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July 1, 2024

VIA ELECTRONIC MAIL

Thomas J. Friel, Jr.
KING & SPALDING LLP
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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. 11,665,493 (“the ’493 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 ’493 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
11,665,493 (First Petition)	Svean (U.S. 6,567,524)
	Voix (U.S. 6,687,377)

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	Padhi (U.S. 2005/0096899)
	Hayashi (JP2002204500A)
	Bourk (U.S. 5,182,774)
11,665,493 (Second Petition)	Epley (U.S. 2007/0299362)
	Padhi (U.S. 2005/0096899)
	Voix (U.S. 2005/0123146)
	Hayashi (JP2002204500A)
	Bourk (U.S. 5,182,774)
	Beard (U.S. 2008/0107287)

The IPR grounds are as follows:

Patent No.	Ground No.	Claims	Prior Art Basis of Ground
11,665,493 (First Petition)	1	1, 2, 4-8, 10, 11, 13, 14, 18-20	§103: Svean, Voix, and Padhi
	2	3, 15-17	§103: Svean, Voix, Padhi, and Hayashi
	3	9, 12	§103: Svean, Voix, Padhi, and Bourk
11,665,493 (Second Petition)	1	1, 3-5, 7-8, 10-11, 18-20	§103: Epley in view of Padhi and Voix
	2	9, 12	§103: Epley in view of Padhi, Voix, and Bourk
	3	2	§103: Epley in view of Padhi, Voix, and Hayashi

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	4	1, 4, 6, 13-14	§103: Beard in view of Epley, Padhi, and Voix
	5	15-17	§103: Beard in view of Epley, Padhi, Voix, and Hayashi

Sincerely,

/Nikhil Krishnan/

Nikhil Krishnan