

August 28, 2024

VIA E-MAIL

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Re: *Headwater Research LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 2:23-cv-00641 (E.D. Tex.)

Dear Counsel:

Samsung Electronics Co., Ltd. (“**Samsung**”) has filed an *inter partes* review (IPR) petition (IPR2024-01337) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1-30 of U.S. Patent No. 8,588,110 (“**the ’110 Patent**”). The tables in attached Appendix A list all grounds, challenged claims, and references asserted in IPR2024-01337.

I write to inform you that Samsung hereby stipulates that, if the PTAB institutes IPR2024-01337, Samsung agrees not to pursue the same grounds (listed in Appendix A below) in the district court litigation. *Apple, Inc. v. SEVEN Networks, LLC*, IPR2020-00156, Paper 10 at 19 (June 15, 2020); *see also Sand Revolution II, LLC v. Continental Intermodal Group-Trucking LLC*, IPR2019-01393, Paper 24 at 12 (June 16, 2020).

Sincerely,



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Appendix A – Grounds and Prior Art References Used in IPR2024-01337

Ground	Claim(s)	§103
1A	1-16, 19, 21, 23-24, 27-30	Jobs-Jones-Rao
1B	17-18, 24	Jobs-Jones-Rao-Bocking
1C	20	Jobs-Jones-Rao-Cunningham
1D	22	Jobs-Jones-Rao-Padmanabhan
1E	25	Jobs-Jones-Rao-Ibrahim
2	26	Jobs-Jones-Rao-Bocking-Cunningham

List of References

Reference Name	Details
Jobs	U.S. Pat. App. Pub. No. 2007/0149252
Jones	U.S. Pat. No. 8,285,850
Rao	U.S. Pat. App. Pub. No. 2006/0039354
Bocking	U.S. Pat. App. Pub. No. 2006/0075090
Cunningham	U.S. Pat. App. Pub. No. 2006/0019632
Padmanabhan	U.S. Pat. App. Pub. No. 2006/0203739
Ibrahim	U.S. Pat. App. Pub. No. 2008/0026787