**UNITED STATES DISTRICT COURT**
**FOR THE EASTERN DISTRICT OF TEXAS**
**MARSHALL DIVISION**

| | |
|---|---|
| Cerence Operating Company,<br><br>*Plaintiff*,<br><br>vs.<br><br>Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.,<br><br>*Defendants*. | CASE NO. 2:23-CV-0482-JRG-RSP<br><br>**PLAINTIFF CERENCE OPERATING COMPANY'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS**<br><br>**JURY DEMANDED** |

# PLAINTIFF CERENCE OPERATING COMPANY'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

Pursuant to P.R. 3-1 and P.R. 3-2, patent owner Cerence Operating Company ("Cerence") hereby provides its disclosure of asserted claims and infringement contentions and its accompanying document production. This disclosure is based on the information available to Cerence as of the date of this disclosure, before Cerence has received any discovery on the design or operation of the defendants' products. Cerence reserves the right to amend this disclosure to the full extent permitted under the court's rules and orders.

## P.R. 3-1: DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

### P.R. 3-1(A): ASSERTED CLAIMS

Cerence asserts that defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively "Samsung") infringe one or more of the following claims, directly, by inducement, or by contributory infringement:



Samsung v. Cerence
IPR2024-00979
Exhibit 1016

| *U.S. Patent No.* | *Asserted Claims* |
|---|---|
| 7,395,078 | 1-3, 8-10, 12, 15-17 |
| 8,081,993 | 1-2, 6-8, 10-11, 15-17 |
| 11,393,461 | 1-18 |
| 11,087,750 | 1-19 |
| 9,026,428 | 1 |

Collectively, these five patents are referred to herein as the Asserted Patents, and these claims as the Asserted Claims.

**P.R. 3-1(B): ACCUSED INSTRUMENTALITIES OF WHICH CERENCE IS AWARE**

What follows are lists of accused products that Cerence is aware of infringing based upon information presently available to it and its investigation to date. Cerence's infringement claims are not limited to these listed products and specifically extend to all products and apparatuses of Samsung similar to the listed products that include the claimed elements. Unless otherwise stated, Cerence's infringement assertions apply to all variations, versions, editions, and applications of each of the listed products.

**U.S. PATENT NO. 7,395,078**

Cerence accuses the following Samsung products which implement voice message functionality of infringing one or more of the Asserted Claims of the '078 patent:

Galaxy Tab A6, Galaxy J1 mini Prime/Galaxy V2, Galaxy C5 Pro, Galaxy A3 (2017), Galaxy A5 (2017), Galaxy A7 (2017), Galaxy Tab S3, Galaxy S8+, Galaxy S8, Galaxy Xcover 4, Galaxy J7 Max, Galaxy J7 Pro (2017), Galaxy J7 (2017), Galaxy J5 (2017), Galaxy J3 Prime, Galaxy J3 (2017), Galaxy Note Fan Edition (FE), Galaxy S8 Active, Galaxy J7+, Galaxy J7 Sky Pro, Galaxy J7 Nxt, Galaxy J7 V, Galaxy C8 / C7 (2017), Galaxy Tab A 8.0 (2017), Galaxy Tab Active 2, Galaxy J4 (2017), Galaxy A8+ (2018), Galaxy A8 (2018), Galaxy J4 Pro (2018), Galaxy S9+, Galaxy S9, Galaxy J7 Duo, Galaxy J6 (2018), Galaxy J4 (2018), Galaxy A6+ (2018), Galaxy A6 (2018), Galaxy J7 (2018), Galaxy On6, Galaxy J8 (2018), Galaxy Tab S4, Galaxy Tab A 10.5

(2018), Galaxy Note 9, Galaxy J6+, Galaxy J4+, Galaxy A7 (2018), Galaxy A9 (2018), Galaxy A6s, Galaxy A8+ (2018), Galaxy A8 (2018), Galaxy A8s, Galaxy M20, Galaxy M10, Galaxy M30, Galaxy Tab A 10.1 (2019), Galaxy Tab S5e, Galaxy A10, Galaxy A30, Galaxy A50, Galaxy S10e, Galaxy S10, Galaxy S10+, Galaxy A2 Core, Galaxy A20e, Galaxy A20, Galaxy A40, Galaxy A70, Galaxy A80, Galaxy A60, Galaxy View 2, Galaxy S10 5G, Galaxy M40, Galaxy Note 10+, Galaxy Note 10, Galaxy A10e, Galaxy A10s, Galaxy Fold, Galaxy A90 5G, Galaxy A30s, Galaxy A50s, Galaxy A70s, Galaxy M10s, Galaxy A20s, Galaxy M30s, Galaxy A51, Galaxy A71, Galaxy A01, Galaxy S10 Lite, Galaxy Note 10 Lite, Galaxy Xcover Pro, Galaxy Tab S6, Galaxy Tab S6 5G, Galaxy Z Flip, Galaxy M31, Galaxy A11, Galaxy M21, Galaxy A41, Galaxy A31, Galaxy M11, Galaxy S20 Ultra, Galaxy S20+, Galaxy S20, Galaxy Tab S6 Lite, Galaxy A21, Galaxy A51 5G, Galaxy A51 5G UW, Galaxy A71 5G, Galaxy A21s, Galaxy M01, Galaxy M01s, Galaxy A01 Core, Galaxy M31s, Galaxy Tab S7+, Galaxy Tab S7, Galaxy Z Flip 5G, Galaxy Note 20 Ultra, Galaxy Note 20 Ultra 5G, Galaxy Note 20, Galaxy M51, Galaxy Z Fold2 5G, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 FE 2022, Galaxy F41, Galaxy A42 5G, Galaxy M21s, Galaxy A12, Galaxy A02s, Galaxy M02s, Galaxy A32 5G, Galaxy S21 Ultra, Galaxy S21+, Galaxy S21, Galaxy A02, Galaxy M02, Galaxy M12, Galaxy F62, Galaxy M62, Galaxy A32, Galaxy A52, Galaxy A52 5G, Galaxy A72, Galaxy F12, Galaxy F02s, Galaxy M42 5G, Galaxy F52 5G, Galaxy Tab A7 Lite, Galaxy Tab S7 FE, Galaxy A22, Galaxy A22 5G, Galaxy M32, Galaxy F22, Galaxy Z Flip3 5G, Galaxy Z Fold3 5G, Galaxy A52s 5G, Galaxy A03s, Galaxy M32 5G, Galaxy M22, Galaxy M52 5G, Galaxy F42 5G, Galaxy A03 Core, Galaxy A03, Galaxy Tab A8 10.5, Galaxy A13 5G, Galaxy S21 FE, Galaxy S22, Galaxy S22+, Galaxy S22 Ultra, Galaxy A13, Galaxy A23 5G, Galaxy A23, Galaxy F23, Galaxy A53 5G, Galaxy Tab S8, Galaxy Tab S8+, Galaxy Tab S8 Ultra, Galaxy A73 5G, Galaxy A33 5G, Galaxy M33 5G, Galaxy M23, Galaxy M53 5G, Galaxy F13, Galaxy M13, Galaxy M13 5G, Galaxy Xcover6 Pro, Galaxy Z Flip 4, Galaxy Z Fold 4, Galaxy Tab Active4 Pro, Galaxy A04s, Galaxy A04, Galaxy A04e, Galaxy Tab A7 10.4 (2022), Galaxy M04, Galaxy F04, Galaxy A14 5G, Galaxy S23 Ultra, Galaxy S23+, Galaxy S23, Galaxy Xcover 5, Galaxy Tab A7, Galaxy Tab A7 10.4 (2020), Galaxy Tab A 8.0 (2019), Galaxy J3 (2018), Galaxy Tab E, Galaxy S24, Galaxy S24+, Galaxy S24 Ultra, Galaxy Z Fold 5, and Galaxy Z Flip 5.

The Samsung products in the preceding list, including all variations, editions, and applications of the foregoing, and all products and apparatuses of Samsung similar to the foregoing that include the claimed elements are the ’078 Accused Instrumentalities.

**U.S. PATENT NO. 8,081,993**

Cerence accuses the following Samsung products which implement voice over short message functionality of infringing one or more of the Asserted Claims of the ’993 patent:

Galaxy Tab A6, Galaxy J1 mini Prime/Galaxy V2, Galaxy C5 Pro, Galaxy A3 (2017), Galaxy A5 (2017), Galaxy A7 (2017), Galaxy Tab S3, Galaxy S8+, Galaxy S8, Galaxy Xcover 4, Galaxy J7 Max, Galaxy J7 Pro (2017), Galaxy J7 (2017), Galaxy J5 (2017), Galaxy J3 Prime, Galaxy J3 (2017), Galaxy Note Fan Edition (FE), Galaxy S8 Active, Galaxy J7+, Galaxy J7 Sky Pro, Galaxy J7 Nxt, Galaxy J7 V, Galaxy C8 / C7 (2017), Galaxy Tab A 8.0 (2017), Galaxy Tab Active 2,

Galaxy J4 (2017), Galaxy A8+ (2018), Galaxy A8 (2018), Galaxy J4 Pro (2018), Galaxy S9+, Galaxy S9, Galaxy J7 Duo, Galaxy J6 (2018), Galaxy J4 (2018), Galaxy A6+ (2018), Galaxy A6 (2018), Galaxy J7 (2018), Galaxy On6, Galaxy J8 (2018), Galaxy Tab S4, Galaxy Tab A 10.5 (2018), Galaxy Note 9, Galaxy J6+, Galaxy J4+, Galaxy A7 (2018), Galaxy A9 (2018), Galaxy A6s, Galaxy A8+ (2018), Galaxy A8 (2018), Galaxy A8s, Galaxy M20, Galaxy M10, Galaxy M30, Galaxy Tab A 10.1 (2019), Galaxy Tab S5e, Galaxy A10, Galaxy A30, Galaxy A50, Galaxy S10e, Galaxy S10, Galaxy S10+, Galaxy A2 Core, Galaxy A20e, Galaxy A20, Galaxy A40, Galaxy A70, Galaxy A80, Galaxy A60, Galaxy View 2, Galaxy S10 5G, Galaxy M40, Galaxy Note 10+, Galaxy Note 10, Galaxy A10e, Galaxy A10s, Galaxy Fold, Galaxy A90 5G, Galaxy A30s, Galaxy A50s, Galaxy A70s, Galaxy M10s, Galaxy A20s, Galaxy M30s, Galaxy A51, Galaxy A71, Galaxy A01, Galaxy S10 Lite, Galaxy Note 10 Lite, Galaxy Xcover Pro, Galaxy Tab S6, Galaxy Tab S6 5G, Galaxy Z Flip, Galaxy M31, Galaxy A11, Galaxy M21, Galaxy A41, Galaxy A31, Galaxy M11, Galaxy S20 Ultra, Galaxy S20+, Galaxy S20, Galaxy Tab S6 Lite, Galaxy A21, Galaxy A51 5G, Galaxy A51 5G UW, Galaxy A71 5G, Galaxy A21s, Galaxy M01, Galaxy M01s, Galaxy A01 Core, Galaxy M31s, Galaxy Tab S7+, Galaxy Tab S7, Galaxy Z Flip 5G, Galaxy Note 20 Ultra, Galaxy Note 20 Ultra 5G, Galaxy Note 20, Galaxy M51, Galaxy Z Fold2 5G, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 FE 2022, Galaxy F41, Galaxy A42 5G, Galaxy M21s, Galaxy A12, Galaxy A02s, Galaxy M02s, Galaxy A32 5G, Galaxy S21 Ultra, Galaxy S21+, Galaxy S21, Galaxy A02, Galaxy M02, Galaxy M12, Galaxy F62, Galaxy M62, Galaxy A32, Galaxy A52, Galaxy A52 5G, Galaxy A72, Galaxy F12, Galaxy F02s, Galaxy M42 5G, Galaxy F52 5G, Galaxy Tab A7 Lite, Galaxy Tab S7 FE, Galaxy A22, Galaxy A22 5G, Galaxy M32, Galaxy F22, Galaxy Z Flip3 5G, Galaxy Z Fold3 5G, Galaxy A52s 5G, Galaxy A03s, Galaxy M32 5G, Galaxy M22, Galaxy M52 5G, Galaxy F42 5G, Galaxy A03 Core, Galaxy A03, Galaxy Tab A8 10.5, Galaxy A13 5G, Galaxy S21 FE, Galaxy S22, Galaxy S22+, Galaxy S22 Ultra, Galaxy A13, Galaxy A23 5G, Galaxy A23, Galaxy F23, Galaxy A53 5G, Galaxy Tab S8, Galaxy Tab S8+, Galaxy Tab S8 Ultra, Galaxy A73 5G, Galaxy A33 5G, Galaxy M33 5G, Galaxy M23, Galaxy M53 5G, Galaxy F13, Galaxy M13, Galaxy M13 5G, Galaxy Xcover6 Pro, Galaxy Z Flip 4, Galaxy Z Fold 4, Galaxy Tab Active4 Pro, Galaxy A04s, Galaxy A04, Galaxy A04e, Galaxy Tab A7 10.4 (2022), Galaxy M04, Galaxy F04, Galaxy A14 5G, Galaxy S23 Ultra, Galaxy S23+, Galaxy S23, Galaxy Xcover 5, Galaxy Tab A7, Galaxy Tab A7 10.4 (2020), Galaxy Tab A 8.0 (2019), Galaxy J3 (2018), Galaxy Tab E, Galaxy Tab E, Galaxy S24, Galaxy S24+, Galaxy S24 Ultra, Galaxy Z Fold 5, and Galaxy Z Flip 5.

The Samsung products in the preceding list, including all variations, editions, and applications of the foregoing, and all products and apparatuses of Samsung similar to the foregoing that include the claimed elements are the ’993 Accused Instrumentalities.

**U.S. PATENT NO. 11,393,461**

Cerence accuses the following Samsung products which implement detecting a voice command functionality of infringing one or more of the Asserted Claims of the ’461 patent:

Galaxy S8+, Galaxy S8, Galaxy Note Fan Edition (FE), Galaxy S8 Active, Galaxy Note 8, Galaxy Tab A 8.0 (2017), Galaxy Tab Active 2, Galaxy A8+ (2018), Galaxy A8 (2018), Galaxy S9+, Galaxy S9, Galaxy A6+ (2018), Galaxy A6 (2018), Galaxy Tab S4, Galaxy Tab A 10.5 (2018), Galaxy Note 9, Galaxy A7 (2018), Galaxy A9 (2018), Galaxy A6s, Galaxy A8+ (2018), Galaxy A8 (2018), Galaxy A8s, Galaxy M20, Galaxy M10, Galaxy M30, Galaxy Tab A 10.1 (2019), Galaxy Tab S5e, Galaxy A10, Galaxy A30, Galaxy A50, Galaxy S10e, Galaxy S10, Galaxy S10+, Galaxy A2 Core, Galaxy A20e, Galaxy A20, Galaxy A40, Galaxy A70, Galaxy A80, Galaxy A60, Galaxy View 2, Galaxy S10 5G, Galaxy M40, Galaxy Note 10+, Galaxy Note 10, Galaxy A10e, Galaxy A10s, Galaxy Fold, Galaxy A90 5G, Galaxy A30s, Galaxy A50s, Galaxy A70s, Galaxy M10s, Galaxy A20s, Galaxy M30s, Galaxy A51, Galaxy A71, Galaxy A01, Galaxy S10 Lite, Galaxy Note 10 Lite, Galaxy Xcover Pro, Galaxy Tab S6, Galaxy Tab S6 5G, Galaxy Z Flip, Galaxy M31, Galaxy A11, Galaxy M21, Galaxy A41, Galaxy A31, Galaxy M11, Galaxy S20 Ultra, Galaxy S20+, Galaxy S20, Galaxy Tab S6 Lite, Galaxy A21, Galaxy A51 5G, Galaxy A51 5G UW, Galaxy A71 5G, Galaxy A21s, Galaxy M01, Galaxy M01s, Galaxy A01 Core, Galaxy M31s, Galaxy Tab S7+, Galaxy Tab S7, Galaxy Z Flip 5G, Galaxy Note 20 Ultra, Galaxy Note 20 Ultra 5G, Galaxy Note 20, Galaxy M51, Galaxy Z Fold2 5G, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 FE 2022, Galaxy F41, Galaxy A42 5G, Galaxy M21s, Galaxy A12, Galaxy A02s, Galaxy M02s, Galaxy A32 5G, Galaxy S21 Ultra, Galaxy S21+, Galaxy S21, Galaxy A02, Galaxy M02, Galaxy M12, Galaxy F62, Galaxy M62, Galaxy A32, Galaxy A52, Galaxy A52 5G, Galaxy A72, Galaxy F12, Galaxy F02s, Galaxy M42 5G, Galaxy F52 5G, Galaxy Tab A7 Lite, Galaxy Tab S7 FE, Galaxy A22, Galaxy A22 5G, Galaxy M32, Galaxy F22, Galaxy Z Flip3 5G, Galaxy Z Fold3 5G, Galaxy A52s 5G, Galaxy A03s, Galaxy M32 5G, Galaxy M22, Galaxy M52 5G, Galaxy F42 5G, Galaxy A03 Core, Galaxy A03, Galaxy Tab A8 10.5, Galaxy A13 5G, Galaxy S21 FE, Galaxy S22, Galaxy S22+, Galaxy S22 Ultra, Galaxy A13, Galaxy A23 5G, Galaxy A23, Galaxy F23, Galaxy A53 5G, Galaxy Tab S8, Galaxy Tab S8+, Galaxy Tab S8 Ultra, Galaxy A73 5G, Galaxy A33 5G, Galaxy M33 5G, Galaxy M23, Galaxy M53 5G, Galaxy F13, Galaxy M13, Galaxy M13 5G, Galaxy Xcover6 Pro, Galaxy Z Flip 4, Galaxy Z Fold 4, Galaxy Tab Active4 Pro, Galaxy A04s, Galaxy A04, Galaxy A04e, Galaxy Tab A7 10.4 (2022), Galaxy M04, Galaxy F04, Galaxy A14 5G, Galaxy S23 Ultra, Galaxy S23+, Galaxy S23, Galaxy Xcover 5, Galaxy Tab A7, Galaxy Tab A7 10.4 (2020), Galaxy Tab A 8.0 (2019), Galaxy J3 (2018), Galaxy Tab E, Galaxy Tab E, Galaxy S24, Galaxy S24+, Galaxy S24 Ultra, Galaxy Z Fold 5, Galaxy Z Flip 5, Galaxy Watch (2018), Galaxy Watch Active (2019), Galaxy Watch Active 2 (2019), Galaxy Watch 3, Galaxy Watch 4, Galaxy Watch 4 Classic, Galaxy Watch 5, Galaxy Watch 5 Pro, Galaxy Watch 6, and Galaxy Watch 6 Classic.

The Samsung products in the preceding list, including all variations, editions, and applications of the foregoing, and all products and apparatuses of Samsung similar to the foregoing that include the claimed elements are the ’461 Accused Instrumentalities.

**U.S. PATENT NO. 11,087,750**

Cerence accuses the following Samsung products which implement detecting a voice command functionality of infringing one or more of the Asserted Claims of the ’750 patent:

Galaxy S8+, Galaxy S8, Galaxy Note Fan Edition (FE), Galaxy S8 Active, Galaxy Note 8, Galaxy Tab A 8.0 (2017), Galaxy Tab Active 2, Galaxy A8+ (2018), Galaxy A8 (2018), Galaxy S9+, Galaxy S9, Galaxy A6+ (2018), Galaxy A6 (2018), Galaxy Tab S4, Galaxy Tab A 10.5 (2018), Galaxy Note 9, Galaxy A7 (2018), Galaxy A9 (2018), Galaxy A6s, Galaxy A8+ (2018), Galaxy A8 (2018), Galaxy A8s, Galaxy M20, Galaxy M10, Galaxy M30, Galaxy Tab A 10.1 (2019), Galaxy Tab S5e, Galaxy A10, Galaxy A30, Galaxy A50, Galaxy S10e, Galaxy S10, Galaxy S10+, Galaxy A2 Core, Galaxy A20e, Galaxy A20, Galaxy A40, Galaxy A70, Galaxy A80, Galaxy A60, Galaxy View 2, Galaxy S10 5G, Galaxy M40, Galaxy Note 10+, Galaxy Note 10, Galaxy A10e, Galaxy A10s, Galaxy Fold, Galaxy A90 5G, Galaxy A30s, Galaxy A50s, Galaxy A70s, Galaxy M10s, Galaxy A20s, Galaxy M30s, Galaxy A51, Galaxy A71, Galaxy A01, Galaxy S10 Lite, Galaxy Note 10 Lite, Galaxy Xcover Pro, Galaxy Tab S6, Galaxy Tab S6 5G, Galaxy Z Flip, Galaxy M31, Galaxy A11, Galaxy M21, Galaxy A41, Galaxy A31, Galaxy M11, Galaxy S20 Ultra, Galaxy S20+, Galaxy S20, Galaxy Tab S6 Lite, Galaxy A21, Galaxy A51 5G, Galaxy A51 5G UW, Galaxy A71 5G, Galaxy A21s, Galaxy M01, Galaxy M01s, Galaxy A01 Core, Galaxy M31s, Galaxy Tab S7+, Galaxy Tab S7, Galaxy Z Flip 5G, Galaxy Note 20 Ultra, Galaxy Note 20 Ultra 5G, Galaxy Note 20, Galaxy M51, Galaxy Z Fold2 5G, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 FE 2022, Galaxy F41, Galaxy A42 5G, Galaxy M21s, Galaxy A12, Galaxy A02s, Galaxy M02s, Galaxy A32 5G, Galaxy S21 Ultra, Galaxy S21+, Galaxy S21, Galaxy A02, Galaxy M02, Galaxy M12, Galaxy F62, Galaxy M62, Galaxy A32, Galaxy A52, Galaxy A52 5G, Galaxy A72, Galaxy F12, Galaxy F02s, Galaxy M42 5G, Galaxy F52 5G, Galaxy Tab A7 Lite, Galaxy Tab S7 FE, Galaxy A22, Galaxy A22 5G, Galaxy M32, Galaxy F22, Galaxy Z Flip3 5G, Galaxy Z Fold3 5G, Galaxy A52s 5G, Galaxy A03s, Galaxy M32 5G, Galaxy M22, Galaxy M52 5G, Galaxy F42 5G, Galaxy A03 Core, Galaxy A03, Galaxy Tab A8 10.5, Galaxy A13 5G, Galaxy S21 FE, Galaxy S22, Galaxy S22+, Galaxy S22 Ultra, Galaxy A13, Galaxy A23 5G, Galaxy A23, Galaxy F23, Galaxy A53 5G, Galaxy Tab S8, Galaxy Tab S8+, Galaxy Tab S8 Ultra, Galaxy A73 5G, Galaxy A33 5G, Galaxy M33 5G, Galaxy M23, Galaxy M53 5G, Galaxy F13, Galaxy M13, Galaxy M13 5G, Galaxy Xcover6 Pro, Galaxy Z Flip 4, Galaxy Z Fold 4, Galaxy Tab Active4 Pro, Galaxy A04s, Galaxy A04, Galaxy A04e, Galaxy Tab A7 10.4 (2022), Galaxy M04, Galaxy F04, Galaxy A14 5G, Galaxy S23 Ultra, Galaxy S23+, Galaxy S23, Galaxy Xcover 5, Galaxy Tab A7, Galaxy Tab A7 10.4 (2020), Galaxy Tab A 8.0 (2019), Galaxy J3 (2018), Galaxy Tab E, Galaxy Tab E, Galaxy S24, Galaxy S24+, Galaxy S24 Ultra, Galaxy Z Fold 5, Galaxy Z Flip 5, Galaxy Watch (2018), Galaxy Watch Active (2019), Galaxy Watch Active 2 (2019), Galaxy Watch 3, Galaxy Watch 4, Galaxy Watch 4 Classic, Galaxy Watch 5, Galaxy Watch 5 Pro, Galaxy Watch 6, and Galaxy Watch 6 Classic.

The Samsung products in the preceding list, including all variations, editions, and applications of the foregoing, and all products and apparatuses of Samsung similar to the foregoing that include the claimed elements are the ’750 Accused Instrumentalities.

**U.S. PATENT NO. 9,026,428**

Cerence accuses the following Samsung products which implement text/character input functionality of infringing the Asserted Claim of the ’428 patent:

Galaxy S7, Galaxy S7 Edge, Galaxy S7 Active, Galaxy S8+, Galaxy S8, Galaxy Note Fan Edition (FE), Galaxy S8 Active, Galaxy Note 8, Galaxy Tab A 8.0 (2017), Galaxy Tab Active 2, Galaxy A8+ (2018), Galaxy A8 (2018), Galaxy S9+, Galaxy S9, Galaxy A6+ (2018), Galaxy A6 (2018), Galaxy Tab S4, Galaxy Tab A 10.5 (2018), Galaxy Note 9, Galaxy A7 (2018), Galaxy A9 (2018), Galaxy A6s, Galaxy A8+ (2018), Galaxy A8 (2018), Galaxy A8s, Galaxy M20, Galaxy M10, Galaxy M30, Galaxy Tab A 10.1 (2019), Galaxy Tab S5e, Galaxy A10, Galaxy A30, Galaxy A50, Galaxy S10e, Galaxy S10, Galaxy S10+, Galaxy A2 Core, Galaxy A20e, Galaxy A20, Galaxy A40, Galaxy A70, Galaxy A80, Galaxy A60, Galaxy View 2, Galaxy S10 5G, Galaxy M40, Galaxy Note 10+, Galaxy Note 10, Galaxy A10e, Galaxy A10s, Galaxy Fold, Galaxy A90 5G, Galaxy A30s, Galaxy A50s, Galaxy A70s, Galaxy M10s, Galaxy A20s, Galaxy M30s, Galaxy A51, Galaxy A71, Galaxy A01, Galaxy S10 Lite, Galaxy Note 10 Lite, Galaxy Xcover Pro, Galaxy Tab S6, Galaxy Tab S6 5G, Galaxy Z Flip, Galaxy M31, Galaxy A11, Galaxy M21, Galaxy A41, Galaxy A31, Galaxy M11, Galaxy S20 Ultra, Galaxy S20+, Galaxy S20, Galaxy Tab S6 Lite, Galaxy A21, Galaxy A51 5G, Galaxy A51 5G UW, Galaxy A71 5G, Galaxy A21s, Galaxy M01, Galaxy M01s, Galaxy A01 Core, Galaxy M31s, Galaxy Tab S7+, Galaxy Tab S7, Galaxy Z Flip 5G, Galaxy Note 20 Ultra, Galaxy Note 20 Ultra 5G, Galaxy Note 20, Galaxy M51, Galaxy Z Fold2 5G, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 FE 2022, Galaxy F41, Galaxy A42 5G, Galaxy M21s, Galaxy A12, Galaxy A02s, Galaxy M02s, Galaxy A32 5G, Galaxy S21 Ultra, Galaxy S21+, Galaxy S21, Galaxy A02, Galaxy M02, Galaxy M12, Galaxy F62, Galaxy M62, Galaxy A32, Galaxy A52, Galaxy A52 5G, Galaxy A72, Galaxy F12, Galaxy F02s, Galaxy M42 5G, Galaxy F52 5G, Galaxy Tab A7 Lite, Galaxy Tab S7 FE, Galaxy A22, Galaxy A22 5G, Galaxy M32, Galaxy F22, Galaxy Z Flip3 5G, Galaxy Z Fold3 5G, Galaxy A52s 5G, Galaxy A03s, Galaxy M32 5G, Galaxy M22, Galaxy M52 5G, Galaxy F42 5G, Galaxy A03 Core, Galaxy A03, Galaxy Tab A8 10.5, Galaxy A13 5G, Galaxy S21 FE, Galaxy S22, Galaxy S22+, Galaxy S22 Ultra, Galaxy A13, Galaxy A23 5G, Galaxy A23, Galaxy F23, Galaxy A53 5G, Galaxy Tab S8, Galaxy Tab S8+, Galaxy Tab S8 Ultra, Galaxy A73 5G, Galaxy A33 5G, Galaxy M33 5G, Galaxy M23, Galaxy M53 5G, Galaxy F13, Galaxy M13, Galaxy M13 5G, Galaxy Xcover6 Pro, Galaxy Z Flip 4, Galaxy Z Fold 4, Galaxy Tab Active4 Pro, Galaxy A04s, Galaxy A04, Galaxy A04e, Galaxy Tab A7 10.4 (2022), Galaxy M04, Galaxy F04, Galaxy A14 5G, Galaxy S23 Ultra, Galaxy S23+, Galaxy S23, Galaxy Xcover 5, Galaxy Tab A7, Galaxy Tab A7 10.4 (2020), Galaxy Tab A 8.0 (2019), Galaxy J3 (2018), Galaxy Tab E, Galaxy Tab E, Galaxy S24, Galaxy S24+, Galaxy S24 Ultra, Galaxy Z Fold 5, and Galaxy Z Flip 5.

The Samsung products in the preceding list, including all variations, editions, and applications of the foregoing, and all products and apparatuses of Samsung similar to the foregoing that include the claimed elements are the ’428 Accused Instrumentalities.

The ’078 Accused Instrumentalities, ’993 Accused Instrumentalities, ’461 Accused Instrumentalities, ’750 Accused Instrumentalities, and ’428 Accused Instrumentalities, collectively are the Accused Instrumentalities.

**P.R. 3-1(C): CLAIM CHARTS**

Cerence's analysis of Samsung's products and apparatuses is based upon information that is publicly available and based on Cerence's own investigation prior to any discovery in this action.

While the publicly available information constitutes evidence of the methods and apparatuses used by Samsung in the Accused Instrumentalities, direct evidence of the actual apparatuses and methods are at times not publicly available. Accordingly, these infringement contentions are based on the available public information, analysis, and reasonable inferences drawn from that information.

Cerence reserves the right to amend or supplement these disclosures for any of the following reasons (along with any other reason that may be permitted under the court's rules and orders):

(1) Samsung provides evidence of the apparatuses and methods used in the Accused Instrumentalities;

(2) The Asserted Claims may include elements that involve features that are implemented by hardware structures and logic and Cerence's current positions on infringement are set forth without the benefit of access to Samsung's source code, schematics, drawings, or other proprietary specifications or information, which cannot be obtained through publicly available information, for the Accused Instrumentalities. Therefore, it may be necessary for Cerence to supplement its positions on infringement after a complete production of such proprietary specifications or information by Samsung;

(3) Cerence's position on infringement of specific claims will depend on the claim constructions adopted by the Court. Because said constructions have not yet occurred, Cerence cannot take a final position on the bases for infringement of the Asserted Claims; and

(4) Cerence's investigation and analysis of Samsung's Accused Instrumentalities are based upon information made publicly available by Samsung and by Cerence's own investigations. Cerence reserves the right to amend these contentions based upon discovery of non-public information that Cerence anticipates receiving from Samsung during discovery.

Attached as Exhibit A, and incorporated herein in their entirety, are charts identifying where each element of the Asserted Claims of the '078, '993, '461, '750, and '428 patents respectively are found in the Accused Instrumentalities.

Unless otherwise indicated, the information provided that corresponds to each claim element is considered to indicate that each claim element is found within each of the different variations, versions, editions, and applications of each respective Accused Instrumentalities.

**P.R. 3-1(D): LITERAL INFRINGEMENT AND DOCTRINE OF EQUIVALENTS**

With respect to the patents at issue, Cerence contends that each element of each Asserted Claim is literally present. To the extent that Samsung identifies elements of the Asserted Claims that it contends are not literally present in the Accused Instrumentalities, Cerence contends that such elements are present under the doctrine of equivalents.

**P.R. 3-1(E): PRIORITY DATES**

| *U.S. Patent No.* | *Priority Date* |
|---|---|
| 7,395,078 | April 20, 2004 |
| 8,081,993 | April 20, 2004 |
| 11,393,461 | March 12, 2013 |
| 11,087,750 | March 12, 2013 |
| 9,026,428 | October 15, 2012 |

**P.R. 3-1(F): IDENTIFICATION OF INSTRUMENTALITIES PRACTICING THE CLAIMED INVENTION**

The Cerence Voice Assistant and/or Voice Over Short Message Service may incorporate or reflect the claims of the Asserted Patents. Cerence reserves the right to supplement this response should further investigation, discovery, or the court's claim construction rulings make such supplementation appropriate.

**P.R. 3-2: DOCUMENT PRODUCTION ACCOMPANYING DISCLOSURE**

**P.R. 3-2(A) DOCUMENTS**

Cerence is presently unaware of any documents that evidence any discussion with, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, any of the inventions claimed in the patents in suit prior to their respective application dates.

A diligent search continues for documents, and Cerence reserves the right to supplement this response.

**P.R. 3-2(B) DOCUMENTS**

Cerence is presently unaware of any documents that evidence the conception, reduction to practice, design, or development of the claimed inventions, which were created on or before the application dates of the patents in suit or priority date identified pursuant to P.R. 3-1(e).

A diligent search continues for documents, and Cerence reserves the right to supplement this response.

**P.R. 3-2(C) DOCUMENTS**

The file histories for the ’078, ’993, ’428, ’750, and ’461 patents may be found in Cerence’s production at CERENCE-00000010-CERENCE-00000172; CERENCE-00000182-CERENCE-00000294; CERENCE-00000320-CERENCE-00000754; CERENCE-00000790-CERENCE-00001841; CERENCE-00001877-CERENCE-00003394.

Dated: March 11, 2024

Respectfully submitted,

/s/ *Benjamin T. Wang*

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## CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendants on March 11, 2024 via electronic mail.

/s/ *Benjamin T. Wang*
Benjamin T. Wang