

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. IPR2025-00335
U.S. Patent No. 8,132,952

PETITIONER'S SUPPLEMENTAL BRIEF
REGARDING UPDATED STIPULATION¹

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

PETITIONER’S EXHIBIT LIST

Exhibit No.	DESCRIPTION
1001	U.S. Patent No. 8,132,952 (“’952 Patent”)
1002	Declaration of Dr. Ioannis Kymissis
1003	U.S. Patent Publication No. 2005/0007516 (“Hong”)
1004	PCT Application Publication No. WO Patent Publication No. 2004/097949 (“Lee”)
1005	U.S. Patent Publication No. 2004/0233665 (“West”)
1006	U.S. Patent Publication No. 2002/0187571 (“Collins”)
1007	PCT Application Publication No. WO 2000/060406 (“Johnson”)
1008	U.S. Patent Publication No. 2005/0184638 (“Mueller”)
1009	U.S. Patent No. 6,252,254 (“Soules”)
1010	U.S. Patent Publication No. 2005/0254258 (“Lee ’258”)
1011	PCT Application Publication No. WO 1997/048134 (“Turnbull”)
1012	Judicial Caseload For Eastern District of Texas
1013	Judge Gilstrap’s Case Schedule (May 4, 2026)
1014	File History of the ’952 Patent
1015	File History of U.S. Application No. 11/909,700
1016	U.S. Patent Publication No. 2004/0130884 (“Yoo”)
1017	“Resins for Optics,” Three Bond Technical News, Jul. 1, 2004
1018	U.S. Patent No. 6,738,120 (“Song”)
1019	U.S. Patent No. 4,229,783 (“Eberhardt”)
1020	U.S. Patent No. 5,587,816 (“Gunjima”)
1021	Docket Control Order in <i>Sinotechnix LLC v. Samsung Electronics et al.</i> , 2:24-cv-544-JRG-RSP
1022	<i>Sotera</i> Stipulation
1023	Judge Gilstrap’s Case Schedule 5/18/2026-7/6/2026
1024	Judicial Caseload For Eastern District of Texas (December 31, 2024)
1025	Discovery Order, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1026	Protective Order, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1027	Judge Gilstrap’s Case Schedule (May 4, 2026) (retrieved May 13, 2025)
1028	Transcript of Hearing on April 15, 2025, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP

Exhibit No.	DESCRIPTION
1029	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
1030	Venue Discovery Order, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1031	Defendant Reply ISO Motion to Transfer (Redacted), <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1032	Minute Entry for Scheduling Conference/Case Management Conference held on 11/7/2024
1033	Lex Machina search Minute Entry for Scheduling Conference/Case Management Conference held on 11/7/2024
1034	Reserved
1035	Complaint, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1036	Assignment Record for the '952 Patent
1037	Molex, LLC response, Feb. 17, 2025
1038	Plaintiff's Initial Disclosures in <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1039	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>
1040	E-mail from Patent Owner's Counsel Dated May 20, 2025
1041	Motion to Dismiss, <i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP
1042	<i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP, ECF No. 131 (E.D. Tex. May 29, 2025).
1043	Summary of Trial Scheduling and Actual Trial Dates in Recent E.D. Tex. Patent Cases
1044	Judge Gilstrap's Case Schedule, April 2026
1045	<i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP, Dkt.51 (E.D. Tex. Dec. 16, 2024).
1046	<i>Sinotechnix LLC v. Samsung Elecs. et al.</i> , 2:24-cv-544-JRG-RSP, Dkt.39 (E.D. Tex. Nov. 21, 2024).
1047	Updated <i>Sotera</i> Stipulation

All annotations, coloring, and emphases have been added unless indicated otherwise.

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 IPR2025-00335], 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).

EX1022, 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).” EX1047, 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 Hong and Lee (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/
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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. 1047 (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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