IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

MOJO MOBILITY INC. Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	§ § § § § § § § § § § §	Civil Action No. 2:22-CV-00398-JRG-RSP JURY TRIAL DEMANDED

NOTICE REGARDING RELATED *INTER PARTES* REVIEW PROCEEDINGS

SAMSUNG EXHIBIT 1203
Samsung Electronics Co, Ltd. v. Mojo Mobility Inc.
IPR2023-01091

Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively, "Samsung") write to provide notice to the Court of certain stipulations that Samsung is contemporaneously making to the Patent Trial and Appeals Board ("PTAB") in the below-listed *inter partes* review ("IPR") proceedings involving Petitioner Samsung Electronics Co. Ltd. and Patent Owner Mojo Mobility Inc. Samsung intends those stipulations to bind it in this case.

IPR Proceeding No.	Patent No.
IPR2023-01086	7,948,208
IPR2023-01087	8,577,440
IPR2023-01088	8,577,440
IPR2023-01089	11,292,349
IPR2023-01090	11,292,349
IPR2023-01091	11,201,500
IPR2023-01092	11,201,500
IPR2023-01093	11,201,500
IPR2023-01094	11,316,371
IPR2023-01095	11,316,371
IPR2023-01096	11,316,371
IPR2023-01097	11,316,371
IPR2023-01098	11,462,942
IPR2023-01099	11,462,942
IPR2023-01100	11,462,942
IPR2023-01124	11,462,942
IPR2023-01101	11,342,777
IPR2023-01102	11,342,777

Each of the patents at issue in the above-listed IPR proceedings is also asserted against Samsung in this case. *See generally* Dkt. 34 (Amended Complaint). Samsung seeks to avoid multiple proceedings addressing the validity of each of the asserted patents based on the same prior art references. As such, Samsung represents both here and in its contemporaneous stipulations to the PTAB that for each of the IPR proceedings identified above, if that IPR is instituted, Samsung will not pursue an invalidity defense under 35 U.S.C. §§ 102 or 103 in this case with respect to the claims challenged in that particular instituted IPR proceeding based on (i) any of the same instituted grounds or (ii) any prior art reference that forms the basis of any instituted ground in the

respective IPR. For the avoidance of doubt, should any IPR not be instituted, Samsung reserves the right to pursue in this case any invalidity defenses based on the same grounds or the same prior art for the claims challenged in that non-instituted IPR.

DATED: December 1, 2023

Respectfully submitted,

By: */s/ Allan M. Soobert*

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on December 1, 2023. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Allan M. Soobert
Allan M. Soobert