

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**SAMSUNG ELECTRONICS CO., LTD, and
SAMSUNG ELECTRONICS AMERICA, INC.,**
Petitioner,

v.

CELLECT, LLC,
Patent Owner.

Case Nos. IPR2020-00472, -00473, -00474, -00475, -00476, -00477, -00512;
IPR2020-00559, -00560, -00561, -00562, -00563, -00564, -00565;
IPR2020-00566, -00567, -00568, -00569, -00571, -00572

**JOINT PAPER ADDRESSING
THE BOARD'S §314(a) QUESTIONS**

Petitioner and Patent Owner jointly submit this paper as authorized by the Board on June 15, 2020. *See* IPR2020-00472, Pap. 8.¹ On June 23, 2020, the District Court granted Petitioner’s motion to stay the related litigation. *Cellect LLC v. Samsung Elecs. Co., Ltd.*, No. 1:19-cv-00438-CMA-MEH, slip op. at *16 (D. Colo. June 23, 2020) (“Stay Order”) (Pap. 10). Petitioner further submits that the Stay Order stays the litigation pending resolution of the above-captioned proceedings, which collectively challenge all of the patents and asserted claims in the underlying litigation. *Id.* In light of the Stay Order, Patent Owner hereby withdraws its arguments asking the Board to deny institution based on 35 U.S.C. §314(a). In light of Patent Owner’s withdrawal, the parties agree to waive the further briefing permitted by the Board’s order relating to §314(a). *See* IPR2020-00472, Pap. 8.

Date: June 29, 2020

Respectfully submitted by: /James L. Davis, Jr./
Counsel for Petitioner

Respectfully submitted by: /Jonathan S. Caplan/
Counsel for Patent Owner

¹ For simplicity, Petitioner and Patent Owner cite to papers in IPR2020-00472.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing JOINT PAPER ADDRESSING THE BOARD'S §314(a) QUESTIONS was served in its entirety by causing the aforementioned document to be electronically mailed, pursuant to the parties' agreement to the following attorneys of record for the Patent Owner listed below:

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