

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LBT IP I LLC,

*Plaintiff,*

v.

APPLE INC.,

*Defendant.*

C.A. No. 19-1245-LPS

**STIPULATION AND [PROPOSED] ORDER  
TO STAY CASE PENDING IPR RESOLUTION**

WHEREAS, Defendant Apple has filed five *inter partes* review (“IPR”) petitions challenging each asserted patent in this litigation, IPR2020-01189, IPR2020-01190, IPR2020-01191, IPR2020-01192, and IPR2020-01193; and

WHEREAS, the parties anticipate that the Patent Trial and Appeal Board (“PTAB”) will make its decisions on institution by the end of January 2021;

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, as follows:

1. This case is hereby STAYED pending resolution (as set forth below) of the five IPR petitions.
2. The parties shall inform the Court of the institution decisions within five (5) business days of the date of the last-issued institution decision in the five IPR petitions.
3. Should the PTAB deny institution of all five IPR petitions, the parties agree that the stay should be lifted at that point. The parties agree to meet and confer and jointly submit an updated proposed schedule to the Court within ten (10) business days of the last-issued decision denying institution.

4. Should the PTAB institute one or more of the petitions, the parties agree that the case should remain stayed until the final disposition of all IPR petitions, including any appeal, reconsideration, and/or rehearing.

5. The parties shall provide written updates to the Court as follows:

- (1) within five (5) business days of the PTAB's last institution decision in the five pending IPR petitions; and
- (2) within five (5) business days of the date of final disposition of the last of any instituted IPR petitions.

DATED: August 25, 2020

**YOUNG CONAWAY STARGATT & TAYLOR LLP**

**POTTER ANDERSON & CORROON LLP**

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*Counsel for Plaintiff, LBT IP I LLC*

*Counsel for Defendant, Apple Inc.*

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE