

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner

v.

WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC.,
Patent Owner

Case IPR2025-01044
U.S. Patent No. 11,516,879

JOINT STATEMENT OF DISPUTED ISSUES

In response to the Board's order of April 7, 2026 (Paper 25), the partes jointly provide a Statement of Disputed Issues in this proceeding.

I. CLAIM CONSTRUCTION

Disputed Issue: Construction of the term “set[ting] [a/the] . . . timer” ('879 Claim Limitations 1.5, 1.6, 8.4, 8.5 and '035 Claim Limitations 1.4, 1.5, 8.3, 8.4).

II. DISPUTED FACTUAL ISSUES

Disputed Issue 1: Whether Zhou, Cherian, and Kim renders obvious the conditional setting of the second parameter set timer ('879 Claim Limitations 1.5, 1.6, 8.4, 8.5 and '035 Claim Limitations 1.4, 1.5, 8.3, 8.4).

Disputed Issue 2: Whether Zhou, Cherian, and Kim renders obvious the setting of a second parameter set timer for an access category ('879 Claim Limitations 1.5, 1.6, 8.4, 8.5 and '035 Claim Limitations 1.4, 1.5, 8.3, 8.4).

Disputed Issue 3: Whether a POSITA would have been motivated to combine Zhou, Cherian, and Kim.

III. OTHER DISPUTES FOR BOARD RESOLUTION

Disputed Issue: Whether Cherian qualifies as prior art.

This paper is being filed by counsel for Petitioner with counsel for the Patent Owner's approval.

Respectfully submitted,

Dated June 26, 2026

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on June 26, 2026, a complete and entire copy of this Joint Statement of Disputed Issues was provided by email, to the Patent Owner by serving the email correspondence address of record as follows:

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