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VIA EMAIL

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Re: *Inpria Corporation v. Lam Research Corp.*, Case No. 22-1359-CJB (D. Del.) and
IPR2025-00309

Dear Counsel:

I write regarding the above-captioned litigation (the “District Court Case”), and the related petition for *inter partes* review (IPR) in IPR2025-00309 that was filed in December 2025 against certain claims of U.S. Patent No. 11,537,048.

Petitioner Lam Research Corp. (“Lam”) hereby stipulates that if the Patent Trial and Appeal Board (PTAB) institutes an IPR based on the grounds identified below, then it will (i) not pursue the grounds identified below in the District Court Case, and (ii) not pursue any other ground that reasonably could have been raised during the IPR (should it be instituted) in the District Court Case.

The grounds presented in the IPR petition are reproduced below for convenience:

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INPRIA EXHIBIT 2019
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Ground	Prior Art	Statutory Basis	Claims Challenged from U.S. Patent No. 11,537,048
1	Dhas, Cardineau	§ 103	1-6 and 8-20
2	Dhas, Cardineau, Molloy	§ 103	7
3	Weidman, Cardineau	§ 103	1-5 and 8-20
4	Weidman, Cardineau, Molloy	§ 103	6 and 7

In so stipulating, Lam seeks to avoid multiple proceedings challenging the same claims on the same grounds. Consistent with Congressional intent, through this stipulation, Lam expresses its intentions to have only the PTAB address the patentability of the challenged claims identified above on the grounds identified above. However, if the PTAB declines institution as to any grounds, then Lam reserves the right to pursue any grounds or challenges to the claims in the District Court Case.

This stipulation is not intended, and should not be construed, to limit Lam's abilities to assert invalidity or unenforceability of U.S. Patent No. 11,537,048 in the District Court Case on any other ground not covered by this stipulation (e.g., indefiniteness, written-description issues, enablement, unenforceability issues, invalidity on grounds that reasonably could not have been raised during the IPR if instituted).

Sincerely,

/Dion M. Bregman/
Dion M. Bregman