

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners,

v.

ICASHE, INC.,

Patent Owner.

Case IPR2025-00639

U.S. Patent No. 9,122,965

PETITIONERS' OFFERED STIPULATION

In addition to Petitioners Samsung Electronics Co. Ltd. and Samsung Electronics America Inc.'s ("Samsung") stipulation in the Petition, if the PTAB grants institution of IPR2025-00639, Samsung stipulates that it will not pursue in *iCashe, Inc. v. Samsung Elecs. Co.*, 2:24-cv-00429 (E.D. Tex) ("Texas Case") the specific grounds asserted in this proceeding or any ground that was raised or could have been raised in an IPR proceeding (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications) against claims 1-20 of U.S. Patent 9,122,965. *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 this proceeding, Samsung will not pursue in the Texas Case combinations of the prior art asserted in this proceeding with any other type of prior art, including unpublished system prior art, against claims 1-20 of U.S. Patent 9,122,965.

Dated: May 16, 2025

Respectfully submitted,

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