Diana Bradley

From: Ralph A. Phillips
Sent: Thursday, November 13, 2025 9:55 AM
To: jtsuei@raklaw.com; FISH SERVICE Samsung/Wilus
Cc: rak_wilus@raklaw.com; nrubin@raklaw.com; Linda Xu; pwang@raklaw.com
Subject: Wilus v. Samsung, No. 25-cv-00070 (EDTX) - P.R. 4-2 disclosure

James,

Pursuant to Patent Rule 4-2 and in the interest of reducing issues, Defendants hereby withdraw their contentions as to indefiniteness for all claim terms identified as indefinite in Defendants' Patent Rule 4-1 disclosure in the above captioned case. Instead, Defendants propose these terms should be given their plain and ordinary meaning and, as such, do not require construction.

Further, Defendants hereby propose the terms "duplicated bit information" ('186 patent, claims 5, 6, 15, 16), "duplicating the predetermined AID field information" ('186 patent, claims 7, 17), and ""repeating a specific value"" ('186 patent, claim 10) should be given their plain and ordinary meaning and do not require construction.

Given Plaintiff's position stated in its PR 4-1 disclosure (below), we understand this to resolve all outstanding claim construction issues in the above captioned case.

Regards,

Ralph

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From: James Tsuei <jtsuei@raklaw.com>
Sent: Thursday, October 23, 2025 6:28 PM
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Subject: Wilus v. Samsung, No. 25-cv-00070 (EDTX) - P.R. 4-1 disclosure

[This email originated outside of F&R.]

Samsung counsel, pursuant to Patent Rule 4-1, Wilus states that it currently identifies no terms of the Asserted Patents which it proposes should be construed.

Thanks,
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SAMSUNG 1134
Samsung v. Wilus
IPR2025-01165

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