

From: [Ahn, Alice](#)
To: [Tawresey, Gwendolyn](#); [SiOnyxITC](#)
Cc: [Samsung-SiOnyx-Cov](#)
Subject: Inv. No. 337-TA-1403/2:24-cv-00291(E.D. Tex.): "737 IPR Stipulation"
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Attachments: [image001.png](#)

Counsel,

Samsung hereby stipulates that, if the Patent Trial and Appeal Board institutes inter partes review proceedings for U.S. Patent No. 11,069,737 on the grounds at issue in IPR2025-01431 following the withdrawal of Ground A-3 and SiOnyx's disclaimer of January 22, 2025 (i.e., Grounds A-1 and B-1), then Samsung will not pursue an invalidity defense in *Sensors with Pixels and Products Containing the Same*, Inv. No. 337-TA-1403 or *SiOnyx, LLC v. Samsung Electronics, Co., Ltd.*, 2:24-cv-00291 (E.D. Tex.) that the patent claims subject to the instituted IPR are invalid, using as primary or combination references any of the references that are asserted in those grounds.

Alice Ahn

Covington & Burling LLP
Salesforce Tower, 415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
T +1 415 591 7091 | aahn@cov.com
www.cov.com



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