

From: [Brann, Elizabeth L.](#)
To: [Michael Shore](#); "[cevans@shorechan.com](#)"; [Chijioke Offor](#)
Cc: [Modi, Naveen](#); [Bansal, Chetan R.](#)
Subject: Samsung Elecs. Co., et al. v. CM HK Ltd., Case No. 4:24-cv-6567-JST (N.D. Cal.); CM HK Ltd v. Samsung Elecs. Co., et al., Case No. 4:24-cv-0880-JRG (E.D. Tex.)
Date: Saturday, July 19, 2025 9:07:26 AM
Attachments: [image001.png](#)

Dear Michael,

Samsung hereby stipulates that if the Patent Trial and Appeal Board ("PTAB") institutes an inter partes review on IPR2025-01071 ("IPR"), then Samsung will not pursue in these actions the specific grounds of invalidity that were raised or reasonably could have been raised in the IPR.

Best regards,

Liza

PAUL
HASTINGS

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