



From: Joshua Scheufler jscheufler@raklaw.com
Subject: Re: Redstone Logics LLC v. NXP USA, Inc., Case No. 7:24-cv-00028-ADA-DG, in the United States District Court for the Western District of Texas
Date: March 31, 2025 at 4:18 PM
To: Eric Green eric.green@nortonrosefulbright.com
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Counsel for Qualcomm and NXP,

Could you please clarify your stipulations? In particular, it is not clear to what extent Qualcomm and NXP's stipulations cover arguments under §§102/103 that would be cumulative of grounds that could have been brought before the PTAB. For example, "system" prior art may be described in printed publications. Do Qualcomm and NXP stipulate that systems described in printed publications will not be presented at trial if the IPR is instituted?

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On Mar 26, 2025, at 3:26 PM, Eric Green <eric.green@nortonrosefulbright.com> wrote:

Counsel,

Defendant NXP USA, Inc. ("Defendant") hereby stipulates that if the Patent Trial and Appeal Board institutes IPR on IPR2025-00485, then Defendant will not pursue in this case the specific grounds that were raised in the IPR, or on any other ground that reasonably could have been raised in the IPR (i.e., under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications).

This stipulation is not intended, and should not be construed, to limit Defendant's ability to assert invalidity of the asserted claims of the '339 Patent in this case on any other ground (e.g., invalidity under 35 U.S.C. §§ 101, 112), regardless of whether *inter partes* review is instituted.

Thanks,
Eric

Eric Green | Partner

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