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Via E-Mail

September 18, 2026

AHMAD, ZAVITSANOS & MENSING, PLLC
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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* (IPR2026-00504) with the Patent Trial and Appeal Board (PTAB) to address the patentability of claims 1-21 of U.S. Patent No. 10,762,187.

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 IPR2026-00504, Samsung will not pursue in the above-captioned District Court litigation for U.S. Patent No. 10,762,187 the specific invalidity grounds asserted in IPR2026-00504, or any other ground that could have been reasonably raised in IPR2026-00504 (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 IPR2026-00504, Samsung will not pursue in the above-captioned District Court litigation as invalidity grounds for U.S. Patent No. 10,762,187 combinations of the prior art references asserted as part of a ground in this proceeding, as listed below, with unpublished system prior art or any other type of prior art.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 IPR2026-00504, Samsung will not pursue in the above-captioned District Court litigation for U.S. Patent No. 10,762,187 combinations of any of the Maes, Niwa, Shults, Bjorn, or Walker references asserted as part of the grounds of IPR2026-00504 with unpublished system prior art or any other type of prior art.

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 IPR2026-00504.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute (or withdraws institution of) IPR2026-00504, the conditions supporting the above stipulations will be unmet and the stipulations null and void.

Sincerely,

Matthew P. Mosteller

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

Appendix A – Grounds and Prior Art References

Ground	’187 Patent Claims	Basis for Rejection
1A	1–6, 8–13, 15–21	§103 – Maes in view of Niwa
1B	7, 14	§103 – Maes in view of Niwa and Shults
2A	1–6, 8–13, 15–21	§103 – Maes in view of Bjorn
2B	7, 14	§103 – Maes in view of Bjorn and Shults
3A	1–6, 8–13, 15–21	§103 – Maes in view of Walker
3B	7	§103 – Maes in view of Walker and Shults

Ground Reference Name	Ground Reference Details
Maes	U.S. Patent No. 6,016,476 to Maes et al.
Niwa	U.S. Patent No. 6,453,301 to Niwa
Shults	U.S. Patent Appl. Pub. No. 2002/0011519 to Shults
Bjorn	U.S. Patent No. 6,035,398 to Bjorn
Walker	U.S. Patent No. 6,163,771 to Walker et al.