**From:** **Ralph A. Phillips** RPhillips@fr.com
**Subject:** Wilus v. Samsung, No. 25-cv-00070 (EDTX) - P.R. 4-2 disclosure
**Date:** November 13, 2025 at 9:55 AM
**To:** jtsuei@raklaw.com, FISH SERVICE Samsung/Wilus FISHSERVICESamsungWilus@fr.com
**Cc:** rak_wilus@raklaw.com, nrubin@raklaw.com, Linda Xu lxu@raklaw.com, pwang@raklaw.com

RP

James,

Pursuant to Patent Rule 4-2 and in the interest of reducing issues, Defendants hereby withdraw their contentions as to indefiniteness for all claim terms identified as indefinite in Defendants' Patent Rule 4-1 disclosure in the above captioned case. Instead, Defendants propose these terms should be given their plain and ordinary meaning and, as such, do not require construction.

Further, Defendants hereby propose the terms "duplicated bit information" ('186 patent, claims 5, 6, 15, 16), "duplicating the predetermined AID field information" ('186 patent, claims 7, 17), and ""repeating a specific value"" ('186 patent, claim 10) should be given their plain and ordinary meaning and do not require construction.

Given Plaintiff's position stated in its PR 4-1 disclosure (below), we understand this to resolve all outstanding claim construction issues in the above captioned case.

Regards,

Ralph

**Ralph A. Phillips ::** Fish & Richardson P.C. **::** +1-202-626-6382

---

**From:** James Tsuei <jtsuei@raklaw.com>
**Sent:** Thursday, October 23, 2025 6:28 PM
**To:** FISH SERVICE Samsung/Wilus <FISHSERVICESamsungWilus@fr.com>
**Cc:** rak_wilus@raklaw.com; nrubin@raklaw.com; Linda Xu <lxu@raklaw.com>; pwang@raklaw.com
**Subject:** Wilus v. Samsung, No. 25-cv-00070 (EDTX) - P.R. 4-1 disclosure

[This email originated outside of F&R.]

Samsung counsel, pursuant to Patent Rule 4-1, Wilus states that it currently identifies no terms of the Asserted Patents which it proposes should be construed.

Thanks,

--
James Tsuei
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
(310) 826-7474
jtsuei@raklaw.com

* * * * * * * * * * * * * * * * * * * * * * * * * * *
IRS Circular 230 Notice: This communication is not intended to be used and cannot be used, for the purpose of avoiding U.S. federal tax-related penalties or promoting, marketing or recommending to another party any tax-related matter addressed herein.
- - - - - - - - - - - - - - - - - - - - - - - - - - - -

This communication shall not create, waive or modify any right, obligation or liability, or be construed to contain or be an electronic signature. This communication may contain information that is legally privileged, confidential or exempt from disclosure, and is intended only for the named addressee(s). If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is prohibited.

************************************************************************************************************************
This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized use or disclosure is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.
************************************************************************************************************************