

From: [Ahn, Alice](#)
To: [Tawresey, Gwendolyn](#); [SiOnyxITC](#)
Cc: [Samsung-EDTX-SiOnyx-Cov](#)
Subject: "682 IPR Stipulation"
Date: Sunday, March 30, 2025 5:36:55 PM
Attachments: [image001.png](#)

Counsel,

Samsung Defendants hereby stipulate that, if the Patent Trial and Appeal Board institutes *inter partes* review proceedings for U.S. Patent No. 10,347,682 based on IPR2025-00064 and/or IPR2025-00065, then Samsung will not pursue an invalidity defense in *SiOnyx, LLC v. Samsung Electronics, Co., Ltd.*, 2:24-cv-00408 (E.D. Tex.) that the patent claims subject to the instituted IPR(s) are invalid based on grounds that were raised or reasonably could have been raised in the instituted IPR(s).

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