

John Yim <jyim@yimassociates.com>

April 29, 2014 9:55 AM

To: Christopher V. Goodpastor

Settlement Purposes Only - (IRON DOME LLC V. E-WATCH, INC. Inter Partes Review) IPR2014-00439

Chris:

Further to our teleconference, where you expressed your client's desire to settle this matter, here is our offer for settlement.

Initial payment of \$428,000 for withdrawing the IPR.

Plus:

First scheduled payment upon the first settlement with a first defendant;

Second scheduled payment upon the second settlement with a second defendant;

Third scheduled payment upon the third settlement with a third defendant;

Fourth scheduled payment upon the fourth settlement with a fourth defendant; and

Fifth scheduled payment upon the fifth settlement with a fifth defendant.

Each of the scheduled payments being in the amount of \$223,000 if the settling defendant is Samsung or Apple; or \$175,000 if any other defendant.

Please contact us after review.

John Yim

John J. Yim & Associates, LLC
7600 Leesburg Pike, Suite 470 East Bldg.

E-Watch, Inc Exhibit 2011 Petitioner - Iron Dome LLC Patent Owner - E-Watch Inc IPR2014-00439

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FOR SETTLEMENT PURPOSES ONLY