

Exhibit B

From: Karambelas, Matthew
Sent: Thursday, August 11, 2022 12:34 PM
To: Benson, Robert; Rizk, Adam; Blake@TheMannFirm.com; Mark@TheMannFirm.com
Cc: Eric Findlay; Brian Craft; De Renzis, Megan; Renaud, Michael; Davenport, Samuel; Debby Gunter; Sarah Hene
Subject: RE: 2:22-cv-00134: E.D. Tex.

Hi Robert,

Thank you for your email. Whether Realtek or its counsel agree not to assist TCL in subsequently defending AMD's claims against TCL in this E.D. Tex. case (following any rulings in this case or the ITC case) directly relates to AMD's pending motion for stay, and Realtek's arguments made in Dkt. No. 43 that it is AMD, not Realtek, who is seeking multiple opportunities to re-litigate issues. As you are aware, in a prior ITC case following termination of Realtek in the ITC, Realtek's outside counsel filed an appearance for TCL. We would like to know whether Realtek will aid in TCL's defense in any way in the E.D. Tex. case, and thus would be seeking opportunities to re-litigate issues through TCL if Realtek loses those issues in prior proceedings (including in this case which Realtek is asking Court to move forward). Please let us know Realtek's position or if Realtek is willing to provide a position.

Best regards,

Matt

Matthew Karambelas
Associate

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
One Financial Center, Boston, MA 02111
+1.617.348.1831
MAKarambelas@mintz.com | [Mintz.com](https://www.mintz.com)



From: Benson, Robert <rbenson@orrick.com>
Sent: Thursday, August 11, 2022 10:28 AM
To: Karambelas, Matthew <MAKarambelas@mintz.com>; Rizk, Adam <ARizk@mintz.com>; Blake@TheMannFirm.com; Mark@TheMannFirm.com
Cc: Eric Findlay <efindlay@findlaycraft.com>; Brian Craft <bcraft@findlaycraft.com>; De Renzis, Megan <MADeRenzis@mintz.com>; Renaud, Michael <MTRenaud@mintz.com>; Davenport, Samuel <SFDavenport@mintz.com>; Debby Gunter <dgunter@findlaycraft.com>; Sarah Hene <shene@findlaycraft.com>
Subject: RE: 2:22-cv-00134: E.D. Tex.

Matt,

We have been considering your correspondence. Unfortunately, we do not understand your question, or the reason for

relevance to any pending issue or motion, and cite any relevant precedent, it may help us better understand your request and respond further.

Best regards,
Robert

From: Karambelas, Matthew <MAKarambelas@mintz.com>
Sent: Tuesday, August 09, 2022 5:21 PM
To: Rizk, Adam <ARizk@mintz.com>; Benson, Robert <rbenson@orrick.com>; Blake@TheMannFirm.com;
Mark@TheMannFirm.com
Cc: Eric Findlay <efindlay@findlaycraft.com>; Brian Craft <bcraft@findlaycraft.com>; De Renzis, Megan <MADeRenzis@mintz.com>; Renaud, Michael <MTRenaud@mintz.com>; Davenport, Samuel <SFDavenport@mintz.com>; Debby Gunter <dgunter@findlaycraft.com>; Sarah Hene <shene@findlaycraft.com>
Subject: RE: 2:22-cv-00134: E.D. Tex.

Counsel for Realtek,

Please confirm whether, if any rulings (including on validity, infringement on Realtek chips, and infringement on GPUs) in this E.D. Tex. action or the -1318 ITC case occur prior to the E.D. Tex. case here proceeding against TCL, Realtek and its counsel agree not to assist TCL in subsequently defending AMD's claims against TCL in this E.D. Tex. case.

Best regards,

Matt

Matthew Karambelas
Associate

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From: Rizk, Adam <ARizk@mintz.com>
Sent: Thursday, August 4, 2022 2:53 PM
To: Benson, Robert <rbenson@orrick.com>; Karambelas, Matthew <MAKarambelas@mintz.com>;
Blake@TheMannFirm.com; Mark@TheMannFirm.com
Cc: Eric Findlay <efindlay@findlaycraft.com>; Brian Craft <bcraft@findlaycraft.com>; De Renzis, Megan <MADeRenzis@mintz.com>; Renaud, Michael <MTRenaud@mintz.com>; Davenport, Samuel <SFDavenport@mintz.com>; Debby Gunter <dgunter@findlaycraft.com>; Sarah Hene <shene@findlaycraft.com>
Subject: RE: 2:22-cv-00134: E.D. Tex.

Robert,

We understand Realtek's position.

AMD does not agree to Realtek's proposed stipulation, but is open to discussing other potential stipulations to promote efficiencies after the discretionary stay is lifted, such as, for example reuse of ITC document productions, contentions, expert reports, fact/expert testimony, etc.

At a minimum even absent stipulation, and as you are aware, there are procedures available for promoting efficiencies after the stay has been lifted, such as requesting transfer of the Commission record and/or seeking discovery with respect to relevant material generated in the course of the ITC proceeding, but that are not technically part of the Commission record.

Kind regards,
Adam

From: Benson, Robert <rbenson@orrick.com>
Sent: Thursday, August 4, 2022 11:09 AM
To: Rizk, Adam <ARizk@mintz.com>; Karambelas, Matthew <MAKarambelas@mintz.com>; Blake@TheMannFirm.com; Mark@TheMannFirm.com
Cc: Eric Findlay <efindlay@findlaycraft.com>; Brian Craft <bcraft@findlaycraft.com>; De Renzis, Megan <MADeRenzis@mintz.com>; Renaud, Michael <MTRenaud@mintz.com>; Davenport, Samuel <SFDavenport@mintz.com>; Debby Gunter <dgunter@findlaycraft.com>; Sarah Hene <shene@findlaycraft.com>
Subject: RE: 2:22-cv-00134: E.D. Tex.

Adam,

Your assumption is not correct. AMD is seeking a stay of the district court litigation, not Realtek. There is no rationale for "reciprocity."

In connection with its motion for a stay of the district court case, we are asking AMD if it will stipulate to be bound by any final determination by the Commission in the 1318 investigation that Realtek products do not infringe the '053, '547, '381 or '628 patents, any final determination by the Commission that any claims of those patents are invalid, and any other determination adverse to AMD related to the merits of the claims and defenses asserted in the 1318 investigation.

Best regards,
Robert

From: Rizk, Adam <ARizk@mintz.com>
Sent: Thursday, August 04, 2022 8:04 AM
To: Benson, Robert <rbenson@orrick.com>; Karambelas, Matthew <MAKarambelas@mintz.com>; Blake@TheMannFirm.com; Mark@TheMannFirm.com
Cc: Eric Findlay <efindlay@findlaycraft.com>; Brian Craft <bcraft@findlaycraft.com>; De Renzis, Megan <MADeRenzis@mintz.com>; Renaud, Michael <MTRenaud@mintz.com>; Davenport, Samuel <SFDavenport@mintz.com>; Debby Gunter <dgunter@findlaycraft.com>; Sarah Hene <shene@findlaycraft.com>
Subject: RE: 2:22-cv-00134: E.D. Tex.

Robert,

I presume that what Realtek is proposing is reciprocity where both AMD/Realtek will stipulate to be bound by any final determination by the Commission in the 1318 investigation that Realtek products infringe or do not infringe the '053, '547, '381 or '628 patents, any final determination by the Commission that any claims of those patents are valid or

invalid, and any other determination adverse to AMD/Realtek related to the merits of the claims and defenses asserted in the 1318 investigation.

Please confirm that this is what you mean so we can take the proposal to our client and get you a response.

Regards,
Adam

From: Benson, Robert <rbenson@orrick.com>
Sent: Thursday, August 4, 2022 10:47 AM
To: Karambelas, Matthew <MAKarambelas@mintz.com>; Blake@TheMannFirm.com; Mark@TheMannFirm.com
Cc: Eric Findlay <efindlay@findlaycraft.com>; Brian Craft <bcraft@findlaycraft.com>; De Renzis, Megan <MADeRenzis@mintz.com>; Rizk, Adam <ARizk@mintz.com>; Renaud, Michael <MTRenaud@mintz.com>; Davenport, Samuel <SFDavenport@mintz.com>; Debby Gunter <dgunter@findlaycraft.com>; Sarah Hene <shene@findlaycraft.com>
Subject: RE: 2:22-cv-00134: E.D. Tex.

Eric and Matt,

In connection with AMD's current motion to stay, please advise whether AMD will stipulate to be bound by any final determination by the Commission in the 1318 investigation that Realtek products do not infringe the '053, '547, '381 or '628 patents, any final determination by the Commission that any claims of those patents are invalid, and any other determination adverse to AMD related to the merits of the claims and defenses asserted in the 1318 investigation.

Best regards,

Robert

From: Karambelas, Matthew <MAKarambelas@mintz.com>
Sent: Wednesday, July 20, 2022 1:55 PM
To: Blake@TheMannFirm.com; Mark@TheMannFirm.com; Benson, Robert <rbenson@orrick.com>
Cc: Eric Findlay <efindlay@findlaycraft.com>; Brian Craft <bcraft@findlaycraft.com>; De Renzis, Megan <MADeRenzis@mintz.com>; Rizk, Adam <ARizk@mintz.com>; Renaud, Michael <MTRenaud@mintz.com>; Davenport, Samuel <SFDavenport@mintz.com>; Debby Gunter <dgunter@findlaycraft.com>; Sarah Hene <shene@findlaycraft.com>
Subject: RE: 2:22-cv-00134: E.D. Tex.

Hi Mark, Blake, and Robert,

Based on your call with Eric last week, AMD understands that Realtek stated it would oppose a motion by AMD for discretionary stay of the 2:22-cv-00134 action pending the proceedings in the -1318 ITC Investigation. Please let us know as soon as possible if that is not the case. We note that TCL has confirmed it will be filing a mandatory stay motion in this action.

Best regards,

Matt

Matthew Karambelas

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