

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

TVNGO LTD.,
Patent Owner

Inter Partes Review No.: IPR2026-00213
Patent No. RE50,328

NOTICE OF PETITIONER'S *SOTERA* STIPULATION

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Petitioner” or “Samsung”) stipulates that, in accordance with the Board’s precedential decision in *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020), if *inter partes* review (“IPR”) is instituted in this proceeding on the grounds presented in the petition and proceeds without Director reversal of institution, then Petitioner will not pursue in the parallel district court litigation, *TVnGO Ltd. v. Samsung Electronics, Co., Ltd. and Samsung Electronics America, Inc.*, Case No. 7:25-cv-00549 (W.D. Tex.), an invalidity defense based on those grounds that were raised in the petition or any grounds that could have reasonably been raised in the petition. Petitioner further stipulates that, if the IPR is instituted and proceeds without Director reversal of institution, Petitioner will not assert in the related district court proceeding any system art corresponding (*i.e.*, materially identical) to a reference describing that same system art asserted as a part of a specific ground raised in the Petition to assert that any claim of the Challenged Patent is invalid under 35 U.S.C. §§ 102 or 103. Furthermore, Petitioner will not assert in the related district court proceeding any § 103 defense based on a combination of any system prior art with any prior art raised in the Petition. 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: March 23, 2026

Respectfully submitted,

/s/ James M. Heintz

James M. Heintz

Reg. No. 41,828

DLA Piper LLP (US)

11911 Freedom Dr., Suite 300

Reston, VA 20190

Phone: 703-773-4000

Fax: 703-773-5000

jim.heintz@dlapiper.com

*Attorney for Petitioners Samsung
Electronics Co., Ltd. and Samsung
Electronics America, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document has been served via electronic mail upon the following on March 23, 2026:

David L. Hecht

Email: dhecht@hechtpartners.com

Email: patents@hechtpartners.com

Patrick G. Maloney

Email: pmaloney@corkmaloney.com

Date: March 23, 2026

/s/ James M. Heintz

James M. Heintz

Reg. No. 41,828

DLA Piper LLP (US)

11911 Freedom Dr., Suite 300

Reston, VA 20190

Phone: 703-773-4000

Fax: 703-773-5000

jim.heintz@dlapiper.com

*Attorney for Petitioners Samsung
Electronics Co., Ltd. and Samsung
Electronics America, Inc.*