From:	Birbach, Naomi
To:	Rafatijo, Homayoon; Robinson, Erick; Partridge, Jayme; Spisak, John S.; Piana, Jayne; Dunn, Patrick; MDT-Samsung-BR; Michael.Smith@Solidcounsel.com; Anjetta.King@solidcounsel.com; joel.hernandez@solidcounsel.com
Cc:	DG-Samsung-MDT; Melissa@gillamsmithlaw.com; Kline, Douglas J; Gordon, Lori A
Subject:	RE: MDT v. Samsung, Case No. 2:24-cv-00435 and IPR Nos. 2025-00535-00544
Date:	Wednesday, April 30, 2025 4:47:24 PM
Attachments:	image002.png

CAUTION: External E-mail. Use caution accessing links or attachments.

Thanks, Homayoon. Please let us know if you approve of the below communication to the Board by 3PM tomorrow.

Regards,
Naomi

Dear Honorable Board,

Petitioners Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc. write to seek authorization to file exhibits in IPR Nos. 2025-00535 (EX-1034), -00536 (EX-1028), -00537 (EX-1036), -00538 (EX-1032), -00539 (EX-1036), -00540 (EX-1033), -00541 (EX-1034), -00542 (EX-1030), -00543 (EX-1037), -00544 (EX-1031) to document the *Sotera* stipulations served on Patent Owner Mobile Data Technologies LLC on April 18 and April 21, 2025.

Patent Owner does not oppose Petitioner contacting the Board to seek leave to file these stipulations.

If the Board determines a call is needed, the parties are available at the following times (all times Eastern):
May 6, 2025, between 10:00 am and 5:00 pm
May 7, 2025 between 10:00 am and 5:00 pm

From: Rafatijo, Homayoon <HRafatijo@brownrudnick.com>
Sent: Wednesday, April 23, 2025 4:48 PM
To: Birbach, Naomi <NBirbach@goodwinlaw.com>; Robinson, Erick <ERobinson@brownrudnick.com>; Partridge, Jayme <JPartridge@brownrudnick.com>; Spisak, John S. <JSpisak@brownrudnick.com>; Piana, Jayne <JPiana@brownrudnick.com>; Dunn, Patrick <PDunn@brownrudnick.com>; MDT-Samsung-BR <MDT-Samsung-BR@brownrudnick.com>; Michael.Smith@Solidcounsel.com; Anjetta.King@solidcounsel.com; joel.hernandez@solidcounsel.com
Cc: DG-Samsung-MDT <DG-Samsung-MDT@goodwinlaw.com>; Melissa@gillamsmithlaw.com; Kline,

Douglas J <DKline@goodwinlaw.com>; Gordon, Lori A <LoriGordon@goodwinlaw.com>
Subject: RE: MDT v. Samsung, Case No. 2:24-cv-00435 and IPR Nos. 2025-00535-00544

EXTERNAL

Counsel:

Patent Owner does not oppose Petitioner contacting the Board to seek leave to file these stipulations. Patent Owner's consent is limited to contacting the Board to seek leave to file the stipulations. Patent Owner's consent is not an admission regarding timeliness or sufficiency of the stipulations.

Given that Petitioner is sending a joint communication on behalf of the parties, please provide the proposed communication to us for approval prior to sending it to the Board. Patent Owner reserves its right to include a Patent Owner's statement.

If the Board determines a call is needed, Patent Owner is available for a Board call (all times Eastern):
May 6, 2025, between 10:00 am and 5:00 pm
May 7, 2025 between 10:00 am and 5:00 pm

brownrudnick

Homayoon Rafatijo, Ph.D., Esq.
IP Litigation Attorney

Brown Rudnick LLP
1900 N Street NW
Washington, D.C. 20036
T: +1 202.536.8309
HRafatijo@brownrudnick.com
www.brownrudnick.com

From: Birbach, Naomi <NBirbach@goodwinlaw.com>
Sent: Monday, April 21, 2025 4:07 PM
To: Robinson, Erick <ERobinson@brownrudnick.com>; Partridge, Jayme <JPartridge@brownrudnick.com>; Spisak, John S. <JSpisak@brownrudnick.com>; Piana, Jayne <JPiana@brownrudnick.com>; Dunn, Patrick <PDunn@brownrudnick.com>; MDT-Samsung-BR <MDT-Samsung-BR@brownrudnick.com>; Michael.Smith@Solidcounsel.com; Anjetta.King@solidcounsel.com; joel.hernandez@solidcounsel.com
Cc: DG-Samsung-MDT <DG-Samsung-MDT@goodwinlaw.com>; Melissa@gillamsmithlaw.com; Kline, Douglas J <DKline@goodwinlaw.com>; Gordon, Lori A <LoriGordon@goodwinlaw.com>
Subject: RE: MDT v. Samsung, Case No. 2:24-cv-00435 and IPR Nos. 2025-00535-00544

CAUTION: External E-mail. Use caution accessing links or attachments.

Counsel,

Please see the additional attached correspondence.

We plan to seek leave from the Board to file these stipulations as exhibits in IPR Nos. 2025-00535—2025-00544. Please let us know by COB Wednesday if you oppose this request.

Regards,
Naomi

From: Birbach, Naomi
Sent: Friday, April 18, 2025 5:38 PM
To: Robinson, Erick <ERobinson@brownrudnick.com>; Partridge, Jayme <JPartridge@brownrudnick.com>; Spisak, John S. <JSpisak@brownrudnick.com>; Piana, Jayne <JPiana@brownrudnick.com>; Dunn, Patrick <PDunn@brownrudnick.com>; MDT-Samsung-BR <MDT-Samsung-BR@brownrudnick.com>; Michael.Smith@Solidcounsel.com; Anjetta.King@solidcounsel.com; joel.hernandez@solidcounsel.com
Cc: DG-Samsung-MDT <DG-Samsung-MDT@goodwinlaw.com>; Melissa@gillamsmithlaw.com; Kline, Douglas J <DKline@goodwinlaw.com>
Subject: MDT v. Samsung, Case No. 2:24-cv-00435

Counsel,

Please see the attached correspondence.

Regards,
Naomi

Naomi Birbach

GOODWIN

Goodwin Procter LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018
o +1 212 459 7374
f +1 212 656 1663
NBirbach@goodwinlaw.com | goodwinlaw.com

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