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VIA E-MAIL

Russ August & Kabat
12424 Wilshire Boulevard
12th Floor
Los Angeles, CA 90025
Phone: 310-826-7474

Andrea L. Fair
MILLER FAIR HENRY PLLC
1507 Bill Owens Parkway
Longview, Texas 75604
Telephone: 903-757-6400

Re: *Headwater Research LLC v. Samsung Electronics Co., Ltd. et al., Case No. 2:23-cv-00228 (E.D. Tex.)*

Dear Counsel:

Samsung Electronics Co., Ltd. (“**Samsung**”) has filed two petitions for *inter partes* review (IPR) (IPR2025-00483 and IPR2025-00484) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1-48 of U.S. Patent No. 9,609,510 (“**the ’510 Patent**”). The tables in attached Appendix A list all grounds, challenged claims, and references asserted in IPR2025-00483 and IPR2025-00484.

I write to inform you that Samsung hereby stipulates that, if the PTAB institutes review in either or both of IPR2025-00483 and IPR2025-00484, Samsung will not pursue in District Court litigation the specific grounds asserted in IPR2025-00483 and IPR2025-00484, or any other ground that could have been reasonably raised in these proceedings (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 review in either or both of IPR2025-00483 and IPR2025-00484, Samsung will not pursue in District Court litigation combinations of the prior art asserted in whichever proceeding(s) are instituted with unpublished system prior art (or any other type of prior art). *See Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025).

Sincerely,



Thad Kodish
Attorney for Samsung Electronics Co., Ltd.

Fish & Richardson P.C.
1180 Peachtree Street, NE
21st Floor
Atlanta, GA 30309

404 892 5005 main
404 892 5002 fax

Thad C. Kodish
Managing Principal
TKodish@fr.com
404 724 2792 direct

Appendix A – Grounds and Prior Art References Used in IPR2025-00483 and IPR2025-00484

Prior Art Challenges

Ground	Claim(s)	35 U.S.C. § 103
1A	1-3, 6-7, 11, 14-25, 28-33, 35-39, 41-43, 45-48	Salmela and Rishy-Maharaj
1B	21, 23, 25	Salmela, Rishy-Maharaj, and Bennett
1C	26-27	Salmela, Rishy-Maharaj, Bennett, and FCCReg
1D	12-13	Salmela, Rishy-Maharaj, and Ionescu
1E	4-5, 8-10	Salmela, Rishy-Maharaj, and Sigmund
1F	40	Salmela, Rishy-Maharaj, and Johansson
1G	34	Salmela, Rishy-Maharaj, and Slavov
1H	44	Salmela, Rishy-Maharaj, and Gupta

List of Prior Art References

Reference Name	Details
Salmela	U.S. Publication No. 2009/0217364 (“Salmela”)
Rishy-Maharaj	U.S. Publication No. 2013/0165075 (“Rishy-Maharaj”)
Bennett	U.S. Publication No. 2010/0029273 (“Bennett”)
FCCReg	Federal Communications Commission (FCC) Regulation (2010), available at, https://www.govinfo.gov/content/pkg/FR-2010-06-22/pdf/2010-15073.pdf (“FCCReg”)
Ionescu	U.S. Publication No. 2012/0236760 (“Ionescu”)
Sigmund	U.S. Publication No. 2010/0222024 (“Sigmund”)
Johansson	U.S. Publication No. 2010/0177663 (“Johansson”)
Slavov	U.S. Publication No. 2009/0253409 (“Slavov”)
Gupta	U.S. Publication No. 2011/0130119 (“Gupta”)