

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners

v.

SURECELL TRANSACTIONS, LLC,
Patent Owner

Case No. IPR2026-00506
U.S. Patent No. 7,924,156

Case No. IPR2026-00507
U.S. Patent No. 11,347,949

Case No. IPR2026-00508
U.S. Patent No. 11,599,734

Case No. IPR2026-00509
U.S. Patent No. 11,687,741

Case No. IPR2026-00510
U.S. Patent No. 11,989,612

Case No. IPR2026-00511
U.S. Patent No. 12,039,396

PETITIONERS' STIPULATION

If IPR is instituted in IPR2026-00506, IPR2026-00507, IPR2026-00508, IPR2026-00509, IPR2026-00510, or IPR2026-00511, unless institution is later vacated, reversed, or otherwise withdrawn by rehearing or Director Review, Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. stipulate that they will not pursue in Civil Action No. 2:26-cv-00106-JRG-RSP, against U.S. Patent Nos. 7,924,156; 11,347,949; 11,599,734; 11,687,741; 11,989,612; or 12,039,396 (i) the specific grounds asserted in IPR2026-00506, IPR2026-00507, IPR2026-00508, IPR2026-00509, IPR2026-00510, or IPR2026-00511, (ii) any other ground that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications), (iii) any ground based on a combination of system prior art (i.e., prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2026-00506, IPR2026-00507, IPR2026-00508, IPR2026-00509, IPR2026-00510, or IPR2026-00511, or (iv) any ground that could be raised under §§ 102 or 103 on the basis of system art corresponding to a reference that forms the basis of any ground raised in IPR2026-00506, IPR2026-00507, IPR2026-00508, IPR2026-00509, IPR2026-00510, or IPR2026-00511. Thus, there will be no overlap between the issues raised in the Petitions and the district court, and these IPRs will serve as “true alternatives” to the district court proceeding.

Date: September 25, 2026

Respectfully submitted,

/ Neil P. Sirota /

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CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. §§42.6(e) and 42.105, the undersigned certifies that, on this date, the foregoing was served via FedEx Overnight Delivery on the Patent Owner at the correspondence address of record (as listed in Patent Center and on the Patent Assignment Cover Sheet) for the subject patent at:

Patent Center	Patent Assignment Cover Sheet
Steven Colby Rimon Law, P.C. 1655 W. Fairview Ave., Suite 102 Boise, Idaho 83702	SureCell Transactions, LLC P.O. Box 837 Verdi, Nevada 89439

A complete copy was also served via electronic mail to counsel of record for Patent Owner in the litigation pending before the U.S. District Court for the Eastern District of Texas entitled *SureCell Transactions LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, No. 2:26-cv-00106 at:

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Date: September 25, 2026

Respectfully submitted,

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