

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners,

v.

KEYLESS LICENSING LLC,

Patent Owner.

Case IPR2025-00528
Patent No. 11,503,144

PETITIONER'S STIPULATION

Pursuant to the Interim Processes for PTAB Workload Management, issued March 26, 2025,¹ the FAQs for Interim Processes for PTAB Workload Management,² and the Board’s guidance in the “Learn about the new interim processes relating to institution in AIA proceedings” presentation,³ Petitioners Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc., stipulate as follows:

If the Patent Trial and Appeal Board (PTAB) institutes this *inter partes* review, Petitioners will not pursue against the ’144 Patent in *Keyless Licensing LLC v. Samsung Electronics America, Inc., et al.*, Case No. 2:24-cv-00464-JRG (E.D. Tex.):

1. “[T]he specific grounds [asserted in IPR2025-00528], or ... any other ground ... that was raised or could have been reasonably raised in an IPR

¹ *Available at*

<https://www.uspto.gov/sites/default/files/documents/InterimProcesses-PTABWorkloadMgmt-20250326.pdf>.

² *Available at* <https://www.uspto.gov/patents/ptab/faqs/interim-processes-workload-management> (FAQ 14).

³ Presentation, video, and FAQs *available at* <https://www.uspto.gov/about-us/events/learn-about-new-interim-processes-relating-institution-aia-proceedings>.

(i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications)” (see *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential as to § II.A));

2. Any grounds that use patents or publications as a primary or secondary reference in any invalidity combination;
3. Any grounds that include any reference named in IPR2025-00528’s petition’s grounds (i.e., *Bast* (Ex. 1022), *Wedel* (Ex. 1023), *Jambhekar* (Ex. 1025), *Benoit* (Ex. 1026)); or
4. Any grounds that use any patent or printed publication that is cited in the petition as evidence of features of any devices that are used as primary or secondary references in any invalidity combination.

Dated: May 9, 2025

By: /Joshua L. Goldberg/
Joshua L. Goldberg
Lead Counsel
Reg. No. 59,369

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Petitioner's Stipulation** was served on May 9, 2025, via email directed to counsel of record for the Patent Owner at the following:

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Dated: May 9, 2025

Respectfully submitted,

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