

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner,

v.

ONE-E-WAY, INC.,
Patent Owner

Case: IPR2025-01541
U.S. Patent No. 9,107,000

**PETITIONER'S NOTIFICATION OF DISTRICT COURT STAY
AND STIPULATION TO MATERIALLY REDUCE OVERLAP
WITH DISTRICT COURT PROCEEDINGS**

Samsung Electronics Co., Ltd. (“Petitioner”) hereby notifies the Office of the entry of stay in the parallel litigation involving U.S. Pat. No. 9,107,000 (“the ’000 patent”), namely *One-E-Way, Inc. v. Dell Techs. Inc.*, 24-cv-1558 (W.D. Tex., filed December 18, 2024); *One-E-Way, Inc. v. Anker Innovations. Ltd.*, 24-cv-1559 (W.D. Tex., filed December 18, 2024); *One-E-Way, Inc. v. Samsung Electronics Co., Ltd.*, 24-cv-1561 (W.D. Tex., filed December 18, 2024) (“Parallel Litigation”). Specifically, in view of the IPR proceedings, the District Court has ordered that the “action and all deadlines herein are STAYED pending further order of the Court.” *One-E-Way, Inc. v. Dell Techs. Inc.*, 24-cv-1558, Dkt. No. 89, Order Granting Stay at 6 (a copy of which has been filed herein as EX1031).

Petitioner hereby stipulates that, if the Petition is instituted, Petitioner will not pursue against the ’000 Patent in the Parallel Litigation:

1. “[T]he specific grounds [asserted in IPR2025-01541], 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 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 use patents or publications as a primary reference in any invalidity combination;

3. Any grounds that include any reference named in IPR2025-01541's petition's grounds; or

4. Any grounds where a patent or printed publication that is cited in the petition is used as evidence of the operation or structure of a system art device.

Not only does this stipulation include the standard *Sotera* stipulation, but it also addresses duplication between product art and IPR art. Thus, this "broad stipulation ... reduces the concern of inconsistent outcomes or significant duplication of efforts." *Samsung Electronics Co., Ltd. v. Wilus Institute of Standards And Technology Inc.*, IPR2025-00933, Paper 11, at 3.

Dated: December 23, 2025

Respectfully Submitted,

/Trenton A. Ward/

Trenton A. Ward
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 23, 2025, a complete and correct copy of **PETITIONER'S NOTIFICATION OF DISTRICT COURT STAY AND STIPULATION TO MATERIALLY REDUCE OVERLAP WITH DISTRICT COURT PROCEEDINGS** was served via electronic mail on the following email addresses as provided for in Patent Owner's Mandatory Notices:

- Gregory S. Donahue - gdonahue@dinovoprice.com
- Daniel Schmid - dschmid@dinovoprice.com
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/Trenton A. Ward/

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