

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VLSI TECHNOLOGY LLC,)
)
Plaintiff,) No. 18-966-CFC-CJB
v.)
)
INTEL CORPORATION,)
)
Defendant.)
_____)

STIPULATION OF DISMISSAL

Whereas, U.S. Patent Nos. 6,212,633, 7,246,027, 7,247,552, 7,523,331, and 8,081,026 are collectively the “Asserted Patents” in the above-captioned Action;

Whereas, Plaintiff VLSI Technology LLC (“VLSI”) and Defendant Intel Corporation (“Intel”) (each a “Party,” and together, the “Parties”) seek to permanently resolve all disputes concerning Intel or Intel technology with respect to the Asserted Patents; and

Whereas, the Parties have agreed to dismissal of claims and counterclaims asserted in this action on the basis described below;

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the Parties hereby jointly stipulate as follows:

That all counts of VLSI’s complaint, including amendments, are dismissed with prejudice;

That all counts of Intel’s counterclaims, including amendments, are dismissed without prejudice;

That all defenses to the Parties’ claims and counterclaims are dismissed without prejudice;

That VLSI has granted to Intel, its affiliates and their respective former, current and future suppliers and customers under the Asserted Patents a certain covenant not to sue (the “Covenant Not To Sue”);

That neither party is paying any amount to the other party;

That this stipulation is entered voluntarily, and neither the fact of the stipulation or the Covenant Not To Sue, nor anything contained herein or in the Covenant Not To Sue, constitutes, or shall be construed as, an explicit or implied admission or evidence relating to any issue associated with the Action;

That, unless otherwise further ordered by the Court, neither party shall file additional briefing in this Action, including the supplemental briefing with respect to the Court’s April 19, 2022 Standing Order and related matters that would otherwise be due on January 13, 2023;

That each Party will bear its own attorneys’ fees and costs incurred in connection with the Action; and

That any disputes between the Parties regarding the Asserted Patents, the Covenant Not To Sue or this Stipulation shall be litigated solely in the United States District Court for the District of Delaware.

Dated: December 27, 2022 SO STIPULATED AND AGREED.

FARNAN LLP

/s/ Brian E. Farnan

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