

---

**From:** Mar, Eugene (22) x4927  
**Sent:** Friday, July 03, 2020 9:49 AM  
**To:** John Lord; Deepali A. Brahmbhatt; 'Kevin Terrazas'  
**Cc:** Liaw, Winston (19) x4497; Chanana, Sushila (19) x4472; Dacus, Deron  
**Subject:** SynKloud Techs. v. Adobe Inc., No. 6:19-cv-00527 (W.D. Tex.)

Counsel:

Adobe is filing today a petition for inter partes review of claims 9-15 of the '254 Patent. If review is instituted based on this petition, Adobe stipulates that it will not pursue in the related district court action (Case No. 6:19-cv-00527, W.D. Tex.) any grounds for unpatentability of the challenged claims of the '254 Patent raised in this IPR or that reasonably could have been raised in this IPR. To be clear, this stipulation is contingent on, and applies only if, the PTAB institutes review of the petition we are filing today.

Sincerely,

Eugene

**Eugene Y. Mar**  
*Partner*  
[emar@fbm.com](mailto:emar@fbm.com)  
415.954.4927

 **FARELLA BRAUN + MARTEL LLP**

Russ Building  
235 Montgomery Street  
San Francisco / CA 94104

T 415.954.4400  
F 415.954.4480  
[www.fbm.com](http://www.fbm.com)