Alexander Martin

From: Noel Chakkalakal
Sent: Friday, August 9, 2024 11:13 AM
To: Christopher A. Honea; ghintercurrency@ghiplaw.com
Cc: Lance Wyatt; Neil McNabnay; Alexander Martin; Intercurrency – FR Team
Subject: [Intercurrency v Bitsgap/Paybis/Cryptohopper/Cryptense] Sotera stipulaton

Counsel,

Bitsgap Holding OU, Cryptohopper BV, Cryptense SAS, and Paybis Ltd. (collectively "Defendants") are filing an IPR petition challenging claims of U.S. Patent No. 10,776,863 (the "'863 Patent") in joinder with an IPR petition IPR2024-00375 filed by Askeladden LLC. In accordance with *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020) (Precedential), if the IPR is instituted based on this petition, Defendants stipulate that they will not raise against the '863 Patent in the related District Court Cases 2:24-cv-00392 (E.D. Tex.), 2:24-cv-00393 (E.D. Tex.), 2:24-cv-00395 (E.D. Tex.), and 2:24-cv-00253 (E.D. Tex.) any ground raised or that reasonably could have been raised Defendants' IPR petition against the '863 Patent before the PTAB.

Separately, Bitsgap Holding OU, Cryptohopper BV, Cryptense SAS, and Paybis Ltd. (collectively "Defendants") are also filing an IPR petition challenging claims of U.S. Patent No. 11,449,930 (the "'930 Patent") in joinder with an IPR petition IPR2024-00378 filed by Askeladden LLC. In accordance with *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020) (Precedential), if the IPR is instituted based on this petition, Defendants stipulate that they will not raise against the '930 Patent in the related District Court Cases 2:24-cv-00392 (E.D. Tex.), 2:24-cv-00393 (E.D. Tex.), 2:24-cv-00395 (E.D. Tex.), and 2:24-cv-00253 (E.D. Tex.) any ground raised or that reasonably could have been raised in Defendants' IPR petition against the '930 Patent before the PTAB.

Thank you,

Noel F Chakkalakal :: Principal :: Fish & Richardson P.C. :: 214 760 6168 (office) :: 214 850 0473 (cell) :: chakkalakal@fr.com