UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner,

v.

GENGHISCOMM HOLDINGS LLC,
Patent Owner

Case: IPR2025-00789
U.S. Patent No. 11,075,786

PETITIONER'S FURTHER STIPULATION TO MATERIALLY REDUCE OVERLAP WITH DISTRICT COURT PROCEEDINGS

Petitioner included a stipulation under *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential) in its Petition. In addition to that stipulation, Petitioner further stipulates that, if the PTAB institutes review in this proceeding, it 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. *Cf. SAP America, Inc. v. Cyandia, Inc.*, IPR2024-01496, Paper 13 at 9 (PTAB Apr. 7, 2025).

Dated: June 6, 2025

Respectfully Submitted,

/Andrew R. Sommer/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 6, 2025, a complete and correct copy of **PETITIONER'S FURTHER STIPULATION TO MATERIALLY REDUCE OVERLAP WITH DISTRICT COURT PROCEEDINGS** was served via electronic mail on the following email addresses as provided for in Patent Owner's Mandatory Notices:

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