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September 1, 2021

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Re: *Neo Wireless LLC v. Dell Technologies Inc. and Dell Inc.*, Case No. 6:21-cv-0024 (WDTX)

Dear Counsel:

We write regarding a petition for *inter partes* review (IPR) being filed with the Patent Trial and Appeal Board (PTAB) to address the claims of U.S. Patent No. 10,075,941 (“’941 Patent”). The table below lists grounds asserted by Dell Technologies Inc. and Dell Inc. (“Dell”) in an IPR petition (IPR2021-01468) challenging the ’941 Patent, along with the implicated claims against which the grounds are asserted. I write to inform you that Dell hereby stipulates that *if the PTAB institutes an IPR based on Petitioner’s IPR Petition (IPR2021-01468) for the ’941 Patent, Petitioner will not assert any 35 U.S.C. § 102 or § 103 invalidity ground in this co-pending litigation (6:21-cv-0024) based on any of the primary or secondary references asserted in Petitioner’s IPR Petition.* The references are listed in the second table below.

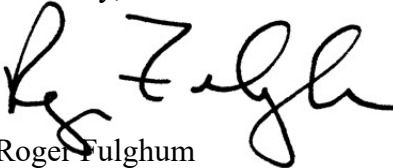
Ground	Claim(s)	35 U.S.C. § 103 Combination
A1	1-14	Walton ’269 in view of Li
A2	2 and 9	Walton ’269 in view of Li and Gupta
B1	1, 3-8, 10-14	PCT819 in view of Airy

Reference	Filing Date	Publication Date	Prior Art Under
Walton '269 (USPN 9,473,269)	Dec. 1, 2003	Oct. 18, 2016 (Issue)	102(e)
Li (USPN 6,947,748)	Dec. 15, 2000	Aug. 29, 2002	102(b)
Gupta (US Pub 2004/0165683)	Aug. 28, 2003	Aug. 26, 2004	102(e)
PCT819 (PCT Pub No. WO 02/093819)	May 16, 2001	Nov. 21, 2002	102(b)
Airy (USPN 6,400,699)	Sept. 12, 2000	Jun. 4, 2002	102(b)

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute any of the grounds identified herein, Dell reserves the right to assert such grounds in the litigation. Dell also reserves its rights to continue to assert all grounds other than the Instituted Grounds in the event of institution.

Through this stipulation, Dell seeks to avoid multiple proceedings addressing the validity of the challenged claims based on the same primary or secondary references. Rather, through this stipulation, Dell expresses its intention to have only the PTAB address the Instituted Grounds of invalidity of these claims.

Sincerely,



Roger Fulghum