FISH.

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VIA EMAIL

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Re: Defendant TSMC's stipulation related to *Advanced Integrated Circuit Process LLC v. Taiwan Semiconductor Manufacturing Co.*, No. 2:25-cv-00324-JRG (E.D. Tex.) and related *inter partes* review proceedings

Counsel,

Defendant Taiwan Semiconductor Manufacturing Co. Ltd. ("TSMC") hereby stipulates that:

If in response to any of the petitions filed by TSMC against U.S. Patent Nos.

- 8,884,373 (IPR2025-01302)
- 8,329,572 (IPR2025-01305)
- 7,439,623 (IPR2025-01211, IPR2025-01212)
- 7,632,751 (IPR2025-01210)

the PTAB institutes *inter partes* review and does not subsequently vacate institution

or terminate before Final Written Decision, then TSMC will not pursue against any of the claims challenged in any instituted IPR proceeding identified above, in any pending litigation, the following:

(i) the specific grounds raised in that instituted IPR proceeding;

(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 pre-AIA §§ 102 or 103 on the basis of prior art patents or printed publications); or

(iii) any other invalidity ground under pre-AIA §§ 102 or 103 involving any type of legally recognized prior art, including any patent, printed publication, or system art.

Defendant will inform the Board of this stipulation.

Sincerely,

Karrie Wheatley

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