UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., and

SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioners,

v.

VASU HOLDINGS, LLC,

Patent Owner.

Case IPR2025-00446

U.S. Patent No. 8,886,181

PETITIONERS' OFFERED STIPULATION

PETITIONERS' OFFERED STIPULATION

Petitioners hereby stipulate that, if the PTAB institutes this IPR, Petitioners will not pursue any ground under 35 U.S.C. §§102-103 against U.S. Patent No. 8,886,181 in *Vasu Holdings, LLC v. Samsung Electronics Co., Ltd.*, Case No. 2:24-cv-00034-JRG-RSP (E.D. Tex.). Attached hereto as Appendix A is an email dated April 18, 2025 from Petitioners' Counsel to Patent Owner's counsel in which Petitioners first provided this stipulation.

Patent Owner has indicated that it does not stipulate to the contents of the stipulation.

Dated: May 1, 2025

Respectfully submitted,

By: */James L. Davis, Jr./*
Name: James L. Davis, Jr.
Registration No. 57,325
ROPES & GRAY LLP

Lead Counsel for Petitioners

APPENDIX A

Bradford, Jonathan

From: Davis, James L., Jr.
Sent: Friday, April 18, 2025 1:30 AM
To: jhannah@kramerlevin.com; jprice@kramerlevin.com; kkastens@kramerlevin.com; jeng@kramerlevin.com; svdocketing@kramerlevin.com; Andre, Paul; LKobialka@KRAMERLEVIN.com; JGilbert@KRAMERLEVIN.com; ctirado@kramerlevin.com; ccapshaw@capshawlaw.com; ederieux@capshawlaw.com; hpeterson@capshawlaw.com; MBrenner@KRAMERLEVIN.com; mhlee@kramerlevin.com
Cc: melissa@gillamsmithlaw.com; Pepe, Steven; Middleton, Alexander; Wang, Jolene; Chun, David S.; Bonny, Christopher M.; Zhang, Frances; Gregov, Drago N.
Subject: IPR2025-00446, -00447, -00448, -00449, -00450 | Vasu Holdings, LLC v. Samsung Electronics Co., Ltd., Case No. 2:24-cv-00034-JRG-RSP (E.D. Tex.)

Counsel,

Samsung in the corresponding district court litigation (*Vasu Holdings, LLC v. Samsung Electronics Co., Ltd.*, Case No. 2:24-cv-00034-JRG-RSP (E.D. Tex.)) hereby stipulates to the following:

1) If the PTAB grants institution of IPR2025-00446, Samsung stipulates that it will not pursue any ground under 35 U.S.C. §§102-103 against U.S. Patent No. 8,886,181 in *Vasu Holdings, LLC v. Samsung Electronics Co., Ltd.*, Case No. 2:24-cv-00034-JRG-RSP (E.D. Tex.).
2) If the PTAB grants institution of IPR2025-00447, Samsung stipulates that it will not pursue any ground under 35 U.S.C. §§102-103 against U.S. Patent No. 10,206,154 in *Vasu Holdings, LLC v. Samsung Electronics Co., Ltd.*, Case No. 2:24-cv-00034-JRG-RSP (E.D. Tex.).
3) If the PTAB grants institution of IPR2025-00448, Samsung stipulates that it will not pursue any ground under 35 U.S.C. §§102-103 against claims 1, 12, 31, and 37 of U.S. Patent No. 10,368,281 in *Vasu Holdings, LLC v. Samsung Electronics Co., Ltd.*, Case No. 2:24-cv-00034-JRG-RSP (E.D. Tex.).
4) If the PTAB grants institution of IPR2025-00449, Samsung stipulates that it will not pursue any ground under 35 U.S.C. §§102-103 against claims 23 and 45 of U.S. Patent No. 10,368,281 in *Vasu Holdings, LLC v. Samsung Electronics Co., Ltd.*, Case No. 2:24-cv-00034-JRG-RSP (E.D. Tex.).
5) If the PTAB grants institution of IPR2025-00450, Samsung stipulates that it will not pursue any ground under 35 U.S.C. §§102-103 against U.S. Patent No. 10,419,996 in *Vasu Holdings, LLC v. Samsung Electronics Co., Ltd.*, Case No. 2:24-cv-00034-JRG-RSP (E.D. Tex.).

Samsung intends to seek leave to file its stipulations in the applicable proceedings before the PTAB. Please confirm whether Vasu opposes the request.

Sincerely,
Jim Davis
Counsel for Samsung

James L. Davis, Jr.
ROPES & GRAY LLP
T +1 650 617 4794 | M +1 314 623 7939
525 University Avenue, 8th Floor
Palo Alto, CA 94301
James.L.Davis@ropesgray.com
www.ropesgray.com
pronouns: he/him/his