

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners

v.

KIWI INTELLECTUAL ASSETS CORPORATION
Patent Owner

Case No. IPR2026-00164
U.S. Patent No. RE50,307

PETITIONERS' STIPULATION

If IPR is instituted in IPR2026-00164, unless institution is later vacated, reversed, or otherwise withdrawn by rehearing or Director Review, Samsung Electronics Co., Ltd.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. 2:25-cv-00811-JRG, against the '307 patent, (i) the specific grounds asserted in IPR2026-00164, (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 IPR2026-00164, 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 IPR2026-00164. 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: December 3, 2025

Respectfully submitted,

/ Neil P. Sirota /

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CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. §§42.6(e) and 42.105, the undersigned certifies that on this date, the foregoing was served via Fedex Overnight Delivery on the Patent Owner at the correspondence address of record for the subject patent at:

Jason H. Vick
AMPED IP LLC
2370 E. 160th PL
Thornton, CO 80602

A complete copy was also served via electronic mail to counsel of record for Patent Owner in the litigation pending before the U.S. District Court for the Eastern District of Texas entitled *Kiwi Intellectual Assets Corporation v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc.*, No. 2:25-cv-00811 at:

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Respectfully submitted,

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