

**From:** [Director Discretionary Decision](#)  
**To:** [Sharifahmadian, Ali R.](#); [Director Discretionary Decision](#)  
**Cc:** [nmassand@nilawfirm.com](mailto:nmassand@nilawfirm.com); [Tim Wang](#); [xSamsungHermesAP](#)  
**Subject:** RE: Samsung v. Hermes, IPR2025-00872, -00953  
**Date:** Monday, July 7, 2025 3:55:26 PM  
**Attachments:** [image001.png](#)

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Petitioner is authorized to file the documents identified below as exhibits in IPR2025-00872 and IPR2025-00953.

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**From:** Sharifahmadian, Ali R. <Ali.Sharifahmadian@arnoldporter.com>  
**Sent:** Thursday, July 3, 2025 9:31 AM  
**To:** Director\_Discretionary\_Decision <Director\_Discretionary\_Decision@uspto.gov>  
**Cc:** nmassand@nilawfirm.com; Tim Wang <twang@nilawfirm.com>; xSamsungHermesAP <xSamsungHermesAP@arnoldporter.com>  
**Subject:** Samsung v. Hermes, IPR2025-00872, -00953

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Dear Honorable Board,

Petitioners respectfully seek authorization to file, as an exhibit in each of IPR2025-00872 and -00953, a copy of a letter that Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Samsung”) sent to Patent Owner containing a *Sotera*+ type stipulation related to the co-pending district court Case No. 2:24-cv-540-JRG-RSP, in which each of the subject patents is asserted in the Eastern District of Texas. The stipulation specifies that for each of the above petitions, if the PTAB institutes review, Samsung will not pursue in the district court (i) any grounds that were raised or reasonably could have been raised in the IPR, and (ii) combinations of the prior art asserted in the IPR with unpublished system prior art. See *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020) (precedential as to § II.A); *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, Paper 19 (PTAB March 28, 2025).

Counsel for Patent Owner, who is copied here, opposes this request.

Should the Board require a conference call, the parties will confer and provide times of mutual availability.

Sincerely,

Ali R. Sharifahmadian  
Counsel for Petitioners

IPR2025-00872  
Ex. 3101

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