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Subject: Leave to file motions to terminate in IPR2025-00847; IPR2025-01265; IPR2026-00061; IPR2026-00130; IPR2026-00220; IPR2026-00261
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Dear Honorable Board,

I am writing to inform you that Petitioner TSMC and Patent Owner have entered into a settlement agreement that resolves their pending disputes. Based on this agreement, the parties jointly request authorization to file: (1) motions to terminate the above-captioned proceedings pursuant to the settlement agreement, and (2) a request to treat as business confidential information a copy of the settlement agreement to be filed with the motions to terminate. In all of the above-captioned proceedings, TSMC is either the only Petitioner or the only remaining Petitioner, and so the parties believe the proceedings should be terminated. Due to the parties' settlement agreement, please be advised that Petitioner TSMC is not permitted to file its oral argument demonstratives in IPR2025-00847 today, as scheduled. (See Paper 22 at 3.) And the parties also believe the hearing scheduled before the Board in IPR2025-00847 on Wednesday, July 15, should not proceed.

Should the Board require further clarification or discussion, both parties are available for a conference call at your convenience.

Thank you,

Reza Dokhanchy
Counsel for Patent Owner

Reza Dokhanchy
Member

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