

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

MONOLITHIC POWER SYSTEMS, INC.,

Plaintiff, Counterclaim-Defendant,

v.

REED SEMICONDUCTOR CORP.,

Defendant, Counterclaim-Plaintiff.

C.A. No. 1:24-cv-00165-JFM

**DEFENDANTS REED SEMICONDUCTOR CORP.'S
STIPULATION REGARDING INVALIDITY CONTENTIONS
AS TO U.S. PATENT NO. 9,041,377**

Defendant Reed Semiconductor Corp. (“Defendant”) submit this stipulation regarding the invalidity contentions regarding asserted U.S. Patent No. 9,041,377 (“the ’377 Patent”).

Defendant is challenging certain claims of the ’377 Patent in *Inter Partes* Review Proceeding No. IPR2024-01158. The Petition asserts the following grounds of invalidity:

1. Claims 1-4, 9-14, and 17-18 are anticipated under 35 U.S.C. § 102 by Tateishi (U.S. Patent Publication No. 2009/010708) and/or Tateishi Patent (U.S. Patent No. 8,476,887);

2. Claims 5, 7-8, and 15 are rendered obvious under 35 U.S.C. § 103 by Tateishi (U.S. Patent Publication No. 2009/010708) and/or Tateishi Patent (U.S. Patent No. 8,476,887).

In this Petition, Defendant is a real party in interest, subject to 37 C.F.R. § 42.8(b)(1).

Defendant hereby stipulates that if the Patent Trial and Appeal Board institutes IPR on IPR2024-01158, the Defendant 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 Defendant's ability to assert invalidity of the asserted claims of the '377 Patent in this case on any other ground, regardless of whether *inter partes* review is instituted. Likewise, this stipulation is not intended, and should not be construed, to limit Defendant's 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: July 23, 2024

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