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Subject: Inpria v. Lam | Asserted Claims
Date: Monday, June 23, 2025 5:00:53 PM
Attachments: [image001.png](#)

Counsel,

Pursuant to D.I. 522, Plaintiff Inpria narrows its asserted claims to the set identified in the tables below.

Asserted Patent	Claims Asserted	Count
'684 Patent	6, 15	2
'153 Patent	18	1
'505 Patent	3, 6, 10, 14, 15, 23	6
'048 Patent	5, 7, 19	3
'903 Patent	3	1
'312 Patent	11, 14	2
'081 Patent	5, 6, 11, 14, 29	5
		20

Inpria is no longer asserting claims 1-3, 5-7, 9, and 12 of the '564 patent. Inpria would have asserted one or more substitute claims in Inpria's motion to amend granted by the Board in IPR2024-00033, but a certificate has not yet issued under 37 CFR § 42.80 due to Lam's notice of appeal. Inpria therefore reserves the right to seek leave to assert one or more substitute claims against Lam in this action or to assert one or more claims in a separate action once a certificate has issued.

This narrowing is made pursuant to D.I. 522 and in reliance on Lam's compliance with its discovery obligations, including its interrogatory responses, document production, and the testimony of the witnesses noticed by Inpria. Inpria reserves all rights to the extent any information produced by Lam, discovery responses provided by Lam, or testimony of the witnesses noticed by Inpria are inaccurate or incomplete or additional information is produced after this date, including as a result of any discovery motions.

Regards,
Phillip

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