

From: [Director_PTABDecision_Review](#)
To: "[Neil Rubin](#)"; [Rak Wilus](#); [W. Karl Renner](#); [Jeremy J. Monaldo](#); [Jennifer J. Huang](#); [IPR39843-0200IP1@fr.com](#); [IPR39843-0194IP1@fr.com](#); [PTAB Inbound](#)
Subject: RE: Samsung v. Wilus - IPR2025-00988, -00933 - request for leave to submit additional exhibit
Date: Friday, February 27, 2026 2:06:00 PM

Counsel,

Patent Owner's request for authorization to submit evidence in support of requests for Director Review in the above identified proceedings is granted.

Thank you.

From: Neil Rubin <nrubin@raklaw.com>
Sent: Thursday, February 19, 2026 6:20 AM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: Rak Wilus <rak_wilus@raklaw.com>; W. Karl Renner <renner@fr.com>; Jeremy J. Monaldo <jjm@fr.com>; Jennifer J. Huang <jjh@fr.com>; IPR39843-0200IP1@fr.com; IPR39843-0194IP1@fr.com; PTAB Inbound <ptabinbound@fr.com>
Subject: Samsung v. Wilus - IPR2025-00988, -00933 - request for leave to submit additional exhibit

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Dear Honorable Director:

Patent Owner Wilus intends to submit requests for director review of the recent institution decisions in IPR2025-00988 and IPR2025-00933, concerning two Wilus patents related by continuation. The deadlines for director review are 2/20 and 2/23, respectively. Wilus respectfully requests authorization to submit as an exhibit in each IPR Samsung's 1/6/2026 secondary election of prior art in the parallel district court litigation, a copy of which is attached to this email. This document was not available for Wilus to file before the deadline for briefing on discretionary denial.

In its director review requests, Wilus seeks to demonstrate that the decision made on its requests for discretionary denial misapprehended the practical scope of Petitioner's *Sotera* stipulations as a result of improperly crediting Petitioner's arguments made in its oppositions to the discretionary denial requests.

Among Petitioner's statements in its opposition were: "Samsung's broad stipulation—even more sweeping than *Sotera*—eliminates any potential overlap between this proceeding and Wilus's district court action." IPR2025-00988, Paper 9 at 34. "Samsung's stipulation guarantees that, if instituted, none of the prior art asserted in the Petition will be used in the

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Ex. 3101

District Court proceeding—even in combination with unpublished system art.” *Id.* at 35.

The proposed exhibit shows that Samsung intends to proceed with its IPR prior art in combination with unpublished system art, against patents in the same family, containing similar claim limitations, as that art is asserted against in its IPRs. For example, the Bharadwaj prior art reference that is the primary reference in grounds 2A-2D in IPR2025-00988 is a part of Samsung’s fourth elected combination against the ‘595 patent in district court. As another example, the Josiam reference that is the primary reference for grounds 1A and 1B in IPR2025-00933 is a part of Samsung’s fifth elected combination against the ‘281 patent in district court.

Wilus respectfully requests leave to submit this document as an exhibit and to address it in its requests for director review, so that the director may consider the inconsistencies between Samsung’s representations to the then Acting Director in opposing discretionary denial and Samsung’s subsequent conduct in the district court proceedings.

Respectfully submitted,

Neil A. Rubin

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