**SAMSUNG STIPULATION**

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung") have filed a petition for *inter partes* review (IPR) with the Patent Trial and Appeal Board (PTAB) to address the patentability of claims in the patent challenged in this proceeding.

Samsung hereby stipulates that, if the PTAB institutes review in this proceeding, Samsung will not pursue in District Court litigation the specific grounds asserted in *inter partes* review in this proceeding, or any other ground that could have been reasonably raised in this proceeding (i.e., any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications)." *See Sotera Wireless, Inc. v. Masimo Corporation*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020). Samsung also stipulates that, if the PTAB institutes review in this proceeding, Samsung will not pursue in District Court litigation combinations of the prior art asserted in this proceeding with unpublished system prior art (or any other type of prior art). *See Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025).

Respectfully submitted,

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