

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC.,

SAMSUNG ELECTRONICS CO., LTD.,

Petitioners,

v.

XIFI NETWORKS R&D, INC.

Patent Owner.

Case IPR2025-001204

Patent No. 11,818,591

PETITIONERS' STIPULATION

Pursuant to the Board’s authorization granted on February 21, 2025, Petitioners hereby stipulate that, if the Board institutes *inter partes* review in this proceeding, IPR2025-001204, Petitioners will not pursue in the parallel litigation, *XiFi Networks R&D, Inc. v Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Case No. 2:24-cv-01057-JRG (E.D. Tex.), **(1)** any grounds of invalidity arising under U.S.C. § 102 or § 103 involving only patent or printed publication prior art that could have reasonably been raised before the Board with respect to U.S. Pat. No. 11,818,591 (the ’591 patent), including the same grounds in the Petition (Paper 1); or **(2)** any grounds of invalidity arising under U.S.C. § 102 or § 103 with respect to the ’591 patent that include WO 2013/126859 (“Chincholi”) or U.S. Patent Application 2011/0320625 (“Riggert”).

Date: August 1, 2025

/s/ James M. Glass

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on August 1, 2025 the foregoing document was served via email on the following counsel of record:

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