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**VIA E-MAIL**

Jamie H. McDole  
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Re: *Image Processing Techs., LLC v. LG Electronics Inc., Case No. 2:22-cv-00077-JRG-RSP*

Dear Jamie:

We write to inform you that LG Electronics Inc. and LG Electronics USA, Inc. (collectively, "LG") hereby stipulate that if the PTAB institutes *inter partes* review for LG's concurrently filed IPR petition challenging U.S. Patent 6,959,293 (the "'293 Patent"), then LG will not pursue invalidity against Image Processing Techs., LLC's ("IPT") Claim 1 of the '293 Patent in the District Court proceeding captioned above using any anticipation or obviousness ground which includes the primary reference in that petition, referred to therein as "Pirim" (including its incorporated documents), and will not present any anticipation or obviousness ground that includes the secondary reference used in that Petition, referred to therein as "Bolle." LG 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 '293 Patent's Claim 1. Accordingly, LG reserves the right to make arguments regarding the priority date of the '293 Patent. This stipulation does not apply to any claims other than Claim 1 of the '293 Patent, nor does it apply to any claims of any other patent. Additionally, the references and invalidity grounds identified above may be included in LG's invalidity contentions to preserve its rights in the event that, for example, the above-captioned IPR is not instituted.

Sincerely,



Clarence A. Rowland  
O'MELVENY & MYERS LLP