Filed on behalf of Petitioners Filed: September 9, 2026

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC. AND SAMSUNG ELECTRONICS CO., LTD.,
Petitioners

v.

GAEA, LLC,
Patent Owner

Case No. IPR2026-00427
U.S. Patent No. 12,265,715

PETITIONERS' UPDATED MANDATORY NOTICES

Petitioners Meta Platforms, Inc. and Samsung Electronics Co., Ltd. ("Petitioners") provide the following update to the mandatory notices pursuant to 37 C.F.R. § 42.8(b)(2).

I. RELATED MATTERS

As noted in the Petition, the '715 patent is the subject of pending district court litigations involving Petitioners: *Gaea, LLC v. Meta Platforms, Inc.*, Case No. 4:26-cv-00348 (N.D. Tex.) (filed on March 23, 2026) and *Gaea, LLC v. Samsung Electronics Co., Ltd.*, Case No. 2:26-cv-00264 (E.D. Tex.) (filed on March 31, 2026). Petition at 3.

Each Petitioner has entered into a *Sotera*-type stipulation with respect to its own pending district court litigation. Samsung Electronics Co., Ltd. entered into its stipulation in invalidity contentions served on August 31, 2026 in *Gaea, LLC v. Samsung Electronics Co., Ltd.*, Case No. 2:26-cv-00264 (E.D. Tex.). Meta Platforms, Inc. entered into its stipulation by letter to Patent Owner's counsel on September 9, 2026 concerning *Gaea, LLC v. Meta Platforms, Inc*., Case No. 4:26-cv-00348 (N.D. Tex.). Each Petitioner's stipulation provides as follows:

> Petitioners hereby stipulate that if the Patent Trial and Appeal Board ("PTAB") institutes an *inter partes* review on IPR2026-00427 ("IPR"), then Petitioner (i) will not pursue in the pending district court litigations the specific grounds of invalidity that were raised or grounds that reasonably could have been raised

under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications in the IPR, and (ii) will not pursue in the pending district court litigations grounds of invalidity under 35 U.S.C. §§ 102 or 103 that cite to any of the prior art references listed in the grounds for the IPR with respect to any challenged claim (*see* Grounds 1-3 of the IPR Petition), including in combination with any other prior art that could not have been raised in the IPR (e.g., system art) for grounds of invalidity under 35 U.S.C. § 103. To avoid any doubt, if the PTAB declines institution or rescinds institution of the IPR, then Petitioners reserve the right to pursue any grounds of invalidity, including but not limited to the grounds in (i) and (ii), in the pending district court litigations.

Dated: September 9, 2026

Respectfully submitted,

By: / Lisa K. Nguyen /

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Counsel for Petitioner
META PLATFORMS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2026, a true and correct copy of the foregoing **PETITIONERS' UPDATED MANDATORY NOTICES** is being served by electronic mail on Patent Owner's counsel of record pursuant to its Mandatory Notices in this proceeding as addressed below:

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Dated: September 9, 2026

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