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

SINOTECHNIX LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., ET AL., Defendants.	CIVIL ACTION NO. 2:24-cv-544-JRG-RSP **JURY TRIAL DEMANDED**

PLAINTIFF'S INITIAL DISCLOSURES

Pursuant to the Court's Docket Control Order and Paragraph 1 of the Discovery Order in the above-captioned case, Plaintiff Sinotechnix LLC ("Sinotechnix") makes these initial disclosures. These disclosures are based on information reasonably available to Sinotechnix at this time. These disclosures are made expressly subject to and without waiving any applicable privilege or exemption from discovery including, without limitation, the attorney-client privilege, the investigative privilege, and the work product doctrine. Sinotechnix will further supplement or amend these disclosures to the extent required by the Federal Rules of Civil Procedure.

I. THE CORRECT NAMES OF THE PARTIES

Plaintiff: Sinotechnix LLC

Defendants: Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Display Co., Ltd.

II. POTENTIAL PARTIES

Sinotechnix is not currently aware of any potential additional parties to this lawsuit.

III. LEGAL THEORIES AND FACTS

Sinotechnix provides the following brief description of its legal theories and factual bases for its legal claims based upon information available to Sinotechnix at this time. Fact discovery is still underway, and Sinotechnix expects to discover additional information that may be relevant to its legal theories and claims. Sinotechnix, therefore, reserves the right to supplement, amend, and/or correct the following disclosures as necessary to conform to evidence obtained through discovery.

Sinotechnix is the assignee of the asserted patents and, as such, holds the right to bring suit for infringement and to recover damages resulting from such infringement. To this end, Sinotechnix alleges that Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Display Co., Ltd. (collectively "Defendants") have infringed (and continue to infringe) the asserted patents, as set forth in the operative complaint, by, through, or in connection with their having made, used, offered for sale, sold, and/or imported the accused products identified in Sinotechnix's operative Infringement Contentions. Sinotechnix also alleges that Defendants have indirectly infringed, and continue to do so, as set forth in the operative complaint, by inducing others (e.g., its subsidiaries, distributors, affiliates, retailers, customers, consumers) to directly infringe by making using, offering to sell, selling, and/or importing the accused products identified in Sinotechnix's operative Infringement Contentions. Based upon information available to Sinotechnix to date, the factual bases for Sinotechnix's infringement allegations are set forth in Sinotechnix's First Amended Complaint and Sinotechnix's Infringement Contentions, which are incorporated herein by reference in their entirety.

Sinotechnix's infringement claims will be the subject of expert testimony, and Sinotechnix will make the required expert disclosures according to the deadlines set forth in the operative Docket Control Order. Those disclosures, when made, are also hereby incorporated by reference

in their entirety.

Sinotechnix asserts that it is entitled to an award of damages resulting from Defendants' infringements. Pursuant to 35 U.S.C. § 284 such damages must be "in no event less than a reasonable royalty for the use made of the invention by [Defendants]." Sinotechnix's damages claim will be the subject of expert testimony, and Sinotechnix will make the required expert disclosures according to the deadlines set forth in the operative Docket Control Order. Those disclosures, when made, are also hereby incorporated by reference in their entirety.

Sinotechnix also asserts that it is entitled to enhanced damages under 35 U.S.C. § 284 based on Defendants' willful infringements of the asserted patents and their wanton disregard of Sinotechnix's patent rights. Sinotechnix notified Defendants of the asserted patents and their infringements prior to this lawsuit. In response, Defendants took no steps to remedy their infringing conduct and, in fact, continue their infringing activities. Since learning of the asserted patents, Defendants' infringements have been, and continue to be, willful and in wanton disregard of Sinotechnix's patent rights.

IV. POTENTIALLY KNOWLEDGABLE PERSONS

Sinotechnix identifies the following persons who may have knowledge of relevant facts. Additional individuals may become known to Sinotechnix, and Sinotechnix reserves the right to further supplement or amend this list, accordingly.

Name / Contact Information	Area(s) of Knowledge
Sinotechnix LLC c/o Nelson Bumgardner Conroy PC 2727 N. Harwood Street, Suite 250 Dallas, Texas 75201	Plaintiff in this matter with knowledge regarding ownership and enforcement of the patents-in-suit, as well as the licensing history regarding the patents-in-suit and/or related patents.
Robert Katz c/o Nelson Bumgardner Conroy PC	Knowledge of the acquisition and ownership of the patents-in-suit, Sinotechnix's

2727 N. Harwood Street, Suite 250 Dallas, Texas 75201	organizational structure, and Sinotechnix's general business activities.
Seoul Semiconductor Co., Ltd. 97-11, Sandan-ro, 163 beon-gil, Danwon-gu Ansansi, Gyeonggi-do, South Korea 15429	Prior owner of the U.S. Patent Nos. 7,168,162; 7,748,873; 7,901,113; 8,132,952; and 9,412,913 with potential knowledge regarding historical ownership of the patents and certain historical licensing activities.
Seoul Viosys Co., Ltd. 65-16, Sandan-ro, 163 beon-gil, Danwon-gu Ansansi, Gyeonggi-do, South Korea 15429	Prior owner of U.S. Patent No. 7,951,626 with potential knowledge regarding historical ownership of the patents and certain historical licensing activities.
Inventors of the patents-in-suit Address: Unknown Phone number: Unknown	Believed to have knowledge regarding the conception and reduction to practice of the inventions of the patents for which they are named inventors.
Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Display Co., Ltd., including current and former employees	Information regarding and knowledge of the accused products, including technical design and operation; revenues, transaction volumes, and other damages-related information/data; marketing and sales information. Information regarding and knowledge regarding Defendants' licensing practices, knowledge of the patents-in-suit, and claims and defenses.

Sinotechnix further incorporates each person listed in Defendants' Initial Disclosures, and all supplements thereto. Those persons are believed to have information concerning the allegations, claims, defenses, counterclaims, and/or damages, including but not limited to issues of infringement and validity.

Sinotechnix expects that it may use testimony from employees and representatives of Defendants and/or their affiliates to support Sinotechnix's claims or defenses. Those persons are believed to have information concerning the allegations, claims, defenses, counterclaims, and/or damages, including but not limited to issues of infringement and validity. Each of Defendants' representatives or employees may have knowledge regarding the design, development, operation, manufacture, sale, use, distribution, and benefits of the infringing products, as well as knowledge

of the patents-in-suit and Defendants' infringements of the patents-in-suit. These current and former employees include, but are not limited to, individuals, if any, identified in Defendants' interrogatory responses.

Sinotechnix further believes that Defendants' suppliers of components, if any, that support infringing features or functionality may possess knowledge of relevant facts. Those persons are believed to have information concerning the allegations, claims, defenses, counterclaims, and/or damages, including but not limited to the issue of infringement. These entities and their personnel may have knowledge regarding the design, development, operation, manufacture, sale, use, distribution, and benefits of the infringing products or their components, as well as knowledge of Defendants' infringements of the patents-in-suit.

V. INDEMNITY/INSURANCE AGREEMENTS

Sinotechnix is unaware of any indemnity or insurance agreements relevant to this action.

VI. SETTLEMENT AGREEMENTS

Sinotechnix will produce settlement agreements relevant to the subject matter of this action in its possession, custody, or control subject to first satisfying contractual requirements related to confidentiality of such agreements.

VII. ANY STATEMENT OF ANY PARTY TO THE LITIGATION

Sinotechnix is unaware of any written statements of any parties to this litigation.

Dated: December 9, 2024

Respectfully submitted,

/s/ Ryan Griffin

Patrick J. Conroy
Texas Bar No. 24012448
Ryan Griffin
Texas Bar No. 24053687
T. William Kennedy Jr.
Texas Bar No. 24055771
Jon Rastegar
Texas Bar No. 24064043
Nelson Bumgardner Conroy PC
2727 North Harwood Street
Suite #250
Dallas, TX 75201
Tel: (214) 446-4950
pat@nelbum.com
ryan@nelbum.com
bill@nelbum.com
jon@nelbum.com

Janson H. Westmoreland
State Bar No. 24131755
Nelson Bumgardner Conroy PC
3131 West 7th St., #300
Fort Worth, TX 76107
Tel: (214) 446-4950
janson@nelbum.com

Attorneys for Plaintiff
Sinotechnix LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on December 9, 2024, the foregoing document was served by e-mail on all counsel of record pursuant to Local Rule CV-5(d).

/s/ *Ryan Griffin*

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PLAINTIFF'S ADDITIONAL DISCLOSURES

Pursuant to the Court's Docket Control Order and Paragraph 3 of the Discovery Order in the above-captioned case, Plaintiff Sinotechnix LLC ("Sinotechnix") makes these additional disclosures. These disclosures are based on information reasonably available to Sinotechnix at this time. In addition, these disclosures are made with the understanding that Sinotechnix cannot anticipate all the positions that Defendants may take in this case. Sinotechnix reserves the right to supplement or amend its disclosures in accordance with the Federal Rules of Civil Procedure and the Local Court Rules as discovery progresses and as additional information otherwise becomes available to it. These disclosures are made expressly subject to and without waiving any applicable privilege or exemption from discovery including, without limitation, the attorney-client privilege, the investigative privilege, and the work product doctrine.

I. DISCLOSURES REQUIRED BY THE LOCAL PATENT RULES

Sinotechnix provided its Disclosure of Asserted Claims and Infringement Contentions and Accompanying Document Production under P.R. 3-1 and 3-2 on October 24, 2024.

II. RELEVANT DOCUMENTS AND THINGS

Sinotechnix has produced documents in its possession, custody, or control that may be relevant to the pleaded claims or defenses in this action. Sinotechnix is working to produce additional documents that are subject to third party confidentiality obligations.

III. DAMAGES COMPUTATION

Sinotechnix seeks damages under 35 U.S.C. § 284 adequate to compensate for Defendants' infringements of the claims of the patents-in-suit; that being no less than a reasonable royalty, together with interest and costs. Sinotechnix also seeks up to treble damages for Defendants' willful infringements. Sinotechnix also seeks a finding that this is an exceptional case requiring Defendants to pay the costs of this action, as well as attorneys' fees under 35 U.S.C. § 285. Because Sinotechnix will rely on a damages expert, Sinotechnix will supplement this disclosure at the time for Expert Disclosures.

Dated: December 9, 2024

Respectfully submitted,

/s/ Ryan Griffin

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State Bar No. 24131755
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/s/ *Ryan Griffin*