

Hoi Cheung

From: Josh Griswold
Sent: Thursday, June 6, 2024 4:18 PM
To: Hoi Cheung
Subject: FW: Bell Semiconductor v. TI, No. 4:23-cv-609

From: James F. Smith
Sent: Thursday, June 6, 2024 3:05 PM
To: Chad Henson <chenson@devlinlawfirm.com>; Jill Callaghan <jcallaghan@devlinlawfirm.com>; Christopher Clayton <cclayton@devlinlawfirm.com>; Paul Richter <prichter@devlinlawfirm.com>
Cc: aa@rothfirm.com; TI-Bell@caldwellcc.com; Seth Reich <sreich@caldwellcc.com>; Fair Andrea <andrea@wsfirm.com>; wh@wsfirm.com
Subject: Bell Semiconductor v. TI, No. 4:23-cv-609

Counsel,

Texas Instruments is filing an IPR petition challenging claims of U.S. Pat. No. 7,345,245. Texas Instruments stipulates that if the Patent Trial and Appeal Board institutes IPR for the '245 patent based on the soon-to-be-filed IPR petition by Texas Instruments, and only while any IPR from this petition is pending, Texas Instruments will not advance against the '245 patent in *Bell Semiconductor, LLC v. Texas Instruments Incorporated*, Case No. 4:23-cv-00609: (1) the same grounds of invalidity advanced in the instituted IPR, or (2) any grounds of invalidity that reasonably could have raised during the inter partes review.

Best regards,
James

James F. Smith /// Caldwell Cassady & Curry
2121 N. Pearl St., Suite 1200
Dallas, TX 75201
Direct Line: 214-888-4856
Main Line: 214-888-4848
jsmith@caldwellcc.com
www.caldwellcc.com