

From: [Reidy, Patrick C.](#)
To: [James Tsuei](#); rak_cerence@raklaw.com
Cc: [xSamsung Cerence2 AP](#); zzz.External.melissa@gillamsmithlaw.com; [xSamsung Cerence AP](#)
Subject: RE: Cerence v. Samsung (2:24-cv-00181) | Supplemental Invalidity Contentions
Date: Thursday, May 22, 2025 10:34:06 AM
Attachments: [image001.png](#)
[Cerence 2 \(EDTX\) DRAFT Supplemental Invalidity Contention Cover Pleading.pdf](#)
[Redline Cerence 2 \(EDTX\) DRAFT Supplemental Invalidity Contention Cover Pleading.pdf](#)

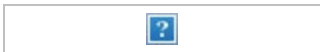
Counsel,

Following up on our request below. I've re-attached the proposed supplemental cover pleading here, addressing the '428 prior art document production served yesterday.

Regards,

Patrick

[Patrick C. Reidy](#)
Partner | [Bio](#)



70 West Madison Street | Suite 4200
Chicago, Illinois 60602-4321
T: +1 312.583.2424
Patrick.Reidy@arnoldporter.com
www.arnoldporter.com | [LinkedIn](#)

From: Reidy, Patrick C. <Patrick.Reidy@arnoldporter.com>
Sent: Monday, May 12, 2025 5:38 PM
To: James Tsuei <jtsuei@raklaw.com>; rak_cerence@raklaw.com
Cc: [xSamsung Cerence2 AP](#) <xSamsungCerence2AP@arnoldporter.com>;
zzz.External.melissa@gillamsmithlaw.com <melissa@gillamsmithlaw.com>; [xSamsung Cerence AP](#)
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Counsel,

Samsung is amending its invalidity contentions. The amended cover pleading (subject to a placeholder for a forthcoming document production) and the additional claim charts (Exhibits A-27 to A-28, B-27 to B-28, C-27 to C-28, and D-16 to D-18) are attached. The amendments are directed to (1) including the prior art and grounds asserted in Samsung's IPRs filed against the asserted patents, and (2) amending Samsung's § 112 enablement and written description defenses with respect to the '428 patent.

Samsung intends to seek leave with the Court to amend its invalidity contentions.

Samsung has good cause to seek leave because, for example, Samsung discovered the prior art after serving its invalidity contentions, the stage of the case remains early, and there is no prejudice to Cerence. Please let us know whether or not Cerence opposes leave to amend.

Regards,

Patrick

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Partner | [Bio](#)



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www.arnoldporter.com | [LinkedIn](#)