ffUNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS AMERICA, INC.,

SAMSUNG ELECTRONICS CO., LTD.,

Petitioners,

v.

XIFI NETWORKS R&D, INC.

Patent Owner.

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Case PGR2025-00067
Patent No. 12,190,198

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PETITIONERS' STIPULATION

Pursuant to the Board's authorization granted on February 21, 2025, Petitioners hereby stipulate that, if the Board institutes post-grant review in this proceeding, PGR2025-00067, Petitioners will not pursue in the parallel litigation, *XiFi Networks R&D, Inc. v Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Case No. 2:24-cv-01057-JRG (E.D. Tex.), **(1)** any grounds of invalidity arising under U.S.C. § 102 or § 103 involving only patent or printed publication prior art that could have reasonably been raised before the Board with respect to U.S. Patent 12,190,198 (the '198 patent), including the same grounds in the Petition (Paper 1); **(2)** any grounds of invalidity arising under U.S.C. § 102 or § 103 with respect to the '198 patent that include WO 2013/126859 ("Chincholi") or U.S. Patent 9,055,592 ("Clegg"); **(3)** any grounds that the '198 Patent is directed to ineligible subject-matter under U.S.C. § 101 that could have reasonably been raised before the Board with respect to the '198 patent; or **(4)** any grounds of invalidity under § 112 that could have reasonably been raised before the Board with respect to the '198 patent provided that for any term challenged under § 112 in this proceeding Patent Owner does not assert a different claim construction in the parallel litigation than what Patent Owner asserts in this proceeding.

[signature page follows]

Date: August 22, 2025

/s/ James M. Glass

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on August 22, 2025 the foregoing document was served via email on the following counsel of record:

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