

April 26, 2022

VIA E-MAIL

Raymond W. Mort, III
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100 Congress Avenue, Suite 2000
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Re: *Jawbone Innovations, LLC v. Apple Inc.*, Case No. 6:21-cv-00984

Counsel:

We write regarding a petition for *inter partes* review (IPR) being filed with the Patent Trial and Appeal Board (PTAB) to address claims of U.S. Patent No. 8,467,543 (“the ’543 patent”). The table below lists grounds asserted by Apple Inc. (“Apple”) in the IPR2022-00865 petition challenging claims of this patent, along with the implicated claims against which the grounds are asserted.

We write to inform you that Apple hereby stipulates that in the event the PTAB institutes an *inter partes* review based on the IPR2022-00865 petition and including the grounds listed in the table below against the corresponding claims listed in the table for those grounds (“Instituted Grounds”), then Apple will not seek resolution in the above-captioned district court litigation (6:21-cv-00984) of the Instituted Grounds against the corresponding claims listed in the table for those same grounds.

Patent No.	Proceeding No.	Claim(s)	Ground
8,467,543	IPR2022-00865	1, 2, 6-10, 12-18, 26	Obvious (§ 103) over Yang and Burnett Thesis
8,467,543	IPR2022-00865	1, 3, 6-10, 12-18, 26	Obvious (§ 103) over Yang and Park
8,467,543	IPR2022-00865	19-25	Obvious (§ 103) over Yang, Burnett Thesis or Park, and Sasaki

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Exhibit 1032

Patent No.	Proceeding No.	Claim(s)	Ground
8,467,543	IPR2022-00865	4	Obvious (§ 103) over Yang, Burnett Thesis or Park, and Litchblau
8,467,543	IPR2022-00865	5	Obvious (§ 103) over Yang, Burnett Thesis or Park, and Andrea
8,467,543	IPR2022-00865	8-11	Obvious (§ 103) over Yang, Burnett Thesis or Park, and Turnbull

In so stipulating, Apple seeks to avoid multiple proceedings addressing the validity of the '543 patent based on the same grounds. Rather, Apple wishes the patentability of this patent over the above-identified Grounds to be addressed at the PTAB. But, for the sake of clarity and to avoid any doubt, if the PTAB declines institution of Apple's IPR petition relating to the '543 patent, Apple reserves the right to seek resolution of the above-identified Grounds in the above-captioned district court litigation (6:21-cv-00984).

Sincerely,

/s/ Daniel R. Gopenko

Daniel R. Gopenko
Fish & Richardson P.C.
Counsel for Apple Inc.

List of Prior Art References

Reference Name	Details
Yang	U.S. Patent Application Publication 2002/0193130
Burnett Thesis	Gregory Burnett, <i>The Physiological Basis of Glottal Electromagnetic Micropower Sensors (GEMS) and Their Use in Defining an Excitation Function for the Human Vocal Tract</i> , Dissertation, January 1999
Park	U.S. Patent 5,590,241
Sasaki	U.S. Patent 5,471,538
Litchblau	U.S. Patent 6,714,654
Andrea	U.S. Patent 6,061,456
Turnbull	U.S. Patent 6,980,092