

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CROGA INNOVATIONS LTD., Plaintiff, v. CISCO SYSTEMS, INC., Defendant.	Case No. 2:24-cv-00065-JRG (Lead Case) JURY TRIAL DEMANDED
CROGA INNOVATIONS LTD., Plaintiff, v. FORTINET, INC., Defendant.	Case No. 2:24-cv-00206-JRG (Member Case) JURY TRIAL DEMANDED
CROGA INNOVATIONS LTD., Plaintiff, v. PALO ALTO NETWORKS, INC., Defendant.	Case No. 2:24-cv-00208-JRG (Member Case) JURY TRIAL DEMANDED

**JOINT STIPULATION OF DISMISSAL OF ASSERTED PATENT BY CROGA
INNOVATIONS LTD. AND CISCO SYSTEMS, INC.**

Plaintiff Croga Innovations Ltd. (“Croga”) and Defendant Cisco Systems, Inc. (“Cisco”) hereby stipulate and agree as follows:

WHEREAS, on February 1, 2024, Croga filed a complaint (Dkt. No. 1) (the “Complaint”) in *Croga Innovations Ltd. v. Cisco Systems, Inc.*, Case No. 2:24-cv-00065-JRG (Lead Case), the above-captioned action, alleging certain Cisco products identified therein infringed U.S. Patent

Nos. 11,223,601 (“the ’601 Patent”), 10,601,780 (“the ’780 Patent”), and 7,738,368 (“the ’368 Patent”) (collectively, the “patents-in-suit”);

WHEREAS, on April 8, 2024, Cisco filed an Answer (Dkt. No. 17) raising defenses of, *inter alia*, non-infringement and invalidity;

WHEREAS, on August 13, 2024, Cisco filed a petition for *Inter Partes* Review in IPR2024-01282, challenging claims 1 and 2 of the ’368 Patent;

WHEREAS, the Court’s First Amended Docket Control Order requires that Croga disclose its final election of Asserted Claims by October 10, 2025;

WHEREAS, the parties seek to streamline the issues in dispute; and

NOW, THEREFORE, in consideration thereof and of the mutual agreements, the Parties HEREBY STIPULATE AND AGREE AS FOLLOWS:

1. Count III of the Complaint alleging infringement of the ’368 Patent against Cisco is dismissed with prejudice;
2. Cisco and Croga will jointly request that the PTAB terminate IPR2024-01282 challenging claims 1 and 2 of the ’368 Patent;
3. Within 5 business days of the Court’s entry of this Stipulation, Cisco will notify the Patent Trial and Appeal Board requesting permission to file a joint motion to terminate IPR2024-01282;
4. Within 5 business days of receiving permission from the Patent Trial and Appeal Board, the parties shall execute and file a joint motion to terminate IPR2024-01282;
5. This Stipulation only dismisses those claims relating to the ’368 Patent and does not dismiss any other claims of infringement based on the ’601 Patent and/or ’780 Patent, nor any other pending IPRs relating to those patents;

6. This Stipulation is the sole and entire agreement between the Cisco and Croga made in connection with, or in contemplation of, the termination of IPR2024-01282;

7. All attorneys' fees, costs of court, and expenses related to Count III of the Complaint and IPR2024-01282 shall be borne by each party incurring same

Dated: December 30, 2024

By: /s/ Brett Cooper

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Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Brett Cooper
Brett Cooper

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Parties complied with the meet and confer requirement in Local Rule CV-7(h) on December 30, 2024, and the Parties are in agreement as to this Motion's substance, as indicated by the signatures of counsel for all Parties.

/s/ Brett Cooper
Brett Cooper