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

MULLEN INDUSTRIES LLC, *Plaintiff,* v. SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS AMERICA, INC., *Defendants.*	Case No. 2:24-cv-00049-JRG **JURY TRIAL DEMANDED**

PLAINTIFF'S FINAL PRE-TRIAL ELECTION OF ASSERTED CLAIMS

Pursuant to the Court's Fourth Amended Docket Control Order (Dkt. 85 at 4), Plaintiff serves its Final Pre-Trial Election of Asserted Claims, as follows:

Asserted Patent	Asserted Claims	Preliminary Pre-Trial Election of Asserted Claims	Final Pre-Trial Election of Asserted Claims
11,234,117 ('117 Patent)	1, 2-14, 15, 16-28, 29, 30-41, 42, 43-72, 73, 74-92	1, 8, 13, 15, 22, 29, 40, 42, 44, 48	1, 15, 29, 42, 48
11,246,024 ('024 Patent)	1, 2-14, 16-20, 22-23, 24, 25-35, 37-41, 43, 44, 45, 46-50, 53-57, 59-69, 71-75, 77, 78	1, 24, 45, 77	24, 45
11,190,633 ('633 Patent)	1, 2-39	1, 18, 21, 39	1, 39

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11,122,418 ('418 Patent)	1, 2, 6, 7, 10, 13, 17	1, 2, 10, 13, 17	1, 2, 10
11,109,218 ('218 Patent)	11, 12, 13, 14, 15	11, 12, 13, 14, 15	11
11,096,039 ('039 Patent)	1, 4, 7, 8, 9, 13	1, 9	1
9,204,283 ('283 Patent)	1, 2, 6, 8, 9, 13, 15, 16, 17	1	1
8,374,575 ('575 Patent)	1, 2, 3, 6, 8, 13, 23, 24, 26, 28, 30, 31, 32, 35, 37, 38, 39, 40, 42, 44	30	30

Plaintiff's foregoing election of claims is preliminary and Plaintiff reserves the right to amend, modify or change the foregoing election pursuant to the rules and any Orders of this Court. Plaintiff expressly reserves all rights, including the right to amend, modify, or change the foregoing election of claims, including but not limited to as this case progresses and Samsung meets its discovery obligations. There will be no prejudice to Samsung from any such amendment because Plaintiff's infringement contentions in this case provide notice to Samsung of its infringement of additional claims of the Asserted Patents. Plaintiff also reserves that right to seek that one or more presently unelected claims be tried against Samsung in one or more subsequent trials.

Dated: May 2, 2025

Respectfully submitted,

/s/ Peter F. Snell

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document and accompanying attachments have been served on counsel of record for Defendants by email and/or other electronic means on May 2, 2025.

/s/ Peter F. Snell
Peter F. Snell