FISH.

March 3, 2025

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Re: *SK nexilis Co. v. Solus Advanced Materials Co. et al.*, No. 2:23-cv-00539 (E.D. Tex.)

Dear Counsel:

Solus Advanced Materials Co., Ltd. has filed IPR petitions with the Patent Trial and Appeal Board (PTAB) to address the validity of the asserted claims, as indicted in the table below:

IPR	Patent
IPR2024-01460	U.S. Patent No. 10,480,090
IPR2024-01461	U.S. Patent No. 10,811,689
IPR2024-01462	U.S. Patent No. 11,346,014
IPR2024-01463	U.S. Patent No. 11,591,706

Defendants Volta Energy Solutions S.A.R.L., Volta Energy Solutions Europe KFT., Volta Energy Solutions Hungary KFT., Volta Energy Solutions Canada Inc., and Solus Advanced Materials Co., Ltd. hereby stipulate that, for any of the IPRs listed above, if the PTAB institutes IPR, Defendants agree not to pursue any of the grounds raised in the associated petition, or any grounds Defendants could have reasonably raised in the petition, in this district court litigation or any parallel proceeding. If the PTAB declines to institute any of the IPRs listed above, Defendants reserve the right to assert any grounds of invalidity in the district court proceedings against the patent for which the PTAB declined to institute IPR.

Sincerely,

Daniel Tishman
Attorney for Defendants