

From: [Zeilberger, Daniel](#)
To: [parmenio@cahill.com](#); [ctracyjames@cahill.com](#); [jstookey@cahill.com](#); [cmangiaratti@cahill.com](#)
Cc: [Modi, Naveen](#); [Dittmann, Eric W.](#); [Ashkenazi, Isaac S.](#); [Mays-Williams, Ashley](#); [Wolfe, Michael](#); [Meuth, Ryan](#); [Taylor, Amanda](#); [PH-Xencor-Merus-IPR](#)
Subject: IPR2025-00604 and IPR2025-00605
Date: Wednesday, April 30, 2025 8:17:32 PM
Attachments: [image001.png](#)

Counsel,

We write regarding *Merus N.V. v. Xencor, Inc.*, No. 24-913-CFC (D. Del.) (the “District Court Case”) and the related petitions for *inter partes* review in IPR2025-00604 and IPR2025-00605.

1. Petitioner Xencor, Inc. hereby stipulates that if the Patent Trial and Appeal Board grants institution of IPR2025-00604, then Xencor, Inc. will not pursue in the District Court Case any ground raised in IPR2025-00604 or any other ground that could have been reasonably raised in IPR2025-00604.
2. Petitioner Xencor, Inc. hereby stipulates that if the Patent Trial and Appeal Board grants institution of IPR2025-00605, then Xencor, Inc. will not pursue in the District Court Case any ground raised in IPR2025-00605 or any other ground that could have been reasonably raised in IPR2025-00605.

Very truly yours,

Dan



Daniel Zeilberger | Partner, Litigation Department

Paul Hastings LLP | 2050 M Street NW, Washington, DC 20036 | Direct: +1.202.551.1993 |
Main: +1.202.551.1700 | Fax: +1.202.551.0493 | danielzeilberger@paulhastings.com |
www.paulhastings.com