



Douglas J. Kline
+1 617 570 1209
dkline@goodwinlaw.com

Goodwin Procter LLP
100 Northern Avenue
Boston, Massachusetts 02210

goodwinlaw.com
+1 617 570 1000

April 18, 2025

VIA E-MAIL

Erick S. Robinson
Brown Rudnick LLP
811 Main Street Suite 1850
Houston, TX 77002
ERobinson@brownrudnick.com

Re: *Mobile Data Technologies LLC v. Samsung Electronics Co., Ltd., et al.*, Case No. 2:24-cv-00435-JRG-RSP (E.D. Tex.)

Dear Counsel:

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) hereby stipulate, consistent with the stipulation made by the Petitioner in *Sotera Wireless Inc. v. Masimo Corp.*, IPR2020-01019, that if the Patent Trial and Appeal Board (“PTAB”) institutes an *inter partes* review (“IPR”) in either or both of IPR2025-00535 and IPR2025-00536 concerning U.S. Patent No. 9,032,039, then Samsung will not pursue in this litigation the grounds raised or any other grounds that could have reasonably been raised before the PTAB in the instituted proceeding(s).

Regards,

/s/ Douglas J. Kline

Douglas J. Kline