

From: Jeremy Baldoni <jeremybaldoni@quinnemanuel.com>
Sent: Friday, January 17, 2025 6:53 PM
To: Zhong, Annita; Linxwiler, Jeffrey; Rodriguez, Sarai; #Pictiva-Samsung; 'Jennifer Truelove'
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Subject: IPR2024-01222 and IPR2024-01223 - Stipulation

Counsel,

Defendants hereby stipulate that, if the Patent Trial and Appeal Board institutes an inter partes review proceeding for U.S. Patent No. 6,949,389 on the grounds presented in the petition in either IPR2024-01222 or IPR2024-01223 (or both), then Defendants will not pursue an invalidity defense in 2:23-cv-00495 (E.D. Tex.) or 2:24-cv-00532 (E.D. Tex.) that the patent claims subject to the instituted IPR (or IPRs) are invalid based on the same grounds asserted in, or grounds involving any of the prior art asserted in, either IPR2024-01222 or IPR2024-01223.

Best regards,

Jeremy Baldoni
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