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May 8, 2023

Timothy W. Riffe
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VIA EMAIL

Brett Cooper
BC Law Group, P.C.
200 Madison Avenue, 24th Floor
New York, NY 10016

Re: *Sonrai Memory Ltd. v. Micron Technology, Inc.*, Case No. 6:22-cv-00855

Dear Brett:

I write regarding the petitions for *inter partes* review (IPR) that are being filed today against U.S. Patent Nos. 6,724,241 and 6,920,527, which Sonrai has asserted against Micron in the above-captioned litigation. Micron hereby stipulates that if the Patent Trial and Appeal Board (PTAB) institutes the IPR petitions filed in IPR2023-00904 and IPR2023-00909 on the grounds presented within those petitions, then Micron will not seek resolution in the district court of the same grounds as set forth in the petitions or any grounds that Micron could have reasonably raised in the petitions. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020).

In so stipulating, Micron seeks to avoid multiple proceedings in different forums addressing the validity of the ’527 and ’241 patents based on any grounds set forth in the petitions or any grounds that Micron could have reasonably raised in the petitions. Rather, consistent with Congressional intent, Micron wishes the patentability of the ’527 and ’241 patents over the prior art references applied (or any that could have reasonably been raised) in IPR2023-00904 and IPR2023-00909 to be addressed at the PTAB.

Regards,

Timothy W. Riffe