

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
2 A Limited Liability Partnership
3 Including Professional Corporations
4 HARPER S. BATTS, Cal Bar No. 242603
5 hbatts@sheppardmullin.com
6 CHRISTOPHER S. PONDER, Cal Bar No. 296546
7 cponder@sheppardmullin.com
8 JEFFREY LIANG, Cal Bar No. 281429
9 jliang@sheppardmullin.com
10 LAI L. YIP, Cal Bar No. 258029
11 lyip@sheppardmullin.com
12 1540 El Camino Real Suite 120
13 Menlo Park, California 94025-4111
14 Telephone: 650.815.2600
15 Facsimile: 650.815.2601

16 Attorneys for Advanced Micro Devices, Inc. and
17 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' RESPONSIVE NOTICE
OF NEW AND RELEVANT FACTS RE:
MOTION TO STAY PENDING
DETERMINATION OF INTER PARTES
REVIEW**

Judge: Honorable Jon S. Tigar

1 Defendants Advanced Micro Devices, Inc. and Pensando Systems, Inc. respectfully submit
 2 this Notice regarding their Motion to Stay Pending Determination of Inter Partes Review (“IPR”)
 3 (Dkt. 129) and Plaintiffs Concurrent Ventures, LLC and XstreamEdge, Inc.’s Notice of New and
 4 Relevant Facts filed on March 16, 2026 (Dkt. 185).

5 On March 9, 2026, Plaintiffs unilaterally reached out to the Director of the USPTO
 6 alleging Defendants breached the *Sotera* Stipulation filed in this case by serving invalidity
 7 contentions that identify printed prior art. As noted in Plaintiffs’ Notice filed yesterday, the
 8 Director stayed all three IPR proceedings and initiated Director Review to consider whether
 9 termination is warranted based on an alleged *Sotera* violation.

10 Defendants dispute Plaintiffs’ characterization of their conduct. Furthermore, a dispute
 11 regarding any alleged violation of the *Sotera* Stipulation can only be properly resolved before this
 12 Court, not the PTAB, because a *Sotera* Stipulation governs the admissibility of prior art in this
 13 case. Defendants will be promptly filing a motion on this important issue and requesting
 14 expedited briefing.

15
 16 DATED: March 17, 2026

17 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

18
 19 By

/s/ Harper S. Batts

HARPER S. BATTS

CHRISTOPHER S. PONDER

JEFFREY LIANG

LAI YIP

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, March 17, 2026, a true and correct copy of the foregoing document, **DEFENDANTS' RESPONSIVE NOTICE OF NEW AND RELEVANT FACTS RE: MOTION TO STAY PENDING DETERMINATION OF INTER PARTES REVIEW** was served by the indicated means to the persons at the addresses below:

Michael Matulewicz-Crowley
Christine E. Lehman
Adam Adler
Courtland L. Reichman
Jennifer Estremera
Laura Carwile
Scott Cole
Ariane S. Mann
Zachary Jacobs
Stephen Bosco

Counsel for Plaintiffs Concurrent Ventures, LLC and XstreamEdge, Inc.

Via Email:

mmatulewicz-crowley@reichmanjorgensen.com
clehman@reichmanjorgensen.com
aadler@reichmanjorgensen.com
creichman@reichmanjorgensen.com
jestremera@reichmanjorgensen.com
lcarwile@reichmanjorgensen.com
scole@reichmanjorgensen.com
amann@reichmanjorgensen.com
zjacobs@reichmanjorgensen.com
sbosco@reichmanjorgensen.com

**REICHMAN JORGENSEN LEHMAN
& FELDBERG LLP**

Dated: March 17, 2026

By /s/ Harper S. Batts

HARPER S. BATTS

*Attorneys for Defendants
Advanced Micro Devices, Inc. and
Pensando Systems, Inc.*