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VIA E-MAIL (AHEALY@SUSMANGODFREY.COM)

Andres Healy, Esq.
Susman Godfrey L.L.P.
401 Union Street
Suite 3000
Seattle, WA 98101

Re: *Zophonos Inc. v. Samsung Electronics America, Inc. et al,*
Case No. 2:25-cv-00752-JRG (E.D. Tex.)

Dear Mr. Healy:

We write regarding IPR2026-00085, in which Petitioners Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (together "Samsung"), challenge the patentability of claims 32-44 of U.S. Patent No. 11,900,016 ("the '016 patent"). Samsung hereby stipulates that, if the Director of the Patent and Trademark Office ("Director") permits Samsung to file this stipulation as an exhibit in the IPR proceeding prior to issuing his decision on institution and, thereafter, institutes this IPR petition on the grounds presented therein, then Samsung will not pursue in the above-captioned litigation (i) any grounds that were raised or reasonably could have been raised in the IPR, and (ii) combinations of the prior art asserted in this IPR with unpublished system prior art. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020) (precedential as to § II.A); *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, Paper 19 (PTAB March 28, 2025).

For the sake of clarity and to avoid any doubt, if the Director does not permit Samsung to file this stipulation as an exhibit in the IPR proceeding prior to his decision on institution, declines institution, or later vacates institution of this IPR, Samsung reserves the right to pursue in this litigation (i) any ground that was raised or reasonably could have been raised in the IPR, and/or (ii) combinations of the prior art asserted in this IPR with unpublished system prior art. This stipulation is not intended, and should not be construed, to limit Samsung's ability to assert invalidity of the asserted claims of the '016 patent on any other ground, regardless of whether IPR is instituted.

Samsung v. Zophonos
IPR2026-00085
Exhibit 1019

Sincerely,

/s/ Jin-Suk Park
Jin-Suk Park