Michael Labas

From: Homin Ban
Sent: Tuesday, August 19, 2025 9:34 PM
To: radian@caldwellcc.com; Melissa Smith; Andrea Fair
Cc: QE-Samsung-RMS; QE-Samsung-RMS-IPR
Subject: IPR2025-01377 - Stipulation

Counsel,

Consistent with *Sotera Wireless, Inc.*, Petitioner hereby stipulates "that if the PTAB institutes inter partes review, Petitioner 'will not pursue in [*Radian Memory Systems v. Samsung Elecs. Co., Ltd. et al.*, No. 2:24-cv-01073 (EDTX) ("Litigation")] the specific grounds [asserted in IPR2025- 01377], 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).'" *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential). For the avoidance of doubt, if the PTAB institutes inter partes review, Petitioner will not, in the Litigation, rely on any product or system art that is "based on the same evidence presented" in this IPR. *Cf. SAP America, Inc. v Cyandia, Inc.*, IPR2024-01496, Paper 13 at 9 (PTAB Apr. 7, 2025). Further, if the PTAB institutes inter partes review, Petitioner will not, in the Litigation, "assert combinations of product art with printed publication prior art asserted in this [IPR] proceeding." *Samsung Elecs. Co., Ltd. v. SiOnyx, LLC*, IPR2025-00064, Paper 16 at 14 (PTAB Jun. 6, 2025).

Best,
Homin

Homin Ban
Associate
Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
213-443-3343 Direct
213-443-3000 Main Office Number
213-443-3100 Fax
hominban@quinnemanuel.com
www.quinnemanuel.com

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.