

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SECURE COMMUNICATION
TECHNOLOGIES, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.
and SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2: 24-CV-00484-JRG-RSP

JURY TRIAL DEMANDED

**NOTICE OF SAMSUNG DEFENDANTS’
SOTERA PLUS PRIOR ART STIPULATION**

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Defendants”) filed petitions for *Inter Partes* Review (“IPR”) of each of the three patents asserted in this litigation with the Patent Trial and Appeal Board of the United States Patent and Trademark Office (“PTAB”). The three IPR proceedings are identified below, including identification of the challenged patent and the challenged claims. The claims challenged in the IPR petitions identified below include every claim that is asserted against Defendants in this litigation.

IPR Number	Patent No.	IPR Filing Date	Challenged Claims
IPR2025-01049	11,334,918	May 30, 2025	1-20, and 22-31
IPR2025-01050	11,443,344	May 30, 2025	1-10, 12-16, 18-19, and 22-30
IPR2025-01051	11,687,971	May 30, 2025	1-10, 12-16, 18-19, 22-31, 34-44, 46, 48-62, 64-68, 72, and 75-83

Defendant notifies the Court and Plaintiff Secure Communication Technologies, LLC (“Plaintiff”) that Defendants are submitting the following prior art stipulation that is broader than *Sotera* (the “*Sotera* Plus stipulation”) in connection with each of the patents in IPR2025-01049, IPR2025-01050, and IPR2025-01051, identified in the table above. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19 (PTAB Dec. 1, 2020) (“*Sotera*”) (describing the standard, unbroadened *Sotera* stipulation). These stipulations “ensure that these IPR proceedings would be a ‘true alternative’ to the district court proceeding.” *See Motorola Solutions Inc. v. Stellar, LLC*, IPR2024-01208, Paper 19 at 3-4 (PTAB March 28, 2025).

Stipulation for U.S. Patent No. 11,334,918:

Defendants hereby stipulate, broader than the stipulation made in *Sotera*, that if the PTAB institutes IPR2025-01049 (and does not subsequently vacate institution), Defendants will not pursue in the above-captioned litigation (EDTX 2:24-CV-00484-JRG-RSP), against the claims challenged in IPR2025-01049, any prior art invalidity grounds, including invalidity grounds based on any system prior art alone or any system prior art in combination with any patents or printed publications

Stipulation for U.S. Patent No. 11,443,344:

Defendants hereby stipulate, broader than the stipulation made in *Sotera*, that if the PTAB institutes IPR2025-01050 (and does not subsequently vacate institution), Defendants will not pursue in the above-captioned litigation (EDTX 2:24-CV-00484-JRG-RSP), against the claims challenged in IPR2025-01050, any prior art invalidity grounds, including invalidity grounds based on any system prior art alone or any system prior art in combination with any patents or printed publications.

Stipulation for U.S. Patent No. 11,687,971:

Defendants hereby stipulate, broader than the stipulation made in *Sotera*, that if the PTAB institutes IPR2025-01051 (and does not subsequently vacate institution), Defendants will not pursue in the above-captioned litigation (EDTX 2:24-CV-00484-JRG-RSP), against the claims challenged in IPR2025-01051, any prior art invalidity grounds, including invalidity grounds based on any system prior art alone or any system prior art in combination with any patents or printed publications.

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For the avoidance of doubt, for each of the IPR petitions listed above, if institution is denied (or subsequently vacated), Defendants reserve the right to pursue the grounds of the denied petition, or any other prior art invalidity grounds, in this litigation.

Dated: July 10, 2025

Respectfully submitted,

/s/ Ryan K. Yagura

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*Counsel for Defendants Samsung Electronics Co.,
Ltd. and Samsung Electronics America, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that, on July 10, 2025, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/ Ryan K. Yagura

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