

From: [Rafatijo, Homayoon](#)
To: [Birbach, Naomi](#); [Robinson, Erick](#); [Partridge, Jayme](#); [Spisak, John S.](#); [Piana, Jayne](#); [Dunn, Patrick](#); [MDT-Samsung-BR](#); Michael.Smith@Solidcounsel.com; Anjetta.King@solidcounsel.com; joel.hernandez@solidcounsel.com
Cc: [DG-Samsung-MDT](#); Melissa@gillamsmithlaw.com; [Kline, Douglas J](#); [Gordon, Lori A](#)
Subject: RE: MDT v. Samsung, Case No. 2:24-cv-00435 and IPR Nos. 2025-00535-00544
Date: Wednesday, April 23, 2025 3:47:00 PM
Attachments: [image003.png](#)

Counsel:

Patent Owner does not oppose Petitioner contacting the Board to seek leave to file these stipulations. Patent Owner's consent is limited to contacting the Board to seek leave to file the stipulations. Patent Owner's consent is not an admission regarding timeliness or sufficiency of the stipulations.

Given that Petitioner is sending a joint communication on behalf of the parties, please provide the proposed communication to us for approval prior to sending it to the Board. Patent Owner reserves its right to include a Patent Owner's statement.

If the Board determines a call is needed, Patent Owner is available for a Board call (all times Eastern):

May 6, 2025, between 10:00 am and 5:00 pm

May 7, 2025 between 10:00 am and 5:00 pm

brownrudnick

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From: Birbach, Naomi <NBirbach@goodwinlaw.com>

Sent: Monday, April 21, 2025 4:07 PM

To: Robinson, Erick <ERobinson@brownrudnick.com>; Partridge, Jayme <JPartridge@brownrudnick.com>; Spisak, John S. <JSpisak@brownrudnick.com>; Piana, Jayne <JPiana@brownrudnick.com>; Dunn, Patrick <PDunn@brownrudnick.com>; MDT-Samsung-BR <MDT-Samsung-BR@brownrudnick.com>; Michael.Smith@Solidcounsel.com; Anjetta.King@solidcounsel.com; joel.hernandez@solidcounsel.com

Cc: DG-Samsung-MDT <DG-Samsung-MDT@goodwinlaw.com>; Melissa@gillamsmithlaw.com; Kline, Douglas J <DKline@goodwinlaw.com>; Gordon, Lori A <LoriGordon@goodwinlaw.com>

Subject: RE: MDT v. Samsung, Case No. 2:24-cv-00435 and IPR Nos. 2025-00535-00544

CAUTION: External E-mail. Use caution accessing links or attachments.



Counsel,

Please see the additional attached correspondence.

We plan to seek leave from the Board to file these stipulations as exhibits in IPR Nos. 2025-00535—2025-00544. Please let us know by COB Wednesday if you oppose this request.

Regards,
Naomi

From: Birbach, Naomi
Sent: Friday, April 18, 2025 5:38 PM
To: Robinson, Erick <ERobinson@brownrudnick.com>; Partridge, Jayme <JPartridge@brownrudnick.com>; Spisak, John S. <JSpisak@brownrudnick.com>; Piana, Jayne <JPiana@brownrudnick.com>; Dunn, Patrick <PDunn@brownrudnick.com>; MDT-Samsung-BR <MDT-Samsung-BR@brownrudnick.com>; Michael.Smith@Solidcounsel.com; Anjetta.King@solidcounsel.com; joel.hernandez@solidcounsel.com
Cc: DG-Samsung-MDT <DG-Samsung-MDT@goodwinlaw.com>; Melissa@gillamsmithlaw.com; Kline, Douglas J <DKline@goodwinlaw.com>
Subject: MDT v. Samsung, Case No. 2:24-cv-00435

Counsel,

Please see the attached correspondence.

Regards,
Naomi

Naomi Birbach



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