

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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**SAMSUNG ELECTRONICS CO., LTD., and**  
**SAMSUNG ELECTRONICS AMERICA, INC.,**

Petitioners,

v.

**VASU HOLDINGS, LLC,**

Patent Owner.

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Case IPR2025-00448

U.S. Patent No. 10,368,281

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**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 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.). 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

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**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; hpetererson@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

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