
From: Lavenue, Lionel
Sent: Friday, January 19, 2024 11:03 AM
To: Robert Auchter; bcooper@bc-lawgroup.com; Foras Counsel
Cc: Specht, Kara; Cassady, R. Benjamin; Berntsen, Matthew; Myles, Joseph; Kim, Misook
Subject: IPR No. IPR2023-01373

Counsel:

BMW AG and Robert Bosch GmbH stipulate that, if IPR No. IPR2023-01373 is instituted, they will not pursue “any invalidity challenges to the ’958 patent that rely on any references used in the Petition (Bigbee and Nguyen) in the related district court proceeding, *Foras Technologies Ltd. v. Bayerische Motoren Werke AG et al.*, No. 6:23-cv-00386 (W.D. Tex.). 35 U.S.C. § 315(d); *Ericsson Inc. v. Koninklijke KPN N.V.*, IPR2022-00069, Paper 9, 11-12 (PTAB May 25, 2022).

Regards,

Lionel

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