

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MONOLITHIC POWER SYSTEMS, INC.,

Plaintiff,

v.

C.A. No. 1:24-cv-00166-JFM

NENGDA MICROELECTRONICS
(SHENZEN) CO., LTD., a Chinese
corporation; and NENGDA
SEMICONDUCTOR TECHNOLOGY
(SHENZEN) CO., LTD., a Chinese
corporation,

Defendants.

**DEFENDANTS NENGDA MICROELECTRONICS (SHENZEN) CO., LTD.
AND NENGDA SEMICONDUCTOR TECHNOLOGY (SHENZEN) CO.,
LTD. STIPULATION REGARDING INVALIDITY CONTENTIONS
AS TO U.S. PATENT NO. 9,590,608**

Defendants Nengda Microelectronics (Shenzen) Co., Ltd. and Nengda Semiconductor (Shenzen) Co., Ltd. (“Defendants”) submit this stipulation regarding the invalidity contentions regarding asserted U.S. Patent No. 9,590,608 (“the ’608 Patent”).

Reed Semiconductor Corp. (“Reed”) is challenging certain claims of the ’608 Patent in *Inter Partes* Review Proceeding No. IPR2024-00871. The Petition asserts the following grounds of invalidity:

1. Claims 1 and 11-12 are unpatentable under 35 U.S.C. § 102 over TI;
2. Claims 1 and 11-12 are unpatentable under 35 U.S.C. § 102 over Galinski (U.S. Patent No. 7,145,316 B1);
3. Claims 1, 2, 11-12 and 16 are unpatentable under 35 U.S.C. § 103 over Galinski (U.S. Patent No. 7,145,316 B1) in view of Li (Chinese Patent Application Publication No. CN 102832810 A);
4. Claims 1, 6, 11-12 and 15 are unpatentable under 35 U.S.C. § 103 over Wong (U.S. Patent No. 7,321,258 B2); and
5. Claims 6 and 15 are unpatentable under 35 U.S.C. § 103 over Galinski (U.S. Patent No. 7,145,316 B1) or, in the alternative, Galinski (U.S. Patent No. 7,145,316 B1) in view of Wong (U.S. Patent No. 7,321,258 B2).

In this Petition, Reed identified Nengda Microelectronics (Shenzen) Co., Ltd. and Nengda Semiconductor (Shenzen) Co., Ltd. as real parties in interest, subject to 37 C.F.R. § 42.8(b)(1).

Defendants hereby stipulate that if the Patent Trial and Appeal Board institutes IPR on IPR2024-00871, the Defendants will not pursue in this case the specific grounds identified above in connection with the referenced prior art and challenged claims as originally issued on the instituted *inter partes* review petition,

or on any other ground for which the Board institutes, that was raised or could have been reasonably raised in the IPR.

This stipulation is not intended, and should not be construed, to limit Defendants' ability to assert invalidity of the asserted claims of the '608 Patent in this case on any other ground, regardless of whether *inter partes* review is instituted. Likewise, this stipulation is not intended, as should not be construed, to limit Defendants' ability to use the asserted prior art references for any purpose other than invalidity under §§ 102 or 103, regardless of whether *inter partes* review is instituted.

Date: May 7, 2024

FOX ROTHSCHILD LLP

/s/ Nathan D. Barillo

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