

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioners,

v.

MULLEN INDUSTRIES LLC,
Patent Owner.

Case No. IPR2025-00018
Patent No. 11,122,418

**PETITIONERS' SUBMISSION OF
SOTERA STIPULATION EXHIBIT 1079**

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 11,122,418 (“the ’418 patent”)
1002	Prosecution History of U.S. Patent No. 11,122,418
1003	Declaration of David H. Williams (“Williams-Decl.”)
1004	Curriculum Vitae of David H. Williams
1005	U.S. Patent No. 7,333,820 (“Sheha”)
1006	U.S. Provisional Patent Application No. 60/305,975 (“Sheha-Prov.”)
1007	U.S. Patent Application Publication No. 2004/0024846 (“Randall”)
1008	International Patent Application Publication No. WO 02/17075 (“Randall-WIPO”)
1009	U.S. Patent No. 7,233,795 (“Ryden”)
1010	U.S. Provisional Patent Application No. 60/277,117 (“Ryden-Prov.”)
1011	U.S. Patent No. 6,819,919 (“Tanaka”)
1012	U.S. Patent No. 7,013,148 (“Ganesh”)
1013	U.S. Patent No. 6,968,179 (“De-Vries”)
1014	U.S. Patent No. 6,920,328 (“Wollrab”)
1015	U.S. Patent No. 6,714,791 (“Friedman”)
1016	U.S. Patent Application Publication No. 2002/0145561 (“Sandhu”)
1017	U.S. Patent No. 6,885,874 (“Grube”)
1018	U.S. Patent No. 6,716,101 (“Meadows”)
1019	U.S. Patent No. 7,366,522 (“Thomas”)
1020	U.S. Patent No. 5,736,960 (“Murphy”)
1021	U.S. Patent No. 5,923,286 (“Divakaruni”)
1022	International Patent Application Publication No. WO 01/91486 (“Darling”)
1023	RESERVED
1024	RESERVED
1025	RESERVED

1026	RESERVED
1027	RESERVED
1028	RESERVED
1029	RESERVED
1030	RESERVED
1031	RESERVED
1032	RESERVED
1033	RESERVED
1034	RESERVED
1035	RESERVED
1036	Civil Docket Report in <i>Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:24-cv-00049 (E.D. Tex.) (last checked October 7, 2024)
1037	Federal Court Management Statistics–Profiles, U.S. District Courts–Combined Civil and Criminal (June 30, 2024) (available at https://www.uscourts.gov/file/78871/download)
1038	Docket Control Order in <i>Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:24-cv-00049 (E.D. Tex.) (June 14, 2024) (Dkt. 30)
1039	Plaintiff’s Disclosure of Asserted Claims and Infringement Contentions in <i>Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:24-cv-00049 (E.D. Tex.) (May 15, 2024)
1040-1078	RESERVED
1079	Sotera Stipulation Letter dated February 11, 2025

Pursuant to 37 CFR § 42.6(e)(4)(ii), and the Board's authorization by email of February 18, 2025, Petitioners herewith submit as Exhibit 1079 a copy of a letter that Co-Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. sent to Patent Owner Mullen Industries LLC, containing a *Sotera*-type prior art stipulation related to the co-pending district court Case No. 2:24-cv-00049-JRG in the Eastern District of Texas.

Respectfully submitted,

Date: February 19, 2025

/Elisabeth Hunt/

Elisabeth Hunt, Reg. No. 67,336
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
(617) 646-8000 Phone
(617) 646-8646 Fax

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on February 19, 2025, I will cause a copy of the foregoing document, including any exhibits filed therewith, to be served via electronic mail, as previously consented to by Patent Owner, upon the following:

Peter F. Snell
Brad M. Scheller

PFSnell@mintz.com
BMScheller@mintz.com

Date: February 19, 2025

/Dara Del Rosario/
Dara Del Rosario
Paralegal
WOLF, GREENFIELD & SACKS, P.C.