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**CONFIDENTIAL—SUBJECT TO FRE 408
FOR SETTLEMENT PURPOSES ONLY**

December 1, 2022

James Francis McDonough, III
Rozier Hardt McDonough PLLC
3621 Vinings Slope, Suite 4300
Atlanta, GA 30339
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VIA EMAIL (Confirmation by FedEx)

Re: Liberty Access Technologies Licensing LLC Patent Portfolio

Dear Mr. McDonough:

On behalf of ASSA ABLOY AB and its affiliates (AAAB), we are aware that Liberty Access Technologies, LLC, purports to be the exclusive licensee of U.S. Patent Nos. 9,373,205; 10,657,747; and 11,373,474, and that Liberty has asserted those patents in Case No. 2:22-cv-00318 in the Eastern District of Texas. We are also aware that Liberty previously asserted the '205 patent and another related patent—U.S. Patent No. 9,911,258—in Case No. 1:18-cv-3627 in the Northern District of Illinois. We write to open negotiations regarding a license to those patents and all related patents and applications, including those which are listed in Attachment A, collectively referred to as Liberty's Access Control Portfolio.

Specifically, AAAB requests a license to Liberty's Access Control Portfolio in exchange for AAAB's agreement not to file post-grant invalidity proceedings or declaratory judgment actions against any of Liberty's Access Control Portfolio based, at least in part, on technology and prior art uniquely in AAAB's possession.

Indeed, AAAB's award-winning mobile access technology predates Liberty's Access Control Portfolio by many years. AAAB demonstrated this mobile access technology publicly at least as early as 2006 and offered for sale products using this technology well before the earliest priority date of any patent in Liberty's Access Control Portfolio.


For example, AAAB's documents describe the limitations claimed in Liberty's Access Control Portfolio, including the usage of a portable/mobile electronic device such as a phone to wirelessly access spaces and services. These documents date from at least 2006, and they describe features, usage scenarios, and advantages of AAAB's

mobile access technology. While some of this information is publicly available, AAAB has unique knowledge about these systems.

Importantly, it is unlikely that any other entity has knowledge of the prior art technology and information in AAAB's possession, and AAAB has not disclosed these documents or art to any other entities at this time. As a sign of good faith, AAAB is sharing one the above described documents and would be willing to share additional documents with Liberty under the enclosed non-disclosure agreement ("NDA").

We kindly request a response to this inquiry no later than December 9, 2022, including whether Liberty will be willing to enter into an NDA to allow us to disclose AAAB's art.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lionel M. Lavenue". The signature is fluid and cursive, written in a professional style.

Lionel M. Lavenue

Enclosures:

Attachment A: Listing of Known Patents in Liberty's Access Control Portfolio

Attachment B: AAAB Press Release of Mobile Access Technology 2006

Attachment C: Non-Disclosure Agreement