



May 15, 2025

Direct Phone Number +1 512-867-8457
david.obrien@haynesboone.com

VIA EMAIL

Warren J. Thomas
wthomas@mcciplaw.com

Gregory J. Carlin
gcarlin@mcciplaw.com

Lee G. Hamilton
lhamilton@mcciplaw.com

Samuel V.B. Fritz
sfritz@mcciplaw.com

Re: Georgia Tech Research Corporation v. Murata Electronics North America, Inc. et al.,
1:24-cv-05268-JPB (NDGA)

Dear Counsel:

I write regarding the above-captioned litigation (the “Parallel District Court Litigation”), and the petition for *Inter Partes* Review (IPR) in IPR2025-00383 that was filed February 10, 2025 challenging certain claims of U.S. Patent No. 7,489,914.

Petitioner Murata Manufacturing Co., Ltd and Murata Electronics North America, Inc. (together “Murata”) hereby stipulates that if the Patent Trial and Appeal Board (PTAB) institutes the IPR based on the grounds identified below, then it (i) will not pursue the grounds identified below in the Parallel District Court Litigation and (ii) will not pursue any other ground that reasonably could have been raised during the IPR (should it be instituted) in the Parallel District Court Litigation.

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

Ground	Prior Art	Statutory Basis	Claims Challenged in IPR2024-00334
1	Francisco (US Patent 6,128,508) and JP466 (JP Published App. No. 2001-267466A)	§ 103	1-2, 5, 12-20
2	Francisco, JP466 and Hirayama (US Published App. No. 2002/0118067)	§ 103	4, 6
3	Francisco, JP466 and Okubora (EP Published App. No. EP 1 189 345 A2)	§ 103	7-11

Through this stipulation, Murata expresses its intentions to have only the PTAB address the patentability of the challenged claims identified above on the grounds identified above. However, Murata reserves the right to pursue in the Parallel District Court Litigation any ground that would

May 15, 2025
Page 2 of 2

have been otherwise precluded by this stipulation if the PTAB denies institution or vacates institution prior to entry of a final written decision in the IPR.

This stipulation is not intended, and should not be construed, to limit Murata's abilities to assert invalidity, ineligibility or unenforceability of U.S. Patent No. 7,489,914 in the Parallel District Court Litigation on any other ground not covered by this stipulation.

Respectfully yours,



David O'Brien
Counsel for Murata

0049195.00030US01 | 4910-5909-1001 v.3