

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

MULLEN INDUSTRIES LLC,
Patent Owner.

Case No. IPR2025-00019
U.S. Patent No. 9,204,283

**PATENT OWNER'S SUBMISSION OF THE
EASTERN DISTRICT OF TEXAS' MEMORANDUM OPINION AND
ORDER DENYING THE MOTION TO TRANSFER EXHIBIT 2026**

TABLE OF EXHIBITS

Exhibit	Description
2001	<i>Samsung Launches SmartThings Find, a New Way to Quickly and Easily Located Your Galaxy Devices</i> , https://news.samsung.com/global/samsung-launches-smarththings-find-a-new-way-to-quickly-and-easily-locate-your-galaxy-devices (October 30, 2020)
2002	<i>Samsung SmartThings Find</i> , https://smarththingsfind.samsung.com/login (accessed January 24, 2024)
2003	Dictionary definition of “to” – Microsoft Encarta College Dictionary, 2001
2004	Reserved
2005	Reserved
2006	Reserved
2007	<i>Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings With Parallel District Court Litigation</i> , Vidal, June 21, 2022
2008	<i>Mullen Industries LLC v. Samsung Elecs. Co., Ltd.</i> , Case No. 2:24-CV-00049-JRG, Order Denying Motion to Stay, Dkt. 71 (E.D. Tex. Jan. 23, 2025)
2009	<i>MyPort, Inc. v. Samsung Elecs. Co., Ltd.</i> , Case No. 2:22-CV-00114-JRG, Order, Dkt. 73 (E.D. Tex. June 13, 2023)

2010	<i>Solas OLED Ltd. v. Samsung Display Co., Ltd.</i> , Case No. 2:19-CV-00152-JRG, 2020 U.S. Dist. LEXIS 125973 (E.D. Tex. July 17, 2020)
2011	<i>Oyster Optics, LLC, v. Infinera Corp.</i> , Case No. 2:19-CV-00257-JRG, Order, Order, Dkt. 87 (E.D. Tex. July 17, 2020)
2012	Docket Navigator, Time to Milestones for Judge Gilstrap (E.D. Tex.) in Patent Cases for the Last 5 Years
2013	<i>Mullen Industries LLC v. Samsung Elecs. Co., Ltd.</i> , Case No. 2:24-CV-00049-JRG, Complaint, Dkt. 1 (E.D. Tex. Jan. 26, 2024)
2014	<i>Mullen Industries LLC v. Samsung Elecs. Co., Ltd.</i> , Case No. 2:24-CV-00049-JRG (E.D. Tex.), Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.’s Amended Invalidity Contentions
2015	Transcript of the Deposition of David Williams, IPR2023-000091, July 26, 2023
2016	Excerpt from <i>Mullen Industries LLC v. Samsung Elecs. Co., Ltd.</i> , Case No. 2:24-CV-00049-JRG (E.D. Tex.), Non-Party Google LLC’s Objections and Responses to Mullen’s Document Subpoena
2017	USPTO Director’s Brief in <i>Apple Inc. v. Vidal</i> , No. 5:20-cv-06128-EJD (N.D. Cal. Sept. 21, 2023)
2018	USPTO Director’s Brief in <i>Apple Inc. v. Vidal</i> , No. 2024-1864 (Fed. Cir. Oct. 16, 2024)
2019	Plaintiff-Appellants Brief in <i>Apple Inc. v. Vidal</i> , No. 2024-1864 (Fed. Cir. Aug. 5, 2024) (with Appx. containing <i>Apple Inc. v. Vidal</i> , No. 5:20-cv-06128-EJD, Order Denying Plaintiffs’ Renewed

	Motion for Summary Judgment; Granting Defendant's Motion for Summary Judgment (N.D. Cal. Mar. 31, 2024))
2020	<i>Samsung Display Co., Ltd. v. Pictiva Displays Int'l Ltd.</i> , IPR2024-00855, Paper 13, Director Review Decision (PTAB Jan. 10, 2025)
2021	Centripetal - Public Comment on Advanced Notice of Proposed Rulemaking (ANPRM) Regarding Discretionary Institution Practices
2022	Stanwood - Public Comment on Advanced Notice of Proposed Rulemaking (ANPRM) Regarding Discretionary Institution Practices
2023	Pharmaceutical Research and Manufacturers of America (PhRMA) - Public Comment on Advanced Notice of Proposed Rulemaking (ANPRM) Regarding Discretionary Institution Practices
2024	Alliance of U.S. Startups and Inventors for Jobs (USIJ) - Public Comment on Advanced Notice of Proposed Rulemaking (ANPRM) Regarding Discretionary Institution Practices
2025	American Intellectual Property Law Association (AIPLA) - Public Comment on Advanced Notice of Proposed Rulemaking (ANPRM) Regarding Discretionary Institution Practices
2026	Eastern District of Texas's Memorandum Opinion and Order Denying the Motion to Transfer Venue to the Northern District of California Under 28 U.S.C. § 1404(a)

Pursuant to 37 CFR § 42.6(e)(4)(ii), and the Board's authorization by email of April 2, 2025, Patent Owner herewith submits as Exhibit 2026 a copy of the March 25, 2025 Memorandum Opinion and Order of the United States District Court for the Eastern District of Texas Denying Defendants Samsung Electronics America, Inc., Ltd. and Samsung Electronics America, Inc.'s Motion to Transfer Venue to the Northern District of California Under 28 U.S.C. § 1404(a) in co-pending parallel district court Case No. 2:24-cv-00049-JRG (E.D. Tex.) (Dkt. 90).

Dated: April 2, 2025

Respectfully submitted,

/Peter F. Snell/

Peter F. Snell (Reg. No. 52,235)
Brad M. Scheller (Reg. No. 61,022)
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.
919 Third Avenue
New York, New York 10022
Telephone: 212-935-3000
Facsimile: 212-983-3115
E-mails: PFSnell@mintz.com;
BMScheller@mintz.com

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

I certify that on April 2, 2025, I will cause a copy of the foregoing document, including the exhibit filed therewith, to be served via electronic mail, as previously consented by Petitioners, upon the following:

Elisabeth H. Hunt
Gregory S. Nieberg
Michael S. Parsons
Daniel D. Smith
Andrew R. Varrenti
Benjamin Haber
William M. Fink
Caitlin Hogan

elisabeth.hunt@wolfgreenfield.com
gregory.nieberg@wolfgreenfield.com
michael.parsons@wolfgreenfield.com
dan.smith@wolfgreenfield.com
andrew.varrenti@wolfgreenfield.com
bhaber@omm.com
tfink@omm.com
chogan@omm.com

Dated: April 2, 2025

/Marie Belén Larrory/

Marie Belén Larrory

Paralegal

MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.