From: John McKee <johnmckee@quinnemanuel.com>
Sent: Monday, May 20, 2024 11:42 AM
To: Proxense; Proxense-SG
Cc: QE-Google-Proxense
Subject: IPR2024-00232, IPR2024-00233, IPR2024-00234

Counsel,

Google stipulates that if the Patent Trial and Appeal Board institutes an IPR in the above-captioned proceedings on the grounds presented in the Petitions, Google will not pursue an invalidity defense in the district court action *Proxense, LLC v. Google LLC et al*., No. 6:23-cv-00320 (W.D. Tex.) that the patent claims subject to the instituted IPRs are invalid based on the same grounds as in the petitions or even on the references that are the bases for those grounds (e.g., Ludtke and Kon).

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GOOGLE EXHIBIT 1025
GOOGLE v. PROXENSE
IPR2024-00234