



**Karrie Wheatley**  
Principal  
wheatley@fr.com  
T: 713 654 5361

Fish & Richardson P.C.  
909 Fannin St.  
Suite 2100  
Houston, TX 77010  
T: 713 654 5300  
F: 713 652 0109

July 17, 2025

**VIA EMAIL**

Justin Nelson  
[jnelson@susmangodfrey.com](mailto:jnelson@susmangodfrey.com)  
Susman Godfrey LLP  
1000 Louisiana Street, Suite 5100  
Houston, Texas 77002

Mark Hannemann (pro hac vice)  
[mark.hannemann@troutman.com](mailto:mark.hannemann@troutman.com)  
Troutman Pepper Locke LLP  
200 Vesey St., 20th floor  
New York, NY 10281

Russell A. Chorush  
[rchorush@hpcllp.com](mailto:rchorush@hpcllp.com)  
Heim, Payne & Chorush, LLP  
609 Main Street, Suite 3200  
Houston, TX 77002

Tim Tingkang Xia, Ph.D.  
[Tim.xia@troutman.com](mailto:Tim.xia@troutman.com)  
Troutman Pepper Locke LLP  
600 Peachtree Street, N.E., Suite 3000  
Atlanta, GA 30308

**Re: Defendant TSMC's stipulation related to *Advanced Integrated Circuit Process LLC v. Taiwan Semiconductor Manufacturing Co.*, No. 2:24-cv-00623-JRG (E.D. Tex.) and related *inter partes* review proceedings**

Counsel,

Defendant Taiwan Semiconductor Manufacturing Co. Ltd. ("TSMC") hereby stipulates that:

If either:

(a) in response to any of the petitions filed by TSMC against U.S. Patent Nos.

- 8,198,686 (IPR2025-00682),
- 8,907,425 (IPR2025-00683),
- 7,579,227 (IPR2025-00828),
- 7,923,764 (IPR2025-00829)
- 8,253,180 (IPR2025-00830),
- 8,587,076 (IPR2025-00831), or



Justin Nelson, et al.

Page 2

- 8,796,779 (IPR2025-00832),

the PTAB institutes *inter partes* review and does not subsequently vacate institution,

or

(b) in response to any of United Microelectronics Corporation's ("UMC") petitions against U.S. Patent Nos.

- 8,198,686 (IPR2025-01091),
- 8,907,425 (IPR2025-01090),
- 7,579,227 (IPR2025-01076),
- 7,923,764 (IPR2025-01079)
- 8,253,180 (IPR2025-01092),
- 8,587,076 (IPR2025-01093), or
- 8,796,779 (IPR2025-01053),

the PTAB institutes *inter partes* review, which is not subsequently vacated or terminated before Final Written Decision,

then

TSMC will not pursue against any of the claims challenged in any instituted IPR proceeding identified above, in any pending litigation, the following:

- (i) the specific grounds raised in that instituted IPR proceeding;
- (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under pre-AIA §§ 102 or 103 on the basis of prior art patents or printed publications); or
- (iii) any other invalidity ground under pre-AIA §§ 102 or 103 involving any type of legally recognized prior art, including any patent, printed publication, or system art.

Defendant will inform the Board of this stipulation.

Sincerely,

*Karrie Wheatley*

Karrie Wheatley