

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC.,

SAMSUNG ELECTRONICS CO., LTD.,

Petitioners,

v.

XIFI NETWORKS R&D, INC.

Patent Owner.

Case IPR2025-01208
Patent No. 11,974,143

PETITIONERS' CORRECTED STIPULATION¹

¹ On August 1, 2025, Petitioners filed a stipulation (Paper 7) that inadvertently referenced U.S. Patent No. 9,055,592 (“Clegg”) instead of U.S. Patent No. 7,206,840 (“Choi”). Patent Owner has confirmed that it does not object to Petitioner filing this Corrected Stipulation

Pursuant to the Board's authorization granted on February 21, 2025, Petitioners hereby stipulate that, if the Board institutes *inter partes* review in this proceeding, IPR2025-001208, Petitioners will not pursue in the parallel litigation, *XiFi Networks R&D, Inc. v Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Case No. 2:24-cv-01057-JRG (E.D. Tex.), **(1)** any grounds of invalidity arising under U.S.C. § 102 or § 103 involving only patent or printed publication prior art that could have reasonably been raised before the Board with respect to U.S. Pat. No. 11,974,143 (the '143 patent), including the same grounds in the Petition (Paper 1); or **(2)** any grounds of invalidity arising under U.S.C. § 102 or § 103 with respect to the '143 patent that include WO 2013/126859 ("Chincholi"), U.S. Patent Application 2011/0320625 ("Riggert"), or U.S. Patent No. 7,206,840 ("Choi").

Date: October 10, 2025

/s/ James M. Glass

James M. Glass
Registration No. 46,729
Quinn Emanuel Urquhart & Sullivan LLP
295 5th Avenue, 9th Floor
New York, New York 10016
Tel: (212) 849-7142
Fax (212) 849-7100

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on October 10, 2025 the foregoing document was served via email on the following counsel of record:

CMorton@RobinsKaplan.com

JGutierrez@RobinsKaplan.com

AFahrenkrog@RobinsKaplan.com

RKXiFi@RobinsKaplan.com

/s/ James M. Glass

James M. Glass
Registration No. 46,729