

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. IPR2025-00197
Patent No. 11,109,218

**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. 11,109,218 (“the ’218 patent”)
1002	Prosecution History of U.S. Patent No. 9,204,218
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	RESERVED
1010	RESERVED
1011	RESERVED
1012	RESERVED
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	RESERVED
1017	RESERVED
1018	RESERVED
1019	U.S. Patent No. 7,366,522 (“Thomas”)
1020	RESERVED
1021	RESERVED
1022	International Patent Application Publication No. WO 01/91486 (“Darling”)
1023	RESERVED
1024	U.S. Patent No. 6,714,793 (“Carey”)
1025	U.S. Patent No. 6,415,224 (“Wako”)

Exhibit	Description
1026	RESERVED
1027	RESERVED
1028	RESERVED
1029	U.S. Patent No. 6,456,854 (“Chern”)
1030	U.S. Patent No. 6,754,665 (“Futagami”)
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 November 14, 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	RESERVED
1041	U.S. Patent Application Publication No. 2003/0074209 (“Tobin”)
1042	U.S. Patent No. 6,813,499 (“McDonnell”)
1043	U.S. Patent No. 6,133,853 (“Obradovich”)
1044	RESERVED
1045	RESERVED
1046	RESERVED
1047	RESERVED

Exhibit	Description
1048	RESERVED
1049	RESERVED
1050	RESERVED
1051	U.S. Patent No. 6,674,849 (“Froeberg”)
1052	RESERVED
1053	RESERVED
1054	U.S. Patent No. 6,867,733 (“Sandhu”)
1055	RESERVED
1056	U.S. Patent No. 6,049,718 (“Stewart”)
1057	U.S. Patent No. 6,609,005 (“Chern-005”)
1058	RESERVED
1059	RESERVED
1060	RESERVED
1061	RESERVED
1062	RESERVED
1063	RESERVED
1064	RESERVED
1065	RESERVED
1066	RESERVED
1067	U.S. Patent No. 6,127,945 (“Mura-Smith”)
1068	U.S. Patent No. 6,633,813 (“Deworetzki”)
1069	U.S. Patent No. 7,143,443 (“Song”)
1070	U.S. Patent No. 6,107,944 (“Behr”)
1071	U.S. Patent No. 7,203,752 (“Rice”)
1072	U.S. Patent No. 6,366,856 (“Johnson”)
1073-1078	RESERVED
1079	Sotera Stipulation Letter dated February 11, 2025

Exhibit	Description
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 '218 patent (claims 11-15).
EX1080 at 2.

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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