| | |
|---|---|
| **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

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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

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**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
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Washington, D.C. 20036
T: +1 202.536.8309
HRafatijo@brownrudnick.com
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**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

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**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

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