**From:** Patrick Stafford
**To:** Zhong, Annita; Linxwiler, Jeffrey; Rodriguez, Sarai; #Pictiva-Samsung; "Jennifer Truelove"
**Cc:** ~Smith, Melissa; QE-Samsung-Pictiva
**Subject:** IPR2024-01095 - Stipulation

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Counsel,

Defendants hereby stipulate that, if the Patent Trial and Appeal Board institutes an inter partes review proceeding for U.S. Patent No. 11,828,425 on the grounds presented in the petition in IPR2024-01095, then Defendants will not pursue an invalidity defense in this case that the patent claims subject to the instituted IPR are invalid based on those grounds that were raised in the IPR.

Best regards,

**Patrick Stafford**
*Of Counsel,*
Quinn Emanuel Urquhart & Sullivan, LLP

1300 I Street, NW, Suite 900
Washington, D.C. 20005
202-538-8188 Direct
202.538.8000 Main Office Number
202.538.8100 FAX
patrickstafford@quinnemanuel.com
www.quinnemanuel.com

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