From: David Hoffman
Sent: Friday, September 19, 2025 4:11 PM
To: McDole, Jamie; Teng, Austin; Haghighatian, Nadia
Cc: Oliver Richards; David Hoffman
Subject: Efficiency Proposal re MOSAID v. Infineon

Counsel,

In the hope of reducing the workload on the Courts, the PTAB, and the parties, and in view of the considerable redundancy in Accused Products against the number of Asserted Patents, Infineon proposes that the parties agree to streamline their dispute. In particular, Infineon offers to terminate each of its filed IPR petitions (and commit to file no additional post-grant challenges for any current Asserted Patent) in exchange for MOSAID reducing each of its two pending district court cases to one patent each (and agreeing to not reassert dismissed patents in another case). MOSAID can elect to retain whichever patent it would like in each case. MOSAID can clearly cover essentially the same scope of Accused Products with only two patents.

Simply put, if MOSAID is willing to focus its cases, Infineon is willing to defend itself solely in the district court. This consolidated approach will save time, conserve resources, and avoid jury confusion from presenting multiple patents on complex semiconductor technology against the same Accused Product. MOSAID, meanwhile, will retain control of selecting the specific patent and claims that go to trial.

Please let us know before September 26th if MOSAID is amenable.

Regards,

David Hoffman

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IPR2025-01456