

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner,

v.

COBBLESTONE WIRELESS, LLC,
Patent Owner.

IPR2024-00317
Patent 8,554,196

**PATENT OWNER'S RESPONSE TO
PETITIONER'S MOTION FOR JOINDER**

The Board authorized this filing during the hearing on June 5, 2024 for Patent Owner to provide its response to Samsung's Motion for Joinder of this Samsung IPR2024-00317 with the Carrier's IPR2024-00135. Paper 8. The "Carriers" T-Mobile USA, Inc., AT&T Services Inc., AT&T Corp., AT&T Mobility LLC, and Cellco Partnership (Verizon Wireless) are real parties in interest. Petition at 43.

If Petitioner agrees that the effect of joinder is that Petitioner will be bound by the Carrier's *Sand Revolution* stipulation in the Carrier's IPR2024-00135, then Patent Owner agrees that Samsung's Petition and the Carrier's petition will be substantively identical, that there will be no unfair prejudice to Patent Owner, and that the same arguments will be made. Under these conditions, Patent Owner agrees that joinder is appropriate.

Otherwise, if Samsung does not agree to be bound by Carriers' *Sand Revolution* stipulation as a result of joinder, then Patent Owner takes no position on Samsung's motion for Joinder (Paper 8). Petitioner respectfully requests that the Board independently consider the following:

1. Whether joinder is appropriate in view of the facts, and

2. Whether the PTAB, the District Court, or a combination of both the PTAB and the District Court have authority¹ to decide whether Petitioner will be bound by the Carriers' stipulation as a result of joinder.

Regardless of the Board's decision, Patent Owners respectfully submit that it should make clear that the Board's decision was made without the benefit of hearing opposing argument, so the decision should have no precedential value.

Date: June 10, 2024

Respectfully submitted,

/ Qi Tong /

Qi (Peter) Tong, Reg. No. 74,272
Counsel for Patent Owner

¹ In IPR2024-00315, Patent Owners will argue a related issue: ***after*** a Petitioner is bound by a stipulation, only the District Court has authority to allow for its withdrawal.

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

The undersigned hereby certifies that the above document was served on June 10, 2024, by filing this document through the Patent Trial and Appeal Case Tracking System (P-TACTS) as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioners:

James M. Glass (Reg. No. 46,729)
jimglass@quinnemanuel.com
Jason Williams (*pro hac vice* forthcoming)
jasonwiliams@quinnemanuel.com
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Tel: (212) 849-7000
Fax: (212) 849-7100

Quincy Lu (Reg. No. 76,954)
quincylu@quinnemanuel.com
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
1109 First Avenue, Suite 210
Seattle, WA 98101
Tel: (206) 905-7000
Fax: (206) 905-7100

Date: June 10, 2024

/ Qi Tong /
Qi (Peter) Tong, Reg. No. 74,272
Counsel for Patent Owner
4925 Greenville Ave., Suite 200
Dallas, TX 75206
(310) 826-7474