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17 Pensando Systems, Inc.

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

20 CONCURRENT VENTURES, LLC AND
21 XTREAMEDGE, INC.,

22 Plaintiffs,

23 v.

24 ADVANCED MICRO DEVICES, INC. AND
25 PENSANDO SYSTEMS, INC.,

26 Defendants.

Case No. 4:25-cv-09567-JST

**DEFENDANTS' RESPONSIVE NOTICE
OF NEW AND RELEVANT FACTS RE:
MOTION TO STAY PENDING
DETERMINATION OF INTER PARTES
REVIEW**

Judge: Honorable Jon S. Tigar

1 Defendants Advanced Micro Devices, Inc. and Pensando Systems, Inc. respectfully submit
 2 this Notice regarding their Motion to Stay Pending Determination of Inter Partes Review (“IPR”)
 3 (Dkt. 129) and Plaintiffs Concurrent Ventures, LLC and XstreamEdge, Inc.’s Notice of New and
 4 Relevant Facts filed on March 16, 2026 (Dkt. 185).

5 On March 9, 2026, Plaintiffs unilaterally reached out to the Director of the USPTO
 6 alleging Defendants breached the *Sotera* Stipulation filed in this case by serving invalidity
 7 contentions that identify printed prior art. As noted in Plaintiffs’ Notice filed yesterday, the
 8 Director stayed all three IPR proceedings and initiated Director Review to consider whether
 9 termination is warranted based on an alleged *Sotera* violation.

10 Defendants dispute Plaintiffs’ characterization of their conduct. Furthermore, a dispute
 11 regarding any alleged violation of the *Sotera* Stipulation can only be properly resolved before this
 12 Court, not the PTAB, because a *Sotera* Stipulation governs the admissibility of prior art in this
 13 case. Defendants will be promptly filing a motion on this important issue and requesting
 14 expedited briefing.

15
 16 DATED: March 17, 2026

17 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

18
 19 By

/s/ Harper S. Batts

HARPER S. BATTS

CHRISTOPHER S. PONDER

JEFFREY LIANG

LAI YIP

22 Attorneys for Advanced Micro Devices, Inc. and
 23 Pensando Systems, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, March 17, 2026, a true and correct copy of the foregoing document, **DEFENDANTS' RESPONSIVE NOTICE OF NEW AND RELEVANT FACTS RE: MOTION TO STAY PENDING DETERMINATION OF INTER PARTES REVIEW** was served by the indicated means to the persons at the addresses below:

Michael Matulewicz-Crowley
Christine E. Lehman
Adam Adler
Courtland L. Reichman
Jennifer Estremera
Laura Carwile
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**REICHMAN JORGENSEN LEHMAN
& FELDBERG LLP**

Dated: March 17, 2026

By /s/ Harper S. Batts

HARPER S. BATTS

*Attorneys for Defendants
Advanced Micro Devices, Inc. and
Pensando Systems, Inc.*