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

VASU HOLDINGS, LLC, a Texas Corporation, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., a Korean Corporation, and SAMSUNG ELECTRONICS AMERICA, INC., a New York Corporation, Defendants.	)	Case No. 2:24-cv-00034-JRG-RSP

PLAINTIFF VASU HOLDINGS, LLC'S DISCLOSURE OF ASSERTED CLAIMS AND SUPPLEMENTAL INFRINGEMENT CONTENTIONS UNDER PATENT LOCAL RULES 3-1, 3-3, 3-4, AND DKT. NO. 29

Pursuant to Local Patent Rules 3-1, 3-3, 3-4, and Dkt. No. 29 (Discovery Order), Plaintiff Vasu Holdings, LLC ("Vasu") makes the following Disclosure of Asserted Claims and Supplemental Infringement Contentions to Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc., ("Defendants"), including the claim charts attached hereto as Appendix A-1, Appendices B-1 through B-4, Appendix C-1, Appendices D-1 through D-4, Appendices E-1 through E-4, and Appendices F-1 through F-4 (the "Appendices") for each of the Accused Products of U.S. Patent Nos. 8,520,605, (the "'605 Patent"), 8,886,181 (the "'181 Patent"), 8,958,434 (the "'434 Patent"), 10,206,154 (the "'154 Patent"), 10,368,281 (the "'281 Patent"), and 10,419,996 (the "'996 Patent") (collectively, the "Asserted Patents").

Vasu supplements its Preliminary Infringement Contentions after the source code of certain Accused Products are made available by Samsung on July 31, 2024 and August 15, 2024 pursuant to Local Patent Rules 3-3 and 3-4. This Disclosure of Asserted Claims and

Samsung Ex. 1034
Samsung v. Vasu
IPR2025-00446
Page 00001

Supplemental Infringement Contentions, and the accompanying Appendices, are preliminary, as discovery has not yet commenced in this action, such that Defendants have not produced any technical documents. As Vasu's investigation is ongoing, Vasu reserves the right to amend, modify, supplement, and/or narrow any portion of this Disclosure of Asserted Claims and Supplemental Infringement Contentions, including, but not limited to, the identification of asserted claims, the products and/or services accused of infringement, and the bases and manner of infringement.

To the maximum degree allowed by the Federal Rules of Civil Procedure, the Court's Local Rules, and any scheduling orders entered in this action, Vasu reserves its right to amend, modify, supplement, and/or narrow this Disclosure of Asserted Claims and Supplemental Infringement Contentions as appropriate, as the case develops.

I. 3-1(a). Identification of Each Claim in Suit

Based on the information presently known to Vasu, and without the benefit of relevant discovery or the Court's claim construction, Vasu provides the following contentions pursuant to Patent Local Rules 3-1(a): Defendant has infringed and continues to infringe Claims 1, 12, 24, 28, 29, and 30 of the '605 Patent, Claims 1, 3, 4, 8, and 9 of the '181 Patent, Claims 1, 2, 10, 12, and 19 of the '434 Patent, Claims 1, 2, 4, 43, and 47 of the '154 Patent, Claims 1, 12, 23, 31, 37, and 45 of the '281 Patent, and Claims 1, 12, 23, 25, 34, 35, 39, and 41 of the '996 Patent (collectively, the "Asserted Claims"). Defendants have directly infringed and continues to directly and indirectly infringe the Asserted Claims pursuant to 35 U.S.C. § 271(a).

Due to the early stage of this litigation, the lack of discovery to date (including discovery concerning Defendants' products and services, and actions taken with respect to its products and services), and the absence of a claim construction order, the above identification is necessarily limited and preliminary in nature. Vasu reserves the right to amend, modify,

supplement, or narrow these contentions pursuant to Patent Local Rule 3-6, including identifying additional asserted claims, as it obtains additional information over the course of discovery and in light of the Court's claim construction order.

II. 3-1(b). Identification of Accused Instrumentalities

Based on the information presently known to Vasu, and without the benefit of relevant discovery or the Court's claim construction, Vasu provides the following contentions pursuant to Patent Local Rule 3-1(b):

U.S. Pat. No. 8,520,605
The "Accused Products" are devices released in the following product ranges: • Samsung 300 Series ("300 Series") WLAN Access Point: WEA302i, WEA303i, WEA303e • Samsung 400 Series ("400 Series") WLAN Access Points: WEA403i, WEA403Si, WEA403e, WEA412h, WEA412i, WEA453e, and WEA463e • Samsung 500 Series ("500 Series") WLAN Access Point: WEA504i, WEA512i, WEA514i, and WEA524i • WEA Access Point Controllers: WEC8500 and WEC8050 • Wireless Enterprise Manager: WDS-LM500 Defendants infringe the asserted claims (claims 1, 12, 24, 28, 29, and 30) of the '605 Patent through direct infringement, inducement of infringement, and contributory infringement. The Accused Products all include technology that operates the same with respect to the claims asserted.

U.S. Pat. No. 8,886,181
The "Accused Products" are devices released in the following product ranges: • Galaxy A Series ("A Series"): A01, A01 Core, A02, A02s, A03, A03s, A03 Core, A10, A10e, A11, A12, A13, A13 5G, A14 5G, A20, A20s, A21, A21s, A22, A22 5G, A23 5G, A23 5G UW, A30, A30s, A31, A32, A32 5G, A34 5G, A41, A42 5G, A50, A51, A51 5G, A51 5G UW, A52, A52 5G, A52s 5G, A53 5G, A53 5G UW, A54 5G, A71, A71 5G, A71 5G UW, A72, A80, A82 5G, A73 5G, A90 5G • Galaxy Note Series ("Note"): Note II, Note 3, Note 4, Note 5, Note 8, Note 9, Note 10, Note 10 Lite, Note 10 5G, Note 10+, Note 10+ 5G, Note 20, Note 20 Ultra, Note 20 5G, Note 20 Ultra 5G, Note Edge

- Galaxy S Series ("S Series"): SIII, S4, S4 Active, S4 Mini, S5, S5 Active, S5 Mini, S5 Sport, S6, S6 Active, S6 Edge, S6 Edge+, S7, S7 Active, S7 Edge, S8, S8 Active, S8+, S9, S9+, S10, S10e, S10 Lite, S10+, S20, S20 5G, S20 5G UW, S20 Ultra, S20 Ultra 5G, S20 FE, S20 FE 5G, S20 Ultra 5G, S20+, S20+ 5G, S21, S21 Ultra, S21 5G, S21 FE, S21 FE 5G, S21 Ultra 5G, S21+, S21+ 5G, S22, S22 5G, S22 Ultra, S22+, S23, S23 FE, S23 5G, S23+, S23 Ultra, S24, S24+, S24 Ultra
- Galaxy Z Series ("Z Series"): Z Fold, Z Fold 5G, Z Fold2, Z Fold3, Z Fold2 5G, Z Fold3 5G, Z Fold4, Z Fold4 5G, Z Fold5, Z Fold6, Z Flip, Z Flip 5G, Z Flip3 5G, Z Flip4, Z Flip4 5G, Z Flip5, Z Flip6
- Galaxy XCover Series ("XCover"): XCover, XCover FieldPro, XCover Pro, XCover Pro 2, XCover 4s, XCover 5, XCover 6 Pro
- Galaxy J Series ("J Series"): Amp Prime, Amp Prime 3, J2, J2 Dash, J2 Pure, J3, J3 Achieve, J3 Star, J3 Aurora, J3 Top, J7, J7 Top, J7 Pop, J7 Refine, J7 V, J7 Prime, J7 Star
- Galaxy Tab S Series ("Tab S"): Tab S3, Tab S5e, Tab S6, Tab S6 5G, Tab S7, Tab S7 5G, Tab S7 FE 5G, Tab S7+, Tab S7+ 5G, Tab S8, Tab S8 Ultra, Tab S8+, Tab S8+ 5G, Tab S9, Tab S9 FE, Tab S9 FE+, Tab S9 Ultra, Tab S9+, Tab S9+ 5G
- Galaxy Tab A Series ("Tab A"): Tab A, Tab A8.0, Tab A8.4, Tab A10.1, Tab A10.5, Tab A7, Tab A7 Lite, Tab A8
- Galaxy Tab View Series ("View"): View, View 2
- Galaxy Tab E Series ("Tab E"): Tab E8.0, Tab E9.6

Defendants infringe the asserted claims (claims 1, 3, 4, 8, 9) of the '181 Patent through direct infringement, inducement of infringement, and contributory infringement. The Accused Products all include technology that operates the same with respect to the claims asserted.

U.S. Pat. No. 8,958,434
The "Accused Products" are devices released in the following product ranges: • Samsung 300 Series ("300 Series") WLAN Access Point: WEA302i, WEA303i, WEA303e • Samsung 400 Series ("400 Series") WLAN Access Points: WEA403i, WEA403Si, WEA403e, WEA412h, WEA412i, WEA453e, and WEA463e • Samsung 500 Series ("500 Series") WLAN Access Point: WEA504i, WEA512i, WEA514i, and WEA524i • WEA Access Point Controllers: WEC8500 and WEC8050 • Wireless Enterprise Manager: WDS-LM500 Defendants infringe the asserted claims (claims 1, 2, 10, 12, and 19) of the '434 Patent through direct infringement, inducement of infringement, and contributory infringement. The Accused Products all include technology that operates the same with respect to the claims asserted.

U.S. Pat. No. 10,206,154
The "Accused Products" are devices released in the following product ranges: • Galaxy A Series ("A Series"): A01, A01 Core, A02, A02s, A03, A03s, A03 Core, A10, A10e, A11, A12, A13, A13 5G, A14 5G, A20, A20s, A21, A21s, A22, A22 5G, A23 5G, A23 5G UW, A30, A30s, A31, A32, A32 5G, A34 5G, A41, A42 5G, A50, A51, A51 5G, A51 5G UW, A52, A52 5G, A52s 5G, A53 5G, A53 5G UW, A54 5G, A71, A71 5G, A71 5G UW, A72, A80, A82 5G, A73 5G, A90 5G • Galaxy Note Series ("Note"): Note II, Note 3, Note 4, Note 5, Note 8, Note 9, Note 10, Note 10 Lite, Note 10 5G, Note 10+, Note 10+ 5G, Note 20, Note 20 Ultra, Note 20 5G, Note 20 Ultra 5G, Note Edge • Galaxy S Series ("S Series"): SIII, S4, S4 Active, S4 Mini, S5, S5 Active, S5 Mini, S5 Sport, S6, S6 Active, S6 Edge, S6 Edge+, S7, S7 Active, S7 Edge, S8, S8 Active, S8+, S9, S9+, S10, S10e, S10 Lite, S10+, S20, S20 5G, S20 5G UW, S20 Ultra, S20 Ultra 5G, S20 FE, S20 FE 5G, S20 Ultra 5G, S20+, S20+ 5G, S21, S21 Ultra, S21 5G, S21 FE, S21 FE 5G, S21 Ultra 5G, S21+, S21+ 5G, S22, S22 5G, S22 Ultra, S22+, S23, S23 FE, S23 5G, S23+, S23 Ultra, S24, S24+, S24 Ultra • Galaxy Z Series ("Z Series"): Z Fold, Z Fold 5G, Z Fold2, Z Fold3, Z Fold2 5G, Z Fold3 5G, Z Fold4, Z Fold4 5G, Z Fold5, Z Fold6, Z Flip, Z Flip 5G, Z Flip3 5G, Z Flip4, Z Flip4 5G, Z Flip5, Z Flip6 • Galaxy XCover Series ("XCover"): XCover, XCover FieldPro, XCover Pro, XCover Pro 2, XCover 4s, XCover 5, XCover 6 Pro • Galaxy J Series ("J Series"): Amp Prime, Amp Prime 3, J2, J2 Dash, J2 Pure, J3, J3 Achieve, J3 Star, J3 Aurora, J3 Top, J7, J7 Top, J7 Pop, J7 Refine, J7 V, J7 Prime, J7 Star • Galaxy Tab S Series ("Tab S"): Tab S3, Tab S5e, Tab S6, Tab S6 5G, Tab S7, Tab S7 5G, Tab S7 FE 5G, Tab S7+, Tab S7+ 5G, Tab S8, Tab S8 Ultra, Tab S8+, Tab S8+ 5G, Tab S9, Tab S9 FE, Tab S9 FE+, Tab S9 Ultra, Tab S9+, Tab S9+ 5G • Galaxy Tab A Series ("Tab A"): Tab A, Tab A8.0, Tab A8.4, Tab A10.1, Tab A10.5, Tab A7, Tab A7 Lite, Tab A8 • Galaxy Tab View Series ("View"): View, View 2 • Galaxy Tab E Series ("Tab E"): Tab E8.0, Tab E9.6 Defendants infringe the asserted claims (claims 1, 2, 4, 43, 47) of the '154 Patent through direct infringement, inducement of infringement, and contributory infringement. The Accused Products all include technology that operates the same with respect to the claims asserted.

U.S. Pat. No. 10,368,281
The "Accused Products" are devices released in the following product ranges: • Galaxy A Series ("A Series"): A01, A01 Core, A02, A02s, A03, A03s, A03 Core, A10, A10e, A11, A12, A13, A13 5G, A14 5G, A20, A20s, A21, A21s, A22, A22 5G, A23 5G, A23 5G UW, A30, A30s, A31, A32, A32 5G, A34 5G, A41, A42 5G, A50, A51, A51 5G, A51 5G UW, A52, A52 5G, A52s 5G, A53 5G, A53 5G UW, A54 5G, A71, A71 5G, A71 5G UW, A72, A80, A82 5G, A73 5G, A90 5G • Galaxy Note Series ("Note"): Note II, Note 3, Note 4, Note 5, Note 8, Note 9, Note 10, Note 10 Lite, Note 10 5G, Note 10+, Note 10+ 5G, Note 20, Note 20 Ultra, Note 20 5G, Note 20 Ultra 5G, Note Edge • Galaxy S Series ("S Series"): SIII, S4, S4 Active, S4 Mini, S5, S5 Active, S5 Mini, S5 Sport, S6, S6 Active, S6 Edge, S6 Edge+, S7, S7 Active, S7 Edge, S8, S8 Active, S8+, S9, S9+, S10, S10e, S10 Lite, S10+, S20, S20 5G, S20 5G UW, S20 Ultra, S20 Ultra 5G, S20 FE, S20 FE 5G, S20 Ultra 5G, S20+, S20+ 5G, S21, S21 Ultra, S21 5G, S21 FE, S21 FE 5G, S21 Ultra 5G, S21+, S21+ 5G, S22, S22 5G, S22 Ultra, S22+, S23, S23 FE, S23 5G, S23+, S23 Ultra, S24, S24+, S24 Ultra • Galaxy Z Series ("Z Series"): Z Fold, Z Fold 5G, Z Fold2, Z Fold3, Z Fold2 5G, Z Fold3 5G, Z Fold4, Z Fold4 5G, Z Fold5, Z Fold6, Z Flip, Z Flip 5G, Z Flip3 5G, Z Flip4, Z Flip4 5G, Z Flip5, Z Flip6 • Galaxy XCover Series ("XCover"): XCover, XCover FieldPro, XCover Pro, XCover Pro 2, XCover 4s, XCover 5, XCover 6 Pro • Galaxy J Series ("J Series"): Amp Prime, Amp Prime 3, J2, J2 Dash, J2 Pure, J3, J3 Achieve, J3 Star, J3 Aurora, J3 Top, J7, J7 Top, J7 Pop, J7 Refine, J7 V, J7 Prime, J7 Star • Galaxy Tab S Series ("Tab S"): Tab S3, Tab S5e, Tab S6, Tab S6 5G, Tab S7, Tab S7 5G, Tab S7 FE 5G, Tab S7+, Tab S7+ 5G, Tab S8, Tab S8 Ultra, Tab S8+, Tab S8+ 5G, Tab S9, Tab S9 FE, Tab S9 FE+, Tab S9 Ultra, Tab S9+, Tab S9+ 5G • Galaxy Tab A Series ("Tab A"): Tab A, Tab A8.0, Tab A8.4, Tab A10.1, Tab A10.5, Tab A7, Tab A7 Lite, Tab A8 • Galaxy Tab View Series ("View"): View, View 2 • Galaxy Tab E Series ("Tab E"): Tab E8.0, Tab E9.6 Defendants infringe the asserted claims (claims 1, 12, 23, 31, 37, and 45) of the '281 Patent through direct infringement, inducement of infringement, and contributory infringement. The Accused Products all include technology that operates the same with respect to the claims asserted.

U.S. Pat. No. 10,419,996
The "Accused Products" are devices released in the following product ranges: • Galaxy A Series ("A Series"): A01, A01 Core, A02, A02s, A03, A03s, A03 Core, A10, A10e, A11, A12, A13, A13 5G, A14 5G, A20, A20s, A21, A21s, A22, A22 5G,

A23 5G, A23 5G UW, A30, A30s, A31, A32, A32 5G, A34 5G, A41, A42 5G, A50, A51, A51 5G, A51 5G UW, A52, A52 5G, A52s 5G, A53 5G, A53 5G UW, A54 5G, A71, A71 5G, A71 5G UW, A72, A80, A82 5G, A73 5G, A90 5G

- Galaxy Note Series ("Note"): Note II, Note 3, Note 4, Note 5, Note 8, Note 9, Note 10, Note 10 Lite, Note 10 5G, Note 10+, Note 10+ 5G, Note 20, Note 20 Ultra, Note 20 5G, Note 20 Ultra 5G, Note Edge
- Galaxy S Series ("S Series"): SIII, S4, S4 Active, S4 Mini, S5, S5 Active, S5 Mini, S5 Sport, S6, S6 Active, S6 Edge, S6 Edge+, S7, S7 Active, S7 Edge, S8, S8 Active, S8+, S9, S9+, S10, S10e, S10 Lite, S10+, S20, S20 5G, S20 5G UW, S20 Ultra, S20 Ultra 5G, S20 FE, S20 FE 5G, S20 Ultra 5G, S20+, S20+ 5G, S21, S21 Ultra, S21 5G, S21 FE, S21 FE 5G, S21 Ultra 5G, S21+, S21+ 5G, S22, S22 5G, S22 Ultra, S22+, S23, S23 FE, S23 5G, S23+, S23 Ultra, S24, S24+, S24 Ultra
- Galaxy Z Series ("Z Series"): Z Fold, Z Fold 5G, Z Fold2, Z Fold3, Z Fold2 5G, Z Fold3 5G, Z Fold4, Z Fold4 5G, Z Fold5, Z Fold6, Z Flip, Z Flip 5G, Z Flip3 5G, Z Flip4, Z Flip4 5G, Z Flip5, Z Flip6
- Galaxy XCover Series ("XCover"): XCover, XCover FieldPro, XCover Pro, XCover Pro 2, XCover 4s, XCover 5, XCover 6 Pro
- Galaxy J Series ("J Series"): Amp Prime, Amp Prime 3, J2, J2 Dash, J2 Pure, J3, J3 Achieve, J3 Star, J3 Aurora, J3 Top, J7, J7 Top, J7 Pop, J7 Refine, J7 V, J7 Prime, J7 Star
- Galaxy Tab S Series ("Tab S"): Tab S3, Tab S5e, Tab S6, Tab S6 5G, Tab S7, Tab S7 5G, Tab S7 FE 5G, Tab S7+, Tab S7+ 5G, Tab S8, Tab S8 Ultra, Tab S8+, Tab S8+ 5G, Tab S9, Tab S9 FE, Tab S9 FE+, Tab S9 Ultra, Tab S9+, Tab S9+ 5G
- Galaxy Tab A Series ("Tab A"): Tab A, Tab A8.0, Tab A8.4, Tab A10.1, Tab A10.5, Tab A7, Tab A7 Lite, Tab A8
- Galaxy Tab View Series ("View"): View, View 2
- Galaxy Tab E Series ("Tab E"): Tab E8.0, Tab E9.6

Defendants infringe the asserted claims (claims 1, 12, 23, 25, 34, 35, 39, and 41) of the '996 Patent through direct infringement, inducement of infringement, and contributory infringement. The Accused Products all include technology that operates the same with respect to the claims asserted.

Due to the early stage of this litigation, the lack of discovery to date (including discovery concerning Defendants' products and services), and the absence of a claim construction order, the above identification is necessarily limited and preliminary in nature. Vasu anticipates that discovery will reveal additional Accused Products and/or products, features and/or services that infringe the patents-in-suit. Vasu reserves the right to amend, modify, supplement, or narrow these contentions pursuant to Patent Local Rule 3-6, including identifying additional Accused Products, products, features and/or services, as it obtains

additional information over the course of discovery and in light of the Court's claim construction order.

III. 3-1(c)-(d). Claim Charts

Based on the information presently known to Vasu, Vasu provides the following Charts:

- Appendix A-1: showing how the WLAN 300 Series, 400 Series, and 500 Series Access Points, WEC8500/8050, and WDS-LM500 infringe the Asserted Claims 1, 12, 24, 28, 29, and 30 of the '605 Patent;
- Appendix B-1: showing how the Accused Galaxy A Series, S Series, Z Series, XCover, Note, J Series phones infringe the Asserted Claims 1, 3, 4, 8, and 9 of the '181 Patent;
- Appendix B-2: showing how the Accused Galaxy S Series, Note, Z Series, and J Series phones infringe the Asserted Claims 1, 3, 4, 8, and 9 of the '181 Patent;
- Appendix B-3 showing how the Accused Galaxy S Series, A Series, and View Series tablets infringe the Asserted Claims 1, 3, 4, 8, and 9 of the '181 Patent;
- Appendix B-4: showing how the Accused Galaxy View and E Series tablets infringe the Asserted Claims 1, 3, 4, 8, and 9 of the '181 Patent;
- Appendix C-1: showing how the WLAN 300 Series, 400 Series, and 500 Series Access Points, WEC8500/8050, and WDS-LM500 infringe the Asserted Claims 1, 2, 10, 12, and 19 of the '434 Patent;
- Appendix D-1: showing how the Accused Galaxy A Series, S Series, Z Series, XCover, Note, and J Series phones infringe the Asserted Claims 1, 2, 4, 43, and 47 of the '154 Patent;

- Appendix D-2: showing how the Accused Galaxy S Series, Note, Z Series, and J Series phones infringe the Asserted Claims 1, 2, 4, 43, and 47 of the ’154 Patent;
- Appendix D-3: showing how the Accused Galaxy S Series, A Series, and View Series tablets infringe the Asserted Claims 1, 2, 4, 43, and 47 of the ’154 Patent;
- Appendix D-4: showing how the Accused Galaxy View and E Series tablets infringe the Asserted Claims 1, 2, 4, 43, and 47 of the ’154 Patent;
- Appendix E-1: showing how the Accused Galaxy A Series, S Series, Z Series, XCover, Note, and J Series phones infringe the Asserted Claims 1, 12, 23, 31, 37, and 45 of the ’281 Patent;
- Appendix E-2: showing how the Accused Galaxy S Series, Note, Z Series, and J Series phones infringe the Asserted Claims 1, 12, 23, 31, 37, and 45 of the ’281 Patent;
- Appendix E-3: showing how the Accused Galaxy S Series, A Series, and View Series tablets infringe the Asserted Claims 1, 12, 23, 31, 37, and 45 of the ’281 Patent;
- Appendix E-4: showing how the Accused Galaxy View and E Series tablets infringe the Asserted Claims 1, 12, 23, 31, 37, and 45 of the ’281 Patent;
- Appendix F-1: showing how the Accused Galaxy A Series, S Series, Z Series, XCover, Note, and J Series phones infringe the Asserted Claims 1, 12, 23, 25, 34, 35, 39, and 41 of the ’996 Patent;

- Appendix F-2: showing how the Accused Galaxy S Series, Note, Z Series, and J Series phones infringe the Asserted Claims 1, 12, 23, 25, 34, 35, 39, and 41 of the ’996 Patent;
- Appendix F-3: showing how the Accused Galaxy S Series, A Series, and View Series tablets infringe the Asserted Claims 1, 12, 23, 25, 34, 35, 39, and 41 of the ’996 Patent; and
- Appendix F-4: showing how the Accused Galaxy View and E Series tablets infringe the Asserted Claims 1, 12, 23, 25, 34, 35, 39, and 41 of the ’996 Patent.

The Appendices identify each element that is governed by 35 U.S.C. 112 (6) and the structure meeting this element. The Appendices also identify the elements governed under the doctrine of equivalents.

Vasu makes this disclosure based upon information presently known and reasonably available to it as of the date hereof. This Disclosure of Asserted Claims and Supplemental Infringement Contentions, and the accompanying Appendices, are preliminary, as discovery has not yet commenced in this action, such that Defendants have not produced any technical documents.

Vasu has subdivided the Asserted Claims in the Charts to explain where the Accused Products meet each claim element. These subdivisions are not to be taken as an indication of the boundaries of claim elements with respect to the doctrine of equivalents, or any other issue. In addition, the Accused Products may infringe the Asserted Claims in multiple ways. Vasu reserves the right to provide an alternative claim mapping or infringement contentions for such Accused Products or other products and services. Vasu further reserves the right to rely upon

the opinions of one or more experts in support of its infringement contentions in accordance with the Court's Scheduling Order.

As Vasu's investigation is ongoing, Vasu reserves the right to amend, modify, supplement, and/or narrow any portion of this Disclosure of Asserted Claims and Supplemental Infringement Contentions, including, but not limited to, the identification of Asserted Claims, the products and/or services accused of infringement, and the bases and manner of infringement.

The Asserted Claims cover a variety of inventions for mobile switch between cellular and Wi-Fi seamless roaming and broadband content access. Vasu's Supplemental Infringement Contentions set forth exemplary arrangement of features in the Accused Products illustrating why the Asserted Claims are infringed. As described in the specifications of the Asserted patents and as recited in the claims, Vasu's invention provides seamless roaming, seamless session continuity, and broadband access distribution. As such, there are multiple ways that the Asserted Claims are infringed, including as set forth in the Supplemental Infringement Contentions as well as by other arrangements of features in the Accused Products, such as by components which have multiple different functions such as Intelligent Wi-Fi and Smart Network Switch.

To the maximum degree allowed by the Federal Rules of Civil Procedure, the Court's Local Rules, and any scheduling orders entered in this action, Vasu reserves its right to amend, modify, supplement, and/or narrow this Disclosure of Asserted Claims and Supplemental Infringement Contentions as appropriate, as the case develops.

IV. Priority Date of Asserted Claims

Pursuant to Local Patent Rule 3-1(e), Vasu hereby identifies the priority date of asserted claims (identified in the accompanying Appendices) of the Asserted Patents as January 6, 2004.

V. 3-1(f). Identification of Own Practicing Products

Based on the information presently known to Vasu and Vasu's present understanding, Vasu provides the following contentions pursuant to Patent Local Rule 3-1 (f): Vasu does not identify any of its own products as practicing the patents. Vasu reserves the right to amend, modify, supplement, or narrow these contentions pursuant to Patent Local Rule 3-6.

Dated: August 30, 2024

By: */s/ Paul J. Andre*

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CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2024, a true and correct copy of the foregoing document, **PLAINTIFF VASU HOLDINGS, LLC'S DISCLOSURE OF ASSERTED CLAIMS AND SUPPLEMENTAL INFRINGEMENT CONTENTIONS UNDER PATENT LOCAL RULES 3-1, 3-3, 3-4, AND DKT. NO. 29** were served via electronic mail upon counsel for Defendant Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.:

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