

**From:** [Director Discretionary Decision](#)  
**To:** [Karan Jhurani](#)  
**Cc:** [rak\\_headwater@raklaw.com](mailto:rak_headwater@raklaw.com); [A Ra Choi](#); [PTAB Inbound](#); [IPR39843-0185IP1](#); [jmilkey@raklaw.com](mailto:jmilkey@raklaw.com); [Trials](#)  
**Subject:** RE: IPR2025-00482 - Petitioner's Request for Authorization to Submit Updated Stipulation (39843-0185IP1)  
**Date:** Monday, May 12, 2025 3:23:40 PM

---

Counsel – Petitioner’s unopposed request is granted and Petitioner is authorized to file an updated stipulation.

---

**From:** Karan Jhurani <[jhurani@fr.com](mailto:jhurani@fr.com)>  
**Sent:** Friday, May 9, 2025 4:52 PM  
**To:** Trials <[Trials@USPTO.GOV](mailto:Trials@USPTO.GOV)>  
**Cc:** Cc: [rak\\_headwater@raklaw.com](mailto:rak_headwater@raklaw.com) <[rak\\_headwater@raklaw.com](mailto:rak_headwater@raklaw.com)>; A Ra Choi <[achoi@raklaw.com](mailto:achoi@raklaw.com)>; PTAB Inbound <[PTABInbound@fr.com](mailto:PTABInbound@fr.com)>; IPR39843-0185IP1 <[IPR39843-0185IP1@fr.com](mailto:IPR39843-0185IP1@fr.com)>; Karan Jhurani <[jhurani@fr.com](mailto:jhurani@fr.com)>; [jmilkey@raklaw.com](mailto:jmilkey@raklaw.com)  
**Subject:** IPR2025-00482 - Petitioner's Request for Authorization to Submit Updated Stipulation (39843-0185IP1)

**CAUTION:** This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Your Honors,

For the above-referenced proceeding, Petitioner Samsung requests authorization to file an updated stipulation, the pertinent language for which is provided below:

*Samsung will not pursue in District Court litigation the specific grounds asserted in inter partes review in this proceeding, or any other ground that could have been reasonably raised in this proceeding (i.e., any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications).” See Sotera Wireless, Inc. v. Masimo Corporation, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020). Samsung also stipulates that, if the PTAB institutes review in this proceeding, Samsung will not pursue in District Court litigation combinations of the prior art asserted in this proceeding with unpublished system prior art (or any other type of prior art). See Motorola Solutions, Inc. v. Stellar, LLC, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025).*

Petitioner would be amenable to Patent Owner re-filing its discretionary denial brief by May 24 (see Paper 9; indicating that brief may be filed within one month from April 24) and addressing in that re-filed brief the impact of the stipulation on its analysis. Alternatively, Petitioner would not oppose any future request by Patent Owner to file a reply to the opposition, to address this stipulation.

Patent Owner does not oppose this request.

The parties are available for a call at the following times, should the Board request such a call:

1. Monday, May 12 between 2 and 4 pm ET
2. Wednesday, May 14 between 1 and 4 pm ET

Best,  
Karan  
Counsel for Petitioner Samsung

**Karan Jhurani**

Principal ■ Fish & Richardson P.C.

T: 404 724 2807

[jhurani@fr.com](mailto:jhurani@fr.com) | [Bio](#) | [LinkedIn](#) | [fr.com](#)

1180 Peachtree Street NE, 21st Floor, Atlanta, GA 30309

\*\*\*\*\*  
\*\*\*\*\*  
This email message is for the sole use of the intended recipient(s) and may contain  
confidential and privileged information. Any unauthorized use or disclosure is  
prohibited. If you are not the intended recipient, please contact the sender by  
reply email and destroy all copies of the original message.  
\*\*\*\*\*  
\*\*\*\*\*