Arnold & Porter

Jin-Suk Park
+1 202.942.5648 Direct
jin.park@arnoldporter.com

April 18, 2025

VIA E-MAIL

Meng Xi
Susman Godfrey, LLP
1000 Louisiana Street, Suite 5100
Houston, TX 77002
mxi@susmangodfrey.com

Re: *Four Batons Wireless, LLC v. Samsung Electronics Co., Ltd., et al.*, Case No. 2:24-cv-00284-JRG-RSP (E.D. Tex.)

Dear Ms. Xi:

We write regarding IPR2025-00496, in which Petitioners Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (together "Samsung"), challenge the patentability of claims 1-13 and 16 of U.S. Patent No. 8,798,006 ("the '006 patent"). Samsung hereby stipulates that, if the Patent Trial and Appeal Board ("PTAB") permits Samsung to file this stipulation as an exhibit in the IPR proceeding prior to issuing its decision on institution and, thereafter, institutes this IPR petition on the grounds presented therein, then Samsung will not pursue in the above-captioned litigation (i) any grounds that were raised or reasonably could have been raised in the IPR, and (ii) combinations of the prior art asserted in this IPR with unpublished system prior art. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020) (precedential as to § II.A); *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, Paper 19 (PTAB March 28, 2025).

For the sake of clarity and to avoid any doubt, if the PTAB does not permit Samsung to file this stipulation as an exhibit in the IPR proceeding prior to its decision on institution, declines institution, or later vacates institution of this IPR, Samsung reserves the right to pursue in this litigation (i) any ground that was raised or reasonably could have been raised in the IPR, and/or (ii) combinations of the prior art asserted in this IPR with unpublished system prior art. This stipulation is not intended, and should not be construed, to limit

Samsung v. Four Batons
IPR2025-00496
Exhibit 1020

Samsung's ability to assert invalidity of the asserted claims of the '006 patent on any other ground, regardless of whether IPR is instituted.

Sincerely,

/s/ Jin-Suk Park
Jin-Suk Park