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VIA EMAIL

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Re: *Resonac Hard Disk Corporation et al v. MR Technologies GmbH, Case No. 3:25-cv-08631(N. Cal.) and IPR2026-00015*

Dear Counsel:

I write regarding the above-captioned litigation (the “District Court Case”), and the related petition for *inter partes* review in IPR2026-00015 (the “IPR”) that was filed October 8, 2025 against certain claims of U.S. Patent No. 11,138,997 (the “’997 Patent”).

Petitioners Resonac Hard Disk Corporation and Resonac Corporation (collectively “Resonac”) hereby stipulate that if the Patent Trial and Appeal Board (PTAB) institutes the IPR (and that institution is not subsequently vacated), then, upon institution, Resonac will not pursue, against the ’997 Patent, in the District Court Case any ground of invalidity based on patents or printed publications that was raised or reasonably could have been raised in the IPR (i.e., any ground that could be raised under §§ 102 and 103 based on prior art patents or printed publications), including but not limited to the grounds identified below.

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RESONAC HARD DISK CORPORATION and RESONAC CORPORATION

Exhibit 1037

Page 1 of 2

Ground	Prior Art	Statutory Basis	Claims Challenged from U.S. Patent No. 11,138,997
1	Takenoiri	§ 103	1-2, 5-7
2	Takenoiri, Li	§ 103	4, 9

If the PTAB denies institution in the IPR, or if institution is subsequently vacated, Petitioners reserve the right to raise any grounds of invalidity in the District Court Case.

Sincerely,

/ Dion M. Bregman /
Dion M. Bregman