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Counsel for Defendants
Samsung Electronics Co., Ltd.,
and Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

THETA IP, LLC.

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants

Case No. 2:16-cv-00527-JRG-RSP

JURY

SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.'S INVALIDITY CONTENTIONS

- U.S. Patent No. 6,807,406, filed Oct. 17, 2000, issued Oct. 19, 2004 to Razavi et al. (the "'406 Patent");
- U.S. Patent No. 6,819,938, filed June 20, 2002, issued Nov. 16, 2004 to Sahota (the "'938 Patent");
- U.S. Patent No. 6,944,427, filed Jan. 31, 2003, issued Sep. 13, 2005 to Haub et al. (the "'427 Patent");
- U.S. Patent No. 6,965,655, filed June 20, 2000, issued Nov. 15, 2005 to Mostov et al. (the "'655 Patent");
- U.S. Patent No. 7,054,605, filed Jan. 16, 2002, issued May 30, 2006 to Groe (the "'605 Patent");
- U.S. Patent No. 7,016,654, filed Apr. 30, 2002, issued Mar. 21, 2006 to Bugeja (the "'654 Patent");
- U.S. Patent No. 7,274,760, filed Aug. 2, 2001, issued Sep. 25, 2007 to Tsividis et al. (the "'760 Patent");
- U.S. Patent No. 7,299,021, filed Sep. 13, 2002, issued Nov. 20, 2007 to Parssinen et al. (the "'021 Patent");
- U.S. Patent Application 20040042572, filed Aug. 2, 2001 by Tsividis et al. (the "'572 Application");
- PCT Publication No. WO 02/056470, published July 18, 2002 by Palaskas et al. (the "'470 Application"); and
- Farbod Behbahani et al., "Adaptive Analog IF Signal Processor for a Wide-Band CMOS Wireless Receiver," 36 IEEE J. Solid State Circuits 1205-17 (2001) ("Behbahani 2001").

The identified prior art references further include any other references listed in this document or the accompanying claim charts.

III. CLAIM CHARTS PREPARED PER PATENT RULE 3-3(B) AND (C)

Pursuant to P. R. 3-3(b) and (c), Samsung provides the following charts identifying where specifically in each alleged item of prior art each limitation of each asserted claim is found.

Dated: November 28, 2016

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