

Pluta, Robert G.

From: Heintz, James M. <Jim.Heintz@us.dlapiper.com>
Sent: Thursday, June 5, 2025 9:00 AM
To: Pluta, Robert G.
Cc: DLA-Samsung-Maxell; FW-CLIENT-Maxell-Samsung-Service; Minutoli, Gianni
Subject: RE: Request for authorization to file motion for supplemental information

CAUTION: External Email - Only click on contents you know are safe.

Rob,

We will shorten our portion of the response as shown below. You are authorized to send the email below without changes.

Jim

Dear Board,

Pursuant to 37 CFR 42.123(b), Patent Owner requests authorization to file a motion to submit supplemental information in each of IPR2024-00735, IPR2024-00777, IPR2024-00828, IPR2024-00867, IPR2024-00906, and IPR2024-00907. More specifically, Patent Owner intends to move to supplement the record to add the following information:

- 1. April 24, 2025, Public Motions Hearing transcript from Maxell, Ltd. v. Samsung Electronics et al.*
- 2. May 19, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.*
- 3. May 21, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.*
- 4. May 23, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.*
- 5. May 27, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.*

This information is relevant to the instituted grounds insofar as Petitioner makes arguments contrary to the positions it has taken in these proceedings. Good cause exists because the trial was only completed on May 28, 2025.

The parties have conferred, and Petitioners oppose this request because Petitioners' pretrial disclosures disclosed the underlying information to Patent Owner prior to Patent Owner's deadlines for filing its Patent Owner Responses. Accordingly, no good cause exists to support Patent Owner's untimely request.

To the extent necessary, the parties are available on the following days for a conference call: 6/5 (before Noon ET and after 3pm ET), 6/6 [anytime].

From: Heintz, James M.
Sent: Wednesday, June 4, 2025 4:29 PM
To: Pluta, Robert G. <RPluta@mayerbrown.com>
Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>; Minutoli, Gianni <gianni.minutoli@us.dlapiper.com>
Subject: RE: Request for authorization to file motion for supplemental information

Rob,

We will review this additional information and get back to you as soon as we are able. To be clear, we do not agree to your characterization of the stricken parts of Samsung's portion of the email as unnecessary or inappropriate,

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and sending the modified Samsung portion of the email is not acceptable until we have had the opportunity to complete our review of this additional information.

Jim

James M. Heintz

Chair, Post Grant Review Practice

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DLA Piper LLP (US)
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From: Pluta, Robert G. <RPluta@mayerbrown.com>

Sent: Wednesday, June 4, 2025 3:01 PM

To: Heintz, James M. <Jim.Heintz@us.dlapiper.com>

Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>; Minutoli, Gianni <gianni.minutoli@us.dlapiper.com>

Subject: RE: Request for authorization to file motion for supplemental information

 EXTERNAL MESSAGE

Jim,

Your additions are unnecessary argument inappropriate for an email to the board requesting authorization to file a motion. I've struck the sentences that are problematic. Although our position is fairly clear from the transcripts that this is new information, here's a summary with finer points for your consideration—note the change in the dates for the transcripts where the testimony appears:

April 24, 2025, Public Motions Hearing transcript from Maxell, Ltd. v. Samsung Electronics et al.: *see, e.g.* 27:13-28:10; 29:1-6

May 19, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.: *see, e.g.*, 249:13-250:16

May 21, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.: *see, e.g.*, 664:25-666:1

May 23, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.: *see, e.g.*, 896:18-24, 902:1-7, 903:18-904:2, 904:22-905:3, and 908:25-909:11; 1003:24-1004:2

May 27, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.— *see, e.g.*, 1336-1338; 1343:13-16; 1348:22-1349:4; 1350:3-1351:4; 1353:11-1354:13

We understand that you contend this is not “new information.” We simply disagree but the email to the board is not the place to hash it out. Please let us know if the changes below in light of the foregoing are acceptable for purposes of emailing the Board. I also updated our availability which coincides with your availability.

Dear Board,

Pursuant to 37 CFR 42.123(b), Patent Owner requests authorization to file a motion to submit supplemental information in each of IPR2024-00735, IPR2024-00777, IPR2024-00828, IPR2024-00867, IPR2024-00906, and IPR2024-00907. More specifically, Patent Owner intends to move to supplement the record to add the following information:

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5. May 27, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.

This information is relevant to the instituted grounds insofar as Petitioner makes arguments contrary to the positions it has taken in these proceedings. Good cause exists because the trial was only completed on May 28, 2025.

The parties have conferred, and Petitioners oppose this request because no new information was presented in the April hearing or May trial. All of the information in the hearing and trial was known to Patent Owner based on the pretrial disclosures well before Patent Owner filed its Patent Owner Responses in the above-referenced IPRs. During the meet and confer on Patent Owner's request, Patent Owner refused to identify any information that was not known to Patent Owner at the time it filed its Patent Owner Responses. Accordingly, no good cause exists to support Patent Owner's untimely request.

To the extent necessary, the parties are available on the following days for a conference call: 6/4 (anytime), 6/5 (before Noon ET and after 3pm ET), 6/6 [anytime].

Regards,

Rob Pluta

Partner

Mayer Brown LLP

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mayerbrown.com

From: Heintz, James M. <Jim.Heintz@us.dlapiper.com>

Sent: Wednesday, June 4, 2025 10:33 AM

To: Pluta, Robert G. <RPluta@mayerbrown.com>

Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>; Minutoli, Gianni <gianni.minutoli@us.dlapiper.com>

Subject: RE: Request for authorization to file motion for supplemental information

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Rob,

Samsung's position is included in the email below. You are authorized to send the email below without changes. If you make any changes to the Maxell portion of the email, notify us before sending it so that we may evaluate whether any changes to the Samsung portion of the email are necessary.

Jim

Dear Board,

Pursuant to 37 CFR 42.123(b), Patent Owner requests authorization to file a motion to submit supplemental information in each of IPR2024-00735, IPR2024-00777, IPR2024-00828, IPR2024-00867, IPR2024-00906, and IPR2024-00907. More specifically, Patent Owner intends to move to supplement the record to add the following information:

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This information is relevant to the instituted grounds insofar as Petitioner makes arguments contrary to the positions it has taken in these proceedings. Good cause exists because the trial was only completed on May 28, 2025.

The parties have conferred, and Petitioners oppose this request because no new information was presented in the April hearing or May trial. All of the information in the hearing and trial was known to Patent Owner based on the pretrial disclosures well before Patent Owner filed its Patent Owner Responses in the above-referenced IPRs. During the meet and confer on Patent Owner's request, Patent Owner refused to identify any information that was not known to Patent Owner at the time it filed its Patent Owner Responses. Accordingly, no good cause exists to support Patent Owner's untimely request.

To the extent necessary, the parties are available on the following days for a conference call: 6/4-6/6 [anytime].

Regards,

From: Pluta, Robert G. <RPluta@mayerbrown.com>

Sent: Tuesday, June 3, 2025 6:56 PM

To: Heintz, James M. <Jim.Heintz@us.dlapiper.com>

Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>; Minutoli, Gianni <gianni.minutoli@us.dlapiper.com>

Subject: RE: Request for authorization to file motion for supplemental information

 EXTERNAL MESSAGE

Jim,

Here's the email:

Dear Board,

Pursuant to 37 CFR 42.123(b), Patent Owner requests authorization to file a motion to submit supplemental information in each of IPR2024-00735, IPR2024-00777, IPR2024-00828, IPR2024-00867, IPR2024-00906, and IPR2024-00907. More specifically, Patent Owner intends to move to supplement the record to add the following information:

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- 5. May 27, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.*

This information is relevant to the instituted grounds insofar as Petitioner makes arguments contrary to the positions it has taken in these proceedings. Good cause exists because the trial was only completed on May 28, 2025.

The parties have conferred and Petitioner opposes this request.

To the extent necessary, the parties are available on the following days for a conference call: 6/4-6/6 [anytime].

Regards,

Rob Pluta
Partner

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From: Heintz, James M. <Jim.Heintz@us.dlapiper.com>
Sent: Tuesday, June 3, 2025 5:48 PM
To: Pluta, Robert G. <RPluta@mayerbrown.com>
Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>; Minutoli, Gianni <gianni.minutoli@us.dlapiper.com>
Subject: RE: Request for authorization to file motion for supplemental information

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Rob,

It seems that you are not willing to provide the explanation we requested below. In light of that, please provide the final version of the email you will send to the Board so I can forward that email to Samsung this evening and get direction on Samsung's position for inclusion in that email. In the meantime, I will check with our team regarding availability for a call with the Board should that prove necessary.

Regards,

Jim

From: Pluta, Robert G. <RPluta@mayerbrown.com>
Sent: Tuesday, June 3, 2025 5:20 PM
To: Heintz, James M. <Jim.Heintz@us.dlapiper.com>
Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>; Minutoli, Gianni <gianni.minutoli@us.dlapiper.com>
Subject: RE: Request for authorization to file motion for supplemental information

 EXTERNAL MESSAGE

Jim,

We disagree. From your email below I take it you oppose our request to seek authorization to file a motion for supplemental information. Please send me some times you or your team are available for a call with the Board.

Regards,

Rob Pluta
Partner
Mayer Brown LLP
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From: Heintz, James M. <Jim.Heintz@us.dlapiper.com>
Sent: Tuesday, June 3, 2025 4:09 PM
To: Pluta, Robert G. <RPluta@mayerbrown.com>
Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>; Minutoli, Gianni <gianni.minutoli@us.dlapiper.com>
Subject: RE: Request for authorization to file motion for supplemental information

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Rob,

It appears there is no good cause for Maxell's delay in raising this issue until after Maxell's submission of its Patent Owner Responses.

All of the issues you raise below were known to Maxell prior to the filing of its Patent Owner Responses, the earliest of which was filed on January 23, 2025 in IPR2024-00828. See Ex. 2001 in IPR2024-00735. By choosing not to raise these issues in its Patent Owner Responses, Maxell has waived them. See, e.g., IPR2024-00735, Paper 12 at 9. For example, in the parallel litigation, the Court's claim construction order was issued on November 11, 2024, opening expert reports were due on November 9, 2024, rebuttal expert reports were due on December 5, 2024, all expert depositions were conducted on or before January 6, 2025, and opening dispositive motion briefs were filed on January 14, 2025. With respect to the '815 IPR, Maxell has indicated that it now seeks to address the "interpretation of first and second character." The district court's claim construction for "character" has been known to Maxell since the district court's November 5th Markman order, and Samsung's application of that construction has been known to Maxell since the rebuttal expert report (by a different expert) was served on December 5, 2024. But Maxell chose not to address this construction or Samsung's application in its January 31st Patent Owner Response despite requesting the Board consider other district court constructions from that same order. Similarly, for the '590 and '241 IPRs, the issues you raise relate solely to Maxell's motion for summary judgment related to the *Sotera* stipulation, which issues were known to Maxell when briefing on that motion was completed in February, prior to the filing of Maxell's Patent Owner Responses. Please explain what issues were raised at the hearing and at trial that were not raised in those papers. Moreover, Maxell's delay appears to have been intentional. It appears Maxell made the strategic choice not to raise these issues in its Patent Owner Responses to avoid any chance that the Court in the litigation would estop Maxell on those issues at trial. Now that Maxell has obtained a jury verdict under Maxell's original theory, Maxell seeks to have the Board adopt a different theory in ruling on the patentability of the claims in the IPR.

Regards,

James M. Heintz

Chair, Post Grant Review Practice

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jim.heintz@us.dlapiper.com

DLA Piper LLP (US)
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From: Pluta, Robert G. <RPluta@mayerbrown.com>

Sent: Monday, June 2, 2025 7:46 PM

To: Heintz, James M. <Jim.Heintz@us.dlapiper.com>

Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>; Minutoli, Gianni <gianni.minutoli@us.dlapiper.com>

Subject: RE: Request for authorization to file motion for supplemental information

Jim,

In response to your requests, please see below in red:

1. What issues does Maxell think are raised by the transcripts Maxell is requesting to submit,
In the various transcripts, it's our contention that Samsung takes inconsistent positions in interpreting the claims of the patents and/or prior art. For example,
For 848: interpretation of mode;
For 086: interpretation of mode;
For 815: interpretation of first and second character
For 590/241: characterization of disclosure of simultaneous transmission, transmission of video, and updating of operating system in prior art.
2. How do those issues relate to the issues raised in Maxell's Patent Owner Responses, and
These issues directly to the issues addressed in Maxell's POR specifically related to claim construction and Samsung's mapping of the claims to the prior art. Samsung's positions at trial are also contrary to positions it took in the Replies, and the Petitions.
3. Why those issues could not have been raised earlier.
These issues arose just recently because of positions Samsung took during trial (as to the 086/848/815 patents), or at the SJ hearing (in the case of the 590/241 patents). None of this information existed at the time of filing Maxell's PORs. *See also Ultratec, Inc. v. CaptionCall, LLC*, 872 F.3d 1267, 1272 (Fed. Cir. 2017) (Jury trial testimony elicited after briefing before the Board "is not evidence that could have been located earlier through a more diligent or exhaustive search; it did not exist during the IPR discovery period. . . . That inconsistent testimony did not exist sooner and thus could not have been proffered to the Board sooner."); *see also id.* at 1273 ("If Mr. Occhiogrosso gave conflicting testimony on cross-examination, this would be highly relevant to both the Board's analysis of the specific issues on which he gave inconsistent testimony and to the Board's overall view of his credibility.").

We do intend to request briefing on these issues and ask the Board to consider the context and evidence in the motion for supplemental information. We would not oppose Samsung filing a response brief.

Regards,

Rob Pluta

Partner

Mayer Brown LLP

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From: Heintz, James M. <Jim.Heintz@us.dlapiper.com>

Sent: Monday, June 2, 2025 4:08 PM

To: Pluta, Robert G. <RPluta@mayerbrown.com>

Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>; Minutoli, Gianni <gianni.minutoli@us.dlapiper.com>

Subject: RE: Request for authorization to file motion for supplemental information

CAUTION: External Email - Only click on contents you know are safe.

Rob,

As you know, the parties are required to meet and confer before contacting the Board. In order to allow us to understand Maxell's position so we can consult with our client, we request a meet and confer regarding Maxell's request, and would like Maxell's answer to the following questions:

- (1) What issues does Maxell think are raised by the transcripts Maxell is requesting to submit,
- (2) How do those issues relate to the issues raised in Maxell's Patent Owner Responses, and
- (3) Why those issues could not have been raised earlier.

Moreover, your email does not mention any briefing regarding these transcripts, and as you know a sur-reply is limited to issues raised in the reply. Please advise whether Maxell intends to request authorization to brief any issue identified in response to question #1 above, and if so, Maxell's position on Samsung's ability to file a response brief.

Regards,

James M. Heintz

James M. Heintz

Chair, Post Grant Review Practice

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M +1 202 997 7461
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DLA Piper LLP (US)
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From: Pluta, Robert G. <RPluta@mayerbrown.com>

Sent: Monday, June 2, 2025 10:37 AM

To: Heintz, James M. <Jim.Heintz@us.dlapiper.com>; Minutoli, Gianni <gianni.minutoli@us.dlapiper.com>

Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>

Subject: Request for authorization to file motion for supplemental information

 EXTERNAL MESSAGE

Dear counsel,

Maxell intends to email the Board today requesting authorization to file motions to submit supplemental information, per the draft email below. Please let us know whether Petitioner opposes the request, and your availability for a conference call with the Board should one be necessary.

Dear Board,

Pursuant to 37 CFR 42.123(b), Patent Owner requests authorization to file a motion to submit supplemental information in each of IPR2024-00735, IPR2024-00777, IPR2024-00828, IPR2024-00867, IPR2024-00906, and IPR2024-00907. More specifically, Patent Owner intends to move to supplement the record to add the following information:

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4. May 22, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.
5. May 27, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.

This information is relevant to the instituted grounds insofar as Petitioner makes arguments contrary to the positions it has taken in these proceedings. Good cause exists because the trial was only completed on May 28, 2025.

*The parties have conferred and Petitioner **does not oppose/opposes** this request.*

*To the extent necessary, the parties are available on the following days for a conference call: **6/3-6/6 [anytime]**.*

Best regards,

Rob

Robert G. Pluta

Partner

Mayer Brown LLP

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The information contained in this email may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please reply to the sender and destroy all copies of the message. To contact us directly, send to postmaster@dlapiper.com. Thank you.

The information contained in this email may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please reply to the sender and destroy all copies of the message. To contact us directly, send to postmaster@dlapiper.com. Thank you.

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