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Via E-Mail

September 18, 2026

AHMAD, ZAVITSANOS & MENSING, PLLC
1221 McKinney Street, Suite 2500
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Re: *Mobility IP Holdings, Inc. v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., Case No. 2:26-cv-157 (E.D. Tex.)*

Counsel:

Samsung Electronics Co., Ltd. is filing a petition for *inter partes* review (IPR2026-00502) with the Patent Trial and Appeal Board (PTAB) to address the patentability of claims 1–87 of U.S. Patent No. 8,548,924.

I write to inform you that Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (together, “Samsung”) hereby stipulate that, if the PTAB institutes and maintains institution of review in IPR2026-00502, Samsung will not pursue in the above-captioned District Court litigation for U.S. Patent No. 8,548,924 the specific invalidity grounds asserted in IPR2026-00502, or any other ground that could have been reasonably raised in IPR2026-00502 (i.e., any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications). *See Sotera Wireless, Inc. v. Masimo Corporation*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020). Samsung also stipulates that, if the PTAB institutes and maintains institution of review in IPR2026-00502, Samsung will not pursue in the above-captioned District Court litigation as invalidity grounds for U.S. Patent No. 8,548,924 combinations of the prior art references asserted as part of a ground in this proceeding, as listed below, with unpublished system prior art or any other type of prior art. *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025). Accordingly, Samsung hereby stipulates that, if the PTAB institutes and maintains institution of review in IPR2026-00502, Samsung will not pursue in the above-captioned District Court litigation for U.S. Patent No. 8,548,924 combinations of any of the Huomo, Smets, Kisliakov, Ryan, Peart, or Abbott references asserted as part of the grounds of IPR2026-00502 with unpublished system prior art or any other type of prior art.

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In so stipulating, Samsung seeks to avoid multiple proceedings in different forums addressing the validity of the instituted claims based on the same grounds or prior art. The tables in attached Appendix A list the grounds and ground references asserted in IPR2026-00502.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute (or withdraws institution of) IPR2026-00502, the conditions supporting the above stipulations will be unmet and the stipulations null and void.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Mosteller", with a stylized, flowing script.

Matthew P. Mosteller

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

Appendix A – Grounds and Prior Art References

Ground	'924 Patent Claims	Basis for Rejection
1A	1-71, 76-87	§103 – Huomo in view of Smets
1B	1-71, 76-87	§103 – Huomo in view of Smets and Kisliakov
2A	1-2, 4, 6-8, 22-23, 25, 27-29, 31-32, 34, 36-38, 52-53, 55-58, 60-61, 63-64, 66-77, 79-82, 84-86	§103 – Ryan in view of Abbott
2B	3, 5, 9-14, 16-19, 21, 24, 26, 30, 33, 35, 39-43, 46-49, 51, 54, 59, 62, 78, 87	§103 – Ryan in view of Abbott and Peart
2C	65, 83	§103 – Ryan in view of Abbott and Smets
2D	15, 20, 45, 50	§103 – Ryan in view of Abbott, Peart, and Smets
2E/2F	2, 11, 23, 32, 41, 53, 61, 80	§103 – Ryan in view of Abbott, Smets, and Kisliakov / §103 – Ryan in view of Abbott, Peart, Smets, and Kisliakov

Ground Reference Name	Ground Reference Details
Huomo	U.S. Patent No. 8,538,332 to Huomo et al.
Smets	U.S. Patent Appl. Pub. No. 2006/0022033 to Smets et al.
Kisliakov	U.S. Patent Appl. Pub. No. 2003/0212896 to Kisliakov
Ryan	U.S. Patent No. 7,213,766 to Ryan et al.
Abbott	International Pub. No. WO2001096990A2 to Abbott et al.
Peart	U.S. Patent No. 8,001,054 to Peart et al.