Paper No. __

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE LLC,
SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioners,

v.

MULLEN INDUSTRIES LLC,
Patent Owner.

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Case No. IPR2025-00365
Patent No. 11,234,117

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. 11,234,117 ("the '117 patent")
1002	Prosecution History of U.S. Patent No. 11,234,117
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	U.S. Patent No. 6,885,874 ("Grube")
1018	U.S. Patent No. 6,716,101 ("Meadows")
1019	U.S. Patent No. 7,366,522 ("Thomas")
1020	U.S. Patent No. 5,736,960 ("Murphy")
1021	U.S. Patent No. 5,923,286 ("Divakaruni")
1022	International Patent Application Publication No. WO 01/91486 ("Darling")
1023	U.S. Patent No. 6,084,951 ("Smith")
1024	RESERVED
1025	U.S. Patent No. 6,415,224 ("Wako")

Exhibit	Description
1026	RESERVED
1027	RESERVED
1028	RESERVED
1029	RESERVED
1030	RESERVED
1031	RESERVED
1032	RESERVED
1033	RESERVED
1034	RESERVED
1035	International Patent Application Publication No. WO 00/22860 ("Degnbol")
1036	Civil Docket Report in *Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 2:24-cv-00049 (E.D. Tex.) (last checked December 26, 2024)
1037	Federal Court Management Statistics–Profiles, U.S. District Courts–Combined Civil and Criminal (September 30, 2024) (available at https://www.uscourts.gov/file/79291/download)
1038	Docket Control Order in *Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.*, 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 *Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.*, 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	RESERVED
1043	RESERVED
1044	U.S. Patent No. 6,269,369 ("Robertson")
1045	U.S. Patent Application Publication No. 2002/0169539 ("Menard")
1046	U.S. Patent No. 7,681,034 ("Lee")

Exhibit	Description
1047	RESERVED
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	U.S. Patent No. 6,532,418 (“Chun”)
1056	U.S. Patent No. 6,049,718 (“Stewart”)
1057	RESERVED
1058	RESERVED
1059	U.S. Patent No. 7,796,998 (“Zellner”)
1060	U.S. Patent No. 7,284,033 (“Jhanji”)
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	RESERVED
1070	RESERVED
1071	U.S. Patent No. 7,203,752 (“Rice”)
1072	RESERVED
1073	RESERVED

Exhibit	Description
1074	U.S. Patent No. 6,285,867 (“Boling”)
1075	U.S. Patent No. 6,208,934 (“Bechtolsheim”)
1076	U.S. Patent Application Publication No. 2003/0040272 (“Lelievre”)
1077	U.S. Patent No. 5,048,117 (“Aisaka”)
1078	U.S. Patent No. 5,212,811 (“Kuge”)
1079	Sotera Stipulation Letter dated February 11, 2025
1080	Plaintiff's Preliminary Pre-Trial Election of Asserted Claims in *Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.*, 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 three of the claims of the '117 patent that are challenged in IPR2025-00365 (claims 1, 8, 13). EX1080 at 1.

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	PFSnell@mintz.com
Brad M. Scheller	BMScheller@mintz.com

Date: April 3, 2025

/Dara Del Rosario/
Dara Del Rosario
Paralegal
WOLF, GREENFIELD & SACKS, P.C.