



May 15, 2025

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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 IPR2025-00384 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	Yeh (US Patent 5,995,814) and Dalmia (published academic thesis of Sidharth Dalmia, entitled “Design and Implementation of High-Q Passive Devices for Wireless Applications Using System-On-Package (SOP) Based Organic Technologies”)	§ 103	1-2, 5, 12-20
2	Dalmia and Hashemi (publication entitled “Concurrent Multiband Low-Noise Amplifiers—Theory, Design, and Applications” from IEEE Transactions on Microwave Theory and Techniques)	§ 103	4, 6

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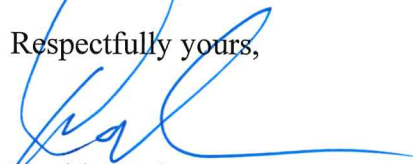
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Through this stipulation, Murata expresses its intentions to have only the PTAB address the patentability of the challenged claims identified above on the grounds identified above. However, Murata reserves the right to pursue in the Parallel District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

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