From: Karl T. Fisher
Sent: Monday, July 17, 2023 12:46 PM
To: Bradley D Liddle; Gerard O'Rourke
Cc: Howard Lim; Sean O'Kelly; Michael Pomeroy; Jordan Haynie; Monica Goff; Kyle G. Gottuso; Marc Vander Tuig; Shelley A. Kinsella; David M. Magee
Subject: Rotolight v. Videndum, Case No. 1:22-cv-00928-MN-JLH (D.Del) [IWOV-IDOCS.FID4775722]

Counsel,

Videndum will be filing IPR Petitions challenging U.S. Patent Nos. 10,845,044, 10,197,257, and 10,197,258. Videndum stipulates that if these IPR Petitions are instituted on the grounds presented in the Petitions, then Videndum will not pursue in the above-referenced case the specific grounds identified in the respective IPR Petitions as to the Challenged Claims of U.S. Patent Nos. 10,845,044, 10,197,257, and 10,197,258, or on any other ground for the Challenged Claims in U.S. Patent Nos. 10,845,044, 10,197,257, and 10,197,258, for which the Board institutes, that was raised or reasonably could have been raised in those IPR Petitions.

To be clear, this stipulation is not intended, and should not be construed, to limit Videndum's ability to assert invalidity against non-challenged claims that Plaintiff ultimately asserts in this litigation (if any), or to limit Videndum's ability to assert invalidity under 35 U.S.C. §§ 102 or 103 based on prior art or grounds that could not have reasonably been raised in the IPR Petitions as to the Challenged Claims of U.S. Patent Nos. 10,845,044, 10,197,257, and 10,197,258.

Regards,
Karl

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