UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners

v.

MAXELL, LTD.,
Patent Owner

Inter Partes Review No.: IPR2025-01311

PETITIONERS' STIPULATION

IPR2025-01311; Samsung
Ex. 1027 - Page 1

If IPR is instituted in IPR2025-01311, unless institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Samsung Electronics Co. Ltd., and Samsung Electronics America, Inc., stipulate that they will not pursue in Civil Action No. 5:25-CV-00052-RWS, against the '091 Patent, (i) the specific grounds asserted in IPR2025-01311, (ii) 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), (iii) any ground based on a combination of system prior art (*i.e.*, prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2025-01311, or (iv) any ground that could be raised under §§ 102 or 103 on the basis of system art corresponding to a reference that forms the basis of any ground raised in IPR2025-01311. Thus, there will be ***no*** overlap between the issues raised in the Petition and the district court, and this IPR will serve as a "true alternative" to the district court proceeding.

Date: October 14, 2025

Respectfully submitted,

/s/ Salvatore Tamburo

Salvatore Tamburo
Reg. No. 45,153
DLA Piper LLP (US)
500 Eighth Street, NW
Washington, DC 20004
Phone: + 1 202 799 4122
Fax: + 1 202 863 7822
Salvatore.Tamburo@us.dlapiper.com

Attorney for Petitioners

IPR2025-01311; Samsung
Ex. 1027 - Page 3

CERTIFICATE OF SERVICE

The undersigned certifies pursuant to 37 C.F.R. §§42.6(e) and 42.105 that on October 14, 2025, a true and correct copy of the foregoing document was served by emailing a copy of the same (by agreement) to the following attorneys for Patent Owner:

Robert G. Pluta – rpluta@mayerbrown.com

Amanda S. Bonner – asbonner@mayerbrown.com

Daniel Kim – dkim@mayerbrown.com

Saqib Siddiqui – ssiddiqui@mayerbrown.com

A courtesy copy was sent to the below counsel via electronic mail: maxell-samsung-service@mayerbrown.com

Date: October 14, 2025

Respectfully submitted,

/s/ Salvatore Tamburo

Salvatore Tamburo
Reg. No. 45,153
DLA Piper LLP (US)
500 Eighth Street, NW
Washington, DC 20004
Phone: + 1 202 799 4122
Fax: + 1 202 863 7822
Salvatore.Tamburo@us.dlapiper.com

Attorney for Petitioners