

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

SINOTECHNIX LLC.
Patent Owner

Case No. IPR2025-00331
U.S. Patent No. 7,618,162

PETITIONER'S SUPPLEMENTAL
BRIEF RE STIPULATION¹

¹Filed pursuant to the Board's Email dated June 12, 2025. *See* EX3101.

PETITIONER’S EXHIBIT LIST

Exhibit No.	DESCRIPTION
1001	U.S. Patent No. 7,618,162 ('162 Patent)
1002	Declaration of Dr. Tom Milster
1003	File History of U.S. Patent No. 7,618,162
1004	U.S. Patent No. 6,356,395 (“Tawa”)
1005	U.S. Patent No. 5,384,659 (“Shikama”)
1006	U.S. Patent No. 6,105,869 (“Scharf”)
1007	Robert D. Guenther, “Modern Optics,” John Wiley & Sons, Inc. (1990)
1008	The Royal Swedish Academy of Sciences. “The Nobel Prize in Physics 2014: Press Release.” October 7, 2014. https://www.nobelprize.org
1009	Parkyn, William A. and David G. Pelka. “Uniformly illuminating dual-lens system for LED collimation.” SPIE Optics + Photonics (2001).
1010	Reserved
1011	U.S. Patent No. 3,754,814 (“Leith”)
1012	U.S. Patent No. 4,655,539 (“Caufield”)
1013	Reserved
1014	U.S. Patent No. 5,600,487 (“Kiyomoto”)
1015	U.S. Patent No. 5,607,492 (“Doric”)
1016	U.S. Patent No. 5,924,788 (“Parkyn”)
1017	U.S. Patent No. 6,433,936 (“Carpenter”)
1018	U.S. Patent Publication No. 2004/0228131 (“Minano”)
1019	U.S. Patent Publication No. 2007/0109615 (“Wunderer”)
1020	Docket Control Order in <i>Sinotechnix LLC v. Samsung Electronics et al.</i> , 2:24-cv-544-JRG-RSP
1021	Judicial Caseload For Eastern District of Texas
1022	Judge Gilstrap’s Case Schedule (May 4, 2026)
1023	U.S. Patent No. 4,864,216
1024	Love, Clyde, <i>Differential and Integral Calculus</i> (sixth ed.). New York, MacMillan. (1916)
1025	Kingslake, R., & Johnson, R. B, “Lens Design Fundamentals,” Academic Press, (2009)

Exhibit No.	DESCRIPTION
1026	LinkedIn page of William (“Bill”) A. Parkyn
1027	“IntelLED Corp promotes Caterina Hall to CEO” at https://www.ledsmagazine.com/company-newsfeed/article/16682414/inteled-corp-promotes-caterina-hall-to-ceo
1028	RocketReach page of David Pelka
1029	Sotera Stipulation
1030	Judge Gilstrap’s Case Schedule (May 4, 2026) (retrieved May 13, 2025)
1031	Judge Gilstrap’s Case Schedule 5/18/2026-7/6/2026
1032	Judge Gilstrap’s Case Schedule, April 2026
1033	Summary of Trial Scheduling and Actual Trial Dates in Recent E.D. Tex. Patent Cases
1034	Judicial Caseload For Eastern District of Texas (December 31, 2024)
1035	Defendant Reply ISO Motion to Transfer (Redacted), <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1036	E-mail from Patent Owner’s Counsel Dated May 20, 2025
1037	Motion to Transfer, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1038	Motion to Dismiss, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1039	Transcript of Hearing on April 15, 2025, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1040	Minute Entry for Scheduling Conference/Case Management Conference held on 11/7/2024
1041	Lex Machina search Minute Entry for Scheduling Conference/Case Management Conference held on 11/7/2024
1042	Molex, LLC response, Feb. 17, 2025
1043	<i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP, ECF No. 131 (E.D. Tex. May 29, 2025).
1044	Complaint, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1045	Assignment Record for the ’162 Patent
1046	Appendix A of Infringement Contentions Served October 24, 2024 in <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP

Exhibit No.	DESCRIPTION
1047	Reserved
1048	Docket Overview from Docket Navigator: <i>SVV Technology Innovations Inc. v. Samsung Electronics Co., Ltd. et al.</i> and <i>Lexington Luminance LLC v. Samsung Electronics Co, Ltd; et al.</i>
1049	Plaintiff's Initial Disclosures in <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1050	Venue Discovery Order, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1051	Discovery Order, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1052	Protective Order, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1053	<i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP, D.I. No. 51 (E.D. Tex. Dec. 16, 2024).
1054	<i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP, D.I. No. 39 (E.D. Tex. Nov. 21, 2024).
1055	Updated <i>Sotera</i> Stipulation

On April 21, 2025, Petitioner filed a stipulation stating:

Consistent with *Sotera Wireless, Inc.*, Petitioner hereby stipulates “that if the PTAB institutes *inter partes* review, Petitioner ‘will not pursue in [*Sinotechnix LLC v. Samsung Electronics Co., Ltd. et al.*, No. 2:24-cv-00544 (EDTX) (“Litigation”)] the specific grounds [asserted in IPR2025-00331], or . . . any other ground . . . that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications).” *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential). For the avoidance of doubt, if the PTAB institutes *inter partes* review, Petitioner will not, in the Litigation, rely on any product or system art that is “based on the same evidence presented” in this IPR. *Cf. SAP America, Inc. v. Cyandia, Inc.*, IPR2024-01496, Paper 13 at 9 (PTAB Apr. 7, 2025).

EX1029, 2.

Petitioner files herewith a further broadened stipulation that adds that “if the PTAB institutes *inter partes* review, Petitioner will not, in the Litigation, ‘assert combinations of product art with printed publication prior art asserted in this [IPR] proceeding.’ *Samsung Elecs. Co., Ltd. v. SiOnyx, LLC*, IPR2025-00064, Paper 16 at 14 (PTAB Jun. 6, 2025).” EX1055, 2.

The further broadened stipulation ensures that, if instituted, this IPR will serve as a “true alternative” to the Litigation by categorically excluding the “printed

publication prior art asserted in this [IPR] proceeding” from the Litigation, including any use of that printed publication prior art in combination with any product or system art. Put another way, if the IPR is instituted, the prior art references used in the IPR—namely Tawa, Shikama, and Scharf (or even any product or system art that is based on those references)—will not be used in the Litigation—whether independently or in combination with *any* prior art including product or system art. Under the further broadened stipulation, there will be no “overlap between issues raised in the petition and in the [Litigation],” eliminating any “concerns of inefficiency and the possibility of conflicting decisions” between the PTAB and the district court. *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 at 12 (PTAB Mar. 20, 2020) (precedential).

Indeed, Petitioner’s further broadened stipulation squarely addresses—and moots—the very concerns that the Board has recently found favor denial under *Fintiv* Factor 4. *See SiOnyx*, IPR2025-00064, Paper 16 at 15-16 (PTAB Jun. 6, 2025); IPR2025-00065, Paper 16 at 15 (PTAB Jun. 6, 2025). Accordingly, Petitioner respectfully submits Factor 4 strongly favors institution.

Dated: June 13, 2025

Respectfully submitted,

/Yung-Hoon Ha/

Yung-Hoon Ha (Reg. No. 56,368)

DESMARAIS LLP

Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies that on June 13, 2025, complete a copy of the foregoing **Petitioner's Stipulation Regarding Updated Stipulation and Ex. 1055 (Updated Sotera Stipulation)** was served on counsel of record for the Patent Owner by filing the documents through P-TACTS and by sending via electronic mail to the following addresses:

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