UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., AND
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner

v.

SINOTECHNIX LLC,
Patent Owner

Case IPR2025-00336

U.S. Patent No. 7,901,113

DECLARATION OF THOMAS WILLIAM KENNEDY JR.

I, Thomas William Kennedy Jr., hereby declare as follows:

1. I am an attorney with the law firm of Nelson Bumgardner Conroy, P.C. and represent Sinotechnix LLC in the currently pending patent litigation between Plaintiff Sinotechnix LLC ("Sinotechnix") and Defendants Samsung Electronics Co., Ltd. ("SEC"), Samsung Electronics America, Inc. ("SEA") and Samsung Display Co., Ltd. ("SDC") (SEC, SEA, and SDC are hereafter collectively referred to as "Samsung") in the United States District for the Eastern District of Texas, Case No. 2:24-cv-00544-JRG-RSP (the "Litigation").

2. Sinotechnix alleges in the Litigation that Samsung infringes the following United States patents: 7,618,162; 7,748,873; 7,901,113; 7,951,626; 8,132,952; and 9,412,913.

3. Sinotechnix served its Disclosure of Asserted Claims and Infringement Contentions in the Litigation on October 24, 2024. Sinotechnix served its Amended Disclosure of Asserted Claims and Infringement Contentions in the Litigation on March 24, 2025.

4. Samsung served Local Patent Rule 3-3 Invalidity Contentions on February 14, 2025. Samsung served Amended Local Patent Rule 3-3 Invalidity Contentions on April 14, 2025.

5. Sinotechnix and Samsung served their Initial Disclosures in the Litigation on December 9, 2024. They also served Additional Disclosures pursuant to paragraph 3 of the Discovery order in the Litigation on December 9, 2024.

6. Samsung served its First Set of Interrogatories to Plaintiff Sinotechnix LLC (Nos. 1-16) in the Litigation on December 17, 2024. Sinotechnix served objections and responses to these interrogatories on January 16, 2025.

7. Samsung served its First Set of Requests for Admission to Plaintiff (Nos. 1-4) in the Litigation on December 17, 2024. Sinotechnix served objections and responses to these requests on January 16, 2025.

8. Sinotechnix served its First Common Interrogatories (Nos. 1-5) on Samsung in the Litigation on December 17, 2024. Samsung served objections and responses to these interrogatories on January 16, 2025.

9. Samsung served its Venue Interrogatories to Plaintiff Sinotechnix LLC (Nos. 1-6) in the Litigation on January 9, 2025. Sinotechnix served objections and responses to these interrogatories on January 29, 2025.

10. Samsung served its Venue Requests for Production to Plaintiff Sinotechnix LLC (Nos. 1-10) in the Litigation on January 9, 2025. Sinotechnix served objections and responses to these requests on January 29, 2025.

11. Sinotechnix served its Venue-Related Interrogatories to Defendants (Nos. 1-6) on Samsung in the Litigation on January 9, 2025. Samsung served objections and responses to these interrogatories on January 29, 2025. Samsung supplemented its responses on February 12, 2025; March 18, 2025; and March 26, 2025.

12. Sinotechnix served its Venue-Related Requests for Production to Defendants (Nos. 1-10) on January 9, 2025. Samsung served objections and responses to these requests on January 29, 2025.

13. Sinotechnix served its Second Set of Common Interrogatories (Nos. 6-7) on Samsung in the Litigation on January 16, 2025. Samsung served objections and responses to these interrogatories on February 18, 2025.

14. Sinotechnix served its First Interrogatory to SDC (No. 1) on SDC in the Litigation on January 22, 2025.

15. Sinotechnix served its Third Set of Common Interrogatories (Nos. 8-9) on Samsung in the Litigation on February 6, 2025. Samsung served its objections and responses to these interrogatories on March 10, 2025.

16. Samsung served its Second Set of Interrogatories to Plaintiff Sinotechnix LLC (No. 17) in the Litigation on March 13, 2025. Sinotechnix served objections and responses to these interrogatories on April 14, 2025.

17. Samsung served its Second Set of requests for Admission to Plaintiff Sinotechnix LLC (Nos. 5-12) on March 19, 2025. Sinotechnix served objections and responses to these requests on April 18, 2025.

18. In connection with venue-related discovery in the Litigation, Sinotechnix deposed the following individuals:

- SEA employee Dean Delserro on March 6, 2025, in his individual capacity and as a corporate representative;
- SEC employee Youngmin Lee on March 11, 2025, in his individual capacity and as a corporate representative;
- SEA employee Randy Fuller on March 20, 2025, in his individual capacity;
- SEA employee Daniel Schinasi on March 20, 2025, in his individual capacity and as a corporate representative; and
- SDC employee Hayeon Chang on March 25, 2025, in his individual capacity and as a corporate representative.

19. Samsung deposed Robert Katz, individually and as a corporate representative of Sinotechnix, on April 10, 2025 in the Litigation.

20. To date, the parties in the Litigation have produced more than 300,000 pages of documents.

I declare that the statements in this declaration are true and correct to the best of my knowledge, and I understand that I may be subject to punishment for making intentional false statements.

Dated: May 5, 2025

Bill Kennedy

T. William Kennedy, Jr.