

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SK hynix Inc.
Petitioner

v.

Advanced Memory Technologies, LLC
Patent Owner

IPR2025-01451
Patent No. 7,969,231

PETITIONER'S SOTERA PLUS STIPULATION

Petitioner hereby stipulates that, if the Board institutes *inter partes* review in this proceeding, IPR2025-01451, Petitioner will not pursue in the parallel litigation, *Advanced Memory Technologies, LLC v. SK hynix Inc.*, Case No. 2:24-cv-01078-JRG (E.D. Tex.), (i) the specific grounds raised in IPR2025-01451; (ii) any grounds of invalidity arising under 35 U.S.C. § 102 or § 103 involving only patent or printed publication prior art that could have reasonably been raised before the Board with respect to U.S. Pat. No. 7,969,231, including the same grounds in the Petition (Paper 1); or (iii) any ground based on a combination of system prior art and the references asserted as part of a ground raised in IPR2025-01451, as reflected in the table summarizing the statutory grounds for challenges in Section II of the Petition.

Date: October 15, 2025

By: /s/ James M. Glass

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on October 15, 2025, the foregoing document was served via email on the following counsel of record:

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By: /s/ James M. Glass
James M. Glass (Reg. No. 46729)