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December 3, 2020

**VIA E-MAIL**

Wayne M. Helge  
 Davidson Berquist Jackson & Gowdey L.L.P.  
 8300 Greensboro Drive, Suite 500  
 McLean, VA 22102  
 Email: whelge@dbjg.com

Re: Worlds Inc. v. Microsoft Corporation, Case No. 6:20-cv-872 (W.D. Tex.)

Dear Mr. Helge:

We write regarding the petition for *inter partes* review (IPR) filed against the patent-in-suit, U.S. Patent No. 8,082,501, in the captioned litigation. Microsoft Corporation hereby stipulates that, unless the Patent Trial and Appeal Board (PTAB) denies or later vacates institution of the IPR petition, Microsoft Corporation will not seek resolution in the trial for the above-captioned litigation of invalidity based on the grounds presented in the IPR petition (a table of which is reproduced below) or grounds that would otherwise be estopped under 35 U.S.C. § 315(e) under a later final written decision.

Claims	Prior Art Basis of Ground
1-6, 12, 14, 15	Funkhouser, Sitrick
7, 16	Funkhouser, Sitrick, Wexelblat
8, 10	Funkhouser, Sitrick, Funkhouser '93
1-6, 12, 14, 15	Funkhouser, Sitrick, Durward
7, 16	Funkhouser, Sitrick, Durward, Wexelblat
8, 10	Funkhouser, Sitrick, Durward, Funkhouser '93

In so stipulating, Microsoft seeks to avoid multiple proceedings addressing the validity of the patents in suit based on the above-noted grounds. Rather, consistent with Congressional intent, Microsoft wishes the patentability of these patents over those grounds to be addressed at the Board. But, for the sake of clarity and to avoid any doubt, if the PTAB declines or later vacates institution of the IPR, Microsoft reserves the right to pursue the grounds of the IPR in this litigation.

Sincerely,



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Kirstin L. Stoll-DeBell  
Faegre Drinker Biddle & Reath LLP