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**Re: *Headwater Research LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 2:23-cv-00103 (E.D. Tex.)**

Dear Counsel:

Samsung Electronics Co., Ltd. (“**Samsung**”) has filed an *inter partes* review (IPR) petition (IPR2024-00010) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1-9, 11-13, and 15 of U.S. Patent No. 9,615,192 (“**the ’192 Patent**”). The tables in attached Appendix A list all grounds, challenged claims, and references asserted in IPR2024-00010.

I write to inform you that Samsung hereby stipulates that, if the PTAB institutes IPR2024-00010, Samsung agrees not to pursue the same grounds (listed in Appendix A below) in the district court litigation. *Apple, Inc. v. SEVEN Networks, LLC*, IPR2020-00156, Paper 10 at 19 (PTAB June 15, 2020); *see Sand Revolution II, LLC v. Continental Intermodal Group-Trucking LLC*, IPR2019-01393, Paper 24 at 12 (PTAB June 16, 2020).

Sincerely,



Thad Kodish

Attorney for Samsung Electronics Co., Ltd.

**Appendix A – Grounds and Prior Art References Used in IPR2024-00010**

Ground	Claim(s)	35 U.S.C. §103
1	1, 5-7, 9, 11-13, 15	TS-23.140
2	2-3	TS-23.140 and Shen
3	4	TS-23.140 and Ellison
4	8	TS-23.140 and Rakic
5	1, 5-7, 9, 11-13, 15	Houghton and Munson
6	2-3	Houghton, Munson, and Shen
7	4	Houghton, Munson, and Ellison
8	8	Houghton, Munson, and Rakic

**List of References**

Reference Name	Details
TS-23.140	3GPP TS 23.140 v6.9.0 (2005-03); 3rd Generation Partnership Project; Technical Specification Group Terminals; Multimedia Messaging Service (MMS); Functional Description; Stage 2
Shen	U.S. Patent Pub. No. 2005/0207379
Ellison	U.S. Patent No. 7,082,615
Rakic	U.S. Patent Pub. No. 2009/0282256
Munson	U.S. Patent Publication No. 2009/0240807
Houghton	International Patent Publication. No. WO 2006/077283 A1