

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

PALISADE TECHNOLOGIES, LLP,

*Plaintiff,*

v.

MICRON TECHNOLOGY, INC. and  
MICRON SEMICONDUCTOR  
PRODUCTS, INC.

*Defendants.*

Case No. 7:24-cv-00262-DC-DTG

**Jury Trial Demanded**

**NOTICE OF DEFENDANTS' STIPULATION REGARDING INVALIDITY  
CHALLENGES**

Defendants Micron Technology, Inc. and Micron Semiconductor Products, Inc. (collectively, “Defendants”) hereby stipulate as follows.

WHEREAS, on May 30, 2025, Defendants filed a petition with the Patent Trial and Appeal Board of the United States Patent and Trademark Office (“PTAB”) for *Inter Partes* Review (“IPR”) of claims 1-7, 13-14, and 17-19 of U.S. Patent No. 9,281,314 (“the ’314 Patent”) in IPR No. IPR2025-01009. The claims challenged in the identified petition include every claim of the ’314 Patent that is asserted against Defendants in this litigation;

WHEREAS, on May 30, 2025, Defendants filed a petition with the PTAB requesting IPR of claims 1-2, 4-8, 16-17, 20-21, and 23-27 of U.S. Patent No. 8,327,051 (“the ’051 Patent”) in IPR No. IPR2025-01008. The claims challenged in the identified petition include every claim of the ’051 Patent that is asserted against Defendants in this litigation.

THEREFORE, Defendants notify the Court and Plaintiff Palisade Technologies, LLP (“Plaintiff”) that Defendants are submitting the following stipulations in connection with the ’314 Patent in IPR2025-01009. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020) (“Sotera”). These stipulations “ensure that these IPR proceedings would be a ‘true alternative’ to the district court proceeding.” *See Motorola Solutions Inc. v. Stellar, LLC*, IPR2024-01208, Paper 19 at 3-4 (PTAB Mar. 28, 2025).

If the PTAB institutes the pending IPR in IPR2025-01009 (and does not subsequently vacate institution), Defendants will not pursue as to the challenged claims any ground raised or that could have been reasonably raised in the IPR in the above-captioned district court case (WDTX Case No. 7:24-cv-00262-DC-DTG). *See Sotera*, IPR2020-01019, Paper 12 at 16-19.

If the PTAB institutes the pending IPR in IPR2025-01008 (and does not subsequently vacate institution), Defendants will not pursue as to the challenged claims any ground raised or

that could have been reasonably raised in the IPR in the above-captioned district court case (WDTX Case No. 7:24-cv-00262-DC-DTG). *See Sotera*, IPR2020-01019, Paper 12 at 16-19.

For the avoidance of doubt, if institution is denied (or subsequently vacated) for IPR2025-01009 or IPR2025-01008, Defendants reserve the right to pursue the grounds of the denied petition, or any other prior art invalidity grounds, in this litigation.

Dated: August 13, 2025

Respectfully submitted,

*/s/ John Kappos*

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**O'MELVENY & MYERS LLP**

John Kappos (TX #24130097)  
jkappos@omm.com  
Timothy S. Durst (TX #00786924)  
tdurst@omm.com  
2501 North Harwood Street, Suite 1600  
Dallas, TX 75201  
Telephone: (972) 360-1900  
Facsimile: (972) 360-1901

Xin-Yi Zhou (TX #24127916)  
vzhou@omm.com  
400 South Hope Street, Suite 1900  
Los Angeles, CA 90071  
Telephone: (213) 430-6000  
Facsimile: (213) 430-6407

Brad Berg (admitted *pro hac vice*)  
bberg@omm.com  
610 Newport Center Drive, 17th Floor  
Newport Beach, CA 92660  
Telephone: (949) 823-6900  
Facsimile: (949) 823-6994

Khanh Leon (TX #24120972)  
kleon@omm.com  
1625 Eye Street, NW  
Washington, DC 20006  
Telephone: (202) 383-5300  
Facsimile: (202) 383-5414

**SLAYDEN GRUBERT BEARD PLLC**

Darryl J. Adams (TX #00796101)  
dadams@sbgfirm.com  
401 Congress Avenue, Suite 1650  
Austin, Texas 78701  
Telephone: (512) 402-3562  
Facsimile: (512) 402-6865

*Attorneys for Defendants Micron Technology, Inc.  
and Micron Semiconductor Products, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on August 13, 2025. Any other counsel of record will be served by facsimile transmission, e-mail and/or first class mail.

*/s/ John Kappos* \_\_\_\_\_