

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD., SAMSUNG ELECTRONICS
AMERICA, INC., AND APPLE INC.,
Petitioner,

v.

NEONODE SMARTPHONE LLC,
Patent Owner,

Case IPR2021-00144
Patent 8,095,879

STIPULATION TO LIMIT THE PETITION

Patent Owner Neonode Smartphone LLC (hereinafter, “Patent Owner”), and Petitioners Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and Apple Inc., (hereinafter, collectively “Petitioners”) enter into this stipulation to memorialize their agreement to limit the Petition as stated below. This stipulation is filed pursuant to the Board’s authorization via email dated February 25, 2022 (Exhibit 2037), and is filed by Patent Owner on behalf of both parties.

The Parties have stipulated as follows:

(1) The Petition will be limited to grounds 2A, 2B, 2C and 2D as stated in the Petition, and grounds 1A-1E, and 3 shall be excluded from this proceeding (“Excluded Grounds”);

(2) Patent Owner shall not pursue any decision by the Board on the Excluded Grounds;

(3) Any question by Patent Owner for Petitioner’s expert at deposition that is unrelated to grounds 2A-2D shall be subject to a relevance/scope objection, and the proper motion to exclude, if necessary; and

(4) Patent Owner shall not otherwise present arguments in this proceeding as to the Excluded Grounds for any reason unrelated to grounds 2A-2D.

Respectfully submitted,

/ Tiffany Miller /

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/ Kenneth J. Weatherwax /

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Counsel for Patent Owner

Date: August 8, 2022

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following documents were served by electronic service on the date signed below:

STIPULATION TO LIMIT THE PETITION

The names and address of the parties being served are as follows:

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Respectfully submitted,

/ Keith Moore /

Date: August 8, 2022