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17 Devices, Inc. and Pensando Systems, Inc.

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

20 CONCURRENT VENTURES, LLC AND
21 XTREAMEDGE, INC.,

22 Plaintiffs,

23 v.

24 ADVANCED MICRO DEVICES, INC. AND
25 PENSANDO SYSTEMS, INC.,

26 Defendants.

Case No. 4:25-cv-09567-JST

**DEFENDANTS' STIPULATION
REGARDING INVALIDITY
CONTENTIONS**

Judge: Honorable Jon S. Tigar

Advanced Micro Devices, Inc. and Pensando Systems, Inc. (“Defendants”) submit this stipulation regarding invalidity contentions.

Defendants previously submitted *Sotera*¹ stipulations for U.S. Patent Nos. 10,985,943 (the “’943 patent”); 8,924,596 (the “’596 patent”); and 10,873,753 (the “’753 patent”). Dkt. 78. The following *inter partes* review (“IPR”) proceedings have been instituted by the Patent Trial and Appeal Board (“Board”):

- IPR2025-00223, for the ’943 patent;
- IPR2025-00478, for the ’596 patent; and
- IPR2025-00486, for the ’753 patent.

Pursuant to the Scheduling Order (Dkt. 134), Defendants served invalidity contentions on February 13, 2026, which included some grounds as a reservation of rights in the unlikely event that one or more of Defendants’ IPRs is de-instituted. While it has been rare, the PTAB has recently vacated institution for some IPR proceedings. *See, e.g., Revvo Tech., Inc. v. Cerebrum Sensor Tech., Inc.*, IPR2025-00632, Paper 20 (PTAB Nov. 3, 2025). Defendants do not see any reason for de-institution here but nonetheless included some grounds merely as a reservation of rights. On February 20, 2026, Plaintiffs asserted that the invalidity contentions are improper because they include prior art references that are covered by the *Sotera* stipulations.

Defendants confirm that the *Sotera* stipulation remains in effect for the instituted IPRs. So long as these respective IPRs remain instituted, Defendants’ previously-submitted *Sotera* stipulations remain in effect, and consistent with those stipulations, Defendants will not pursue in this case any ground that was raised or could have been reasonably raised in those IPRs (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patents or printed publications), which includes the following grounds.

For the ’943 patent:

Seshadri Seshadri and Biederman Atsatt-113	Seshadri and Kulkarni Seshadri, Biederman, and Kulkarni Atsatt-113 and Kulkarni
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¹ *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19 (PTAB Dec. 1, 2020) (precedential).

Atsatt-113 and Biederman Seshadri and Tarafdar Seshadri, Biederman, and Tarafdar Atsatt-113 and Tarafdar Atsatt-113, Biederman, and Tarafdar	Atsatt-113, Biederman, and Kulkarni Seshadri and Atsatt-923 Seshadri, Biederman, and Atsatt-923 Atsatt-113 and Atsatt-923 Atsatt-113, Biederman, and Atsatt-923
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For the '753 patent:

Stroud (anticipation) Pierson (anticipation) Stroud and Da Silva Stroud and RFC 791 Stroud and Cragon Stroud, Da Silva, and Cragon Stroud, RFC 791, and Cragon Stroud, Da Silva, and Saulsbury Stroud, Da Silva, and Cullison Stroud, RFC 791, and Saulsbury Stroud, RFC 791, and Cullison Stroud, Cragon, and Saulsbury Stroud, Cragon, and Cullison Stroud, Da Silva, Cragon, and Saulsbury Stroud, RFC791, Cragon, and Saulsbury Stroud, Da Silva, Cragon, and Cullison Stroud, RFC791, Cragon, and Cullison	Jana and RFC 791 Jana, RFC 791, and Cragon Jana, RFC 791, and Ramanujan Jana, RFC 791, and Saulsbury Jana, RFC 791, Cragon, and Saulsbury Jana, RFC 791, Ramanujan, and Saulsbury Jana, RFC 791, and Cullison Jana, RFC 791, Cragon, and Cullison Jana, RFC 791, Ramanujan, and Cullison Pierson and Stroud Pierson, Stroud, and Cragon Pierson, Stroud, and Ramanujan Pierson, Stroud, and Saulsbury Pierson, Stroud, Cragon, and Saulsbury Pierson, Stroud, Ramanujan, and Saulsbury Pierson, Stroud, and Cullison Pierson, Stroud, Cragon, and Cullison Pierson, Stroud, Ramanujan, and Cullison
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For the '596 patent:

Alexander (anticipation) Buchko (anticipation) Chavan (anticipation) Hammer (anticipation) Khawand (anticipation) Van Loo (anticipation) Hughes (anticipation)	The above-listed Hammer-based grounds in further view of Kanai The above-listed Hammer-based grounds in further view of Matsunami
Alexander and Drews Alexander and Gewirtz Alexander and Goyal Alexander and Kolinummi Alexander and Ohkawa Alexander and Rosenthal Alexander and Borkowski Alexander and Hughes Alexander and Kim Alexander and Tuan The above-listed Alexander-based grounds in further view of Kanai The above-listed Alexander-based grounds in further view of Matsunami	Khawand and Drews Khawand and Gewirtz Khawand and Goyal Khawand and Kolinummi Khawand and Ohkawa Khawand and Rosenthal Khawand and Borkowski Khawand and Hughes Khawand and Kim Khawand and Tuan The above-listed Khawand-based grounds in further view of Kanai The above-listed Khawand-based grounds in further view of Matsunami
Buchko and Drews Buchko and Gewirtz	Mannava and Drews Mannava and Gewirtz Mannava and Goyal Mannava and Kolinummi Mannava and Ohkawa

1	Buchko and Goyal	Mannava and Rosenthal
	Buchko and Kolinummi	Mannava and Borkowski
2	Buchko and Ohkawa	Mannava and Hughes
	Buchko and Rosenthal	Mannava and Kim
3	Buchko and Burkowski	Mannava and Tuan
	Buchko and Hughes	The above-listed Mannava-based grounds in
4	Buchko and Kim	further view of Kanai
	Buchko and Tuan	The above-listed Mannava-based grounds in
5	The above-listed Buchko-based grounds in	further view of Matsunami
	further view of Kanai	
6	The above-listed Buchko-based grounds in	Michaylov and Drews
	further view of Matsunami	Michaylov and Gewirtz
7		Michaylov and Goyal
	Chavan and Drews	Michaylov and Kolinummi
8	Chavan and Gewirtz	Michaylov and Ohkawa
	Chavan and Goyal	Michaylov and Rosenthal
9	Chavan and Kolinummi	Michaylov and Borkowski
	Chavan and Ohkawa	Michaylov and Hughes
10	Chavan and Rosenthal	Michaylov and Kim
	Chavan and Borkowski	Michaylov and Tuan
11	Chavan and Hughes	The above-listed Michaylov-based grounds in
	Chavan and Kim	further view of Kanai
12	Chavan and Tuan	The above-listed Michaylov-based grounds in
	The above-listed Chavan-based grounds in	further view of Matsunami
13	further view of Kanai	
	The above-listed Chavan-based grounds in	Van Loo and Drews
14	further view of Matsunami	Van Loo and Gewirtz
		Van Loo and Goyal
15	Dongare and Drews	Van Loo and Kolinummi
	Dongare and Gewirtz	Van Loo and Ohkawa
16	Dongare and Goyal	Van Loo and Rosenthal
	Dongare and Kolinummi	Van Loo and Borkowski
17	Dongare and Ohkawa	Van Loo and Hughes
	Dongare and Rosenthal	Van Loo and Kim
18	Dongare and Borkowski	Van Loo and Tuan
	Dongare and Hughes	The above-listed Van Loo-based grounds in
19	Dongare and Kim	further view of Kanai
	Dongare and Tuan	The above-listed Van Loo-based grounds in
20	The above-listed Dongare-based grounds in	further view of Matsunami
	further view of Kanai	
21	The above-listed Dongare-based grounds in	Hughes and Drews
	further view of Matsunami	Hughes and Gewirtz
22		Hughes and Goyal
	Hammer and Drews	Hughes and Kolinummi
23	Hammer and Gewirtz	Hughes and Ohkawa
	Hammer and Goyal	Hughes and Rosenthal
24	Hammer and Kolinummi	Hughes and Borkowski
	Hammer and Ohkawa	Hughes and Hughes
25	Hammer and Rosenthal	Hughes and Kim
	Hammer and Borkowski	Hughes and Tuan
26	Hammer and Hughes	Hughes and Kanai
	Hammer and Kim	Hughes and Matsunami
27	Hammer and Tuan	
28	(cont.)	

1
2 DATED: March 10, 2026

3 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

4
5 By

/s/ Harper S. Batts

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8 Attorneys for Advanced Micro Devices, Inc. and
9 Pensando Systems, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, March 10, 2026, a true and correct copy of the foregoing document, **DEFENDANTS ADVANCED MICRO DEVICES, INC. and PENSANDO SYSTEMS, INC.'s STIPULATION REGARDING INVALIDITY CONTENTIONS** was served by the indicated means to the persons at the addresses below:

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Dated: March 10, 2026

By /s/ Harper S. Batts
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