

August 25, 2025

VIA E-MAIL

Russ, August & Kabat
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Re: *AlmondNet, Inc. v. LiveIntent, Inc.*, Case No. 1:24-cv-00831 (D. Del.)

Dear Counsel:

LiveIntent, Inc. has filed an *inter partes* review (IPR) petition with the Patent Trial and Appeal Board (PTAB) to address the patentability of claims 1-4, 6-18, and 20-44 (Challenged Claims) of U.S. Patent No. 8,677,398 ('398 Patent). This proceeding has been assigned AIA Review No. IPR2025-01317. The tables in Appendix A below list the references and grounds asserted in IPR2025-01317 against the Challenged Claims.

I write to inform you that LiveIntent stipulates that, if IPR is instituted in IPR2025-01317 and unless institution is later vacated, reversed, or otherwise withdrawn by rehearing or Director Review, LiveIntent will not pursue in related District Court Case No. 1:24-cv-00831 (D. Del.) against the Challenged Claims (i) the specific grounds raised in IPR2025-01317, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground based on a combination of system prior art and the references asserted as part of a ground raised in IPR2025-01317. This stipulation is broader than the estoppel provisions of 35 U.S.C. § 315(e). This stipulation is broader than the estoppel provisions of 35 U.S.C. § 315(e).

Best regards,

/s/ Aamir A. Kazi

Aamir Kazi
Attorney for LiveIntent

Appendix A – Prior Art References and Grounds Used in IPR2025-01317

Reference	Filing Date	Publication Date
U.S. Pub. No. 2002/0123928 to Charles A. Eldering et al. (“Eldering”)	Aug. 10, 2001	Sep. 5, 2002
U.S. Pub. No. 2006/0265507 to Jaz Banga et al. (“Banga”)	May 12, 2006	Nov. 23, 2006
Internet Engineering Task Force (IETF) Request for Comment (RFC) 2460, Internet Protocol, Version 6 (IPv6) Specification (Dec. 1998)	N/A	Dec., 1998
IETF RFC 3177, IAB/IESG Recommendations on IPv6 Address Allocations to Sites (Sep. 2001)	N/A	Sep., 2001
IETF RFC 3513, Internet Protocol Version 6 (IPv6) Addressing Architecture (Apr. 2003)	N/A	Apr., 2003
IETF RFC 3587, IPv6 Global Unicast Address Format (Aug. 2003)	N/A	Aug., 2003
Internet Draft v08 of IETF RFC 2462, IPv6 Stateless Address Autoconfiguration, draft-ietf-ipv6-rfc2462bis-08.txt (May 12, 2005)	N/A	May, 2005

Ground	Claims	Pre-AIA 35 U.S.C. §103
1	1-4, 6-18, 20-44	Eldering, Banga, and the Knowledge of a POSITA re IPv6 as Evidenced by At Least RFCs 2460, 3177, 3513, and 3587