

From: [Director_PTABDecision_Review](#)
To: ["Modi, Naveen"](#); [Chris Evans](#); [PH-Samsung-CMHK-IPR](#); [Bansal, Chetan R.](#); [ginger](#); [Andrew Huffstetler](#)
Subject: RE: IPR2025-01023 & -01071: Sotera Stipulation Violation—Extension Request - Petitioner may respond
Date: Friday, July 10, 2026 4:16:00 PM

Counsel,

In light of Petitioner's representations regarding the withdrawal of certain portions of its invalidity contentions in the district court litigation, Patent Owner's request for extension of time to seek Director Review of the Board's Decision granting institution in the above-identified proceedings is denied. Patent Owner may renew its request for an extension of time if Patent Owner alleges that Petitioner has failed to comply with its *Sotera* stipulations going forward.

Thank you.

From: Modi, Naveen <naveenmodi@paulhastings.com>
Sent: Thursday, July 2, 2026 1:59 PM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; Chris Evans <chris@offorevans.com>
Cc: PH-Samsung-CMHK-IPR <PH-Samsung-CMHK-IPR@paulhastings.com>; Bansal, Chetan R. <chetanbansal@paulhastings.com>; ginger <ginger@gingineerllc.com>; Andrew Huffstetler <andrew@offorevans.com>
Subject: RE: IPR2025-01023 & -01071: Sotera Stipulation Violation—Extension Request - Petitioner may respond

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Honorable Director Squires,

Patent Owner's request should be denied because Petitioner Samsung has complied with its *Sotera* stipulations. Due to the procedural posture of the parallel district court cases, the parties have not pursued merits discovery in those cases since well before the IPRs were instituted, which nullifies CM HK's argument that there has been a violation of the *Sotera* stipulations. Moreover, to avoid any doubts regarding Samsung's commitment to its *Sotera* stipulations, Samsung's district court counsel sent an email to CM HK's district court counsel on May 20, 2026 that given the institution of the IPRs, Samsung is affirmatively withdrawing the portion of its invalidity contentions (served before the IPRs were even filed) that includes grounds raised or that reasonably could have been raised in the IPRs.

Respectfully,

Naveen Modi
Counsel for Petitioner Samsung

IPR2025-01023
IPR2025-01071
Ex. 3102

Naveen Modi

Global Co-Chair of IP & Partner
Paul Hastings LLP
(202) 551-1990

From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Sent: Tuesday, June 30, 2026 1:36 PM
To: Chris Evans <chris@offorevans.com>
Cc: PH-Samsung-CMHK-IPR <PH-Samsung-CMHK-IPR@paulhastings.com>; Bansal, Chetan R. <chetanbansal@paulhastings.com>; Modi, Naveen <naveenmodi@paulhastings.com>; ginger <ginger@gingineerllc.com>; Andrew Huffstetler <andrew@offorevans.com>
Subject: [EXT] RE: IPR2025-01023 & -01071: Sotera Stipulation Violation—Extension Request - Petitioner may respond

Counsel,

Petitioner may respond with no more than three sentences on its position as to Patent Owner's request via email by Thursday, July 2nd.

Thanks.

From: Chris Evans <chris@offorevans.com>
Sent: Tuesday, June 30, 2026 8:36 AM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: PH-Samsung-CMHK-IPR <ph-samsung-cmhk-ipr@paulhastings.com>; Bansal, Chetan R. <chetanbansal@paulhastings.com>; Modi, Naveen <naveenmodi@paulhastings.com>; ginger <ginger@gingineerllc.com>; Andrew Huffstetler <andrew@offorevans.com>
Subject: IPR2025-01023 & -01071: Sotera Stipulation Violation—Extension Request

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Dear Director,

Patent Owner respectfully requests an extension of the deadline to seek Director Review because exceptional circumstances have arisen after institution. Petitioner obtained institution while representing that it would not pursue in district court invalidity grounds raised or reasonably could have been raised in these IPRs, but it now refuses to effectuate that Sotera stipulation and continues to maintain overlapping invalidity contentions based on *Bassompierre* and related obviousness grounds in the parallel district court litigation. Despite Patent Owner's efforts to resolve the issue, Petitioner has refused to cure the violation, warranting an extension under the Director's recent exceptional-circumstances guidance. *Light & Wonder, Inc.*

v. Evolution Malta Ltd., IPR2024-01072, Paper 30 at 4 n.5 (Director June 22, 2026) (precedential).

Respectfully submitted,

Christopher L. Evans
Counsel for Patent Owner CM HK Ltd.

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