

From: [Trials](#)
To: [Sharifahmadian, Ali R.](#); ptong@raklaw.com; [Reidy, Patrick C.](#); [Clark, Douglas](#); [Boardman, Albert](#); [xSamsung Cerence AP](#)
Cc: [Trials](#)
Subject: RE: Samsung et al. v. Cerence, IPR2024-01267
Date: Monday, January 6, 2025 12:29:46 PM
Attachments: [image001.png](#)

Counsel,

Thank you for your email of December 20, 2024 regarding the *Samsung v. Cerence* proceeding, IPR2024-01267, responding to the Board's inquiry of December 19, 2024. Your email indicates that Petitioners intend to send a letter to Patent Owner's counsel providing a *Sotera*-type stipulation related to the co-pending district court Case No. 2:23-cv-00482-JRG-RSP in the Eastern District of Texas. It does not indicate, however, whether Petitioners have discussed the proposed letter with Patent Owner's counsel, nor does it provide Patent Owner's position on Petitioners' request for authorization to file the proposed letter as an exhibit in IPR2024-01267. If you still wish to submit the proposed letter as an exhibit, please submit a request for authorization that includes the above information.

The Board will enter your previous email and this response in the record of the IPR2024-01267 proceeding.

Regards,

Franchesca I. Alicea Villanueva
Supervisory Paralegal
Patent Trial & Appeal Board
U.S. Patent & Trademark Office

From: Sharifahmadian, Ali R. <Ali.Sharifahmadian@arnoldporter.com>
Sent: Friday, December 20, 2024 2:34 PM
To: Hawthorne, Eric W. <Eric.Hawthorne@USPTO.GOV>; ptong@raklaw.com
Cc: Reidy, Patrick C. <Patrick.Reidy@arnoldporter.com>; Clark, Douglas <Douglas.Clark@arnoldporter.com>; Boardman, Albert <Albert.Boardman@arnoldporter.com>; Trials <Trials@USPTO.GOV>; xSamsung Cerence AP <xSamsungCerenceAP@arnoldporter.com>
Subject: RE: Samsung et al. v. Cerence, IPR2024-01267

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Ex. 3001
IPR2024-01267

Dear Mr. Hawthorne,

Thank you for your email. In this IPR2024-01267, Petitioners intend to send a letter to Patent Owner's counsel providing a Sotera-type stipulation related to the co-pending district court Case No. 2:23-cv-00482-JRG-RSP in the Eastern District of Texas, similar to the letters that were sent by Petitioners with respect to IPR2024-00978 and IPR2024-00979.

Petitioners hereby request authorization to file the letter as an exhibit in IPR2024-01267, and would appreciate the Board's favorable consideration of this request.

Sincerely,

Ali R. Sharifahmadian
Counsel for Petitioners

Ali R. Sharifahmadian
Partner | [Bio](#)

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From: Hawthorne, Eric W. <Eric.Hawthorne@USPTO.GOV>
Sent: Thursday, December 19, 2024 9:08 AM
To: Sharifahmadian, Ali R. <Ali.Sharifahmadian@arnoldporter.com>; ptong@raklaw.com
Cc: Reidy, Patrick C. <Patrick.Reidy@arnoldporter.com>; Clark, Douglas <Douglas.Clark@arnoldporter.com>; Boardman, Albert <Albert.Boardman@arnoldporter.com>; Trials <Trials@USPTO.GOV>
Subject: Samsung et al. v. Cerence, IPR2024-01267

External E-mail

Counsel,

According to the Petition and the Patent Owner's Preliminary Response in Samsung et al. v. Cerence, IPR2024-01267, the patent at issue (US 9,026,428 B2) is being asserted in the same district court action as the patents at issue in IPR2024-00978 and IPR2024-00979.

On December 6, 2024, counsel for Petitioners in those two proceedings sought authorization to file as an exhibit a copy of a letter that Co-Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. sent to Patent Owner. The letter contained a Sotera-type prior art

stipulation related to the co-pending district court Case No. 2:23-cv-00482-JRG-RSP in the Eastern District of Texas. Authorization was granted on December 9, 2024.

Do Petitioners intend to seek authorization to file as an exhibit in IPR2024-01267 a similar stipulation letter with regard to the '428 Patent?

The Board will enter this email and counsel's response in the procedural record for IPR2024-01267.

Eric W. Hawthorne
Supervisory Paralegal Specialist
Patent Trial and Appeal Board

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