

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

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

**APPLE INC.’S MOTION TO STAY**

Defendant Apple Inc. (“Apple”) respectfully moves the Court to stay this litigation pending the final resolution, including any appeal, of Apple’s petitions for *inter partes* and covered business method review of U.S. Patent Nos. 8,577,813; 8,856,539; 9,100,826; and 9,530,137.

The grounds for this motion are set forth in Defendant Apple Inc.’s Opening Brief in Support of Its Motion to Stay Pending *Inter Partes* and Covered Business Method Review, and the Declaration of Mark D. Selwyn in support of same, filed contemporaneously herewith.

Pursuant to Rule 7.1.1 of the Local Rules of the United States District Court for the District of Delaware, counsel for Apple have consulted with counsel for Plaintiff Universal Secure Registry LLC regarding the subject matter of this motion, and Plaintiff has not consented to the relief requested.

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/s/ Jason J. Rawnsley  
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