

June 16, 2022

**VIA E-MAIL**

Peter Lambrianakos  
Fabricant LLP  
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Re: *Jawbone Innovations, LLC v. Samsung Elecs. Co., Ltd., et al.*, Case No.  
2:21-cv-00186 (E.D. Tex.)

Dear Peter:

We write regarding our on-going litigation, in which Jawbone Innovations, LLC asserts U.S. Patent No. 8,019,091 (the "'091 patent") against Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (together, "Samsung").

Samsung is planning to submit a petition for *inter partes* review on claims 1-20 of the '091 patent. By this letter, Samsung stipulates that, unless the Board denies or later vacates institution of this petition, Samsung will not seek resolution of invalidity in this litigation based on the specific grounds asserted in this petition, or on any other ground that was raised or could have been reasonably raised in an IPR.

Sincerely,



Jin-Suk Park

cc: Counsel of record