Beyer, Carrie A.

From: Beyer, Carrie A.
Sent: Friday, August 8, 2025 10:01 PM
To: Garland Stephens; 'Richard Koehl'; 'Heng Gong'
Cc: 00066-Dialect-Microsoft; Brzezynski, Lora A.; Rahmeier, Thatcher A.
Subject: Dialect , LLC v. Microsoft

Counsel,

Microsoft Corporation has filed IPR Petitions challenging claims in the following patents: U.S. 7,917,367 (IPR2025-01193); U.S. 7,634,409 (IPR2025-01229); U.S. 7,398,209 (IPR2025-01351); 8,620,659 (IPR2025-01352). For each of these proceedings, Microsoft stipulates as follows:

IPR2025-01193

If the PTAB institutes an IPR (and does not subsequently vacate institution) based on Defendant Microsoft's petition against U.S. Patent No. 7,917,367 (IPR2025-01193), Defendant will not pursue in this litigation against the claims challenged in IPR2025-01193, (i) the specific grounds raised in IPR2025-01193, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground asserting a combination of system prior art with any reference asserted as part of a ground raised in IPR2025-01193, as reflected in the table summarizing the Statutory Grounds for Challenges on page 2 of the Petition; for avoidance of doubt, Microsoft reserves the right to rely on any reference raised in IPR2025-01193 for purposes other than its teachings of specific claim elements, including to show the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

IPR2025-01229

If the PTAB institutes an IPR (and does not subsequently vacate institution) based on Defendant Microsoft's petition against U.S. Patent No. 7,634,409 (IPR2025-01229), Defendant will not pursue in this litigation against the claims challenged in IPR2025-01229, (i) the specific grounds raised in IPR2025-01229, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground asserting a combination of system prior art with any reference asserted as part of a ground raised in IPR2025-01229, as reflected in the table summarizing the Statutory Grounds for Challenges on page 2 of the Petition; for avoidance of doubt, Microsoft reserves the right to rely on any reference raised in IPR2025-01229 for purposes other than its teachings of specific claim elements, including to show the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

IPR2025-01351

If the PTAB institutes an IPR (and does not subsequently vacate institution) based on Defendant Microsoft's petition against U.S. Patent No. 7,398,209 (IPR2025-01351), Defendant will not pursue in this litigation against the claims challenged in IPR2025-01351, (i) the specific grounds raised in IPR2025-01351, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have

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reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground asserting a combination of system prior art with any reference asserted as part of a ground raised in IPR2025-01351, as reflected in the table summarizing the Statutory Grounds for Challenges on page 2 of the Petition; for avoidance of doubt, Microsoft reserves the right to rely on any reference raised in IPR2025-01351 for purposes other than its teachings of specific claim elements, including to show the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

IPR2025-01352

If the PTAB institutes an IPR (and does not subsequently vacate institution) based on Defendant Microsoft's petition against U.S. Patent No. 8,620,659 (IPR2025-01352), Defendant will not pursue in this litigation against the claims challenged in IPR2025-01352, (i) the specific grounds raised in IPR2025-01352, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground asserting a combination of system prior art with any reference asserted as part of a ground raised in IPR2025-01352, as reflected in the table summarizing the Statutory Grounds for Challenges on page 2 of the Petition; for avoidance of doubt, Microsoft reserves the right to rely on any reference raised in IPR2025-01352 for purposes other than its teachings of specific claim elements, including to show the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

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