

February 26, 2025

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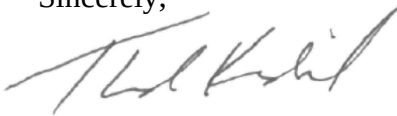
Re: *Headwater Research LLC v. Samsung Electronics Co., Ltd. et al., Case No. 2-24-cv-00228 (E.D. Tex.)*

Dear Counsel:

Samsung Electronics Co., Ltd. (“**Samsung**”) has filed a petition for *inter partes* review (IPR) petition (IPR2025-00481) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1-13 of U.S. Patent No. 11,096,055 (“**the '055 Patent**”). The tables in attached Appendix A list all grounds, challenged claims, and references asserted in IPR2025-00481.

I write to inform you that Samsung hereby stipulates that, if the PTAB institutes IPR2025-00481, Samsung agrees not to pursue the same grounds (listed in Appendix A below) for the currently asserted claims in the district court litigation. *Apple, Inc. v. SEVEN Networks, LLC*, IPR2020-00156, Paper 10 at 19 (PTAB June 15, 2020); *see Sand Revolution II, LLC v. Continental Intermodal Group-Trucking LLC*, IPR2019-01393, Paper 24 at 12 (PTAB June 16, 2020).

Sincerely,



Thad Kodish

Attorney for Samsung Electronics Co., Ltd.

Appendix A – Grounds and Prior Art References Used in IPR2025-00481

Ground	Claim(s)	35 U.S.C. § 103
1A	1-2, 6-7, 9-10, 12	Jheng and Chiu
2A	1-2, 6-7, 9-10, 12	Jheng, Chiu, and Rao
1B	3-4	Jheng, Chiu, and Collins
2B	3-4	Jheng, Chiu, Rao, and Collins
1C	5	Jheng, Chiu, and Camilleri
2C	5	Jheng, Chiu, Rao, and Camilleri
1D	8	Jheng, Chiu, and Bajko
2D	8	Jheng, Chiu, Rao, and Bajko
1E	11	Jheng, Chiu, and Liu
2E	11	Jheng, Chiu, Rao, and Liu
1F	13	Jheng, Chiu, and Brown
2F	13	Jheng, Chiu, Rao, and Brown

List of References

Reference Name	Details
Jheng	U.S. 2009/0239584 (“Jheng”)
Chiu	WO 2004/031488 (“Chiu”)
Rao	U.S. 2006/0039354 (“Rao”)
Collins	U.S. 2006/0206941 (“Collins”)
Camilleri	U.S. 2009/0149220 (“Camilleri”)
Bajko	U.S. 2004/0196796 (“Bajko”)
Liu	U.S. 2008/0020755 (“Liu”)
Brown	U.S. 2005/0164737 (“Brown”)