
IPR2025-01513 and IPR2025-01514

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Date Thu 9/4/2025 5:57 PM

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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 IPR2025-01513, directed to U.S. Patent No. 10,339,520 (“the ’520 patent”) and IPR2025-01514, directed to U.S. Patent No. 11,176,538 (“the ’538 patent”).

1. Petitioner Google LLC hereby stipulates that if the Patent Trial and Appeal Board grants institution of IPR2025-01513, then Google LLC will not assert in the District Court Case that any challenged claim of the ’520 patent is invalid on any ground raised in IPR2025-01513 or any other ground that could have been reasonably raised in IPR2025-01513.
2. Petitioner Google LLC hereby stipulates that if the Patent Trial and Appeal Board grants institution of IPR2025-01514, then Google LLC will not assert in the District Court Case that any challenged claim of the ’538 patent is invalid on any ground raised in IPR2025-01514 or any other ground that could have been reasonably raised in IPR2025-01514.

Very truly yours,
Naveen Modi
Counsel for Petitioner

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