

May 27, 2025

**VIA EMAIL**

Brandon R. Theiss  
Volpe Koenig  
30 S. 17<sup>th</sup> Street, Suite 1800  
Philadelphia, PA 19103

RE: *Intellectual Ventures I LLC et al. v. Southwest Airlines Co., No. 7:24-cv-00277 (W.D. Tex.)*

Dear Mr. Theiss:

Defendant Southwest Airlines Co. (“Southwest”) hereby stipulates that if the Patent Trial and Appeal Board institutes an IPR in response to Southwest’s petition in IPR2025-00786 against Intellectual Ventures I LLC’s U.S. Patent No. 7,949,785, then Southwest will not pursue in the district court litigation any ground raised or that could have been reasonably raised in an IPR. *Sotera Wireless*, Paper 12 at 18.

Regards,

/Keith D. Harden/  
Keith D. Harden  
Backup Counsel for Petitioner