

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners,

v.

XIFI NETWORKS R&D, INC.,

Patent Owner.

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

**PATENT OWNER'S OBJECTIONS TO PETITIONERS'
DEMONSTRATIVE EXHIBITS**

Pursuant to the Board's Order of September 11, 2026 (Paper 39), Patent Owner below identifies its objections to Petitioners' demonstrative exhibits. Patent Owner and Petitioners met and conferred on October 5, 2026, after which the following objections remained unresolved.

Slides 5-6 & 8-24: These slides provide new citations to and/or characterization of EX2010 (Tanenbaum), never previously cited or discussed by Petitioners, constituting improper new evidence and argument.

Slides 36-44, 47-50, 52-54, 56-58, 66-67, 75-78 & 98: These slides contain citations to and/or arguments based on the portions of Petitioners' Reply and supplemental expert declaration (EX1026) that are subject to Patent Owner's pending motion to strike, and which are improper for the reasons stated therein.

Slides 44, 47: These slides include citations to the specification of the challenged patent that do not appear in Petitioners' papers and therefore constitute new evidence and argument.

Slide 46: This slide makes arguments regarding the meaning of "virtual MAC interface" and cites to the patent specification, neither of which appear in Petitioners' papers, and therefore are new arguments and evidence.

Slide 90: This slide contains a new citation to EX1005 at [0134] and a new argument that "Chincholi discloses cellular standards that use OFDMA," neither of which appears in Petitioners' papers.

Dated: October 6, 2026

Respectfully Submitted,

/Cyrus A. Morton/

Cyrus A. Morton

(Reg. No. 44,954)

CMorton@RobinsKaplan.com

Lead Counsel

Jessica L. Gutierrez

(Reg. No. 75,094)

JGutierrez@RobinsKaplan.com

Back-Up Counsel

Aaron R. Fahrenkrog

(*Pro hac vice*)

afahrenkrog@RobinsKaplan.com

Back-Up Counsel

Robins Kaplan LLP

800 LaSalle Avenue, Suite 2800

Minneapolis, MN 55402

Phone: 612-349-8500

Fax: 612-339-4181

Attorneys for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Patent Owner's Objections to Petitioners' Demonstrative Exhibits was served on October 6, 2026, by electronic mail to Petitioners' counsel at the following addresses indicated in Petitioners'

Mandatory Notices:

James M. Glass
jimglass@quinnemanuel.com

Patrick T. Schmidt
patrickschmidt@quinnemanuel.com

Benjamin Kleinman
benjaminkleinman@quinnemanuel.com

Quincy Lu
quincylu@quinnemanuel.com
qe-samsung-xifi-ipr@quinnemanuel.com

Dated: October 6, 2026

/Cyrus A. Morton/

Cyrus A. Morton
(Registration No. 44,954)
CMorton@RobinsKaplan.com
Robins Kaplan LLP
800 LaSalle Avenue, Suite 2800
Minneapolis, MN 55402
Phone: 612-349-8500
Fax: 612-339-4181

Attorney for Patent Owner