IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

W&WSENS DEVICES INC., Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD, SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG SEMICONDUCTOR, INC. and SAMSUNG AUSTIN SEMICONDUCTOR LLC, Defendants.	)	Case No. 2:24-cv-00854-JRG

JOINT MOTION FOR ENTRY OF AN ORDER
OF PARTIAL DISMISSAL WITHOUT PREJUDICE

Plaintiff W&Wsens Devices Inc. ("Plaintiff") and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (together, "Defendants") hereby submit this Joint Motion seeking entry of an order of partial dismissal pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) and show the Court as follows:

The parties have met and conferred regarding narrowing the issues in dispute and, in reliance on certain disclosures from Defendants to Plaintiff have agreed to seek an order that:

(1) Plaintiff's claims asserted against Defendants in this action based on U.S. Patent No. 9,525,084 (the "'084 Patent"), including Count XI (Direct Infringement of the '084 Patent) and Count XII (Indirect Infringement of the '084 Patent) of the First Amended Complaint (Dkt. No. 52) are dismissed WITH PREJUDICE as to Defendants' currently existing products and colorable variations thereof. All other claims of Plaintiff based on the '084 patent are dismissed WITHOUT PREJUDICE;

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(2) Defendants' counterclaims asserted against Plaintiff in this action based on the '084 Patent are dismissed WITHOUT PREJUDICE;

(3) Defendants shall join Plaintiff in requesting authorization from the Patent Trial and Appeals Board ("PTAB") to file a joint motion to dismiss Defendants' IPR2025-00997 and Plaintiff is authorized to represent to the PTAB that Defendants join in such request for authorization and joint motion to dismiss;

(4) This action is dismissed WITHOUT PREJUDICE as to Defendants Samsung Semiconductor, Inc. and Samsung Austin Semiconductor LLC and shall proceed as to Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.;

(5) Each party shall bear its own costs, attorney fees, and expenses incurred in connection with the claims and proceedings dismissed by this order;

(6) Nothing in the parties' joint motion seeking entry of this order shall be deemed to be an admission of any fact or liability or used to support any motion, including motions under 35 U.S.C. § 285, or for any other purpose, with the exception of the joint motion to dismiss Defendants' IPR2025-00997; and

(7) The new caption of this action shall be as follows:

W&WSENS DEVICES INC., Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD, and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	)	Case No. 2:24-cv-00854-JRG

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Accordingly, the parties respectfully request that the Court enter the proposed Order submitted herewith reflecting their agreements.

Respectfully submitted,

Dated: October 7, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send notification of filing electronic to all counsel of record.

/s/ Aaron M. Frankel
Aaron M. Frankel

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for the parties met and conferred, and all parties agree to filing the foregoing document as a joint motion.

/s/ Aaron M. Frankel
Aaron M. Frankel

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