

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

PAYGEO, LLC,
Patent Owner.

Case IPR2025-01551
U.S. Patent No. 8,554,671

PETITIONER'S STIPULATION

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

If the Patent Trial and Appeal Board (PTAB) institutes this *inter partes* review, Samsung will not pursue in *PayGeo, LLC v. Samsung Electronics Co., Ltd., et al.*, Case No. 2:25-cv-00334-RWS-RSP (E.D. Tex.) against any claims challenged in this *inter partes* review:

1. “[T]he specific grounds [asserted in IPR2025-01551], or on 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.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential as to § II.A)); and

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

² Presentation, video, and FAQs available at <https://www.uspto.gov/about-us/events/learn-about-new-interim-processes-relating-institution-aia-proceedings>.

2. Any grounds that include any reference named in IPR2025-01551's petition's grounds (*i.e.*, *Look* (Ex. 1005), *Stallings* (Ex. 1006), and *Tumminaro* (Ex. 1007)).

Dated: November 6, 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 **Petitioner's Stipulation** was served on November 6, 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: November 6, 2025

/ William Esper /
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