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March 5, 2026

Nicholas F. Lenning
K&L Gates LLP
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Re: *AQ Corp. v. Samsung Electronics Co., Ltd. et al.*, No. 2:25-cv-01012-JRG (EDTX)

Dear Nick:

I write regarding the petitions for *inter partes* review ("IPR") that Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (together, "Samsung") filed against each of the patents that AQ Corporation has asserted in the above-referenced action:

- IPR2026-00231 (U.S. Patent No. 11,303,011);
- IPR2026-00232 (U.S. Patent No. 11,495,875); and
- IPR2026-00234 (U.S. Patent No. 11,728,564).

To avoid any potential overlap in multiple proceedings, Samsung stipulates—on broader terms than those in *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020)—that, for each of these IPRs, if the Patent Trial and Appeal Board ("PTAB") institutes Samsung's IPR petition, and the instituted proceedings are not subsequently vacated, dismissed, reversed or otherwise withdrawn, then Samsung will not pursue in the above-referenced action: (i) the specific grounds raised in the instituted IPR; (ii) any other grounds that could have reasonably been raised before the PTAB in the instituted IPR (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications); or (iii) any ground based on a combination of system prior art and the references asserted as part of a ground raised in the instituted IPR.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute one or more of the above-referenced IPR proceedings, Samsung reserves the right to assert any grounds of invalidity in the above-referenced action, including grounds within the scope of (i) – (iii) above.

Sincerely,

/s/ Adam Janes
Adam Janes