

Becker, Jeff

From: Becker, Jeff
Sent: Wednesday, April 16, 2025 11:12 AM
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Cc: Sirota, Neil; Williams, Eliot D.; McDonald, Jacob; Ton, Thao
Subject: IPR2025-00101 Stipulation

Dear Counsel:

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.

Regards,
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