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Subject: [EXTERNAL] Stipulation Regarding IPRs
Date: Wednesday, December 2, 2020 3:40:28 PM
Attachments: [image001.png](#)

EXTERNAL

Counsel,

Medtronic stipulates that, if IPR2020-01453 is instituted on the grounds presented in the IPR2020-01453 Petition, then Petitioner will not pursue any invalidity defense for the '294 patent based in whole or in part on any of the references in those grounds (i.e., U.S. Patent Nos. 6,425,916; 5,957,949; 6,440,164; 6,077,295; 7,025,780; and 5,713,950 and WIPO publication WO 00/15147). Medtronic further stipulates that, if IPR2020-01454 is instituted on the grounds presented in the IPR2020-01454 Petition, then Petitioner will not pursue any invalidity theory for the '739 patent based in whole or in part on any of the references in those grounds (i.e., U.S. Patent Nos. 6,425,916; 5,957,949; 5,840,081; 6,077,295; 7,025,780; and 5,961,549 and WIPO publication WO 00/15147).

Best wishes,

James M. Heintz

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