
IPR2025-01344 and IPR2025-01361

From Modi, Naveen <naveenmodi@paulhastings.com>

Date Thu 8/21/2025 5:42 PM

To Matthew Berkowitz <mberkowitz@reichmanjorgensen.com>; Patrick Colsher <pcolsher@reichmanjorgensen.com>; Khue Hoang <khoang@reichmanjorgensen.com>; Joy Wang <ywang@reichmanjorgensen.com>; Tim Trost <ttrost@reichmanjorgensen.com>; RJ_CardWare_GoogleIPR <RJ_CardWare_GoogleIPR@reichmanjorgensen.com>

Cc PH-Google-Cardware-IPR <PH-Google-Cardware-IPR@paulhastings.com>; Zeilberger, Daniel <danielzeilberger@paulhastings.com>

CAUTION: EXTERNAL SENDER

Counsel,

We write regarding *CardWare Inc. v. Google LLC*, No. 24-cv-278 (W.D. Tex.) (the “District Court Case”) and the related petitions for *inter partes* review in IPR2025-01344, directed to U.S. Patent No. 10,810,579 (“the ’579 patent”) and IPR2025-01361, directed to U.S. Patent No. 11,620,634 (“the ’634 patent”).

1. Petitioner Google LLC hereby stipulates that if the Patent Trial and Appeal Board grants institution of IPR2025-01344, then Google LLC will not assert in the District Court Case that any challenged claim of the ’579 patent is invalid on any ground raised in IPR2025-01344 or any other ground that could have been reasonably raised in IPR2025-01344.
2. Petitioner Google LLC hereby stipulates that if the Patent Trial and Appeal Board grants institution of IPR2025-01361, then Google LLC will not assert in the District Court Case that any challenged claim of the ’634 patent is invalid on any ground raised in IPR2025-01361 or any other ground that could have been reasonably raised in IPR2025-01361.

Very truly yours,
Naveen Modi
Counsel for Petitioner

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. If you reply to this message, Paul Hastings may collect personal information including your name, business name and other contact details, and IP address. For more information about Paul Hastings’ information collection, privacy and security principles please click [HERE](#). If you have any questions, please contact Privacy@paulhastings.com.