

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

PROFESSOR MASAHIRO IIDA,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Case No. 1:23-CV-899-ADA

JURY TRIAL DEMANDED

INTEL’S *SOTERA* STIPULATION REGARDING INVALIDITY CONTENTIONS

On April 20, 2023, Defendant Intel Corporation (“Intel”) filed a Petition in IPR2023-00864 requesting *inter partes* review (“IPR”) of all the claims of U.S. Patent No. 6,812,737. On September 1, 2023, Intel sent correspondence to Plaintiff’s counsel with a *Sotera* stipulation. (See IPR2023-00864, Ex. 1045.) Intel hereby files on the district court docket the same stipulation it provided to Plaintiff in its correspondence.

Specifically, Intel stipulates that, if the Patent Trial and Appeal Board institutes an IPR proceeding for U.S. Patent No. 6,812,737 on the grounds presented in Intel’s Petition in IPR2023-00864, Intel will not pursue an invalidity defense in the above-captioned district court litigation that the patent claims subject to the instituted IPR are invalid based on grounds that were raised or reasonably could have been raised during the IPR.

DATED: September 20, 2023

Respectfully submitted,

/s/ Heather E. Takahashi

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CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system in accordance with Local Rule CV-5.

/s/ Heather E. Takahashi

Heather Takahashi