

UNITED STATES PATENT AND TRADEMARK OFFICE

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

SAMSUNG ELECTRONICS CO., LTD.;  
SAMSUNG ELECTRONICS AMERICA, INC.,  
Petitioner

v.

NETWORK-1 TECHNOLOGIES, INC.,  
Patent Owner.

---

Case No. IPR2026-00119  
U.S. Patent No. 11,916,893

---

**NOTICE OF PETITIONER'S PRIOR ART STIPULATION**

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively “Petitioner” or “Samsung”) hereby stipulate that if and when the Board institutes *inter partes* review (and that institution is not subsequently vacated) in this proceeding (IPR2026-00119), Petitioner will not advance against U.S. Patent No. 11,916,893, in the co-pending district court proceeding, *Network-1 Technologies, Inc. v. Samsung Electronics Co., Ltd. et al.*, No. 2:25-cv-667-JRG (E.D. Tex.): (1) any ground of invalidity raised or that reasonably could have been raised in this proceeding; or (2) any ground arising from 35 U.S.C. §§ 102 or 103 that includes any reference that forms the basis of any ground raised in IPR2026-00119.<sup>1</sup>

For avoidance of doubt, if the PTAB declines to institute IPR2026-00119, or if institution is later vacated, reversed, or otherwise withdrawn by rehearing or Director Review, Petitioner reserves the right to assert any grounds of invalidity in the above-captioned District Court proceeding against U.S. Patent No. 11,916,893.

---

<sup>1</sup> Petitioner respectfully reserves the right to modify this stipulation in the event that the PTAB adopts any rule that would alter the scope of any prior art stipulation required for institution and maintenance of an *inter partes* review, including those in the Notice of Proposed Rulemaking issued October 17, 2025.

Dated: December 18, 2025

Respectfully submitted,

/s/ William M. Fink

William M. Fink (Reg. No. 72,332)

O'Melveny & Myers LLP

1625 Eye Street, NW

Washington, DC 20006

Telephone: (202) 383-5300

Fax: (202) 383-5414

Email: [tfink@omm.com](mailto:tfink@omm.com)

Attorney for Petitioner

**CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2025, I caused a true and correct copy of the foregoing NOTICE OF PETITIONER'S PRIOR ART STIPULATION to be served electronically on counsel for Patent Owner at the following addresses:

Michael F. Heim  
R. Allan Bullwinkel  
Christopher L. Limbacher  
William B. Collier, Jr.  
Heim, Payne & Chorush, LLP  
609 Main Street, Suite 3200  
Houston, TX 77002  
Phone: (713) 221-2000  
Email: mheim@hpcllp.com  
Email: abullwinkel@hpcllp.com  
Email: climbacher@hpcllp.com  
Email: wcollier@hpcllp.com

Dated: December 18, 2025

Respectfully submitted,

/s/ William M. Fink

William M. Fink (Reg. No. 72,332)  
O'Melveny & Myers LLP  
1625 Eye Street, NW  
Washington, DC 20006  
Telephone: (202) 383-5300  
Fax: (202) 383-5414  
Email: tfink@omm.com  
Attorney for Petitioner