
From: Gass, Christopher J.
Sent: Tuesday, June 3, 2025 10:55 PM
To: Fussell, Tripp; Miller, Tiffany A.; Buccigross, Gray M.; Bakewell, Clark S.; Geoff Culbertson (EXTERNAL CONTACT); Krawice, Courtney; Kelly Tidwell (EXTERNAL CONTACT)
Cc: Airan, David; Mueller, Wesley; Filbin, Paul; Schubert, Mike; Sanner, James; blake
Subject: Pantech v. OnePlus, No. 5:24-cv-00038-RWS-JBB - Stipulation as to IPR2025-00756

Counsel,

OnePlus Technology (Shenzhen) Co., Ltd. has filed an IPR petition (“Petition”) with the Patent Trial and Appeal Board (PTAB) to challenge the validity of claims 1, 2, 5-8, 11, and 12 of U.S. Patent No. 10,764,803 (“’803 Patent”) in IPR2025-00756. OnePlus stipulates that, should the PTAB institute review of the Petition, it would not pursue in this district court litigation any grounds that were raised or reasonably could have been raised in the IPR. OnePlus further stipulates that, should IPR2025-00756 be instituted, OnePlus would not pursue in this district court litigation any invalidity grounds under 35 U.S.C. §§ 102 and 103 against the ’803 Patent—including those grounds with system prior art.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-00756, OnePlus reserves the right to assert any grounds of invalidity in this district court litigation against the ’803 Patent.

Regards,
Chris

Christopher J. Gass | Leydig, Voit & Mayer, Ltd.
Attorney at Law | Intellectual Property
Two Prudential Plaza, Suite 4900 | Chicago, IL 60601-6731 | USA
direct: + 1 312 616 5634 | main: + 1 312 616 5600
cgass@leydig.com | www.leydig.com

[Chicago](#) - [Boulder](#) - [Frankfurt](#) - [San Francisco](#) - [Shenzhen](#) - [Arlington, Virginia](#)

This e-mail transmission is confidential and intended solely for the person or organization to whom it is addressed. It may contain privileged and confidential information. If you are not the intended recipient, you must not copy, distribute or take any action in reliance on the information contained herein. If you have received this e-mail in error, please notify the sender as soon as possible and delete the e-mail message and any attachment(s) from your system. Thank you.