

September 28, 2023

Chad S. Campbell
CSCampbell@perkinscoie.com
D. +1.602.351.8393
F. +1.602.648.7193

Via email

Bradley Wayne Caldwell
Warren McCarty, III
Caldwell Cassady Curry PC
2121 N. Pearl Street
Ste 1200
Dallas, TX 75201
bcaldwell@caldwellcc.com
wmccarty@caldwellcc.com

Michelle E. Armond
Douglas R. Wilson
Joseph Li
Yue Han
ARMOND WILSON LLP
4685 MacArthur Court, Suite 390
Newport Beach, CA 92660
ipr@armondwilson.com

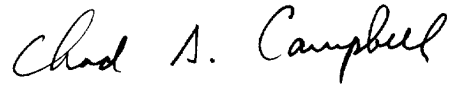
**Re: *BeSang Inc. v. Intel Corporation*, Case No. 3:23-cv-00113-HZ (D. Or.);
Intel Corporation v. BeSang Inc., IPR2023-00991**

Dear Counsel for BeSang:

In connection with IPR2023-00991, Intel Corporation (“Intel”) hereby stipulates and agrees that, if the PTAB institutes an *inter partes* review (“IPR”) proceeding for U.S. Patent No. 7,378,702 on the grounds presented in Intel’s petition, and so long as the PTAB does not vacate its institution decision or otherwise terminate the instituted IPR, Intel will not pursue an invalidity defense in *BeSang Inc. v. Intel Corporation*, Case No. 3:23-cv-00113-HZ (D. OR.) 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. This stipulation and agreement is not intended and should not be construed to limit Intel’s ability to assert invalidity of any claims of the ’702 patent on any other ground.

Counsel for BeSang
September 28, 2023
Page 2

Sincerely,

A handwritten signature in black ink that reads "Chad S. Campbell". The signature is written in a cursive, flowing style.

Chad S. Campbell

CSC:cls