

February 3, 2023

Attn: Michael Shanahan
Ellenoff Grossman & Schole LLP
1345 Avenue of the Americas, 11th Fl.
New York, NY 10105
Telephone: (212) 370-1300
Fax: (212) 370-7889
mshanahan@egsllp.com

Fish & Richardson P.C.
111 Congress Avenue
Suite 810
Austin, TX 78701
512 472 5070 main
512 320 8935 fax

David M Hoffman
Principal
hoffman@fr.com
512 226 8154 direct

Re: *Sentient Sensors, LLC v. Xilinx, Inc.*, Case No. 1:22-cv-000173-MN in the United States
District Court for the District of Delaware

Dear Counsel:

I write regarding the pending petitions for *inter partes* review (IPR) filed against U.S. Patent Nos. 6,938,177. Specifically, I write to state, and inform you of, Xilinx's stipulation that, if the Patent Trial and Appeal Board (PTAB) institutes the IPR petition filed by Xilinx against the above-referenced patent, then Xilinx will not pursue those same instituted grounds, or other grounds formed solely of printed publications that share the same prior art references, in the above-captioned litigation with respect to the claims subject to IPR.

The prior art references are:

- U.S. Patent No. 6,148,399 to James C. Lyke ("**Lyke**")
- P. Dehkordi, T. Powell and D. Bouldin, *Development of a DSP/MCM subsystem assessing low-volume, low-cost MCM prototyping for universities*, Proceedings 1996 IEEE Multi-Chip Module Conference (Cat. No. 96CH35893), 1996, pp. 89-94 ("**Dehkordi**")
- G. A. Frantz, K. Lin, J. B. Reimer and J. Bradley, "The Texas Instruments TMS320C25 Digital Signal Microcomputer," in IEEE Micro, vol. 6, no. 6, pp. 10-28, Dec. 1986 ("**Frantz**")
- J. Faura, C. Horton, P. van Duong, J. Madrenas, M. A. Aguirre and J. M. Inerser, *A novel mixed signal programmable device with on-chip microprocessor*, Proceedings of CICC 97 - Custom Integrated Circuits Conference, 1997, pp. 103-106 ("**Faura**").
- U.S. Patent No. 5,663,734 to Norman F. Krasner ("**Krasner**")
- U.S. Patent No. 4,279,020 to Ronald W. Christian et al ("**Christian**")
- U.S. Patent No. 5,675,824 to Randy C. Steele ("**Steele**")

The grounds are:

Ground	Claims	Prior Art References Used in Challenge
Ground 1	1, 4	Lyke, Dehkordi, Frantz, Faura
Ground 2	2	Ground 1 + Krasner
Ground 3	3	Ground 1 + Christian
Ground 4	5, 10-11, 13-14, 15, 17, 19, 20	Ground 1 + Steele
Ground 5	12, 18	Ground 4 + Christian

For sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR, Xilinx reserves the right to pursue the grounds of the IPR in this litigation. Further, Xilinx reserves the right to pursue in this litigation any ground or basis or invalidity that could not have been raised under the limited IPR procedure. Xilinx also reserves the right to bring an invalidity challenge in this litigation as to any claim that is not challenged in IPR.

Sincerely,



David M. Hoffman
Counsel for Xilinx