From: Vujcic, Sasha
To: Chris Evans; Michael Shore
Cc: Team Samsung CyWee; Chijioke Offor; zdellaporta@shorefirm.com
Subject: RE: Samsung v. CM HK: Invalidity Contentions must be amended
Date: Wednesday, May 20, 2026 7:04:11 PM

Counsel,

It is not clear why CM HK sent this e-mail. Merits discovery in both the NDCA and EDTX cases has been stayed since well before IPR2025-1023 and IPR2025-1071 were instituted, and the parties have not litigated invalidity in any district court since then. Therefore, Samsung has already satisfied its obligations. That said, given that IPR2025-1023 and IPR2025-1071 are instituted, Samsung reaffirms that it will not pursue (and hereby, withdraws) the portion of its invalidity contentions that includes grounds raised or that reasonably could have been raised in IPR2025-1023 and IPR2025-1071.

Best,
Sasha

From: Chris Evans <chris@offorevans.com>
Sent: Wednesday, May 20, 2026 1:09 PM
To: Vujcic, Sasha <sashavujcic@paulhastings.com>; Michael Shore <mshore@shorefirm.com>
Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>; Chijioke Offor <chiji@offorevans.com>; zdellaporta@shorefirm.com
Subject: [EXT] Re: Samsung v. CM HK: Invalidity Contentions must be amended

-- External Email -- Report Suspicious

Any updates?

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From: Chris Evans <chris@offorevans.com>
Sent: Tuesday, May 19, 2026 8:02:21 PM
To: Vujcic, Sasha <sashavujcic@paulhastings.com>; Michael Shore <mshore@shorefirm.com>
Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>; Chijioke Offor <chiji@offorevans.com>; zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>
Subject: Re: Samsung v. CM HK: Invalidity Contentions must be amended

Sasha,

What are you conferring about? You already stipulated to withdraw them. Was that a real stipulation or not?

Sincerely,

Chris Evans

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From: Vujcic, Sasha <sashavujcic@paulhastings.com>
Sent: Tuesday, May 19, 2026 7:52:34 PM
To: Chris Evans <chris@offorevans.com>; Michael Shore <mshore@shorefirm.com>
Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>; Chijioke Offor <chiji@offorevans.com>; zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>
Subject: RE: Samsung v. CM HK: Invalidity Contentions must be amended

Dear Chris,

We are conferring with our client and will respond as soon as practicable.

Best regards,
Sasha

From: Chris Evans <chris@offorevans.com>
Sent: Tuesday, May 19, 2026 2:44 PM
To: Michael Shore <mshore@shorefirm.com>; Vujcic, Sasha <sashavujcic@paulhastings.com>
Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>; Chijioke Offor <chiji@offorevans.com>; zdellaporta@shorefirm.com
Subject: [EXT] Re: Samsung v. CM HK: Invalidity Contentions must be amended

So you are not withdrawing the defenses you stipulated you would withdraw? What does your response mean? I will proceed on the basis that you are refusing to abide by your stipulation.

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From: Michael Shore <mshore@shorefirm.com>
Sent: Tuesday, May 19, 2026 5:04:23 PM
To: Vujcic, Sasha <sashavujcic@paulhastings.com>; Chris Evans <chris@offorevans.com>
Cc: Team Samsung <TeamSamsungCywee@paulhastings.com>; Chijioke Offor <chiji@offorevans.com>; zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>
Subject: RE: Samsung v. CM HK: Invalidity Contentions must be amended

Still waiting for a response.

Sent from my Galaxy

-------- Original message --------

From: "Vujcic, Sasha" <sashavujcic@paulhastings.com>
Date: 5/19/26 3:41 PM (GMT-06:00)
To: Chris Evans <chris@offorevans.com>
Cc: Team Samsung <TeamSamsungCywee@paulhastings.com>, Michael Shore <mshore@shorefirm.com>, chiji <chiji@offorevans.com>, Zachary Della Porta <zdellaporta@shorefirm.com>
Subject: RE: Samsung v. CM HK: Invalidity Contentions must be amended

CAUTION: External Email!
Chris,

Samsung has and will continue to comply with its obligations in the district court proceedings.

Best,
Sasha

From: Chris Evans <chris@offorevans.com>
Sent: Tuesday, May 19, 2026 4:55 AM
To: Vujcic, Sasha <sashavujcic@paulhastings.com>
Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>; Michael Shore <mshore@shorefirm.com>; Chijioke Offor <chiji@offorevans.com>; zdellaporta@shorefirm.com
Subject: [EXT] Re: Samsung v. CM HK: Invalidity Contentions must be amended

Sasha,

Still waiting for a response.

Sincerely,

Chris Evans

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From: Chris Evans <chris@offorevans.com>
Sent: Monday, May 18, 2026 3:28:54 PM
To: Vujcic, Sasha <sashavujcic@paulhastings.com>
Cc: Team Samsung CyWee <teamsamsungcywee@paulhastings.com>; Michael Shore <mshore@shorefirm.com>; Chijioke Offor <chiji@offorevans.com>; zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>
Subject: Re: Samsung v. CM HK: Invalidity Contentions must be amended

Sasha,

When will Samsung be withdrawing all 102/103 grounds based on printed publications or patents in the two district court cases?

Sincerely,

Chris Evans

From: Chris Evans <chris@offorevans.com>
Date: Sunday, May 17, 2026 at 10:11 AM
To: Vujcic, Sasha <sashavujcic@paulhastings.com>
Cc: Team Samsung CyWee <teamsamsungcywee@paulhastings.com>, Michael Shore <mshore@shorefirm.com>, Chijioke Offor <chiji@offorevans.com>, zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>
Subject: Samsung v. CM HK: Invalidity Contentions must be amended

Sasha,

To overcome our motion for discretionary denial, Samsung stipulated that if its IPRs were instituted it would not pursue any grounds of invalidity that it raised or could have raised in the IPRs in District Court. The IPRs were instituted in December so Samsung must withdraw all invalidity grounds that were raised or reasonably could have been raised in the IPR from both district court cases. We believe this requires filing amended invalidity contentions withdrawing all 102/103 grounds based on printed publications or patents. Please let us know when you intend to comply with your stipulation.

Sincerely,

Chris Evans

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