

**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

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

Stafford Davis
State Bar No. 24054605
sdavis@stafforddavisfirm.com
Catherine Bartles
State Bar No. 24104849
cbartles@stafforddavisfirm.com
THE STAFFORD DAVIS FIRM, PC
815 South Broadway Avenue
Tyler, Texas 75701
Tel: 903-593-7000
Fax: 903-705-7369

Peter F. Snell
Admitted in this Court
NY Bar No. 4474136
pfsnell@mintz.com
Brad M. Scheller (*pro hac vice*)
bmscheller@mintz.com
Hannah M. Edge (*pro hac vice*)
hmedge@mintz.com
Robert C. Sweeney (*pro hac vice*)
rcsweeney@mintz.com
MINTZ LEVIN COHN FERRIS
GLOVSKY AND POPEO, P.C.
919 Third Avenue
New York, NY 10022
(212) 935-3000

Attorneys for Plaintiff
Mullen Industries LLC

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