

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner

v.

NETLIST, INC.
Patent Owner

Case IPR2025-00001
U.S. Patent No. 11,386,024

**PATENT OWNER'S REQUEST FOR ADVERSE JUDGMENT
UNDER 37 C.F.R. § 42.73(b)**

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-145

PATENT OWNER'S UPDATED EXHIBIT LIST

Exhibit No.	Description
2001	JESD82-30, "LRDIMM DDR3 Memory Buffer (MB) Version 1.0," JEDEC, October 2014,
2002	"Minutes of Meeting No. 160 JC-40 Digital Logic Committee," December 10, 2009 [CONFIDENTIAL]
2003	<i>Samsung Elecs. Co. v. Netlist, Inc.</i> , IPR2020-00062, Exhibit 2026 (P.T.A.B. Aug. 15, 2022)
2004	<i>Samsung Elecs. Co. v. Netlist, Inc.</i> , IPR2020-00062, Paper 53 (P.T.A.B. Mar. 8, 2023)
2005	"Simplified File Naming: JEDEC Meeting Presentations," JEDEC, December 2010 [CONFIDENTIAL]
2006	Email to JEDEC Request LRDIMM DDR3 Memory Initialization Chapter Proposal, January 2025
2007	Email From President of JEDEC Requesting Document Confidentiality
2008	Declaration of Cynthia Lott (<i>served, not filed</i>)
2009	Declaration of Raymond K. Chan (<i>served, not filed</i>)
2010	Disclaimer filed in U.S. Patent No. 11,386,024, August 6, 2025

On August 6, 2025, Patent Owner Netlist, Inc. (“Patent Owner”) filed a disclaimer with the United States Patent and Trademark Office of claims 1-20 of U.S. Patent No. 11,386,024. *See* EX2010. Patent Owner filed this disclaimer merely to avoid additional costs associated with continuing trial in this *inter partes* review proceeding and without any admission as to the propriety of any statement in the Petition, Institution Decision, or any other pleading, Order, or communication.

A party before the Board “may request judgment against itself at any time during a proceeding.” 37 C.F.R. § 42.73(b). “Cancellation or disclaimer of a claim such that the party has no remaining claim in the trial” constitutes a request for adverse judgment. 37 C.F.R. § 42.73(b)(2).

Based on the disclaimer, Patent Owner has no remaining claims in this *inter partes* review. Accordingly, Patent Owner requests that the Board acknowledge the disclaimer of claims 1-20 of the '024 patent and enter adverse judgment under 37 C.F.R. § 42.73(b).

Respectfully submitted,

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/ Jennifer Meyer Chagnon /

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CERTIFICATION OF SERVICE

I certify that the above-captioned **PATENT OWNER'S REQUEST FOR ADVERSE JUDGMENT UNDER 37 C.F.R. § 42.73(b)** and Exhibit 2010 were served in their entireties on August 7, 2025, upon the following parties via electronic mail:

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