

Etters, Brittany Nicole

From: McCraw, Clayton
Sent: Thursday, August 28, 2025 4:34 PM
To: Chris Honea; Randall Garteiser; ghintercurrency@ghiplaw.com
Cc: LaFayette, Shantelle; Etters, Brittany Nicole
Subject: Intercurrency Software LLC v. Airwallex Pty. Ltd., 2:24-cv-1011 (EDTX) - Stipulation as to IPR2025-01446

Counsel,

Today, Airwallex Pty. Ltd. is filing an IPR Petition ("Petition") with the Patent Trial and Appeal Board (PTAB) to challenge the validity of claims 1-16 of U.S. Patent No. 11,620,701 ("the '701 Patent") in IPR2025-01446. Airwallex Pty. Ltd. stipulates that, should the PTAB institute review of the Petition, it would not pursue in this district court litigation any grounds that were raised or reasonably could have been raised in this IPR. Airwallex Pty. Ltd. further stipulates that, should IPR2025-01446 be instituted, Airwallex Pty. Ltd. would not pursue in this district court litigation any invalidity grounds under 35 U.S.C. §§ 102-103 against the '701 Patent—including those grounds with system prior art.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-01446, Airwallex Pty. Ltd. reserves the right to assert any grounds of invalidity in this district court litigation against the '701 Patent.

Regards,
Clayton

B. Clayton McCraw

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