

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 PATENT OWNER'S PRELIMINARY
PRE-TRIAL ELECTION OF ASSERTED CLAIMS EXHIBIT 1080**

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

Exhibit	Description
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
1080	Plaintiff’s Preliminary Pre-Trial Election of Asserted Claims in <i>Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:24-cv-00049 (E.D. Tex.) served on March 20, 2025

Pursuant to 37 CFR §42.6(e)(4)(ii) and the Board's authorization by email of April 2, 2025, Petitioners herewith submit as Exhibit 1080 a copy of Plaintiff's Preliminary Pre-Trial Election of Asserted Claims served on March 20, 2025 in the co-pending district court Case No. 2:24-cv-00049-JRG in the Eastern District of Texas.

Patent Owner has elected five claims of the '418 patent (claims 1, 2, 10, 13, 17). EX1080 at 1.

Respectfully submitted,

Date: April 3, 2025

/Elisabeth Hunt/

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

I certify that on April 3, 2025, a copy of the foregoing document, including any exhibits or appendices filed therewith, is being served via electronic mail, as previously consented to by Patent Owner, upon the following:

Peter F. Snell
Brad M. Scheller

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Date: April 3, 2025

/Dara Del Rosario/
Dara Del Rosario
Paralegal
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