

From: [Neil Benchell](#)
To: [Biggs, Brian](#)
Subject: MMT v. BMW
Date: Wednesday, August 16, 2023 1:34:00 PM
Attachments: [image001.png](#)

Brian,

I spoke with the client who is willing to offer a covenant not to sue on the '540, '260 and '482 patents if BMW withdraws the IPRs.

If BMW agrees I can get a draft covenant not to sue by the end of the week.

Best,

Neil



Neil Benchell

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Admitted in IL

Not Admitted in DE