From: Patrick Stafford
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Cc: ~Smith, Melissa; QE-Samsung-Pictiva
Subject: IPR2024-01093 - Stipulation

Counsel,

Defendants hereby stipulate that, if the Patent Trial and Appeal Board institutes an inter partes review proceeding for U.S. Patent No. 8,723,164 on the grounds presented in the petition in IPR2024-01093, then Defendants will not pursue an invalidity defense in this case that the patent claims subject to the instituted IPR are invalid based on grounds that were raised or reasonably could have been raised in the IPR.

Best regards,

Patrick Stafford
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