

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INPRIA CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 22-1359 (CJB)
	)	
LAM RESEARCH CORP.,	)	
	)	
Defendant.	)	

**DEFENDANT LAM RESEARCH CORPORATION’S MOTION TO DISMISS, OR IN
THE ALTERNATIVE TO SEVER, TRANSFER, AND STAY PROCEEDINGS**

Pursuant to Federal Rules of Civil Procedure 12(b)(7) and 19(b), defendant Lam Research Corporation (“Lam”) moves to dismiss all claims and defenses for failure to join a necessary party, the State University of New York RF (“SUNY”). In the alternative, pursuant to Federal Rule of Civil Procedure 21 and 28 U.S.C. § 1404(a), Lam moves to (i) sever and transfer Lam’s defenses and counterclaims relating to standing/ownership, indemnification, and inventorship regarding the Asserted Patents to the United States District Court for the Northern District of New York, and (ii) otherwise dismiss or stay this action pending resolution of the transferred defenses and counterclaims.

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April 16, 2025

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RULE 7.1.1 CERTIFICATE

Pursuant to D. Del. LR 7.1.1, I hereby certify that counsel for Defendant conferred with counsel for Plaintiff in an effort to reach an agreement on the matters set forth in the above motion, and the parties were unable to resolve the issues.

/s/ Rodger D. Smith II

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CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on April 16, 2025, upon the following in the manner indicated:

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v.	)	
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LAM RESEARCH CORP.,	)	
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Defendant.	)	

**[PROPOSED] ORDER GRANTING DEFENDANT LAM RESEARCH
CORPORATION’S MOTION TO DISMISS, OR IN THE ALTERNATIVE
TO SEVER, TRANSFER, AND STAY PROCEEDINGS**

This matter is before the Court on Lam Research Corp.’s Motion to Dismiss, or in the Alternative to Sever, Transfer, and Stay Proceedings (“Motion”). For good cause shown, the Motion is GRANTED, and it is HEREBY ORDERED that:

The Clerk of the Court is directed to dismiss this action without prejudice and close this case.

SO ORDERED this _____ day of _____, 2025.

UNITED STATES DISTRICT JUDGE