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

Headwater Research LLC, *Plaintiff*, vs. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., *Defendants*.	CASE NO. 2:23-CV-00641-JRG-RSP **PLAINTIFF HEADWATER RESEARCH LLC'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS** **JURY DEMANDED**

PLAINTIFF HEADWATER RESEARCH LLC'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

Pursuant to P.R. 3-1 and P.R. 3-2, patent owner Headwater Research LLC ("Headwater") hereby provides its disclosure of asserted claims and infringement contentions and its accompanying document production. This disclosure is based on the information available to Headwater as of the date of this disclosure, before Headwater has received any discovery on the design or operation of the defendants' products. Headwater 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

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

U.S. Patent No.	*Asserted Claims*
8,588,110	1-30
8,639,811	1-30
9,179,359	1-29
9,647,918	1-19

Collectively, these four 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 HEADWATER IS AWARE

In this section, Headwater provides lists of accused products that Headwater is aware of infringing based upon information presently available to it and its investigation to date. Headwater'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, Headwater's infringement assertions apply to all variations, versions, editions, and applications of each of the listed products.

U.S. PATENT NO. 8,588,110

Headwater accuses the following Samsung mobile devices, such as phones, tablets, and wearables, and all versions and variations thereof of infringing each of the Asserted Claims of the '110 patent:

Samsung mobile devices, such as phones, tablets, and wearables made, used, sold, offered for sale, or imported within six years of the filing of the date of the lawsuit, that support Android OS 6.0 or later or WearOS, including but not limited to Samsung Galaxy A, J, M, S, and Z series devices, including but not limited to the following: Galaxy S II Plus, Galaxy Grand, Galaxy Young, Galaxy Xcover 2, Galaxy S4, Galaxy Fame, Galaxy Mega, Galaxy Win, Galaxy Y Plus, Galaxy Core, Galaxy Star, Galaxy Pocket Neo, Galaxy Ace 3, Galaxy S4 Zoom, Galaxy S4 Active, Galaxy S4 Mini, Galaxy Gear, Galaxy Note 3, Galaxy Core Plus, Galaxy Light, Galaxy Fame Lite, Galaxy Trend Lite, Galaxy Round, Galaxy Express 2, Galaxy J, Galaxy Star Pro, Galaxy Grand 2, Galaxy

Date: August 20, 2024

/s/ Marc Fenster

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendants on August 20, 2024 via electronic mail.

/s/ Marc Fenster
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