

**From:** Tony Nguyen <nguyen@fr.com>  
**Sent:** Tuesday, October 11, 2022 8:19 AM  
**To:** Netlist-Samsung-E.D.Tex@irell.com; jtruelove@mckoolsmith.com; Sam Baxter  
**Cc:** Samsung-Netlist-FISH; EXT Smith, Melissa (T-Mobile)  
**Subject:** Netlist/Samsung: Stipulation re: IPR2022-00996 (U.S. Patent No. 11,016,918) for Netlist v. Samsung, No. 21-463-JRG (E.D. Tex.)

[EXTERNAL EMAIL]

Counsel,

Samsung stipulates that, if the Patent Trial and Appeal Board institutes an IPR proceeding for U.S. Patent No. 11,016,918 on the grounds presented in Samsung's petition in IPR2022-00996, Samsung will not pursue an invalidity defense in the Eastern District of Texas action (C.A. No. 21-463-JRG) that the patent claims subject to the instituted IPR are invalid based on grounds that were raised or reasonably could have been raised in the IPR.

Thanks,  
Tony

**Tony Nguyen :: Fish & Richardson P.C. :: 713 654 5342**

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