UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. and SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioners,

v.

GENGHISCOMM HOLDINGS LLC,
Patent Owner.

Case IPR2025-00781
U.S. Patent 10,200,227

PATENT OWNER'S DISCRETIONARY DENIAL BRIEF

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I. INTRODUCTION AND SUMMARY OF REASONS FOR DISCRETIONARY DENIAL

Pursuant to the Interim Process for PTAB Workload Management memorandum dated March 26, 2025, Patent Owner GenghisComm requests discretionary denial of the Petition under 35 U.S.C. § 314(a). U.S. Patent 10,200,227 ("the '227 Patent") issued in 2019. GenghisComm provided Samsung notice of its infringement of the '227 patent in November 2020, more than 4.5 years ago. EX2001.

A parallel District Court proceeding asserting the '227 patent and 7 other GenghisComm patents is set for trial in 10 months, on April 20, 2026. *GenghisComm v. Samsung*, Case 2:24-cv-0242 (E.D. Tex.). The district court trial is set to conclude substantially before a final written decision will issue in this proceeding (i.e. more than 5 months before the FWD).

Samsung has filed eight different IPRs against the eight patents in the district court case, totaling 31,460 pages. If instituted, these IPRs would reach a FWD until five-seven months ***after*** a single district trial resolves all issues with all eight patents. This weighs heavily in favor of discretionary denial. [1]

[1] The EDTX case involves eight GenghisComm patents; Samsung also delayed before filing IPRs against all eight patents (IPRs 2025-780, -781, -788, -789, -790, -791, -792, and -793). Patent Owner is making similar requests for discretionary

In addition, there is no reason for the PTAB to add a third forum reviewing the validity of this expired patent. The Petition nowhere explains to the PTAB a separate *ex parte* reexamination (Control No. 90/019,411) is already underway, in which the CRU determined certain claims to be unpatentable, a determination that is now on appeal to the PTAB. Appeal No. 2025-002220. This reexamination is being briefed on appeal (Reply brief filed April 13; oral argument requested). There are already two proceedings on this one patent. Instituting a third proceeding would be unreasonable. See *Hulu v. Piranha Media Distribution, LLC*, IPR2024-01252 and IPR2024-01253, Paper 27, April 17, 2025.

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denial in response to each of these petitions. For 6 of these 8, the discretionary denial brief is not due until July 7, an institution decision would be October 10, 2025, and a FWD would be October 10, 2026.

Additionally, for this ’227 patent, and 2 of the other patents, reexaminations are already pending: reexam control nos. 90/019,847 (’005), 90/019,848 (’792), and 90/019,411 (this ’227 patent).

Further, an additional case is pending involving 11,431,386, ED of Texas Case 2:24-cv-901. The trial date for that case is set for June 15, 2026. Samsung filed IPR2025-00899 on the ’386 patent and any FWD would be expected October/November 2026.

Further, the Petition presents no Ground that would invalidate all asserted claims of this one patent. Even Petitioner's view of the '227 patent requires cobbling together a piecemeal patchwork of purported Grounds from multiple references and combinations, and relies on an expert declaration that is 152 pages long and 248 paragraphs to try to fill in further gaps.

A. Relevant Dates

GenghisComm put Samsung on notice of its '227 patent in November 2020, 4.5 years ago. EX2001. The '227 patent expired more than three years ago. GenghisComm filed the District Court litigation in April 2024, where the parties have invested mountains of time and money progressing toward their April 2026 trial date and continue to do so. Despite years of advance knowledge, Samsung chose to wait years to file its IPR Petitions. As a result of Samsung's delay, even Petitioner acknowledges that any final written decision would be expected in September 2026, ***five months after*** the district court's trial. Even the expected institution decision is ***after*** opening and responsive claim construction briefs are due in the district court, with the claim construction hearing just three weeks after institution. This does not include the additional months or years required for Director Review or appeal. Below is a summary of relevant dates:

Date	**Patent, Litigation, Re-exam Event**	**IPR Event**
Feb. 5, 2019	10,200,227 patent issued	
Nov. 19, 2020	Samsung put on notice of	

Date	Patent, Litigation, Re-exam Event	IPR Event
	infringement for ’227 Patent	
May 14, 2022	10,200,227 patent expired	
Feb. 9, 2024	EPR: App. No. 90/019,411 filed	
Apr. 12, 2024	EDTX: Complaint filed	
Aug. 21, 2024	EPR: Final rejection of all challenged claims of the ’227 patent	
Sept. 2024	EDTX: Fact discovery opened	
Oct. 17, 2024	EDTX: Samsung served invalidity contentions, including 18,870 pages of claim charts and 5,339 pages of references	
Dec. 20 2024	Appeal brief in reexam filed	
Mar. 28, 2025		IPR filed
Mar. 31, 2025	EDTX: In-person hearing	
Apr. 13, 2025	EPR: Appeal reply brief filed	
Aug. 18, 2025		Discretionary denial decision anticipated
Aug. 26, 2025	EDTX: Completion of Claim Construction Discovery	
Sep. 4, 2025	EDTX: Opening Claim Construction Brief and Technical Tutorials	
Sep. 9, 2025	EDTX: Deadline to Substantially Complete Document Production	
Sep. 18, 2025	EDTX: Responsive Claim Construction Brief	
Sep. 28, 2025		Institution decision anticipated
Sep. 30, 2025	EDTX: Reply Claim Construction Brief	
Oct. 7, 2025	EDTX: Joint Claim Construction Chart	
Oct. 10, 2025		Institution decisions in 6 other IPRs anticipated
Oct. 21, 2025	EDTX: Claim Construction Hearing	

Date	Patent, Litigation, Re-exam Event	IPR Event
Mar. 17, 2026	EDTX: Final Pre-trial conference	
April 20, 2026	EDTX: Jury selection	
Sep. 28, 2026		FWD statutory deadline

II. THE FINTIV FACTORS FAVOR DISCRETIONARY DENIAL

A. The District Court Already Denied Samsung's Request for Pre-Institution Stay; A Post-Institution Stay Is Also Unlikely

Both the district court case and the reexamination are ongoing and are not stayed.

Despite the clear and repeated guidance from the Courts in the Eastern District of Texas that no pre-institution stay will be granted, and Samsung's inability to identify any case in which the Courts in the E.D. of Texas stayed a case before the PTAB's institution decision, Samsung nonetheless filed a motion requesting a pre-institution stay on Friday, May 16, 2025. On Monday May 19, 2025 the Court entered an Order denying the motion and indicated that the case will not be stayed pre-institution. EX2002.

Even if the Director were to deny this request and the PTAB institutes this IPR, it is still unlikely that a district court action would be stayed even post-institution. The district court is unlikely to stay even post-institution unless Samsung can show that IPRs have been instituted on ***all*** asserted claims and there has been a showing that the PTAB is the Board is ***likely to invalidate every asserted claim*** in the underlying case. *See, e.g*. *Scorpcast, LLC v. Boutique Media*

Pty Ltd, 2020 WL 7631162, at *3 (E.D. Tex. Dec. 22, 2020), explaining:

> Defendants may refile their Motion if the Board institutes on all the asserted claims in this case. …. to meet its burden, Defendants must address whether the Board is likely to invalidate every asserted claim—a showing that requires more than just pointing to a successful petition.

Samsung has made no attempt to demonstrate that all eight of the IPRs (1) will be instituted; and (2) that the Board is likely to invalidate every asserted claim. There is insufficient evidence that the district court is likely to stay its proceeding even if the Board were to institute IPR trial.

B. The District Court Trial Date Is Five-Seven Months *Earlier* than the Statutory Deadline for Final Written Decisions.

District court trial. An FWD in this IPR is not expected until five months *after* the trial date. FWD in the other IPRs in the same case are not expected until seven months *after* the trial date. Director Review and/or appeal would add months or years. This timing should be dispositive. This case is set for jury selection on April 20, 2026 with the final pretrial conference set for March 17, 2026. EX1046. The current median time-to-trial in the Eastern District of Texas is 21.6 months. EX2003.

The only reason Samsung's Petition provided for challenging the trial date was that Judge Schroeder has scheduled four patent jury trials scheduled for April 20, 2026. This was not a valid challenge when Samsung made it because the district court cases are typically one week trials, so the Court could well try four

cases in April 2026.

But whatever the concern over four other trials in April 2026 held when the Petition was filed, that concern is no longer present. Two of Samsung's four identified cases, *Slyde Analytics v. Apple,* 2:24-cv-331, and *Innomemory v. Truist* 2:24-cv-00146, ***have already been dismissed or closed and will not go to trial***. EX2004 and EX2005. The Court has now entered a default judgment in the third case. EX2006, 2:24-cv-348. This leaves two cases, including *GenghisComm v. Samsung*, set to be tried in April 2026. Samsung's only reason to even consider second guessing the trial date is no longer a valid concern.

Ex parte reexam on same patent. That a reexamination on this very same patent is already underway, and is now on appeal, should weigh heavily against institution. There is no reasonable reason why three different tribunals should be looking at this same patent at the same time.

C. Investment in Parallel Proceedings By Court and Parties

GenghisComm has invested substantially in the parallel proceedings. In addition to all the time, effort, and expense to secure the patents, GenghisComm and its counsel have been working on the matter for well over five years. GenghisComm first put Samsung on notice of this '227 patent and its infringement in November 2020. Settled expectations favor denial of institution. *E.g*. *Irhythm Technologies, Inc. v. Welch Allyn, Inc.*, IPR2025-00363 (Paper 10).

The first 2020 notice letter itself was 106 pages long, with 5 claim charts demonstrating infringement by Samsung's use of industry-standard 4G and 5G cellular telephony technologies. Additional pre-suit investigation, drafting the complaint, and related work took extensive additional time. Since the case was filed, GenghisComm has prepared and served its initial infringement contentions, engaged in both offensive and defensive discovery, addressed Samsung's discovery shortcomings with motions to compel, attended and argued disputed motions, and retained both technical, damages and software code experts. Depositions will soon be scheduled. Software code review will soon be underway, and third-party subpoenas have been issued and should soon produce discovery.

Samsung has also invested heavily in the district court litigation. It is defended there by the same law firm that filed this IPR, Greenberg Traurig, which is reportedly one of the law firms with the highest billing rates in the country. EX2007. According to one summary, Greenberg's rates range from $395 per hour for paralegals to $1,670 per hour for partners. EX2008.

As of now, as its Court appearances and emails reflect, Samsung has identified at least 10 Greenberg lawyers working on the E.D. of Texas case, plus untold additional lawyers unidentified by name but included in the reflector Gt-genghiscomm@gtlaw.com. Samsung's district court case team also includes at

least two local counsel, plus paralegal(s), for a total of at least 13 individuals. [2]

All the expensive Greenberg lawyers and other professionals have produced extensive work product. Back in October 2024, for example, Samsung provided its initial invalidity contentions. This work product included ***18,870 pages*** of claim charts, relying on 5,339 pages of references. As of today's date, Samsung has produced over 120,000 pages of documents, GenghisComm has produced over 38,000 pages of documents. Samsung has objected and responded to 14 interrogatories and GenghisComm has answered to 18 interrogatories (plus subparts). Discovery and other issues require near daily attention, with deficiencies letters, response letters, additional follow-up, meet-and-confer conferences, motions, briefing, and argument. This is anticipated to continue throughout the summer. Any argument by Samsung that its investment in the district court proceedings is small cannot be true.

In addition to discovery, the expected institution decision is just days before the district court's claim construction hearing, set for October 21, 2025. EX1046. By that time, claim construction exchanges, including terms, evidence, expert

[2] Lawyers from Greenberg working on the E.D. of Texas case include at least Tom Pease, Drew Sommer, Elana Araj, Jared Lee, Stephen Ullmer, Matthew Levinstein, Richard Edlin, Maya Shermann, Trenton Ward, Annie Rock.

declarations, depositions, as well as briefing, will be well underway with exchanges starting this month on June 17, 2025. The parties will exchange claim construction expert declarations, which are typically expensive, by July 29, 2025. Expert depositions will be shortly thereafter. By time of the institution decision, claim construction proceedings will be substantially complete and an IPR risks inconsistent claim construction decisions.

The December 1, 2025 expert report deadline means that likely millions more will be spent on experts by that deadline. Most importantly, five months before the PTAB will issue any FWD, a jury trial will have been completed.

The average cost for patent litigation trials is between $2.3 million and $4 million, higher for cases seeking damages above $25M, such as GenghisComm's royalty rate card requires here. EX2009. Samsung's actual investment in the case is likely far higher already and recent fee requests suggest Samsung will spend somewhere between $6.5 million and $26 million on the matter. For example, in *Demaray LLC v. Samsung Electronics Co. Ltd.*, Case 6:20-cv-00636-ADA, Dkt. No 564, Samsung represented to the Texas Court that:

> Samsung and its manufacturer-indemnitor Applied Materials have spent nearly four years, and over $25 million in legal fees defending against Demaray's baseless litigation claims. Although Demaray's exceptional conduct manifested early in this case, Samsung only requests fees relating to the final phase of this case, in the final four

months leading up to and through trial, in the amount of $6,765,208.40. That is less than a third of the total fees paid and is necessary to deter the conduct exemplified by Demaray's improper litigation tactics.

EX2010.

Similarly, in *Staton Techiya v. Samsung*, case 2:21-cv-00413-JRG-RSP, Dkt. No. 968, p. 19, Samsung sought:

> Based on the rates and hours above, Samsung seeks the following fees for Kirkland's work:

Category		Period
1	Attorneys' fees for patent infringement, validity, and damages	$16,092,589
2	Attorneys' fees for litigating misconduct allegations	$6,770,143
3	Additional fees for work overlapping categories 1 and 2	$398,897
4	Fees for paralegals	$875,513
Total		$24,137,141

EX2011.

The costs of the ongoing reexamination on this same patent must also be considered. Samsung's request for *ex parte* reexamination alone constituted 1410 pages of filings, included at least 19 references, contained a 166 page expert declaration. Briefs totaling mountains of additional pages have been filed in the reexam.

D. The Petition Overlaps with the District Court and Ex Parte Proceedings

Samsung says nothing about the fact that the same issue, the validity of the '227 patent claims, is already at issue in the reexamination and its appeal is about the same issues in the Petition. Indeed, key issues in the *ex parte* reexam are the

critical date of the ’227 patent, its priority claim, and whether pre or post AIA law applies. The Petition raises the same issues here. EX2012. Compare Pet. pp. 5-15.

In district court, Petitioner’s October 17, 2024 invalidity contentions included 17 charts specific to the ’227 patent. They include every reference that Samsung included with its IPR Petition (Galda, Kaiser, Bury and Dowling) and also many additional references and combinations.

Samsung purported to include a *Sotera* stipulation within its Petition. But in the district court litigation, Samsung purports to rely on several purported “systems prior art” references, much of which Samsung offered for obviousness based on combinations with the same references at issue in this IPR, and many other references. Samsung’s October 17, 2024 invalidity contentions include 8 purported “prior art systems” and devices: EX2013, 38.

Table 3: Prior Art Systems

System Name	Use/Knowledge/Offer Date	Publisher	Short Name
Motorola StarTAC 7868/7868w	December 1998 ~ 2000	Motorola	StarTAC
Samsung Galaxy S III	September 2012	Samsung Electronics	Galaxy S III
Samsung Note II	September 2012	Samsung Electronics	Galaxy Note II
Samsung Galaxy S5	April 2014	Samsung Electronics	Galaxy S5
Samsung Galaxy Note 4	October 2014	Samsung Electronics	Galaxy Note 4
Samsung Galaxy S7	March 2016	Samsung Electronics	Galaxy S7
Samsung Galaxy S10 5G	April 2019	Samsung Electronics	S10 5G
LG V50 ThinQ 5G	April 2019	LG Electronics	ThinQ 5G

On May 16, 2025, Samsung filed a first additional *Sotera* stipulation, which Samsung characterized and titled as "Petitioner's Further Stipulation To Materially Reduce Overlap With District Court Proceedings." *See* Paper 7. In reality, that Stipulation stated only if the PTAB institutes review in this proceeding, Petitioner:

- will not rely in the litigation on any product or system that is "based on the same evidence presented" in this IPR and
- will not advance a theory of obviousness based on the combination of prior art that is asserted in any ground presented in the Petition with any other prior art, including product or system prior art, against the challenged claims.

Importantly, none of Samsung's stipulations state that Samsung will not rely on its product or system references in the District Court action. It states only that Samsung will not "rely in the litigation on any product or system that is 'based on the same evidence presented' in this IPR." The stipulation does not identify any "product or system that is 'based on the same evidence presented' in this IPR" and it is not presently clear to GenghisComm that this includes anything. None of Samsung's purported systems prior art (e.g. Motorola, Samsung, LG phones identified in the table above) are the same as, or based on, any reference in the IPR Petition, so this portion of Samsung's offer appears to contain nothing.

Samsung's new stipulation also offers that it will not advance a theory of obviousness based on the combination of prior art that is asserted in any ground

presented in the Petition (e.g. Galda, Kaiser, Bury, Dowling) with any other alleged prior art, including product or system references. Although not completely empty, this proposal, of course, still leaves the purported systems available for Samsung's use in the district court, on their own and/or in combination with the many other references that are not the specific Galda, Kaiser, Bury, or Dowling references in the Petition but are in Samsung's 18,870 pages of invalidity contentions. This, too, is not a meaningful limitation. Samsung's second additional stipulation does not resolve the issue or even change the analysis.

For example, Samsung's invalidity chart Exhibit B-10 from the district court litigation purports to chart the Motorola StarTac 7868 "system" against the '227 patent, in combinations with at least 9 other references, only a subset of which are the same references that Samsung asks the PTAB to consider in this IPR. For example, Samsung's Exhibit B-10 proposes to combine Motorola StarTac 7868 "system" with Sorger or Bruninghaus, which are not in this IPR Petition. EX2014. Therefore, Petitioner's post-petition *Sotera* stipulation will not meaningfully limit the invalidity arguments in district court and IPR will not resolve the validity disputes.

Unlike this IPR, the parties' entire dispute, including any validity issues about the purported systems, will be resolved in the Texas litigation. This weighs heavily against institution.

III. ADDITIONAL FACTORS SET FORTH IN THE USPTO'S GUIDANCE MEMORANDUM SUPPORT DISCRETIONARY DENIAL

On the merits, Petitioner's IPR argues that Galda, its primary reference in Grounds 1-3, is entitled to a relevant date of May 6-9, 2002. But Patent Owner has shown a swear-behind date in 1999, so the IPR challenge must fail. Patent Owner has also identified numerous substantive shortcomings with Petitioner's references, including Galda.

Following the March 25, 2025 Memorandum, the other factors also weigh against institution. Although filed after the Memorandum issued, Samsung's Petition did not address them.

A. Whether the PTAB or another forum has already adjudicated the validity of the patent claims

The validity of the '227 patent claims have already been adjudicated in the reexamination, which is currently on appeal.

B. Whether there have been changes in the law or new judicial precedent issued since issuance of the claims that may affect patentability

No relevant changes were identified in the Petition and Patent Owner is not aware of anything relevant that would impact an institution decision.

C. The strength of the unpatentability challenge

The Petition presents no Ground that would invalidate all asserted claims of this one patent. Even in Petitioner's view requires cobbling together a piecemeal

patchwork of arguments, from multiple references and combinations. This alone suggests that the claims are not obvious. Galda's weaknesses are discussed above.

D. The extent of the petition's reliance on expert testimony

Samsung's Petition extensively relies on a Declaration of Harry V. Bims, EX1002. The Declaration is 152 pages long and 248 paragraphs. The Petition cites Bims at least 114 times. For example, Petitioner's arguments frequently rely not on the references but on its expert's assumptions about what a POSITA would have known: "A POSITA would have known about how DFT spreading could reduce PAPR in OFDM systems…" Pet., 16 (Petitioner's definition of POSITA, p. 16.)

Petitioner relies on Galda as its only alleged anticipatory reference (limited to claims 11, 17-18, 21) and in its other proposed obviousness combinations. But the Petition relies only on the Bims Declaration (Ex. 1002) extensively to plug holes in Galda's disclosures. As one example, p. 24:

> a POSITA would have understood that allowing flexible subcarrier allocation depending on channel conditions, deployment scenarios, and the payload to be transmitted on the uplink would have improved system flexibility. **EX1002, ¶¶83-93**. The PAR benefits of Galda's DFT spreading technique are obtainable without using equidistant subcarriers. **EX1002, ¶94**.

In turn, although purportedly relying on Galda, the cited portions of the expert's declaration actually cite other references (not Galda) ¶¶ 84, 89-92 and the expert's

other cited paragraphs cite nothing ¶¶ 85-88, 93.

Petitioner's extensive reliance on expert testimony confirms that Petitioner's cited references do not disclose the claim elements. It further suggests that there will be disputes between experts on dispositive issues and that any questions are better resolved in district court. Petitioner's expert declaration is not focused specific testimony limited to helpful context, background or explaining terms of art.

E. Settled expectations of the parties

The '227 patent claims have been in force since 2019. Samsung has been aware that it infringes them since at least November 2020. The claims have long since expired. It was solely Samsung's decision to wait 4.5 years before requesting this IPR.

F. Compelling interests

Patent Owners should not be subjected to proceedings before three different tribunals challenging the claims of one patent, especially after the investment required to try to complete issues before a jury.

IV. CONCLUSION

Patent Owner GenghisComm requests discretionary denial of the Petition under 35 U.S.C. § 314(a).

Respectfully submitted,

Dated: June 11, 2025

/Ragnar Olson/

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CERTIFICATE UNDER 37 CFR § 42.24(d)

Under the provisions of 37 CFR § 42.24(d), the undersigned hereby certifies that the word count for the foregoing Patent Owner's Preliminary Response totals 3,561 which is less than the 14,000 words allowed under 37 CFR § 42.24(b)(1).

Dated: June 11, 2025

/Ragnar Olson/
Ragnar Olson
Reg. No. 58,684

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned hereby certifies that on June 11, 2025, a complete and correct copy of the foregoing PATENT OWNER'S DISCRETIONARY DENIAL BRIEF was served via electronic mail on the following counsel of record for Petitioner:

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