

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,

Petitioner,

v.

NETLIST, INC.,

Patent Owner

Patent No. 11,016,918

Issued: May 25, 2021

Filed: December 30, 2020

Inventors: Chi-She Chen, Jeffrey C. Solomon, Scott H. Milton, Jayesh Bhakta

Title: Flash-DRAM Hybrid Memory Module

Inter Partes Review No. IPR2022-00096

PETITIONER'S UPDATED MANDATORY NOTICES

Pursuant to 37 C.F.R. § 42.8(a)(3), Petitioner hereby provides the following updates to its mandatory notices in Paper No. 1:

Related Matters (37 C.F.R. § 42.8(b)(2))

The following judicial or administrative matters would affect, or be affected by, a decision in this proceeding concerning U.S. Patent No. 11,016,918.

The following proceedings are currently pending:

- *Samsung Electronics Co., Ltd. et al. v. Netlist, Inc.*, No. 1:21-cv-01453 (D. Del. filed Oct. 15, 2021)
- *Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.*, No. 2:21-cv-00463 (E.D. Tex. filed Dec. 20, 2021)
 - [NEW] Petitioner stipulated as follows: “Samsung stipulates that, if the Patent Trial and Appeal Board institutes an IPR proceeding for U.S. Patent No. 11,016,918 on the grounds presented in Samsung’s petition in IPR2022-00996, Samsung will not pursue an invalidity defense in the Eastern District of Texas action (C.A. No. 21-463-JRG) that the patent claims subject to the instituted IPR are invalid based on grounds that were raised or reasonably could have been raised in the IPR.”
See Exhibit 1074.

- *Samsung Electronics Co., Ltd. v. Netlist, Inc.*, IPR2022-00999 (U.S. Patent No. 11,232,054)
- [NEW] *Netlist, Inc. v. Micron Technology, Inc.*, No. 2:22-cv-00203 (E.D. Tex. filed June 13, 2022)
- Application No. 17/582,797

The following proceeding is no longer pending:

- *SK hynix Inc. et al. v. Netlist, Inc.*, IPR2017-00692 (U.S. Patent No. 8,874,831)

Dated: October 11, 2022

Respectfully submitted,

/ Eliot D. Williams /

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Counsel for Petitioner

Samsung Electronics Co., Ltd.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 11th day of October, 2022, **Petitioner’s Updated Mandatory Notices** was served by email on the following counsel for Patent Owner:

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