

From: [Bergeron, Amy](#)
To: [Citroen, Phillip W.](#); [Burke, Katharine](#); [Zhu, Frank](#)
Cc: [Williams, Eliot D.](#); [PH-Entegris-Inpria-IPR](#)
Subject: [EXT] RE: IPR2025-00267 - Entegris v Inpria - Lam Common Interest
Date: Friday, May 9, 2025 3:27:21 PM
Attachments: [image001.png](#)

--- External Email ---

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Counsel,

We disagree that Entegris failed to comply with 37 C.F.R. § 42.11 in any way, and do not currently intend to file anything with the Board.

Best,
Amy

From: Citroen, Phillip W. <phillipcitroen@paulhastings.com>
Sent: Wednesday, May 7, 2025 10:54 AM
To: Burke, Katharine <Katharine.Burke@BakerBotts.com>; Zhu, Frank <frank.zhu@BakerBotts.com>
Cc: Williams, Eliot D. <Eliot.Williams@BakerBotts.com>; Bergeron, Amy <amy.bergeron@bakerbotts.com>; PH-Entegris-Inpria-IPR <PH-Entegris-Inpria-IPR@paulhastings.com>
Subject: IPR2025-00267 - Entegris v Inpria - Lam Common Interest

[EXTERNAL EMAIL]

Counsel,

We understand that Entegris is asserting common interest privilege with Lam in the district court case. We believe this is a fact that Entegris should have made the Board aware of with its IPR petition. See 37 C.F.R. § 42.11. As you are aware, for the IPR proceeding, we have briefs due this upcoming Monday. Please let us know if you plan to inform the Board of the fact that Entegris is asserting common interest privilege with Lam before our briefs are due. Otherwise we will let the Board know in our briefs.

Regards,
Phillip

**PAUL
HASTINGS**

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