the stay.

3. Upon entry of this stipulation, Visa agrees to be subject to the same estoppel as Apple on the IPR and CBM Review petitions listed above filed by Apple, and Apple agrees to be subject to the same estoppel as Visa on the IPR petitions listed above filed by Visa.

4. All discovery shall be immediately stayed pending entry of this stipulation. The parties agree to take reasonable measures to preserve fact discovery up to and including lifting of the stay of litigation.

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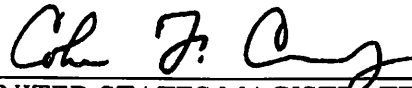
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Attorneys for Apple Inc.

October 26, 2018

SO ORDERED this 29th day of October, 2018.



UNITED STATES ~~MAGISTRATE JUDGE~~
DISTRICT