

KIRKLAND & ELLIS LLP
AND AFFILIATED PARTNERSHIPS

Nikhil Rama Krishnan
To Call Writer Directly:
+1 312 862 2323
nikhil.krishnan@kirkland.com

333 West Wolf Point Plaza
Chicago, IL 60654
United States
+1 312 862 2000
www.kirkland.com

Facsimile:
+1 312 862 2200

June 12, 2024

VIA ELECTRONIC MAIL

Thomas J. Friel, Jr.
KING & SPALDING LLP
601 S. California Ave.
Suite 100
Palo Alto, CA 94304
tfriel@kslaw.com

Re: *Staton Techiya, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Case No. 2:23-cv-00319 (E.D. Tex. 2023)

Dear Thomas:

We write regarding the petitions for *inter partes* review (IPR) that are being filed against U.S. Patent No. 11,710,473 (“the ’473 patent”). Samsung hereby stipulates that, if the Patent Trial and Appeal Board (“PTAB”) institutes either of these IPR petitions on the grounds presented (a table of which is included below), then Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) will not pursue in the above-captioned litigation any grounds that were raised or reasonably could have been raised in the respective IPR.

In so stipulating, Samsung seeks to avoid multiple proceedings addressing the validity of the ’473 patent based on the grounds that were raised or reasonably could have been raised in these IPRs. Rather, consistent with Congressional intent, Samsung wishes the patentability of this patent over those grounds to be addressed at the PTAB. But, for the sake of clarity and to avoid any doubt, if the PTAB either declines institution or later vacates institution of both of these IPRs, Samsung reserves the right to pursue in this litigation any ground that was raised or reasonably could have been raised in the IPRs.

The IPR petitions rely on the following prior art references:

Patent No.	Prior Art
11,710,473 (First Petition)	Patel (U.S. 2007/0041589A1)
	Topholm (WO2006/097099A1)

Austin Bay Area Beijing Boston Brussels Dallas Hong Kong Houston London Los Angeles Miami Munich New York Paris Riyadh Salt Lake City Shanghai Washington, D.C.

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	Williamson (U.S. 5,027,410)
	Melanson (U.S. 7,903,825)
	Rosenberg (U.S. 2007/0189544A1)
	Samadani (U.S. 2008/0079571A1)
	Dijkstra (U.S. 2006/0182295A1)
	Engle (WO2006/036262A1)
11,710,473 (Second Petition)	Kirsch (U.S. 2018/0160211)
	DiCenso (U.S. 2015/0195641)
	Goldstein (U.S. 2008/0181419)
	Woodruff (U.S. 2020/0380945)

The IPR grounds are as follows:

Patent No.	Ground No.	Claims	Prior Art Basis of Ground
11,710,473 (First Petition)	1A	1, 3-7	§103: Patel and Topholm
	1B	2	§103: Patel, Topholm, and Williamson
	2A	8, 19-20	§103: Melanson and Rosenberg
	2B	9, 13-18	§103: Melanson, Rosenberg, Samadani, and Dijkstra
	2C	10-12	§103: Melanson, Rosenberg, Samadani, Dijkstra, and Engle
11,710,473 (Second Petition)	1	1-7	§103: Kirsch and DiCenso
	2	8-20	§103: Goldstein and Woodruff

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Sincerely,

/Nikhil Krishnan/

Nikhil Krishnan