

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD, SAMSUNG ELECTRONICS
AMERICA, INC., SAMSUNG SEMICONDUCTOR, INC., and SAMSUNG
AUSTIN SEMICONDUCTOR LLC,
Petitioner,

v.

W&WSENS DEVICES INC.,
Patent Owner.

Case IPR2025-00994
U.S. Patent No. 11,621,360

PETITIONER'S STIPULATION

Pursuant to the Interim Processes for PTAB Workload Management, issued March 26, 2025,¹ the FAQs for Interim Processes for PTAB Workload Management,² and the Board’s guidance in the “Learn about the new interim processes relating to institution in AIA proceedings” presentation,³ Petitioner Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor LLC (collectively, “Samsung”) stipulates as follows:

If the Patent Trial and Appeal Board (PTAB) institutes this *inter partes* review, Samsung will not pursue against the ’360 Patent in *W&Wsens Devices Inc. v. Samsung Electronics Co., Ltd., et al.*, Case No. 2:24-cv-00854-JRG (E.D. Tex.):

1. “[T]he specific grounds [asserted in IPR2025-00994], or ... any other ground ... that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent

¹ Available at <https://www.uspto.gov/sites/default/files/documents/InterimProcesses-PTABWorkloadMgmt-20250326.pdf>.

² Available at <https://www.uspto.gov/patents/ptab/faqs/interim-processes-workload-management> (FAQ 14).

³ Presentation, video, and FAQs available at <https://www.uspto.gov/about-us/events/learn-about-new-interim-processes-relating-institution-aia-proceedings>.

or printed publications)” (see *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential as to § II.A));

2. Any grounds that include any reference named in IPR2025-00994’s petition’s grounds (*i.e.*, *Kuboi* (Ex. 1004), *Shinohara* (Ex. 1005), and *Yu* (Ex. 1050)); or
3. Any grounds that use any patent or printed publication that is cited in the petition as evidence of features of any devices that are used as primary or secondary references in any invalidity combination.

Dated: August 8, 2025

By: / Joshua L. Goldberg /
Joshua L. Goldberg
Lead Counsel
Reg. No. 59,369

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Petitioner's Stipulation** was served electronically via email on August 8, 2025, in its entirety on the following:

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Patent Owner has consented to electronic service by email.

Dated: August 8, 2025

/ William Esper /
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