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June 18, 2026

VIA E-MAIL

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Cc: Jason S. Charkow, Lisa N. Phillips, Scott R. Samay, Stephanie R. Mandir, Taylor G. Lepore, Stephen McBride, Raymond W. Mort, III

Re: ***Fermat International, Inc. v. Advanced Micro Devices, Inc.*, Case No. 7:26-cv-00011 (W.D. Tex.)**

Dear Counsel:

As you know, Petitioner, Advanced Micro Devices, Inc. ("AMD"), filed a petition for *inter partes* review against claims of U.S. Patent No. 11,886,750 (the "'750 patent") on May 12, 2026, and that proceeding has been assigned AIA Review No. IPR2026-00358.

If *inter partes* review is instituted in IPR2026-00358, and unless institution is later vacated or reversed, or IPR2026-00358 is otherwise terminated or de-instituted by the Board or the Director, AMD stipulates to not pursue any of the following grounds in any district court or ITC action against the '750 patent:

(i) Grounds 1A–2B of IPR2026-00358;[1]

(ii) Any other ground that could have been reasonably raised in IPR2026-00358 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 nor printed publication) and the references that form the basis of Grounds 1A–2B of IPR2026-00358 (i.e., the Dalal, Ng, Raghava, Heil, and Jun references); or

(iv) Any ground under §§ 102 or 103 on the basis of system art mirroring the references that form the basis of Grounds 1A–2B of IPR2026-00358 (i.e., the Dalal, Ng, Raghava, Heil, and Jun references).

For the sake of clarity and to avoid any doubt, if the Board or the Director declines to institute IPR2026-00358, or if institution is later vacated or reversed, or if IPR2026-00358 is otherwise

[1] [1] Grounds 1A–2B of IPR2026-00358 and the references that form the basis of those Grounds are provided in Appendix A.

terminated or de-instituted by the Board or the Director for any reason other than by an appealable final decision, AMD reserves the right to assert any grounds of invalidity in any future proceeding against the ’750 patent.

Sincerely,

David M. Hoffman

Matthew P. Mosteller

Attorneys for Advanced Micro Devices, Inc.

Appendix A – Grounds and Prior Art References Used in IPR2026-00358

ID	Claims	Prior Art Basis Under §103
1A	1–2, 5–9	Dalal-Ng
1B	3–4	Dalal-Ng-Raghava
2A	1–3, 5–8	Heil-Jun
2B	4, 9	Heil-Jun-Raghava

List of References

Reference	Details
Dalal-(AMD1004)	U.S. Publication No. 2019/0109793 ("Dalal")
Ng-(AMD1005)	U.S. Publication No. 2019/0114538 ("Ng")
Raghava-(AMD1006)	U.S. Publication No. 2019/0108145 ("Raghava")
Heil-(AMD1010)	U.S. Publication No. 2016/0306668 ("Heil")
Jun-(AMD1011)	Jun et al. "BlueDBM: An Appliance for Big Data Analytics" ACM (June 13, 2015) ("Jun")