

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS
AMERICA, INC.

Petitioners

v.

KP INNOVATIONS 2, LLC,

Patent Owner

Case No. IPR2025-00101

Patent 10,499,168

PETITIONERS' SECOND UPDATED MANDATORY NOTICES

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Petitioners”) provide the following second update to the mandatory notices pursuant to 37 C.F.R. §§ 42.8(b)(2).

I. RELATED MATTERS

On April 16, 2025, Petitioners stipulated as follows: “Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (‘Petitioners’) stipulate that, if the Patent Trial and Appeal Board institutes trial on U.S. Patent 10,499,168 on the grounds presented in the petition in Case No. IPR2025-00101, Petitioners will not pursue an invalidity defense in the related district court action *KP Innovations 2, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America Inc.*, Case No. 1-24-cv-00170 (W.D. Tex.) that the patent claims subject to the instituted IPR are invalid based on grounds that were raised or reasonably could have been raised in the IPR.” *See* EX1027.

Dated: April 16, 2025

Respectfully submitted,
BAKER BOTTS L.L.P.

/Eliot D. Williams/
Eliot D. Williams
USPTO Reg. No. 50,822
Lead Attorney for Petitioners

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 16, 2025, a complete and entire copy of the foregoing **Petitioners' Second Updated Mandatory Notices** and supporting exhibit were served upon the following email addresses to the counsel of record for the Patent Owner as follows:

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Respectfully submitted,
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Date: April 16, 2025