FISH.

David Hoffman
Principal
hoffman@fr.com
T: 512 226 8154

Fish & Richardson P.C.
111 Congress Avenue
Suite 2000
Austin, TX 78701

T: 512 472 5070
F: 512 320 8935

July 25, 2025

VIA ELECTRONIC MAIL

Jamie McDole, Esq.
Winstead PC
2728 North Harwood Street, Suite 3400
Dallas, TX 75201

Re: *MOSAID Technologies v. Infineon Technologies*, No. 1:25-cv-00358-ADA (W.D. Tex.)
IPR2025-01171, U.S. Patent No. 7,051,306

Counsel:

Infineon Technologies Americas Corp. filed a petition for *inter partes* review against claims of U.S. Patent No. 7,051,306 (the "'306 patent") on June 20, 2025, and that proceeding has been assigned AIA Review No. IPR2025-01171. If *inter partes* review is instituted in IPR2025-01171, unless institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon Technologies Americas Corp. and Infineon Technologies AG stipulate that they will not pursue in Civil Action No. 1:25-cv-00358 (W.D. Tex.), against the '306 patent, (i) the specific grounds raised in IPR2025-01171; (ii) any other ground that could have been reasonably raised in IPR2025-01171 under §§ 102 or 103 on the basis of prior art patents or printed publications; (iii) any ground based on a combination of system prior art (i.e., prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2025-01171, or (iv) any ground under §§ 102 or 103 on the basis of system art corresponding to the references that form the basis of any ground raised in IPR2025-01171.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-01171, or if institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon reserves the right to assert any grounds of invalidity in the above-captioned District Court proceeding against U.S. Patent 7,051,306.

Regards,

David M. Hoffman

cc: Counsel of Record

David Hoffman
Principal
hoffman@fr.com
T: 512 226 8154

Fish & Richardson P.C.
111 Congress Avenue
Suite 2000
Austin, TX 78701

T: 512 472 5070
F: 512 320 8935

September 24, 2025

VIA ELECTRONIC MAIL

Jamie McDole, Esq.
Winstead PC
2728 North Harwood Street, Suite 3400
Dallas, TX 75201

Re: *MOSAID Technologies v. Infineon Technologies*, No. 1:25-cv-00358-ADA (W.D. Tex.)
IPR2025-01489, U.S. Patent No. 7,349,448

Counsel:

Infineon Technologies Americas Corp. filed a petition for *inter partes* review against claims of U.S. Patent No. 7,349,448 (the "'448 patent") on August 29, 2025, and that proceeding has been assigned AIA Review No. IPR2025-01489. If inter partes review is instituted in IPR2025-01489, unless institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon Technologies Americas Corp. and Infineon Technologies AG stipulate that they will not pursue in Civil Action No. 1:25-cv-00358 (W.D. Tex.), against the '448 patent, (i) the specific grounds raised in IPR2025-01489; (ii) any other ground that could have been reasonably raised in IPR2025-01489 under §§ 102 or 103 on the basis of prior art patents or printed publications; (iii) any ground based on a combination of system prior art (i.e., prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2025-01489, or (iv) any ground under §§ 102 or 103 on the basis of system art corresponding to the references that form the basis of any ground raised in IPR2025-01489.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-01489, or if institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon reserves the right to assert any grounds of invalidity in the above-captioned District Court proceeding against U.S. Patent 7,349,448.

Regards,

David M. Hoffman

cc: Counsel of Record

David Hoffman
Principal
hoffman@fr.com
T: 512 226 8154

Fish & Richardson P.C.
111 Congress Avenue
Suite 2000
Austin, TX 78701

T: 512 472 5070
F: 512 320 8935

September 24, 2025

VIA ELECTRONIC MAIL

Jamie McDole, Esq.
Winstead PC
2728 North Harwood Street, Suite 3400
Dallas, TX 75201

Re: *MOSAID Technologies v. Infineon Technologies*, No. 1:25-cv-00358-ADA (W.D. Tex.)
IPR2025-01487, U.S. Patent No. 9,972,381

Counsel:

Infineon Technologies Americas Corp. filed a petition for inter partes review against claims of U.S. Patent No. 9,972,381 (the "'381 patent") on August 29, 2025, and that proceeding has been assigned AIA Review No. IPR2025-01487. If inter partes review is instituted in IPR2025-01487, unless institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon Technologies Americas Corp. and Infineon Technologies AG stipulate that they will not pursue in Civil Action No. 1:25-cv-00436 (W.D. Tex.), against the '381 patent, (i) the specific grounds raised in IPR2025-01487; (ii) any other ground that could have been reasonably raised in IPR2025-01487 under §§ 102 or 103 on the basis of prior art patents or printed publications; (iii) any ground based on a combination of system prior art (i.e., prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2025-01487, or (iv) any ground under §§ 102 or 103 on the basis of system art corresponding to the references that form the basis of any ground raised in IPR2025-01487.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-01487, or if institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Infineon reserves the right to assert any grounds of invalidity in the above-captioned District Court proceeding against U.S. Patent 9,972,381.

Regards,

David M. Hoffman

cc: Counsel of Record