

Hopkins, Matt

From: Walters, Chad <chad.walters@bakerbotts.com>
Sent: Monday, June 16, 2025 8:47 AM
To: Ferguson, Brian E.; Hopkins, Matt; Border, Scott; Quarles, Rick
Cc: Grado, Andrew; McDonald, Jacob
Subject: IPR2025-00778 Stipulation
Signed By: chad.walters@bakerbotts.com

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Counsel,

Petitioners stipulate that, if the Patent Trial and Appeal Board institutes trial on U.S. Patent No. 11,959,533 on the grounds presented in the petition in Case No. IPR2025-00778, Petitioners will not pursue an invalidity defense in the related district court action Case No. 4-24-cv-00839 (SDTX) that the patent claims subject to the instituted IPR are invalid based on grounds that were raised or reasonably could have been raised in the IPR.

Regards,

Chad Walters
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