Jeffrey B. Plies
DECHERT LLP
300 West 6th Street, Suite 2010
Austin, Texas 78701
Telephone: (512) 394-3000
jeffrey.plies@dechert.com

Robert L. Masterson
DECHERT LLP
Cira Centre, 2929 Arch Street
Philadelphia, Pennsylvania 19104
Telephone: (215) 994-4000
robert.masterson@dechert.com

S. Michael Song
DECHERT LLP
2440 W. El Camino Real, Suite 700
Mountain View, California 94040
Telephone: (650) 813-4800
michael.song@dechert.com

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

DECHERT LLP

/s/ *Jeffrey B. Plies*

Jeffrey B. Plies
DECHERT LLP
300 West 6th Street, Suite 2010
Austin, Texas 78701
Telephone: (512) 394-3000
jeffrey.plies@dechert.com

S. Michael Song
DECHERT LLP
2440 W. El Camino Real, Suite 700
Mountain View, California 94040
Telephone: (650) 813-4800
michael.song@dechert.com

Robert L. Masterson
DECHERT LLP
Cira Centre, 2929 Arch Street
Philadelphia, Pennsylvania 19104
Telephone: (215) 994-4000
robert.masterson@dechert.com

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

IPR2023-00819
Theta EX2010