
From: Gass, Christopher J. <cgass@leydig.com>
Sent: Thursday, May 29, 2025 10:09 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 IPR2025-00763

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 1-10 of U.S. Patent No. 11,212,838 (“’838 Patent”) in IPR2025-00763. 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 IPR2025-00763 be instituted, OnePlus would not pursue in this district court litigation any invalidity grounds under 35 U.S.C. §§ 102 and 103 against the ’838 Patent—including those grounds with system prior art.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-00763, OnePlus reserves the right to assert any grounds of invalidity in this district court litigation against the ’838 Patent.

Regards,
Chris

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