

TSMC, et al. v. MYW Semitech IPRs: Petitioners' Stipulation (IPRs 2026-00065, -00066, -00067)



Jennifer Bailey

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Counsel -

I am writing regarding the above-referenced IPRs. This email provides Petitioners' stipulation for each of the IPRs. Please note that we will also file this email as an exhibit with the Board in each of the IPRs.

Petitioners' Stipulation:

With respect to each of IPR2026-00065 challenging the claims of the '768 Patent, IPR2026-00066 challenging the claims of the '763 Patent, and IPR2026-00067 challenging the claims of the '306 Patent, if the respective IPR is instituted and institution is not later vacated, Petitioners TSMC and Apple hereby stipulate that they will not assert in any district court proceeding that any claim challenged in the respective instituted IPR proceeding is invalid on any ground that Petitioners raised or reasonably could have raised during the respective *inter partes* review.

Please let me know if any questions.

Thanks,

Jennifer

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