

October 29, 2024

VIA E-MAIL

Marc Fenster
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025

*Re: Headwater Research LLC v. T-Mobile USA, Inc., et al., No. 23-cv-00379, -377
(E.D. Tex.)*

Dear Marc:

Defendants T-Mobile USA, Inc. and Sprint LLC (collectively, “T-Mobile”) hereby stipulate that if the Patent Trial and Appeal Board institutes an IPR in response to T-Mobile’s petition in IPR2024-00942 against Headwater Research LLC’s U.S. Patent No. 8,589,541, then T-Mobile will not pursue invalidity challenges in this litigation against the challenged claims in that petition for IPR on the grounds or the prior art references asserted in that petition for IPR.

T-Mobile also hereby stipulates that if the Patent Trial and Appeal Board institutes an IPR in response to T-Mobile’s petition in IPR2024-00943 against Headwater Research LLC’s U.S. Patent No. 8,589,541, then T-Mobile will not pursue invalidity challenges in this litigation against the challenged claims in that petition for IPR on the grounds or the prior art references asserted in that petition for IPR.

T-Mobile also hereby stipulates that if the Patent Trial and Appeal Board institutes an IPR in response to T-Mobile’s petition in IPR2024-00944 against Headwater Research LLC’s U.S. Patent No. 8,589,541, then T-Mobile will not pursue invalidity challenges in this litigation against the challenged claims in that petition for IPR on the grounds or the prior art references asserted in that petition for IPR.

T-Mobile also hereby stipulates that if the Patent Trial and Appeal Board institutes an IPR in response to T-Mobile’s petition against Headwater Research LLC’s U.S. Patent No. 9,215,613 (IPR2024-00945), then T-Mobile will not pursue invalidity challenges in this litigation on the grounds or the prior art references asserted in that petition for IPR.

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Sincerely,

/s/ Katherine Q. Dominguez

Katherine Q. Dominguez

October 29, 2024

VIA E-MAIL

Marc Fenster
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025

Re: Headwater Research LLC v. Cellco Partnership d/b/a Verizon Wireless, et al., No. 23-cv-00352 (E.D. Tex.)

Dear Marc:

Defendants Cellco Partnership d/b/a Verizon Wireless and Verizon Corporate Services Group, Inc. (collectively, “Verizon”) hereby stipulate that if the Patent Trial and Appeal Board institutes an IPR in response to Verizon’s petition in IPR2024-00942 against Headwater Research LLC’s U.S. Patent No. 8,589,541, then Verizon will not pursue invalidity challenges in this litigation against the challenged claims in that petition for IPR on the grounds or the prior art references asserted in that petition for IPR.

Verizon also hereby stipulates that if the Patent Trial and Appeal Board institutes an IPR in response to Verizon’s petition in IPR2024-00943 against Headwater Research LLC’s U.S. Patent No. 8,589,541, then Verizon will not pursue invalidity challenges in this litigation against the challenged claims in that petition for IPR on the grounds or the prior art references asserted in that petition for IPR.

Verizon also hereby stipulates that if the Patent Trial and Appeal Board institutes an IPR in response to Verizon’s petition in IPR2024-00944 against Headwater Research LLC’s U.S. Patent No. 8,589,541, then Verizon will not pursue invalidity challenges in this litigation against the challenged claims in that petition for IPR on the grounds or the prior art references asserted in that petition for IPR.

Verizon also hereby stipulates that if the Patent Trial and Appeal Board institutes an IPR in response to Verizon’s petition against Headwater Research LLC’s U.S. Patent No. 9,215,613 (IPR2024-00945), then Verizon will not pursue invalidity challenges in this litigation on the grounds or the prior art references asserted in that petition for IPR.

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Sincerely,

/s/ Katherine Q. Dominguez

Katherine Q. Dominguez

McKool Smith

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October 28, 2024

VIA EMAIL

Marc Fenster
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025

RE: *Headwater Research LLC v. AT&T Services, Inc. et al., No. 2:23-cv-00397*
(E.D. Tex.)

Dear Marc:

Defendants AT&T Services, Inc., AT&T Mobility LLC, and AT&T Corp. (collectively, “AT&T”) hereby stipulate that if the Patent Trial and Appeal Board institutes an IPR in response to AT&T’s petition in IPR2024-00942 against Headwater Research LLC’s U.S. Patent No. 8,589,541, then AT&T will not pursue invalidity challenges in this litigation against the challenged claims in that petition for IPR on the grounds or the prior art references asserted in that petition for IPR.

AT&T also hereby stipulates that if the Patent Trial and Appeal Board institutes an IPR in response to AT&T’s petition in IPR2024-00943 against Headwater Research LLC’s U.S. Patent No. 8,589,541, then AT&T will not pursue invalidity challenges in this litigation against the challenged claims in that petition for IPR on the grounds or the prior art references asserted in that petition for IPR.

AT&T also hereby stipulates that if the Patent Trial and Appeal Board institutes an IPR in response to AT&T’s petition in IPR2024-00944 against Headwater Research LLC’s U.S. Patent No. 8,589,541, then AT&T will not pursue invalidity challenges in this litigation against the challenged claims in that petition for IPR on the grounds or the prior art references asserted in that petition for IPR.

McKool Smith

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AT&T also hereby stipulates that if the Patent Trial and Appeal Board institutes an IPR in response to AT&T's petition against Headwater Research LLC's U.S. Patent No. 9,215,613 (IPR2024-00945), then AT&T will not pursue invalidity challenges in this litigation on the grounds or the prior art references asserted in that petition for IPR.

Regards,



Nicholas Mathews
Principal

NM:mac