

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

MAXELL, LTD.,

Plaintiff,

v.

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

Defendants.

Civil Action No. 5:23-CV-00092-RWS

DEFENDANTS' PRELIMINARY ELECTION OF PRIOR ART

Pursuant to the First Amended Docket Control Order (Dkt. No. 72), Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively referred to herein as “Samsung” or “Defendants”), hereby provide their Preliminary Election of Asserted Prior Art.

'161 Patent

No.	Prior Art
1.	UPnP™ Device Architecture Version 1.0.1 (UPnP)
2.	2005/0091359 (Soin)
3.	2005/0108427 (Van Datta)
4.	8,291,101 (Yan)
5.	2005/0228894 (Takabayashi)
6.	7,987,233 (Osborne)

'590/'241 Patents

No.	Prior Art
1.	Nokia N93
2.	Nokia 6131 NFC
3.	2004/0152455 (Herle)
4.	2006/0258289 (Dua)
5.	3GPP TS 36.211 v0.2.1 (2006-11) (UMTS)
6.	EDGE, HSPA and LTE The Mobile Broadband Advantage (Broadband Advantage).
7.	2006/0203758 (Tee)
8.	ETSI TS 102 190 v1.1.1 (2003-03) (NFC)
9.	Bluetooth Specification 2.0 + EDR (Bluetooth)
10.	2006/0274704 (Desai)
11.	2006/0128332 (Rooyen)
12.	2007/0110080 (Bennett)
13.	2006/0083194 (Dhrimaj)
14.	US 2004/0203800 (Myhre)

'757 Patent

No.	Prior Art
1.	2010/0026815 (Yamamoto)
2.	8,593,555 (Chun)
3.	2014/0247368 (Chinn)
4.	2010/0137026 (Kim)
5.	2001305642 (Takahashi)
6.	20130124207 (Sarin)

No.	Prior Art
7.	20130235245 (Eaton)
8.	Galaxy Prior Art Smartphones
9.	iPhone Prior Art Smartphones

'815 Patent

No.	Prior Art
1.	6,353,702 (Ando)
2.	7,275,063 (Horn)
3.	7,650,361 (Wong)
4.	7,970,240 (Chao)
5.	2001/0056434 (Kaplan)
6.	2005/0160458 (Baumgartner)
7.	2003/0174844 (Candelore)
8.	2004/0201691 (Bryant)
9.	2003/0067554 (Klarfeld)
10.	Galaxy Prior Art Smartphones
11.	iPhone Prior Art Smartphones

'086 Patent

No.	Prior Art
1.	2005/0253814 (Ghassabian)
2.	8,683,582 (Rogers)
3.	8,443,199 (Kim)
4.	8,477,115 (Rekimoto)
5.	2010/0265185 (Oksanen)

No.	Prior Art
6.	8,633,909 (Miyazawa)
7.	2007/0097096 (Rosenberg)
8.	6,795,569 (Setlak)

'848 Patent

No.	Prior Art
1.	WO 2007/060980 (Nozaki)
2.	2009/0037477 (Choi)
3.	2007/0098303 (Gallagher)
4.	2004/0095376 (Graham)
5.	2007/0019083 (Nakashima)
6.	9,665,597 (Haitani)
7.	KR 2007/0017068 (Kim)

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Respectfully submitted,

By /s/ Erik Fuehrer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via electronic mail on June 27, 2024.

/s/ Erik Fuehrer
Erik Fuehrer