

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

W&WSENS DEVICES INC.,	)	
	)	
Plaintiff,	)	Case No. 2:24-cv-00854-JRG
	)	
v.	)	
	)	
SAMSUNG ELECTRONICS CO., LTD,	)	
SAMSUNG ELECTRONICS AMERICA,	)	
INC., SAMSUNG SEMICONDUCTOR, INC.	)	
and SAMSUNG AUSTIN SEMICONDUCTOR	)	
LLC,	)	
	)	
Defendants.	)	
	)	

**JOINT MOTION FOR ENTRY OF AN ORDER
OF PARTIAL DISMISSAL WITHOUT PREJUDICE**

Plaintiff W&Wsens Devices Inc. (“Plaintiff”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (together, “Defendants”) hereby submit this Joint Motion seeking entry of an order of partial dismissal pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) and show the Court as follows:

The parties have met and conferred regarding narrowing the issues in dispute and, in reliance on certain disclosures from Defendants to Plaintiff have agreed to seek an order that:

(1) Plaintiff’s claims asserted against Defendants in this action based on U.S. Patent No. 9,525,084 (the “’084 Patent”), including Count XI (Direct Infringement of the ’084 Patent) and Count XII (Indirect Infringement of the ’084 Patent) of the First Amended Complaint (Dkt. No. 52) are dismissed WITH PREJUDICE as to Defendants’ currently existing products and colorable variations thereof. All other claims of Plaintiff based on the ’084 patent are dismissed WITHOUT PREJUDICE;

(2) Defendants' counterclaims asserted against Plaintiff in this action based on the '084 Patent are dismissed WITHOUT PREJUDICE;

(3) Defendants shall join Plaintiff in requesting authorization from the Patent Trial and Appeals Board ("PTAB") to file a joint motion to dismiss Defendants' IPR2025-00997 and Plaintiff is authorized to represent to the PTAB that Defendants join in such request for authorization and joint motion to dismiss;

(4) This action is dismissed WITHOUT PREJUDICE as to Defendants Samsung Semiconductor, Inc. and Samsung Austin Semiconductor LLC and shall proceed as to Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.;

(5) Each party shall bear its own costs, attorney fees, and expenses incurred in connection with the claims and proceedings dismissed by this order;

(6) Nothing in the parties' joint motion seeking entry of this order shall be deemed to be an admission of any fact or liability or used to support any motion, including motions under 35 U.S.C. § 285, or for any other purpose, with the exception of the joint motion to dismiss Defendants' IPR2025-00997; and

(7) The new caption of this action shall be as follows:

W&WSENS DEVICES INC.,	)	
	)	
Plaintiff,	)	Case No. 2:24-cv-00854-JRG
	)	
v.	)	
	)	
SAMSUNG ELECTRONICS CO., LTD, and	)	
SAMSUNG ELECTRONICS AMERICA,	)	
INC.,	)	
	)	
Defendants.	)	

Accordingly, the parties respectfully request that the Court enter the proposed Order submitted herewith reflecting their agreements.

Respectfully submitted,

Dated: October 7, 2025

By: /s/ Aaron M. Frankel
Paul J. Andre (*pro hac vice*)
Lisa Kobialka (*pro hac vice*)
James Hannah (*pro hac vice*)
HERBERT SMITH FREEHILLS
KRAMER (US) LLP
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065
Telephone: (650) 752-1700
Facsimile: (650) 752-1800
paul.andre@hsfkramer.com
lisa.kobialka@hsfkramer.com
james.hannah@hsfkramer.com

Aaron M. Frankel
Cristina Martinez (*pro hac vice*)
HERBERT SMITH FREEHILLS
KRAMER (US) LLP
1177 Avenue of the Americas
New York, NY 10036
Telephone: (212) 715-9100
aaron.frankel@hsfkramer.com
cristina.l.martinez@hsfkramer.com

Elizabeth L. DeRieux
State Bar No. 05770585
Capshaw DeRieux LLP
114 E. Commerce Ave.
Gladewater, TX 75647
Telephone: (903) 845-5770
ederieux@capshawlaw.com

Attorneys for Plaintiff
W&Wsens Devices Inc.

Dated: October 7, 2025

By: /s/ Benjamin R. Schlesinger
Benjamin R. Schlesinger (*pro hac vice*)
FINNEGAN HENDERSON FARABOW
GARRET & DUNNER, LLP
271 17th Street, NW, Suite 1400
Atlanta, GA 30363
Telephone: (404) 653-6416
Facsimile: (404) 653-6444
benjamin.schlesinger@finnegan.com

Christina Ji-Hye Yang (*pro hac vice*)
Daniel F. Roland (*pro hac vice*)
Gerald F. Ivey
Kai Rajan
Michael Joseph Aragon
Min Yang (*pro hac vice*)
Parmanand K. Sharma (*pro hac vice*)
FINNEGAN HENDERSON FARABOW
GARRET & DUNNER, LLP
901 New York Avenue, NW
Washington, DC 20001
Telephone: (202) 408-4000
Facsimile: (202) 408-4400
christina.yang@finnegan.com
daniel.roland@finnegan.com
gerald.ivey@finnegan.com
kai.rajan@finnegan.com
michael.aragon@finnegan.com
min.yang@finnegan.com
parmanand.sharma@finnegan.com

Charles H. Suh (*pro hac vice*)
FINNEGAN HENDERSON FARABOW
GARRET & DUNNER, LLP
Two Freedom Square
11955 Freedom Drive
Reston, VA 20190
Telephone: (571) 203-2700
Facsimile: (202) 408-4400
charles.suh@finnegan.com

Jinwoo Kim (*pro hac vice*)
FINNEGAN HENDERSON FARABOW
GARRET & DUNNER, LLP

Stanford Research Park
3300 Hillview Ave.
Palo Alto, CA 94304-1203
Telephone: (650) 849-6664
Facsimile: (650) 849-6666
jinwoo.kim@finnegan.com

Melissa Richards Smith
GILLAM & SMITH, LLP
303 South Washington Ave.
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
melissa@gillamsmithlaw.com

Attorneys for Defendants
Samsung Electronics Co., Ltd., Samsung
Electronics America, Inc., Samsung
Semiconductor Inc., & Samsung Austin
Semiconductor LLC

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send notification of filing electronic to all counsel of record.

/s/ Aaron M. Frankel

Aaron M. Frankel

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for the parties met and conferred, and all parties agree to filing the foregoing document as a joint motion.

/s/ Aaron M. Frankel

Aaron M. Frankel