

(counsel listed on signature page)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

TECHNOLOGY PROPERTIES LIMITED LLC,  
et al.,

Plaintiffs,

v.

ZTE CORPORATION, et al.,

Defendants.

3:12-cv-03876-VC (PSG)

**STIPULATION REGARDING PRODUCTS  
NO LONGER ACCUSED OF  
INFRINGEMENT**

1 Plaintiffs, Technology Properties Limited LLC, Phoenix Digital Solutions LLC, and  
2 Patriot Scientific Corporation (collectively “Plaintiffs”), and Defendants, ZTE Corporation and  
3 ZTE (USA) Inc. (collectively, “Defendants”), by and through their undersigned counsel,  
4 respectfully submit the following stipulation:

5 WHEREAS, Plaintiffs have accused several products of infringing U.S. Patent Nos.  
6 5,809,336 (“the ’336 patent”), 5,530,890 (“the ’890 patent”), and 5,440,749 (“the ’749 patent”) in  
7 their infringement contentions served on January 20, 2015 (“the infringement contentions”);

8 WHEREAS, Exhibit A to this stipulation lists products identified in the infringement  
9 contentions that were not made, used, offered for sale, or sold within the United States, or  
10 imported into the United States, before August 8, 2012, which is the date of expiration of the ’749  
11 patent, based on Defendants’ investigation to date and information reasonably available to  
12 Defendants at this time;

13 WHEREAS, Exhibit B to this stipulation lists products identified in the infringement  
14 contentions that were not made, used, offered for sale, or sold within the United States, or  
15 imported into the United States, before June 25, 2013, which is the date of expiration of the ’890  
16 patent, based on Defendants’ investigation to date and information reasonably available to  
17 Defendants at this time;

18 WHEREAS, in related civil action 3:12-cv-03877-VC (PSG), Samsung Electronics Co.,  
19 Ltd. and Samsung Electronics America, Inc. filed a Motion to Strike Infringement Contentions or  
20 Alternatively to Compel Supplemental Infringement Contentions (“Samsung Motion”) as Docket  
21 No. 58, seeking relief concerning Plaintiffs’ infringement contentions, which are common to both  
22 that action and the present action; and

23 WHEREAS, the parties have reached an agreement by this stipulation on several issues  
24 regarding Plaintiffs’ infringement contentions in order to conserve judicial and party resources.

25 **ACCORDINGLY**, it is **HEREBY STIPULATED** by Defendants as follows:

- 26 • The products listed in Exhibit A were not made, used, offered for sale, or sold within the  
27 United States, or imported into the United States, before August 8, 2012 to the best of  
28

1 Defendants' knowledge based on Defendants' investigation to date and information  
2 reasonably available to Defendants at this time.

- 3 • The products listed in Exhibit B were not made, used, offered for sale, or sold within the  
4 United States, or imported into the United States, before June 25, 2013 to the best of  
5 Defendants' knowledge based on Defendants' investigation to date and information  
6 reasonably available to Defendants at this time.

7 **FURTHER**, it is **HEREBY STIPULATED** by and among Plaintiffs and Defendants ("the  
8 parties") and their counsel of record as follows:

- 9 • Plaintiffs withdraw, without prejudice, their infringement contentions for the following  
10 accused products: (i) all products identified in Exhibit A as to the '749 patent, and (ii) all  
11 products identified in Exhibit B as to the '890 patent;
  - 12 • With respect to Plaintiffs' current infringement contentions, Defendants will not move the  
13 Court to strike those contentions or to compel additional infringement contentions; and
  - 14 • Any ruling by the Court on the relief requested in the Samsung Motion will have  
15 corresponding effect in the present civil action, subject to reasonable negotiation between  
16 the parties. Such negotiation may include, but is not limited to, the ability of the parties to  
17 negotiate an extension of time for compliance with the Court's Order relative to ZTE. The  
18 parties will work in good faith to determine how Samsung-specific rulings shall apply to  
19 matters in the ZTE case.
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1 Dated: June 26, 2015

/s/ Barry J. Bumgardner

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18 Dated: June 26, 2015

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25 Dated: June 26, 2015

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**Attorneys for Defendants  
ZTE CORPORATION and  
ZTE (USA) INC.**

Exhibit A

- SPro2 Smart Projector
- S6 Plus
- Grand X MAX+ 4G LTE
- Imperial II 4G LTE
- G719C Dual SIM TD-LTE
- G720C Dual SIM TD-LTE
- Star TD-LTE
- Star 2 TD-LTE
- VS Max TD-LTE Dual SIM
- Speed CDMA
- Grand S II CDMA
- Star TD-LTE
- V5 Max TD-LTE Dual SIM
- Kis 3 Max
- Blade Vec 3G
- Blade Vec Pro
- Zinger
- Grand X MAX
- A880
- Q802C
- Q802D
- Blade G Lux
- Nubia 5S mini LTE
- ZMax LTE-A
- Grand X
- Warp Sync TD-LTE

- 1 • V9820 TD-LTE
- 2 • Compel LTE-A
- 3 • Blade Vec 4G LTE-A/Soshphone 4G/Orange Rono/Turkcell
- 4 • Sprint LivPro Smart Projector
- 5 • Nubia Z7 Mini Dual SIM TD-LTE
- 6 • Nubia Z7 Dual SIM TD-LTE
- 7 • Nubia Max Dual SIM TD-LTE
- 8 • Grand S Pro
- 9 • Nubia W5
- 10 • Blade L2
- 11 • Concord II
- 12 • Q801L TD-LTE
- 13 • Q801T TD-LTE
- 14 • Grand X (Mimosa X)
- 15 • Kis 3
- 16 • Blade Apex 2/OrangeHi 4G/KPN Smart 400
- 17 • Grand Memo II Lte
- 18 • Q801U TD-LTE
- 19 • Q802T TD-LTE
- 20 • Red Bull TD-LTE 8GB
- 21 • Nubia Z5S mini LTE
- 22 • Q705U
- 23 • Sonata 4G
- 24 • Grand S II Dual
- 25 • Grand S II LTE-A
- 26 • Blade Q
- 27 • Optik 2
- 28

- 1 • Blade G LTE
- 2 • Boost Max LTE
- 3 • Nubia Z5S LTE 32GB
- 4 • Nubia Z5S LTE 64GB
- 5 • Nubia Z5S mini
- 6 • Valet
- 7 • Solar
- 8 • Blade Q Mini
- 9 • Radiant
- 10 • Grand S Flex
- 11 • Boost Warp 4G
- 12 • Source
- 13 • Grand S (Athena)
- 14 • Blade Q Maxi
- 15 • U879
- 16 • V879
- 17 • Geek
- 18 • Blade V
- 19 • Whirl
- 20 • Awe
- 21 • Supreme
- 22 • Grand Memo TD-LTE
- 23 • Geek
- 24 • Avail 2
- 25 • Mustang
- 26 • Virgin Mobile Reef
- 27 • Savvy



- 1 • Majesty
- 2 • Nubia Z5 mini CDMA
- 3 • Open
- 4 • Blade Super
- 5 • Grand X Quad
- 6 • Prelude
- 7 • Imperial LTE
- 8 • Overture LTE
- 9 • Velox
- 10 • Vital
- 11 • N9510C
- 12 • Grand Memo CDMA
- 13 • Blade III Pro
- 14 • Director
- 15 • Grand X Pro
- 16 • Blade G
- 17 • Engage LT
- 18 • V81
- 19 • Grand Memo
- 20 • Grand Era LTE
- 21 • Kis Lite
- 22 • V8300
- 23 • Avid 4G
- 24 • V887
- 25 • V889M
- 26 • Flash
- 27 • Viettel

- Kis III
- N8300
- EasyTouch 4G
- T81
- Engage/Nova 4.0
- Grand Era
- Blade III
- Grand X LTE
- Warp Sequent
- Nova
- Skate Acqua
- Render

Exhibit B

- SPro2 Smart Projector
- S6 Plus
- Grand X MAX+ 4G LTE
- Imperial II 4G LTE
- G719C Dual SIM TD-LTE
- G720C Dual SIM TD-LTE
- Star TD-LTE
- Star 2 TD-LTE
- VS Max TD-LTE Dual SIM
- Speed CDMA
- Grand S II CDMA
- Star TD-LTE
- V5 Max TD-LTE Dual SIM
- Kis 3 Max
- Blade Vec 3G
- Blade Vec Pro
- Zinger
- Grand X MAX
- A880
- Q802C
- Q802D
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- 10 • Radiant
- 11 • Grand S Flex
- 12 • Boost Warp 4G
- 13 • Source
- 14 • Grand S (Athena)
- 15 • Blade Q Maxi
- 16 • U879
- 17 • V879
- 18 • Geek
- 19 • Blade V
- 20 • Whirl
- 21 • Awe
- 22 • Supreme
- 23 • Grand Memo TD-LTE
- 24 • Geek
- 25 • Avail 2
- 26 • Mustang
- 27 • Virgin Mobile Reef

- Savvy
- Majesty

**ATTESTATION**

I, Hersh Mehta, am the ECF User whose ID and password are being used to file this Stipulation. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that the signatories listed above have read and approved the filing of this Stipulation.

Dated: June 26, 2015

/s/ Hersh H. Mehta

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