

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS
AMERICA, INC.,
Petitioner,

v.

OPTIMUM IMAGING TECHNOLOGIES LLC,
Patent Owner.

Case IPR2025-00462
Patent No. 8,451,339

PETITIONER'S UPDATED MANDATORY NOTICES

Petitioner submits these updated mandatory notices pursuant to 37 C.F.R. § 42.8(a)(3). Only changes to the information required by 37 C.F.R. § 42.8(b) are listed.

I. REAL PARTY-IN-INTEREST.

No change.

II. RELATED MATTERS.

IPR Proceedings. As acknowledged in the Petition, the following IPRs involve the '339 Patent: IPR2020-01322, IPR2024-00925, and IPR2024-01372. Additionally, concurrently with the filing of these updated mandatory notices, Petitioner has filed another petition against different claims of the '339 Patent: IPR2025-00628.

The '339 Patent is in the same family as U.S. Patent Nos. 7,612,805 and 10,877,266. Nikon is currently challenging the '266 Patent in IPR2024-01374. Sony has challenged the '266 Patent in IPR2024-01046. Nikon is currently challenging the '805 Patent in IPR2024-01373. Sony is currently challenging the '805 Patent in IPR2024-00924. Samsung has filed petitions against the '805 and '266 patents, which present substantively the same arguments and evidence as found in the Nikon IPRs. *See Samsung Electronics Co., Ltd. v. Optimum Imaging Technology, LLC*, IPR2025-000461 ('805 Patent); *Samsung Electronics Co., Ltd. v. Optimum Imaging Technology, LLC*, IPR2025-000463 ('266 Patent).

District Court Proceedings. The following proceedings are pending in the Eastern District of Texas: *Optimum Imaging Technologies LLC v. FUJIFILM Corporation*, Case No. 4-23-cv-00922; (ii) *Optimum Imaging Technologies LLC v. Nikon Corporation*, Case No. 4-23-cv-00923; (iii) *Optimum Imaging Technologies LLC v. Olympus Corporation, et al.*, Case No. 4-23-cv-00924; (iv) *Optimum Imaging Technologies LLC v. Panasonic Corporation*, Case No. 4-23-cv-00926; (v) *Optimum Imaging Technologies LLC v. Sony Corporation*, Case No. 4-23-cv-00928; (vi) *Optimum Imaging Technologies LLC v. Samsung Electronics Co., Ltd.*, Case No. 4:23-cv-00927.

The following proceeding was pending in the United States District Court for the Western District of Texas and has been terminated: *Canon Inc. v. Optimum Imaging Technologies LLC*, Case No. 1:20-cv-01238 (Terminated April 28, 2021).

The following case is pending in the United States District Court for the Northern District of California: *FUJIFILM North America Corporation v. Optimum Imaging Technologies LLC*, Case No. 4:24-cv-03297.

III. LEAD AND BACKUP COUNSEL

No change.

IV. SERVICE INFORMATION

No change.

Dated: February 21, 2025

Respectfully Submitted,

/Andrew R. Sommer/

Andrew R. Sommer
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing **Petitioner's Updated Mandatory Notices** was served by email upon Patent Owner's counsel by email as follows:

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