

## Michael Hawkins

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**From:** Cook, Jason W. <JCook@mcguirewoods.com>  
**Sent:** Wednesday, May 26, 2021 9:11 AM  
**To:** Ryan@EtheridgeLaw.com; Jim@EtheridgeLaw.com; IPTeam  
**Cc:** VanHoutan, Tyler T.; jlowery@mcguirewoods.com; shassett@mcguirewoods.com; gtu@mcguirewoods.com; Cornelia, Matthew W.; steven.geiszler@futurewei.com; Powell, Jillian Michelle  
**Subject:** WSOU Investments LLC v. Huawei Technologies Co., Ltd., et al., C.A. No. 6:20-cv-889

[This email originated outside of F&R.]

Counsel:

The Huawei entities in the above-referenced litigation (collectively, "Huawei") hereby stipulate that if the Patent Trial and Appeal Board ("PTAB") institutes an *inter partes* review ("IPR") against the challenged claims of U.S. Pat. No. 6,704,304 in IPR2021-01012, then Huawei will not pursue in the above-referenced litigation (C.A. No. 6-20-cv-00889-ADA) the same prior art grounds on which the PTAB trial is instituted for the claims on which the PTAB trial is instituted, while trial is instituted.

For your reference, the prior art grounds and the challenged claims are cited in Section III.B of the IPR Petition filed in IPR2021-01012.

Best,

**Jason W. Cook**

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