

From: [Chibib, Michael](#)
To: [Jason Charkow](#); [Ron Daignault](#); [Cathy Pampinella](#); [Stephanie Mandir](#); [PV](#)
Cc: [Civins, Conor](#); [Crumbley, Kit](#); [Hearn-Darst, Anna](#)
Subject: ParkerVision v NXP (6:23-cv-00389-ADA)
Date: Thursday, June 20, 2024 8:30:53 AM

Counsel,

Later today, NXP will file an IPR petition challenging claims of U.S. Pat. No. 7,865,177. In connection with that petition, NXP stipulates that if the Patent Trial and Appeal Board institutes IPR for the '177 patent based on the petition by NXP, and only while any IPR from this petition is pending, NXP will not pursue in Case No. 6-23-cv-00389 the same grounds of invalidity raised in the petition against the claims of the '177 patent, or any grounds of invalidity that reasonably could have been raised in the petition.

Similarly, NXP will be filing an IPR petition challenging claims of U.S. Pat. No. 9,118,528. In connection with that petition, NXP stipulates that if the Patent Trial and Appeal Board institutes IPR for the '528 patent based on the petition by NXP, and only while any IPR from this petition is pending, NXP will not pursue in Case No. 6-23-cv-00389 the same grounds of invalidity raised in the petition against the claims of the '528 patent, or any grounds of invalidity that reasonably could have been raised in the petition.

Best regards,

Mike

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