IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

ICPILLAR LLC,	§	
	§	
Plaintiff,	§	
	§	Case No. 1:23-CV-00282-ADA
v.	§	
	§	Jury Trial Requested
ARM LIMITED and ARM, INC.,	§	
	§	
Defendants.	§	
	§	

DEFENDANTS' STIPULATION

I. STIPULATION

Defendants hereby stipulate that if the Patent Trial and Appeal Board institutes IPR on IPR2024-00476 and/or IPR2024-00566, then Defendants will not pursue in this case the specific grounds identified in connection with the asserted patents (U.S. Pat. Nos. 8,924,899; 9,367,657) and claim(s) as originally issued on the instituted inter parties review petition(s), or on any other ground for a given patent for which the Board institutes, that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications).

This stipulation is not intended, and should be construed, to limit Defendants' ability to assert invalidity of the asserted claims of the asserted patents (U.S. Pat. Nos. 8,924,899; 9,367,657) in this case on any other ground (i.e., invalidity under 35 U.S.C. §§ 101, 112), regardless of whether inter parties review is instituted.

Dated: June 10, 2024

Respectfully submitted,

/s/ Gilbert A. Greene

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Attorneys for Defendants
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on June 10, 2024.

/s/ Gilbert A. Greene
Gilbert A. Green