

May 19, 2025

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Re: *Headwater Research LLC v. Samsung Electronics Co., Ltd. et al*, Case No. 2-24-cv-00228 (E.D. Tex)

Dear Counsel:

Samsung Electronics Co., Ltd. (“**Samsung**”) has filed a petition for *inter partes* review (IPR) petition (IPR2025-00481) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1-13 of U.S. Patent No. 11,096,055 (“**the '055 Patent**”). The tables in attached Appendix A list all grounds, challenged claims, and references asserted in IPR2025-00481.

I write to inform you that Samsung hereby stipulates that, if the PTAB institutes review in this proceeding, Samsung will not pursue in District Court litigation the specific grounds asserted in *inter partes* review in this proceeding, or any other ground that could have been reasonably raised in this proceeding (i.e., any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications).” *See Sotera Wireless, Inc. v. Masimo Corporation*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020). Samsung also stipulates that, if the PTAB institutes review in this proceeding, Samsung will not pursue in District Court litigation combinations of the prior art asserted in this proceeding with unpublished system prior art (or any other type of prior art). *See Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025).

Sincerely,



Thad Kodish
Attorney for Samsung Electronics Co., Ltd.

Appendix A – Grounds and Prior Art References Used in IPR2025-00481

Ground	Claim(s)	35 U.S.C. §103
1A	1-2, 6-7, 9-10, 12	Jheng-Chiu
2A	1-2, 6-7, 9-10, 12	Jheng-Chiu-Rao
1B	3-4	Jheng-Chiu-Collins
2B	3-4	Jheng-Chiu-Rao-Collins
1C	5	Jheng-Chiu-Camilleri
2C	5	Jheng-Chiu-Rao-Camilleri
1D	8	Jheng-Chiu-Bajko
2D	8	Jheng-Chiu-Rao-Bajko
1E	11	Jheng-Chiu-Liu
2E	11	Jheng-Chiu-Rao-Liu
1F	13	Jheng-Chiu-Brown
2F	13	Jheng-Chiu-Rao-Brown

List of References

Reference Name	Details
Jheng	U.S. Patent Publication No. 2009/0239584
Chiu	PCT Patent Publication No. WO2004/031488
Rao	U.S. Patent Publication No. 2006/0039354
Collins	U.S. Patent Publication No. 2006/0206941
Camilleri	U.S. Patent Publication No. 2009/0149220
Bajko	U.S. Patent Publication No. 2004/0196796
Liu	U.S. Patent Publication No. 2008/0020755
Brown	U.S. Patent Publication No. 2005/0164737