September 24, 2025

**<u>VIA ELECTRONIC MAIL</u>**

Jamie McDole, Esq.
Winstead PC
2728 North Harwood Street, Suite 3400
Dallas, TX 75201

Re: *MOSAID Technologies v. Infineon Technologies*, No. 1:25-cv-00358-ADA (W.D. Tex.)
IPR2025-01456, U.S. Patent No. 10,140,028

Counsel:

Infineon Technologies Americas Corp. filed a petition for inter partes review against claims of U.S. Patent No. 10,140,028 (the "'028 patent") on August 29, 2025, and that proceeding has been assigned AIA Review No. IPR2025-01456. If inter partes review is instituted in IPR2025-01456, unless institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon Technologies Americas Corp. and Infineon Technologies AG stipulate that they will not pursue in Civil Action No. 1:25-cv-00436 (W.D. Tex.), against the '028 patent, (i) the specific grounds raised in IPR2025-01456; (ii) any other ground that could have been reasonably raised in IPR2025-01456 under §§ 102 or 103 on the basis of prior art patents or printed publications; (iii) any ground based on a combination of system prior art (i.e., prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2025-01456, or (iv) any ground under §§ 102 or 103 on the basis of system art corresponding to the references that form the basis of any ground raised in IPR2025-01456.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-01456, or if institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon reserves the right to assert any grounds of invalidity in the above-captioned District Court proceeding against U.S. Patent 10,140,028.

Regards,

David M. Hoffman

cc: Counsel of Record



INFINEON 1047
Infineon v. Mosaid
IPR2025-01171

FISH.

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Re: *MOSAID Technologies v. Infineon Technologies*, No. 1:25-cv-00358-ADA (W.D. Tex.)
IPR2025-01487, U.S. Patent No. 9,972,381

Counsel:

Infineon Technologies Americas Corp. filed a petition for inter partes review against claims of U.S. Patent No. 9,972,381 (the "'381 patent") on August 29, 2025, and that proceeding has been assigned AIA Review No. IPR2025-01487. If inter partes review is instituted in IPR2025-01487, unless institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon Technologies Americas Corp. and Infineon Technologies AG stipulate that they will not pursue in Civil Action No. 1:25-cv-00436 (W.D. Tex.), against the '381 patent, (i) the specific grounds raised in IPR2025-01487; (ii) any other ground that could have been reasonably raised in IPR2025-01487 under §§ 102 or 103 on the basis of prior art patents or printed publications; (iii) any ground based on a combination of system prior art (i.e., prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2025-01487, or (iv) any ground under §§ 102 or 103 on the basis of system art corresponding to the references that form the basis of any ground raised in IPR2025-01487.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-01487, or if institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon reserves the right to assert any grounds of invalidity in the above-captioned District Court proceeding against U.S. Patent 9,972,381.

Regards,

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Re: *MOSAID Technologies v. Infineon Technologies*, No. 1:25-cv-00358-ADA (W.D. Tex.)
IPR2025-01489, U.S. Patent No. 7,349,448

Counsel:

Infineon Technologies Americas Corp. filed a petition for *inter partes* review against claims of U.S. Patent No. 7,349,448 (the "'448 patent") on August 29, 2025, and that proceeding has been assigned AIA Review No. IPR2025-01489. If inter partes review is instituted in IPR2025-01489, unless institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon Technologies Americas Corp. and Infineon Technologies AG stipulate that they will not pursue in Civil Action No. 1:25-cv-00358 (W.D. Tex.), against the '448 patent, (i) the specific grounds raised in IPR2025-01489; (ii) any other ground that could have been reasonably raised in IPR2025-01489 under §§ 102 or 103 on the basis of prior art patents or printed publications; (iii) any ground based on a combination of system prior art (i.e., prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2025-01489, or (iv) any ground under §§ 102 or 103 on the basis of system art corresponding to the references that form the basis of any ground raised in IPR2025-01489.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-01489, or if institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon reserves the right to assert any grounds of invalidity in the above-captioned District Court proceeding against U.S. Patent 7,349,448.

Regards,

David M. Hoffman

cc: Counsel of Record