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Subject: Samsung v. Cerence ,IPR2024-01267 | Response to Order re Related Matters Updates (Paper 31)
Date: Wednesday, September 24, 2025 6:04:02 PM
Attachments: [image001.png](#)
[Cerence \(EDTX\) \[DI 111\] 2025-03-10 Claim Construction Order.pdf](#)
[\[Cerence \(EDTX\)\] \[DI 109\] 2025-03-04 Joint Stipulation of Dismissal of Claims re "'428.pdf](#)
[\[Cerence 2 \(EDTX\)\] \[DI 083\] 2025-07-18 Order granting \[82\] Motion to Amend.pdf](#)

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Dear Honorable Board,

I am counsel for Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Petitioners" or "Samsung") in the above-referenced proceeding.

In accordance with the PTAB's Order re Related Matters Update (Paper 31), Samsung and Cerence Operating Company ("Patent Owner" or "Cerence") write to jointly advise the Board of two developments in related matter(s).

First, the Claim Construction Order issued in *Cerence Operating Co. v. Samsung Electronics Co., Ltd. et al.*, 2:23-cv-00482-JRG-RSP (E.D. Tex.), filed October 13, 2023 ("*Cerence 1*") includes two constructions pertaining to the '428 patent (see pages 7 and 9 of the Order)

Second, the '428 patent was transferred from *Cerence 1* to another related matter, *Cerence Operating Co. v. Samsung Electronics Co., Ltd. et al.*, 2:24-cv-00181-JRG-RSP (E.D. Tex.), filed March 15, 2024 ("*Cerence 2*"), as evidenced in the attached Joint Stipulation of Dismissal of Claims of the '428 patent from *Cerence 1*, and the Order Granting Motion to Amend Pleadings to add the '428 patent to *Cerence 2*.

The Parties jointly request permission to file the three attached documents as exhibits in IPR2024-01267:

- Claim Construction Order from *Cerence 1*;
- Joint Stipulation of Dismissal of Claims of the '428 patent from *Cerence 1*; and
- Order Granting Motion to Amend Pleadings to add the '428 patent to *Cerence 2*.

Sincerely,

Ali R. Sharifahmadian

Exhibit 3004 – attachments excluded

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