

July 2, 2020

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Mark D. Selwyn

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Re: *Optis Wireless Technology, et al. v. Apple Inc.*, C.A. No. 19-CV-0006-JRG (E.D. Tex.)

Dear Jason:

We write with regard to your June 25 email proposing a stipulation between the parties. In response to your request for “narrowing of invalidity theories” and in an effort to reduce issues for trial, Apple agrees that it will not pursue the following theories previously elected by Apple in Ms. Sooter’s April 29 email regarding case narrowing:

U.S. Patent No. 8,411,557

- Obviousness in view of US 8,009,637 (“Harris”)
- Obviousness in view of Harris + US 2007/0165567 (“Tan”)

U.S. Patent No. 8,102,833

- Obviousness in view of R1-075037 + US2006/0262871 + R1-073269 + R1-073094
- Obviousness in view of R1-075037 + R1-073926 + US2006/0262871 + R1-073094

We hope that Plaintiffs will consider a reciprocal narrowing of asserted patents and claims.

Sincerely yours,

/s/ Mark D. Selwyn

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IPR2020-00466
APPLE v. OPTIS
APPLE 1045