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VIA E-MAIL

Michael Songer
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White & Case LLP
701 Thirteenth Street, NW
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Re: StratosAudio, Inc. v. Hyundai Motor America, - Case No. 6:20-cv-01125-ADA

Dear Michael:

We write to inform you that Hyundai Motor America ("HMA") hereby stipulates that if the PTAB institutes *inter partes* review for HMA's concurrently filed IPR petition challenging U.S. Patent 8,166,081 (the "081 Patent"), then HMA will not pursue invalidity against StratosAudio's presently asserted claims of the '081 Patent in the District Court proceeding captioned above using any obviousness ground which includes the primary references in that petition, referred to therein as "Noreen" and "Ellis-2005." HMA reserves the right to present invalidity in the District Court proceeding on other bases.

To be clear, this stipulation does not encompass any arguments regarding the proper priority date or dates of alleged invention of the '081 Patent claims. Accordingly, HMA reserves the right to make arguments regarding the priority date of the '081 Patent. This stipulation does not apply to any claims other than the '081 Patent claims challenged in the above-captioned IPR that are also presently asserted in District Court, nor does it apply to any claims of any other patent. Additionally, the primary references identified above may be included in Hyundai's invalidity contentions to preserve its rights in the event that, for example, the above-captioned IPR does not go forward.

Sincerely,



Clarence A. Rowland
O'MELVENY & MYERS LLP