

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners,

v.

HERMES IP MANAGEMENT LLC,

Patent Owner

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Case No. IPR2025-00872

U.S. Patent No. 8,855,720

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**PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL**

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## PATENT OWNER'S EXHIBIT LIST

<b>Exhibit</b>	<b>Description</b>
2001	Docket Control Order in <i>Hermes IP Management LLC v. Samsung Electronics Co., Ltd. et. al.</i> , 2-24:cv-00540 (E.D. Tex.) D.I. 23
2002	Invalidity Contentions Served by Samsung in <i>Hermes IP Management LLC v. Samsung Electronics Co., Ltd. et. al.</i> , 2-24:cv-00540 (E.D. Tex.)
2003	Samsung's Amended Answer in <i>Hermes IP Management LLC v. Samsung Electronics Co., Ltd. et. al.</i> , 2-24:cv-00540 (E.D. Tex.)

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### USE OF EMPHASIS IN QUOTATIONS

All emphases in quotations and exhibit citations have been added, unless otherwise indicated.

### APPLICABLE STATUTES

References to 35 U.S.C. §§ 102 and 103 are to the Pre-AIA versions applicable to the '368 Patent.

## I. INTRODUCTION

Petitioners Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc., (collectively “Samsung” or “Petitioners”) challenge claims 1-16 (the “Challenged Claims”) of Patent Owner Hermes IP Management LLC’s (“Hermes” or “Patent Owner”) U.S. Patent No. 8,855,720 (the “’720 Patent”).

Petitioner Samsung Electronics Co., Ltd. filed its Petition on April 22, 2025. The facts establish that discretionary denial is appropriate here under Section 314(a). Samsung was notified of its infringement of the ’720 Patent in October of 2023. In the Eastern District of Texas, the parties have been litigating the infringement and validity of ’720 Patent for nearly a year, with trial expected to finish 4 months before any final written decision in this IPR. Further, Samsung has asserted the same prior art in the parallel litigation, which would result in duplicating efforts in the parallel litigation and an instituted IPR. Those facts, plus others detailed below, favor discretionary denial.

The petition is also insufficient on the merits, as Petitioner fails to demonstrate a sufficient motivation to combine the cited prior art references. Furthermore, the cited combination does not render the claims obvious.

Accordingly, Patent Owner Hermes IP Management LLC respectfully requests that the Board deny the petition for *inter partes* review of claims 1-15 of the ’720 Patent under §314(a).

## **II. THE '720 PATENT DISCLOSES A METHOD OF SETTING AN IDLE SCREEN TO BE DISPLAYED IN AN IDLE STATE OF A MOBILE DEVICE AMONG A PLURALITY OF SCREENS USABLE AS THE IDLE SCREEN.**

The '720 Patent was developed by inventors at SK Telecom Co., Ltd., based in South Korea, and has a priority date of June 15, 2006. At the time of the filing of the Korean counterpart, mobile phones having touchscreen user interfaces were at their infancy. For example, the first iPhone was not announced until January of 2007.

The '720 Patent solved problems with the then-existing idle screens of a smart phone. Prior art methods allowed “for using a frequently-used application (e.g. schedule management, text message, address book) for the idle screen...so that its used can directly run the application without complicated steps of operation.” 2:13-17. However, under the prior art “once an application is used for the idle screen, it [was] impossible to present another application on the same idle screen.” 2:23-25. Additionally, “when another application is to be used for the idle screen, tree-structured menu items must be searched through a number of steps, which renders it inconvenient to modify the idle screen.” 2:26-29. Furthermore, in the prior art, “although basic applications (e.g. address book, text message) may be given shortcuts on the key input module for direct access, the limited number of key buttons on the terminal makes it impossible to assign shortcuts to all of the ever-increasing applications.” 2:30-34.

The '720 Patent provided a “spin-home function for a mobile communication terminal” to resolve these problems. Specifically, the Patent disclosed the “a plurality of screens usable as the idle screen” and “displaying, in response to an idle screen switch request, a new one of the screens on the display unit according to an order of the screens,” such that the idle screen can accommodate the ever-increasing applications”

Claim 1 captures this invention and recites:

1. A method of setting an idle screen to be displayed in an idle state of a mobile terminal among a plurality of screens usable as the idle screen, the method comprising:
selecting application programs from application programs installed in the mobile terminal, based on a selection from a user, wherein each of the selected application programs is allocated to one of the screens so that the screens present shortcut icons of the application programs allocated thereto;
displaying, in the idle state, one of the screens as the idle screen on a display unit of the mobile terminal, wherein the displayed idle screen presents the shortcut icons corresponding to the application programs allocated thereto;
displaying, in response to an idle screen switch request, a next one of the screens on the display unit according to an order of the screens; and
setting a currently displayed screen as the idle screen to be displayed in the idle state, wherein
the idle screen is displayed on the display unit with indicators corresponding to the screens, and
an indicator corresponding to the screen, which is set as the idle screen, is displayed distinguishably from the rest of the indicators.

**III. THE *FINTIV* FACTORS FAVOR DISCRETIONARY DENIAL UNDER § 314(A).**

The Board should also exercise its §314(a) discretion to deny institution because this proceeding would not promote the efficient and conclusive resolution

of the pending litigation dispute regarding the '720 Patent. The Director has discretion to deny institution under 35 U.S.C. § 314(a). The Board's precedential decisions in *NHK Spring Co., Ltd. v. Intri-Plex Technologies, Inc.* and *Apple Inc. v. Fintiv Inc.* explain that the Board should consider "whether efficiency, fairness, and the merits support the exercise of authority to deny institution."<sup>1</sup> As shown below, a majority of *Fintiv's* factors support the Board's exercise of discretionary denial because efficiency, fairness, and the merits don't support institution.

**A. Factor 1 –The District Court is Very Unlikely to Stay the Pending Litigation.**

As mentioned earlier, there is a pending District Court litigation involving the '720 Patent as well as 2 other patents asserted by Patent Owner against Samsung ("Litigation"). Given that there are 3 patents asserted in the Litigation and only the '720 Patent was challenged in the PTAB, a stay is very unlikely to occur for this reason. Furthermore, a stay of the District Court is unlikely as the Eastern District of Texas uniformly denies pre-institution requests to stay. *Tessera Advanced Technologies, Inc. v. Samsung Electronics Co.*, No. 2:17-CV-00671-JRG, 2018 U.S. Dist. LEXIS 120999 (E.D. Tex. July 19, 2018). Here, Patent Owner has asserted two unrelated patents in the parallel litigation. No evidence suggests the district court,

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<sup>1</sup> IPR2018-00752, Paper 8 (P.T.A.B. Sept. 12, 2018) (designated precedential); IPR2020-00019, Paper 11 at 5 (P.T.A.B. Mar. 20, 2020) (designated precedential).

and in particularly Judge Gilstrap, would stay the parallel litigation if one of the three patents is subject to an IPR.

**B. Factor 2 – The Expected Trial Date Favors Denial.**

This factor weighs in favor of discretionary denial. The Board is unlikely to issue a final written decision for this proceeding before *October 2026*. The district court, however, has scheduled the parallel litigation’s final pretrial conference for April 27, 2026 and jury selection for *June 1, 2026*.<sup>2</sup>

Accordingly, because the deadline for the Board’s final written decision is four months after the scheduled trial timeline, this factor weighs in favor of discretionary denial.

**C. Factor 3 – The Eastern District of Texas and Both Parties Have Significantly Invested in the Parallel Litigation, Favoring Denial.**

This factor weighs in favor of discretionary denial. Patent Owner submitted infringement contentions on November 15, 2024, and Samsung submitted their invalidity contentions on February 18, 2025.<sup>3</sup> The parties have engaged in written discovery and substantial third party discovery has been undertaken. The Markman hearing will occur on December 5, 2025.<sup>4</sup>

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<sup>2</sup> Ex-2001 (EDTX Docket Control Order).

<sup>3</sup> Ex-2001 (Docket Control Order); Ex-2002 (Invalidity Contentions - 720 Chart).

<sup>4</sup> Ex-2001 (Docket Control Order)

Further, the Board will likely issue its institution decision after the Deadline to Substantially Complete Document Production (October 20, 2025), and after the Deadline to Complete Claim Construction Discovery (October 10, 2025). Accordingly, both parties and presiding Judge Rodney Gilstrap will have already made significant investments into the parallel litigation before the Board issues its institution decision.

This expenditure of resources was avoidable. Patent Owner informed Samsung of its infringement of the '720 Patent in October of 2023 and then filed the complaint in the Litigation on July 16, 2024. Petitioner waited eighteen months from being made aware of its infringement and nine months after the filing of the Complaint to file its petition on April 22, 2025. During those eighteen months of combined discussions and litigation, Hermes IP and Samsung expended significant resources (and continue to do so). The Board has found that this weighs in favor of discretionary denial.<sup>5</sup>

Even if Petitioner had filed its petition in a timely manner after the initiation of the Litigation, this factor would still weigh in favor of discretionary denial. As explained, diligence in filing the petition doesn't overcome the concern over

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<sup>5</sup> *Immersion Sys. LLC v. Midas Green Techs., LLC*, PGR2021-00104, Paper 15 at 10 (P.T.A.B. Jan. 31, 2022) (internal quotation and citation omitted).

expended resources in the parallel litigation.<sup>6</sup> And even the remaining work before trial is not significant enough to overcome the extensive efforts already exerted by the parties and the court.<sup>7</sup> Because Hermes IP, Samsung and the district court have expended significant resources in the parallel litigation, this factor weighs against institution.

**D. Factor 4 – The Significant Overlap Between Issues Raised in this Proceeding and the Parallel Litigation Favors Denial.**

This factor weighs in favor of discretionary denial. If the Board institutes this proceeding, Petitioner has not stipulated to ceasing the assertion of any references in the parallel litigation. This means that there will be duplicative efforts expended on overlapping issues in the parallel litigation and an instituted IPR.<sup>8</sup> For example,

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<sup>6</sup> *Verizon Business Net. Servs. LLC v. Huawei Techs. Co. Ltd.*, IPR2020-01278, Paper 12 at 11 (P.T.A.B. Jan. 26, 2021) (weighing claim construction and Markman hearing favored exercise discretion despite Petition’s filing date only 2 months after service) (internal citations omitted).

<sup>7</sup> *NXP USA, Inc. v. Impinj, Inc.*, IPR2021-01556, Paper 10 at 8-9 (P.T.A.B. Apr. 21, 2022) (internal citations omitted).

<sup>8</sup> *eClinicalWorks, LLC v. Decapolis LLC*, IPR2022-00229, Paper 10 (P.T.A.B. Apr. 13, 2022) (weighing petition’s overlap in both grounds and claims along with Petitioner’s failure to adequately stipulate strongly in favor of exercising discretion to deny).

as Petitioner’s preliminary invalidity contentions show, the parties will still be expending efforts to address the following overlapping obviousness arguments in the parallel litigation that are based on Grounds 1-2’s Hawkins, Majava, and Nielsen<sup>9</sup>:

- Whether Hawkins and Majava render obvious claims 1 thru 16; and
- Whether Hawkins, Majava, and Nielsen render obvious claims 7,2, and 16.

This runs directly counter to the *Fintiv* ascribed purpose of Factor 4 stipulations to reduce “inefficiency and the possibility of conflicting decisions.”<sup>10</sup>

Further, institution would open the door to conflicting and inefficient rulings regarding validity. We note that Petitioner could have stipulated that it would not pursue any ground raised or that could have been reasonably raised in an inter

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<sup>9</sup> See Ex-2002 citing Hawkins, Majava, and Nielsen.

<sup>10</sup> *Fintiv*, Paper 11 at 12; *Verizon Business Network Services LLC v. Huawei Technologies Co. Ltd.*, IPR2020-01278, Paper 12 at 12-13 (P.T.A.B. Jan. 26, 2021); compare *Immersion Systems LLC v. Midas Green Technologies, LLC*, PGR2021-00104, Paper 15 at 14-15 (P.T.A.B. Jan. 31, 2022) (discounting Petitioner’s stipulation due to multiple contingencies); with *Sotera*, IPR2020- 01019, Paper 12 at 18 (concerning a stipulation (Ex. 1038 in that proceeding) that required institution of an IPR, but addressed all challenges brought or that could have been brought in the IPR); *Sand Revolution II LLC v. Continental Intermodal Group-Trucking LLC*, IPR2019-01393, Paper 24 at 11–12 (P.T.A.B. Jun. 16, 2020) (informative) (concerning a stipulation (Ex. 1015 in that proceeding) that required institution of an IPR, but addressed the challenges brought in the IPR).

partes review, that is, any ground that could have been raised under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications.”<sup>11</sup>

**E. Even if Samsung filed a timely *Sotera* stipulation, this will not be dispositive.**

As this Board has stated in its March 24, 2025 Guidance, the Board will consider a [*Sotera*] stipulation as part of its holistic analysis under *Fintiv*. As such, this stipulation would be only one factor. Here, Samsung has not provided such a stipulation.

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<sup>11</sup> See *Verizon Business Network Services LLC v. Huawei Technologies Co. Ltd.*, IPR2020-01278 Paper 12 at 12 (P.T.A.B. Jan. 26, 2021); see also *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 19 (P.T.A.B. Dec. 1, 2020) (precedential) (finding that the petitioner’s stipulation “mitigates any concerns of duplicative efforts between the district court and the Board, as well as concerns of potentially conflicting decisions,” where the petitioner “broadly stipulates to not pursue ‘any ground raised or that could have been reasonably raised’”); *NXP USA, Inc. v. Impinj, Inc.*, IPR2021-01556, Paper 10 at 9-10 (P.T.A.B. Apr. 21, 2022) (“Because the Petition challenges all of the ’198 patent claims asserted in the parallel proceeding, and also asserts the same prior art combinations in both proceedings, this factor weighs in favor of discretionary denial.”).

**F. Factor 5 – Petitioners and Patent Owner Are All Parties to the Parallel Litigation, Favoring Denial.**

The Board has consistently found parallel proceedings with the same parties to weigh in favor of exercising discretion to deny institution.<sup>12</sup> Accordingly, because there is no dispute of the parties’ roles in both proceedings, this factor weighs against institution.

**G. Factor 6 – Additional Circumstances Favor Discretionary Denial.**

This factor favors discretionary denial. Among the additional factors considered are the merits of the proposed grounds and the necessity for third party discovery. Both considerations favor discretionary denial.

**i. The Weakness of Grounds 1-2 Weighs Against Institution.**

“Although we need not undertake a full merits analysis when evaluating *Fintiv* Factor 6, we consider the strengths and weaknesses of Petitioner’s case, where stronger merits may weigh against discretionary denial and weaker merits may favor

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<sup>12</sup> *Immersion Systems LLC v. Midas Green Technologies, LLC*, PGR2021-00104, Paper 15 at 15 (P.T.A.B. Jan. 31, 2022); *eClinicalWorks, LLC, Medical Software Solutions, Inc., and NextGen Healthcare, Inc. v. Decapolis LLC*, IPR2022-00229, Paper 10 (P.T.A.B. Apr. 13, 2022) (weighing even only two of three petitioner’s status in parallel proceeding as favoring discretionary denial); *NXP USA, Inc. v. Impinj, Inc.*, IPR2021-01556, Paper 10 at 10 (P.T.A.B. Apr. 21, 2022); *cf. TCO AS v. NCS Multistage Inc.*, PGR2020-00078, Paper 16 at 11 (P.T.A.B. Feb. 18, 2021) (weighing petitioner’s absence from parallel proceedings against discretion).

exercising discretion to deny institution.”<sup>13</sup> “[I]f the merits of the grounds raised in the petition are a closer call, then that fact has favored denying institution when other factors favoring denial are present.”<sup>14</sup>

The two proposed grounds rely on primary prior art references for which there is not sufficient motivation to combine and which do not disclose or render obvious the inventions of the Challenged Claims. To combine Hawkins and Majava, Petitioner contends that a POSITA would have recognized that the advantage of reverting back to the first of the “buttons 701 pages” after a period of idle time, as taught by Majava, so as to reduce the likelihood of accidentally exposing the user’s personal information to others. Petition at 21.

At no point does Petitioner explain why a POSITA would have combined these references to address the primary problems addressed by the ’720 Patent “once an application is used for the idle screen, it [was] impossible to present another application on the same idle screen.” ’720 Patent at 2:23-25. And “although basic

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<sup>13</sup> *Immersion Systems LLC v. Midas Green Technologies, LLC*, PGR2021-00104, Paper 15 at 16 (P.T.A.B. Jan. 31, 2022) (weighing weak disclosures and lack of motivation to combine for exercising discretion to deny); *TCO AS v. NCS Multi-stage Inc.*, PGR2020-00078, Paper 16 at 22-27 (P.T.A.B. Feb. 18, 2021) (weighing failure to map prior art disclosures to claims sufficiently and weak proposed grounds weighed in favor of exercising discretion).

<sup>14</sup> *Fintiv* at 15.

applications (e.g. address book, text message) may be given shortcuts on the key input module for direct access, the limited number of key buttons on the terminal makes it impossible to assign shortcuts to all of the ever-increasing applications.

Further, the cited prior art does not disclose or render obvious all of the claimed elements. As one example, Petitioners point to the tree structured scrolling of Hawkins as disclosing the idle-screen switch request of the claims. However, this type of scrolling is what the inventions of the '720 Patent overcome. '720 Patent at 2:26-29 (“tree-structured menu items must be searched through a number of steps, which renders it inconvenient to modify the idle screen.”).

Accordingly, the merits of the proposed grounds aren't “sufficiently strong to override the concerns about duplication of effort by the Board and the district court.”<sup>15</sup> As a result, this factor weighs heavily against institution.

## **ii. Discovery Issues**

This proceeding may require third party discovery due to “unusual issues in

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<sup>15</sup> *Immersion Systems LLC v. Midas Green Technologies, LLC*, PGR2021-00104, Paper 15 at 16 (P.T.A.B. Jan. 31, 2022) (weighing weak disclosures and lack of motivation to combine for exercising discretion to deny); *TCO AS v. NCS Multi-stage Inc.*, PGR2020-00078, Paper 16 at 22-27 (P.T.A.B. Feb. 18, 2021) (weighing failure to map prior art disclosures to claims sufficiently and weak proposed grounds weighed in favor of exercising discretion).

the case [that] are better resolved by the District Court.”<sup>16</sup> In its amended answer in the parallel litigation, Samsung asserts Hermes IP’s claims for relief may be barred in whole or in part by one or more express and/or implied licenses.”<sup>17</sup> Samsung also asserts that “Plaintiff does not own or lacks all substantial rights in the Asserted Patents. Thus, Plaintiff either (1) lacks standing to assert the Asserted Patents; or (2) lacks a statutory cause of action to assert the Asserted Patents without joining one or more third parties.” EX2003 at 11. As a result, resolution of these issues will require fact intensive third-party discovery from prior Korean owners of the ’720 Patent, corporate entities, and legal representatives.

These facts mirror those in PGR2020-00078, where the Board determined that the fact-intensive discovery necessary regarding allegations of prior use weighed against institution because “it appears that third-party discovery is required to resolve the issue ... of prior art as a ‘public use.’”<sup>18</sup> Here, the consequences of the

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<sup>16</sup> *TCO AS v. NCS Multistage Inc.*, PGR2020-00078, Paper 16 at 21 (P.T.A.B. Feb. 18, 2021) (weighing need for discovery from extraterritorial third party in favor of exercising discretion to deny).

<sup>17</sup> Ex. 2003 at 11 (Amended Answer)

<sup>18</sup> *TCO AS v. NCS Multistage Inc.*, PGR2020-00078, Paper 16 at 21 (P.T.A.B. Feb. 18, 2021) (weighing need for discovery from extraterritorial third party in favor of exercising discretion to deny).

pending discovery go even further than prior-art status. Based on Petitioner’s assertions, Petitioner is contending that it is already licensed to the ’720 Patent. Accordingly, if the Board were to institute these proceedings and Petitioner’s ownership contentions are born out in the parallel litigation, the petition would be made superfluous. Accordingly, third party discovery on Petitioner’s license defense cannot be resolved in the PTAB and must be resolved in the parallel litigation. Thus, this factor further weighs against institution.

\* \* \* \*

In sum, all six *Fintiv* factors (Factors 1-6) weigh against institution. Accordingly, Patent Owner respectfully request that the Board discretionarily deny this petition under §314(a).

#### **H. Additional Consideration Under the Interim Processes for PTAB Workload Management**

This Board in its March 26, 2025 Interim Processes for PTAB Workload Management set forth additional factors that may be considered.

##### **i. The Extent of the Petition’s Reliance on Expert Testimony**

In its Petition, Samsung heavily relies on expert testimony to support its arguments to combine Hawkins and Majava. For example, Samsung argues that “[a] POSITA would have been motivated to incorporate Majava’s teachings regarding reverting to the default first page after a period of idle time into Hawkins for at least the same reason that Majava has such a feature, i.e., to avoid the user accidentally

displaying or exposing personal information to anyone who sees the screen 102.”  
Petition at 22. Rather than Majava and Hawkins inherently teaching the benefits of the combination, Samsung has to concoct motivations using its expert which differ from the intent of the ’720 Patent which allows for more applications to be shown on multiple idle screens. Furthermore, Samsung includes numerous additional expert testimony citations to state a POSITA would have understood some disclosure in Hawkins, Majava, and Nielsen to mean something different than explicitly stated in the reference. *See e.g.* Petition at 35.

The Board should consider such heavy reliance on expert testimony as another factor that supports this petition under § 314(a).

**ii. “settled expectations” of the parties - e.g., how long the patent has been enforced or if the patent is near expiry**

Here, the ’720 Patent is set to expire June 15, 2026. The expiration date of the ’720 Patent will occur at least four months before a final decision in this IPR. This factor weighs heavily in favor of discretionary denial.

**IV. CONCLUSION**

The Board should exercise its discretion to deny institution on *Fintiv* grounds. Accordingly, Patent Owner respectfully requests the Board deny institution of this petition as an IPR wouldn’t serve the AIA goals of promoting efficient and conclusive rulings.

Respectfully Submitted,

/Neal Massand /

Neal Massand (Reg. No. 54,296)

[nmassand@nilawfirm.com](mailto:nmassand@nilawfirm.com)

Ni, Wang & Massand, PLLC

8140 Walnut Hill Lane, Suite 615

Dallas, Texas 75231

(t) (972) 331-4600

(f) (972) 314-0900

## **CERTIFICATE OF COMPLIANCE**

Per 37 C.F.R. §42.24(a) and (d), the undersigned hereby certifies that the Petition complies with the type-volume limitation of 37 C.F.R. §42.24(a)(i) because, exclusive of exempted portions, it contains 3439 words as counted by the word-processing program used to prepare it.

Respectfully Submitted,

/Neal Massand/  
Neal Massand (Reg. No. 54,296)  
nmassand@nilawfirm.com  
Ni, Wang & Massand, PLLC  
8140 Walnut Hill Lane, Suite 615  
Dallas, Texas 75231  
(t) (972) 331-4600  
(f) (972) 314-0900

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that the above-captioned Mandatory Notice was served on counsel of record for the Petitioner by filing this document through the Patent Review Processing System as well as by delivering a copy via electronic mail to:

Ali R. Sharifahmadian

ali.sharifahmadian@arnoldporter.com

Arnold & Porter Kaye Scholer LLP

601 Massachusetts Ave., N.W

Washington, D.C. 20001-3742

patrick.reidy@arnoldporter.com (First Back-up Counsel)

jonathan.swisher@arnoldporter.com (Additional Back-Up Counsel)

SamsungHermesAP@arnoldporter.com

Dated May 21, 2025

/Neal Massand/  
Neal Massand (Reg. No. 54,296)