

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Samsung Electronics Co., Ltd.,
Petitioner,

v.

SiOnyx, LLC,
Patent Owner.

Case No. IPR2024-01431
Patent No. 11,069,737

JOINT MOTION TO WITHDRAW GROUND A-3

On January 22, 2025, Patent Owner SiOnyx, LLC disclaimed claims 1, 7–27, 29–32, and 38–55 of U.S. Patent No. 11,069,737 (“the ’737 patent”), leaving only claims 2–6, 28, and 33–37 for the Board’s consideration. *See* POPR at 1. The Board need not address Grounds A-2, A-4, A-5, A-6, and B-2 because all claims challenged in those grounds have been disclaimed.

The parties jointly request that Ground A-3 be withdrawn from consideration in this IPR, and request the Board limit its consideration to Grounds A-1 and B-1.

For clarity and the avoidance of doubt, if this *inter partes* review is instituted, the parties specifically agree that Ground A-3 will be treated as if it had not been instituted. Neither party will be permitted to discuss this ground at oral argument and the parties agree that it not be addressed in a Final Written Decision. The parties further agree that this agreement shall have no impact on other grounds, including Ground A-1 covering claims 33–37, the non-disclaimed claims covered by Ground A-3.

Date: April 1, 2025

Respectfully submitted,

By: /Scott C. Weidenfeller/

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IPR2024-01431

Patent No. 11,069,737

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Alison L. McCarthy (Lead Counsel)

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that the foregoing Joint Motion to Withdraw Ground A-3, was served by electronic mail on the following counsel of record for patent owner:

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Date: April 1, 2025

/Scott C. Weidenfeller/
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