

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD AND  
SAMSUNG ELECTRONICS AMERICA, INC.,  
Petitioner,

v.

HANNIBAL IP, LLC,  
Patent Owner.

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Case IPR2025-01190  
U.S. Patent No. 11,641,661

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**PETITIONERS' STIPULATION**

Pursuant to the Interim Processes for PTAB Workload Management, issued March 26, 2025,<sup>1</sup> the Interim Director Discretionary Process,<sup>2</sup> and the Board’s guidance in the “Learn about the new interim processes relating to institution in AIA proceedings” presentation,<sup>3</sup> Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., stipulate as follows:

If the Patent Trial and Appeal Board (PTAB) institutes this *inter partes* review, Petitioners will not pursue against the ’661 Patent in *Hannibal IP, LLC v. Samsung Electronics Co., Ltd., et al.*, Case No. 4:25-cv-00200-SDJ (E.D. Tex.):

1. “[T]he specific grounds [asserted in IPR2025-01190], or ... any other ground ... that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications)” (see *Sotera Wireless, Inc. v. Masimo Corp.*,

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<sup>1</sup> Available at <https://www.uspto.gov/sites/default/files/documents/InterimProcesses-PTABWorkloadMgmt-20250326.pdf>.

<sup>2</sup> Available at <https://www.uspto.gov/patents/ptab/interim-director-discretionary-process>.

<sup>3</sup> Presentation, video, and FAQs available at <https://www.uspto.gov/about-us/events/learn-about-new-interim-processes-relating-institution-aia-proceedings>.

IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential as to § II.A));

2. Any grounds that use patents or publications as a primary reference in any invalidity combination;
3. Any grounds that include any reference named in IPR2025-01190's petition's grounds (*i.e.*, *Guo* (Ex. 1005), *Intel* (Ex. 1006), and *5G-Standard* (Ex. 1012));  
or
4. Any grounds where a patent or printed publication that is cited in the petition is used as evidence of the operation or structure of a system art device.

Dated: September 5, 2025

By: / Joshua L. Goldberg /  
Joshua L. Goldberg  
Lead Counsel  
Reg. No. 59,369

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing **Petitioners' Stipulation** was served on September 5, 2025, via email directed to counsel of record for Patent Owner at the following:

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Patent Owner has consented to electronic service by email.

Dated: September 5, 2025

/ William Esper /  
William Esper  
Senior Litigation Paralegal  
FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP