

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

MYPORT, INC.,
Patent Owner

IPR2025-01464
U.S. Patent No. 9,832,017

**PETITIONER'S NOTICE OF
SOTERA PLUS STIPULATION**

Petitioner Apple Inc. ("Petitioner") hereby stipulates, broader than the stipulation made by the Petitioner in *Sotera* that, if the PTAB institutes an IPR (and does not subsequently vacate institution) in response to this Petition challenging U.S. Patent No. 9,832,017 (IPR2025-01464), Petitioner will not pursue in litigation (*MyPort Technologies, Inc. v. Apple, Inc.* 1-24-cv-01337 (DDE) Dec 6, 2024) against the claims challenged in IPR2025-01464, (i) the specific grounds raised in IPR2025-01464, (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 IPR2025-01464, as reflected in the table summarizing the Statutory Grounds for Challenges on page 11 of the Petition.

Dated: October 15, 2025

HAYNES AND BOONE LLP
2801 N. Harwood St., Suite 2300
Dallas, TX 75201
Customer No. 27683

Respectfully submitted,

/ Scott T. Jarratt /
Scott T. Jarratt
Registration No. 70,297
COUNSEL FOR PETITIONER

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), that service was made on Patent Owner as detailed below.

Date of service October 15, 2025

Manner of service Electronic Service:
MyPort_IPR_SDTeam@skiermontderby.com

Documents served **Petitioner's Notice of *Sotera* Plus Stipulation**

Persons served Rex Hwang
John Lord
SKIERMONT DERBY LLP
633 West Fifth Street, Suite 5800
Los Angeles, CA 90071

Michael Ricketts (*Pro Hac Vice* to be submitted)
SKIERMONT DERBY LLP
1601 Elm Street, Suite 4400
Dallas, TX 75201

/ Scott T. Jarratt /
Scott T. Jarratt
Registration No. 70,297
COUNSEL FOR PETITIONER