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

FOUR BATONS WIRELESS, LLC, *Plaintiff*, v. SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., *Defendants*.	§ § § § § § § § § § § § §	Case No. 2:24-cv-00284-JRG

PLAINTIFF FOUR BATONS WIRELESS, LLC'S
DISCLOSURES PURSUANT TO LOCAL PATENT RULES 3-1 AND 3-2

Samsung v. Four Batons
IPR2025-00496
Exhibit 1018

Pursuant to Local Patent Rules 3-1 and 3-2, Plaintiff Four Batons Wireless, LLC ("Four Batons") provides its disclosure of asserted claims and preliminary infringement contentions and accompanying document production to Defendants Samsung Electronics Co., Ltd. ("Samsung Limited") and Samsung Electronics America, Inc. ("Samsung America") ("Samsung Limited" and "Samsung America" may be collectively referred to as "Samsung" or "Defendants"). Four Batons's disclosures are based on publicly available materials regarding the accused infringing products of Defendants that describe or discuss aspects of operation of these products. Fact discovery and claim construction proceedings have not yet commenced. Four Batons has not had access to any discovery of Defendants' materials at this point, and certain information is not yet available to Four Batons that may be relevant to its infringement claims. Four Batons reserves the right to supplement or alter its disclosures based on the discovery it obtains, invalidity and prior art contentions, claim construction, allowance and issuance of substitute claims by the USPTO, and/or any additional information provided by Defendants.

I. Disclosure of Asserted Claims and Preliminary Infringement Contentions

A. Infringed Claims

The following table identifies the patents-in-suit and each claim of those patents that is alleged to be infringed by each opposing party.

Patent	Infringed Claims
8,798,006	All Defendants: 1–8, 16
8,239,671	All Defendants: 1–4, 6–8, 10–11, 18–19
7,502,348	All Defendants: 1–6, 13–17
8,073,436	All Defendants: 1–17, 19

Four Batons reserves the right to augment and supplement its identification of asserted

claims based upon additional information obtained through discovery.

B. Infringing Instrumentalities

Based upon information presently available to it, Four Batons asserts infringement by the instrumentalities set forth in the table below (the "Infringing Instrumentalities").

Patent	Infringing Instrumentalities
8,798,006	For all Asserted Claims, all Samsung products that support Intelligent Wi-Fi, formerly known as "Adaptive Wi-Fi."[1] This includes, but is not limited to, the devices identified below: Samsung Galaxy M35 Android smartphone; Samsung Galaxy F55 Android smartphone; Samsung Galaxy C55 Android smartphone; Samsung Galaxy M55 Android smartphone; Samsung Galaxy A55 Android smartphone; Samsung Galaxy A35 Android smartphone; Samsung Galaxy M15 Android smartphone; Samsung Galaxy M14 4G Android smartphone; Samsung Galaxy F15 Android smartphone; Samsung Galaxy S24 Ultra Android smartphone; Samsung Galaxy S24+ Android smartphone; Samsung Galaxy S24 Android smartphone; Samsung Galaxy Xcover7 Android smartphone; Samsung Galaxy A25 Android smartphone; Samsung Galaxy A15 5G Android smartphone; Samsung Galaxy A15 Android smartphone; Samsung Galaxy S23 FE Android smartphone; Samsung Galaxy A05s Android smartphone; Samsung Galaxy A05 Android smartphone; Samsung Galaxy F34 Android smartphone; Samsung Galaxy Z Fold5 Android smartphone; Samsung Galaxy Z Flip5 Android smartphone; Samsung Galaxy M34 5G Android smartphone; Samsung Galaxy F54 Android smartphone; Samsung Galaxy A24 4G Android smartphone; Samsung Galaxy F14 Android smartphone; Samsung Galaxy M54 Android smartphone; Samsung Galaxy A54 Android smartphone; Samsung Galaxy A34 Android smartphone; Samsung Galaxy M14 Android smartphone; Samsung Galaxy S23 Ultra Android smartphone; Samsung Galaxy S23+ Android smartphone; Samsung Galaxy S23 Android smartphone; Samsung Galaxy A14 Android smartphone; Samsung Galaxy A14 5G Android smartphone; Samsung Galaxy F04 Android smartphone; Samsung Galaxy M04 Android smartphone; Samsung Galaxy A04e Android smartphone; Samsung Galaxy A04s Android smartphone; Samsung Galaxy A04 Android smartphone; Samsung Galaxy Z Fold4 Android smartphone; Samsung Galaxy Z Flip4 Android smartphone; Samsung Galaxy A23 5G Android smartphone; Samsung Galaxy M13 5G Android smartphone; Samsung Galaxy M13 (India) Android smartphone; Samsung Galaxy A13 (SM-A137) Android

[1] https://docs.samsungknox.com/admin/knox-platform-for-enterprise/kbas/kba-360034073174 ("Intelligent Wi-Fi is the new brand name of the existing "Adaptive Wi-Fi" which had been applied to models older than Galaxy S10 (e.g., Galaxy S9 or older models)."). Prior versions of this technology were known as "Switch to Mobile Data" and "Smart Network Switch." *Id.*

Patent	Infringing Instrumentalities
	smartphone; Samsung Galaxy Xcover6 Pro Android smartphone; Samsung Galaxy F13 Android smartphone; Samsung Galaxy M13 Android smartphone; Samsung Galaxy M53 Android smartphone; Samsung Galaxy S20 FE 2022 Android smartphone; Samsung Galaxy A73 5G Android smartphone; Samsung Galaxy A53 5G Android smartphone; Samsung Galaxy A33 5G Android smartphone; Samsung Galaxy F23 Android smartphone; Samsung Galaxy M33 Android smartphone; Samsung Galaxy M23 Android smartphone; Samsung Galaxy A23 Android smartphone; Samsung Galaxy A13 Android smartphone; Samsung Galaxy S22 Ultra 5G Android smartphone; Samsung Galaxy S22+ 5G Android smartphone; Samsung Galaxy S22 5G Android smartphone; Samsung Galaxy S21 FE 5G Android smartphone; Samsung Galaxy A13 5G Android smartphone; Samsung Galaxy A03 Android smartphone; Samsung Galaxy A03 Core Android smartphone; Samsung Galaxy F42 5G Android smartphone; Samsung Galaxy M52 5G Android smartphone; Samsung Galaxy M22 Android smartphone; Samsung Galaxy M32 5G Android smartphone; Samsung Galaxy A03s Android smartphone; Samsung Galaxy A52s 5G Android smartphone; Samsung Galaxy Z Fold3 5G Android smartphone; Samsung Galaxy Z Flip3 5G Android smartphone; Samsung Galaxy A12 Nacho Android smartphone; Samsung Galaxy M21 2021 Android smartphone; Samsung Galaxy F22 Android smartphone; Samsung Galaxy M32 Android smartphone; Samsung Galaxy A22 5G Android smartphone; Samsung Galaxy A22 Android smartphone; Samsung Galaxy F52 5G Android smartphone; Samsung Galaxy M42 5G Android smartphone; Samsung Galaxy M12 Android smartphone; Samsung Galaxy Quantum 2 Android smartphone; Samsung Galaxy F12 Android smartphone; Samsung Galaxy F02s Android smartphone; Samsung Galaxy A72 Android smartphone; Samsung Galaxy A52 5G Android smartphone; Samsung Galaxy A52 Android smartphone; Samsung Galaxy Xcover 5 Android smartphone; Samsung Galaxy A32 Android smartphone; Samsung Galaxy M62 Android smartphone; Samsung Galaxy F62 Android smartphone; Samsung Galaxy S21 Ultra 5G Android smartphone; Samsung Galaxy S21+ 5G Android smartphone; Samsung Galaxy S21 5G Android smartphone; Samsung Galaxy A32 5G Android smartphone; Samsung Galaxy M02s Android smartphone; Samsung Galaxy A12 Android smartphone; Samsung Galaxy M02 Android smartphone; Samsung Galaxy A02 Android smartphone; Samsung Galaxy A02s Android smartphone; Samsung Galaxy M21s Android smartphone; Samsung Galaxy M31 Prime Android smartphone; Samsung Galaxy F41 Android smartphone; Samsung Galaxy S20 FE 5G Android smartphone; Samsung Galaxy S20 FE Android smartphone; Samsung Galaxy A42 5G Android smartphone; Samsung Galaxy M51 Android smartphone; Samsung Galaxy A51 5G UW Android smartphone; Samsung Galaxy Z Fold2 5G Android smartphone; Samsung Galaxy Note20 Ultra 5G Android smartphone; Samsung Galaxy Note20 Ultra Android smartphone; Samsung Galaxy Note20 5G Android smartphone; Samsung Galaxy Note20 Android smartphone; Samsung Galaxy Z Flip 5G Android smartphone; Samsung Galaxy M31s Android smartphone; Samsung Galaxy M01s Android smartphone;

Patent	Infringing Instrumentalities
	Samsung Galaxy M01 Core Android smartphone; Samsung Galaxy A01 Core Android smartphone; Samsung Galaxy A71 5G UW Android smartphone; Samsung Galaxy M01 Android smartphone; Samsung Galaxy A21s Android smartphone; Samsung Galaxy J2 Core (2020) Android smartphone; Samsung Galaxy A Quantum Android smartphone; Samsung Galaxy A71 5G Android smartphone; Samsung Galaxy A51 5G Android smartphone; Samsung Galaxy A21 Android smartphone; Samsung Galaxy M11 Android smartphone; Samsung Galaxy A31 Android smartphone; Samsung Galaxy A41 Android smartphone; Samsung Galaxy M21 Android smartphone; Samsung Galaxy A11 Android smartphone; Samsung Galaxy M31 Android smartphone; Samsung Galaxy S20 Ultra 5G Android smartphone; Samsung Galaxy S20 Ultra Android smartphone; Samsung Galaxy S20+ 5G Android smartphone; Samsung Galaxy S20+ Android smartphone; Samsung Galaxy S20 5G UW Android smartphone; Samsung Galaxy S20 5G Android smartphone; Samsung Galaxy S20 Android smartphone; Samsung Galaxy Z Flip Android smartphone; Samsung Galaxy Xcover Pro Android smartphone; Samsung Galaxy Note10 Lite Android smartphone; Samsung Galaxy S10 Lite Android smartphone; Samsung Galaxy A01 Android smartphone; Samsung Galaxy A71 Android smartphone; Samsung Galaxy A51 Android smartphone; Samsung Galaxy Xcover FieldPro Android smartphone; Samsung Galaxy A70s Android smartphone; Samsung Galaxy A20s Android smartphone; Samsung Galaxy M30s Android smartphone; Samsung Galaxy M10s Android smartphone; Samsung Galaxy Fold 5G Android smartphone; Samsung Galaxy Fold Android smartphone; Samsung Galaxy A90 5G Android smartphone; Samsung Galaxy A30s Android smartphone; Samsung Galaxy A50s Android smartphone; Samsung Galaxy Note10+ 5G Android smartphone; Samsung Galaxy Note10+ Android smartphone; Samsung Galaxy Note10 5G Android smartphone; Samsung Galaxy Note10 Android smartphone; Samsung Galaxy A10s Android smartphone; Samsung Galaxy A10e Android smartphone; Samsung Galaxy Xcover 4s Android smartphone; Samsung Galaxy A2 Core Android smartphone; Samsung Galaxy S10 5G Android smartphone; Samsung Galaxy S10+ Android smartphone; Samsung Galaxy S10 Android smartphone; Samsung Galaxy S10e Android smartphone; Samsung Galaxy Tab Active5 Android tablet; Samsung Galaxy Tab A9+ Android tablet; Samsung Galaxy Tab S9 FE Android tablet; Samsung Galaxy Tab S9 FE+ Android tablet; Samsung Galaxy Tab S9 Android tablet; Samsung Galaxy Tab S9 Ultra Android tablet; Samsung Galaxy Tab S9+ Android tablet; Samsung Galaxy Tab A7 10 4 (2022) Android tablet; Samsung Galaxy Tab Active4 Pro Android tablet; Samsung Galaxy Tab S8 Ultra Android tablet; Samsung Galaxy Tab A7 Lite Android tablet; Samsung Galaxy Tab S7 FE Android tablet; Samsung Galaxy Tab S7 Android tablet; Samsung Galaxy Tab S7+ Android tablet; Samsung Galaxy Tab A 8.5.
8,239,671	For all Asserted Claims, all Samsung products that support WPA3. This includes, but is not limited to, the devices identified below:

Patent	Infringing Instrumentalities
	Samsung Galaxy F55 Android smartphone; Samsung Galaxy M35 Android smartphone; Samsung Galaxy C55 Android smartphone; Samsung Galaxy A35 Android smartphone; Samsung Galaxy A55 Android smartphone; Samsung Galaxy F15 Android smartphone; Samsung Galaxy M14 4G Android smartphone; Samsung Galaxy M15 Android smartphone; Samsung Galaxy M55 Android smartphone; Samsung Galaxy S24 Android smartphone; Samsung Galaxy S24 Ultra Android smartphone; Samsung Galaxy S24+ Android smartphone; Samsung Galaxy Xcover7 Android smartphone; Samsung Galaxy A15 5G Android smartphone; Samsung Galaxy A15 Android smartphone; Samsung Galaxy A25 Android smartphone; Samsung Galaxy S23 FE Android smartphone; Samsung Galaxy A05 Android smartphone; Samsung Galaxy A05s Android smartphone; Samsung Galaxy F34 Android smartphone; Samsung Galaxy M34 5G Android smartphone; Samsung Galaxy Z Flip5 Android smartphone; Samsung Galaxy Z Fold5 Android smartphone; Samsung Galaxy F54 Android smartphone; Samsung Galaxy A24 4G Android smartphone; Samsung Galaxy A34 Android smartphone; Samsung Galaxy A54 Android smartphone; Samsung Galaxy F14 Android smartphone; Samsung Galaxy M14 Android smartphone; Samsung Galaxy M54 Android smartphone; Samsung Galaxy A14 Android smartphone; Samsung Galaxy S23 Android smartphone; Samsung Galaxy S23 Ultra Android smartphone; Samsung Galaxy S23+ Android smartphone; Samsung Galaxy A14 5G Android smartphone; Samsung Galaxy F04 Android smartphone; Samsung Galaxy M04 Android smartphone; Samsung Galaxy A04e Android smartphone; Samsung Galaxy A04 Android smartphone; Samsung Galaxy A04s Android smartphone; Samsung Galaxy A23 5G Android smartphone; Samsung Galaxy Z Flip4 Android smartphone; Samsung Galaxy Z Fold4 Android smartphone; Samsung Galaxy M13 5G Android smartphone; Samsung Galaxy A13 (SM-A137) Android smartphone; Samsung Galaxy F13 Android smartphone; Samsung Galaxy Xcover6 Pro Android smartphone; Samsung Galaxy M13 Android smartphone; Samsung Galaxy M53 Android smartphone; Samsung Galaxy S20 FE 2022 Android smartphone; Samsung Galaxy A13 Android smartphone; Samsung Galaxy A23 Android smartphone; Samsung Galaxy A33 5G Android smartphone; Samsung Galaxy A53 5G Android smartphone; Samsung Galaxy A73 5G Android smartphone; Samsung Galaxy F23 Android smartphone; Samsung Galaxy M23 Android smartphone; Samsung Galaxy M33 Android smartphone; Samsung Galaxy S22 5G Android smartphone; Samsung Galaxy S22 Ultra 5G Android smartphone; Samsung Galaxy S22+ 5G Android smartphone; Samsung Galaxy S21 FE 5G Android smartphone; Samsung Galaxy A13 5G Android smartphone; Samsung Galaxy A03 Android smartphone; Samsung Galaxy A03 Core Android smartphone; Samsung Galaxy F42 5G Android smartphone; Samsung Galaxy M22 Android smartphone; Samsung Galaxy M52 5G Android smartphone; Samsung Galaxy A03s Android smartphone; Samsung Galaxy A12 (India) Android smartphone; Samsung Galaxy A12 Nacho Android smartphone; Samsung Galaxy A52s 5G Android smartphone; Samsung Galaxy

Patent	Infringing Instrumentalities
	M32 5G Android smartphone; Samsung Galaxy Z Flip3 5G Android smartphone; Samsung Galaxy Z Fold3 5G Android smartphone; Samsung Galaxy F22 Android smartphone; Samsung Galaxy M21 2021 Android smartphone; Samsung Galaxy A22 5G Android smartphone; Samsung Galaxy A22 Android smartphone; Samsung Galaxy M32 Android smartphone; Samsung Galaxy F52 5G Android smartphone; Samsung Galaxy F02s Android smartphone; Samsung Galaxy F12 Android smartphone; Samsung Galaxy M12 Android smartphone; Samsung Galaxy M42 5G Android smartphone; Samsung Galaxy Quantum 2 Android smartphone; Samsung Galaxy A52 5G Android smartphone; Samsung Galaxy A52 Android smartphone; Samsung Galaxy A72 Android smartphone; Samsung Galaxy Xcover 5 Android smartphone; Samsung Galaxy A32 Android smartphone; Samsung Galaxy F62 Android smartphone; Samsung Galaxy M02 Android smartphone; Samsung Galaxy M12 (India) Android smartphone; Samsung Galaxy M62 Android smartphone; Samsung Galaxy A02 Android smartphone; Samsung Galaxy A32 5G Android smartphone; Samsung Galaxy M02s Android smartphone; Samsung Galaxy S21 5G Android smartphone; Samsung Galaxy S21 Ultra 5G Android smartphone; Samsung Galaxy S21+ 5G Android smartphone; Samsung Galaxy A02s Android smartphone; Samsung Galaxy A12 Android smartphone; Samsung Galaxy M21s Android smartphone; Samsung Galaxy F41 Android smartphone; Samsung Galaxy M31 Prime Android smartphone; Samsung Galaxy A42 5G Android smartphone; Samsung Galaxy S20 FE 5G Android smartphone; Samsung Galaxy S20 FE Android smartphone; Samsung Galaxy A51 5G UW Android smartphone; Samsung Galaxy M51 Android smartphone; Samsung Galaxy Note20 5G Android smartphone; Samsung Galaxy Note20 Android smartphone; Samsung Galaxy Note20 Ultra 5G Android smartphone; Samsung Galaxy Note20 Ultra Android smartphone; Samsung Galaxy Z Fold2 5G Android smartphone; Samsung Galaxy A01 Core Android smartphone; Samsung Galaxy A71 5G UW Android smartphone; Samsung Galaxy M01 Core Android smartphone; Samsung Galaxy M01s Android smartphone; Samsung Galaxy M31s Android smartphone; Samsung Galaxy Z Flip 5G Android smartphone; Samsung Galaxy M01 Android smartphone; Samsung Galaxy A Quantum Android smartphone; Samsung Galaxy A21s Android smartphone; Samsung Galaxy S20 5G UW Android smartphone; Samsung Galaxy A21 Android smartphone; Samsung Galaxy A51 5G Android smartphone; Samsung Galaxy A71 5G Android smartphone; Samsung Galaxy A11 Android smartphone; Samsung Galaxy A31 Android smartphone; Samsung Galaxy A41 Android smartphone; Samsung Galaxy M11 Android smartphone; Samsung Galaxy M21 Android smartphone; Samsung Galaxy M31 Android smartphone; Samsung Galaxy S20 5G Android smartphone; Samsung Galaxy S20 Android smartphone; Samsung Galaxy S20 Ultra 5G Android smartphone; Samsung Galaxy S20 Ultra Android smartphone; Samsung Galaxy S20+ 5G Android smartphone; Samsung Galaxy S20+ Android smartphone; Samsung Galaxy Z Flip Android smartphone; Samsung Galaxy Note10 Lite Android smartphone; Samsung Galaxy S10 Lite Android smartphone; Samsung Galaxy Xcover Pro Android smartphone; Samsung

Patent	Infringing Instrumentalities
	Galaxy A01 Android smartphone; Samsung Galaxy A51 Android smartphone; Samsung Galaxy A71 Android smartphone; Samsung Galaxy A20s Android smartphone; Samsung Galaxy A70s Android smartphone; Samsung Galaxy A90 5G Android smartphone; Samsung Galaxy M10s Android smartphone; Samsung Galaxy M30s Android smartphone; Samsung Galaxy A10s Android smartphone; Samsung Galaxy A30s Android smartphone; Samsung Galaxy A50s Android smartphone; Samsung Galaxy Note10 5G Android smartphone; Samsung Galaxy Note10 Android smartphone; Samsung Galaxy Note10+ 5G Android smartphone; Samsung Galaxy Note10+ Android smartphone; Samsung Galaxy A10e Android smartphone; Samsung Galaxy M40 Android smartphone; Samsung Galaxy Xcover 4s Android smartphone; Samsung Galaxy A20e Android smartphone; Samsung Galaxy A60 Android smartphone; Samsung Galaxy A80 Android smartphone; Samsung Galaxy A20 Android smartphone; Samsung Galaxy A40 Android smartphone; Samsung Galaxy A70 Android smartphone; Samsung Galaxy A10 Android smartphone; Samsung Galaxy A30 Android smartphone; Samsung Galaxy A50 Android smartphone; Samsung Galaxy Fold 5G Android smartphone; Samsung Galaxy Fold Android smartphone; Samsung Galaxy M30 Android smartphone; Samsung Galaxy S10 5G Android smartphone; Samsung Galaxy S10 Android smartphone; Samsung Galaxy S10+ Android smartphone; Samsung Galaxy S10e Android smartphone; Samsung Galaxy M10 Android smartphone; Samsung Galaxy M20 Android smartphone; Samsung Galaxy A7 (2018) Android smartphone; Samsung Galaxy Note9 Android smartphone; Samsung Galaxy A6 (2018) Android smartphone; Samsung Galaxy J6 Android smartphone; Samsung Galaxy S9 Android smartphone; Samsung Galaxy S9+ Android smartphone; Samsung Galaxy Tab S6 Lite (2024) Android tablet; Samsung Galaxy Tab Active5 Android tablet; Samsung Galaxy Tab A9 Android tablet; Samsung Galaxy Tab A9+ Android tablet; Samsung Galaxy Tab S9 FE Android tablet; Samsung Galaxy Tab S9 FE+ Android tablet; Samsung Galaxy Tab S9 Android tablet; Samsung Galaxy Tab S9 Ultra Android tablet; Samsung Galaxy Tab S9+ Android tablet; Samsung Galaxy Tab A7 10; Samsung Galaxy Tab Active4 Pro Android tablet; Samsung Galaxy Tab S6 Lite (2022) Android tablet; Samsung Galaxy Tab S8 Android tablet; Samsung Galaxy Tab S8 Ultra Android tablet; Samsung Galaxy Tab S8+ Android tablet; Samsung Galaxy Tab A8 10.5; Samsung Galaxy Tab A7 Lite Android tablet; Samsung Galaxy Tab S7 FE Android tablet; Samsung Galaxy Tab A7 10.5; Samsung Galaxy Tab Active3 Android tablet; Samsung Galaxy Tab S7 Android tablet; Samsung Galaxy Tab S7+ Android tablet; Samsung Galaxy Tab S6 Lite (2020) Android tablet; Samsung Galaxy Tab S6 5G Android tablet; Samsung Galaxy Tab A 8.5; Samsung Galaxy Tab S6 Android tablet; Samsung Galaxy Tab S5e Android tablet; Samsung Galaxy Tab A 10.5; Samsung Galaxy Tab S4 10.5; MT7668 Module; NP340XLA; NP345XLA; NT345XLA; NT545XLA; NT545XLA; Samsung SL-T1680W series; Samsung SL-T1680W series; Samsung SL-T1680W series; Samsung SL-T1680W series; Samsung SL-T2270FW series; Samsung SL-T2270W series; Samsung SL-T2270W series; Samsung SL-T2270W series; SL-M3890FW;

Patent	Infringing Instrumentalities
	MT7925 Module; SMT-A61WFB; CCAR210R; WCA720M; CWBR720M; MT7921; XE340XDA; XE530QDA; XE531QDA; XE930QCAI; XQ530QDA; XQ531QDA.
7,502,348	For all Asserted Claims, all Samsung products that support dual concurrent Wi-Fi.[2] For example, Android open-source-code documentation advertises that devices running Android 13 or later versions support concurrent multiple networks with internet connection.[3] This includes, but is not limited to, the devices identified below: Samsung Galaxy F55 Android smartphone; Samsung Galaxy M35 Android smartphone; Samsung Galaxy C55 Android smartphone; Samsung Galaxy A35 Android smartphone; Samsung Galaxy A55 Android smartphone; Samsung Galaxy F15 Android smartphone; Samsung Galaxy M14 4G Android smartphone; Samsung Galaxy M15 Android smartphone; Samsung Galaxy M55 Android smartphone; Samsung Galaxy S24 Android smartphone; Samsung Galaxy S24 Ultra Android smartphone; Samsung Galaxy S24+ Android smartphone; Samsung Galaxy Xcover7 Android smartphone; Samsung Galaxy A15 5G Android smartphone; Samsung Galaxy A15 Android smartphone; Samsung Galaxy A25 Android smartphone; Samsung Galaxy S23 FE Android smartphone; Samsung Galaxy A05 Android smartphone; Samsung Galaxy A05s Android smartphone; Samsung Galaxy F34 Android smartphone; Samsung Galaxy M34 5G Android smartphone; Samsung Galaxy Z Flip5 Android smartphone; Samsung Galaxy Z Fold5 Android smartphone; Samsung Galaxy F54 Android smartphone; Samsung Galaxy A24 4G Android smartphone; Samsung Galaxy A34 Android smartphone; Samsung Galaxy A54 Android smartphone; Samsung Galaxy F14 Android smartphone; Samsung Galaxy M14 Android smartphone; Samsung Galaxy M54 Android smartphone; Samsung Galaxy A14 Android smartphone; Samsung Galaxy S23 Android smartphone; Samsung Galaxy S23 Ultra Android smartphone; Samsung Galaxy S23+ Android smartphone; Samsung Galaxy A14 5G Android smartphone; Samsung Galaxy A04 Android smartphone; Samsung Galaxy A04s Android smartphone; Samsung Galaxy A23 5G Android smartphone; Samsung Galaxy Z Flip4 Android smartphone; Samsung Galaxy Z Fold4 Android smartphone; Samsung Galaxy A13 (SM-A137) Android smartphone; Samsung Galaxy F13 Android smartphone; Samsung Galaxy Xcover6 Pro Android smartphone; Samsung Galaxy M53 Android smartphone; Samsung Galaxy A13 Android smartphone; Samsung Galaxy A23 Android smartphone; Samsung Galaxy A33 5G Android smartphone; Samsung Galaxy A53 5G Android smartphone; Samsung Galaxy A73 5G Android smartphone; Samsung Galaxy F23 Android smartphone; Samsung Galaxy M23 Android smartphone; Samsung Galaxy S22 5G Android smartphone; Samsung Galaxy S22

[2] This feature may also be referred to by other names, such as "dual band simultaneous" Wi-Fi.
[3] https://source.android.com/docs/core/connect/wifi-sta-sta-concurrency.

Patent	Infringing Instrumentalities
	Ultra 5G Android smartphone; Samsung Galaxy S22+ 5G Android smartphone; Samsung Galaxy S21 FE 5G Android smartphone; Samsung Galaxy A13 5G Android smartphone; Samsung Galaxy A03 Android smartphone; Samsung Galaxy F42 5G Android smartphone; Samsung Galaxy M52 5G Android smartphone; Samsung Galaxy A12 Nacho Android smartphone; Samsung Galaxy A52s 5G Android smartphone; Samsung Galaxy M32 5G Android smartphone; Samsung Galaxy Z Flip3 5G Android smartphone; Samsung Galaxy Z Fold3 5G Android smartphone; Samsung Galaxy F22 Android smartphone; Samsung Galaxy A22 5G Android smartphone; Samsung Galaxy A22 Android smartphone; Samsung Galaxy M32 Android smartphone; Samsung Galaxy F12 Android smartphone; Samsung Galaxy M42 5G Android smartphone; Samsung Galaxy A52 5G Android smartphone; Samsung Galaxy A52 Android smartphone; Samsung Galaxy Xcover 5 Android smartphone; Samsung Galaxy A32 Android smartphone; Samsung Galaxy F62 Android smartphone; Samsung Galaxy M62 Android smartphone; Samsung Galaxy A32 5G Android smartphone; Samsung Galaxy S21 5G Android smartphone; Samsung Galaxy S21 Ultra 5G Android smartphone; Samsung Galaxy S21+ 5G Android smartphone; Samsung Galaxy A42 5G Android smartphone; Samsung Galaxy S20 FE 5G Android smartphone; Samsung Galaxy S20 FE Android smartphone; Samsung Galaxy Note20 5G Android smartphone; Samsung Galaxy Note20 Android smartphone; Samsung Galaxy Note20 Ultra 5G Android smartphone; Samsung Galaxy Note20 Ultra Android smartphone; Samsung Galaxy Z Fold2 5G Android smartphone; Samsung Galaxy Z Flip 5G Android smartphone; Samsung Galaxy A51 5G Android smartphone; Samsung Galaxy A71 5G Android smartphone; Samsung Galaxy S20 5G Android smartphone; Samsung Galaxy S20 Android smartphone; Samsung Galaxy S20 Ultra 5G Android smartphone; Samsung Galaxy S20 Ultra Android smartphone; Samsung Galaxy S20+ 5G Android smartphone; Samsung Galaxy S20+ Android smartphone; Samsung Galaxy Note10 Lite Android smartphone; Samsung Galaxy S10 Lite Android smartphone; Samsung Galaxy Xcover Pro Android smartphone; Samsung Galaxy A51 Android smartphone; Samsung Galaxy A71 Android smartphone; Samsung Galaxy Tab Active5 Android tablet; Samsung Galaxy Tab A9+ Android tablet; Samsung Galaxy Tab S9 FE Android tablet; Samsung Galaxy Tab S9 FE+ Android tablet; Samsung Galaxy Tab S9 Android tablet; Samsung Galaxy Tab S9 Ultra Android tablet; Samsung Galaxy Tab S9+ Android tablet; Samsung Galaxy Tab Active4 Pro Android tablet; Samsung Galaxy Tab S7 FE Android tablet; Samsung Galaxy Tab S7 Android tablet; Samsung Galaxy Tab S7+ Android tablet.
8,073,436	For all Asserted Claims, all Samsung products that (i) provide operation of simultaneous wireless interfaces, including (a) both Wi-Fi and cellular interfaces and/or (b) multiple Wi-Fi interfaces on different bands; and (ii) support Android 5.0 or later. This includes, but is not limited to, the devices identified below:

Patent	Infringing Instrumentalities
	Samsung Galaxy F55 Android smartphone; Samsung Galaxy M35 Android smartphone; Samsung Galaxy C55 Android smartphone; Samsung Galaxy A35 Android smartphone; Samsung Galaxy A55 Android smartphone; Samsung Galaxy F15 Android smartphone; Samsung Galaxy M14 4G Android smartphone; Samsung Galaxy M15 Android smartphone; Samsung Galaxy M55 Android smartphone; Samsung Galaxy S24 Android smartphone; Samsung Galaxy S24 Ultra Android smartphone; Samsung Galaxy S24+ Android smartphone; Samsung Galaxy Xcover7 Android smartphone; Samsung Galaxy A15 5G Android smartphone; Samsung Galaxy A15 Android smartphone; Samsung Galaxy A25 Android smartphone; Samsung Galaxy S23 FE Android smartphone; Samsung Galaxy A05 Android smartphone; Samsung Galaxy A05s Android smartphone; Samsung Galaxy F34 Android smartphone; Samsung Galaxy M34 5G Android smartphone; Samsung Galaxy Z Flip5 Android smartphone; Samsung Galaxy Z Fold5 Android smartphone; Samsung Galaxy F54 Android smartphone; Samsung Galaxy A24 4G Android smartphone; Samsung Galaxy A34 Android smartphone; Samsung Galaxy A54 Android smartphone; Samsung Galaxy F14 Android smartphone; Samsung Galaxy M14 Android smartphone; Samsung Galaxy M54 Android smartphone; Samsung Galaxy A14 Android smartphone; Samsung Galaxy S23 Android smartphone; Samsung Galaxy S23 Ultra Android smartphone; Samsung Galaxy S23+ Android smartphone; Samsung Galaxy A14 5G Android smartphone; Samsung Galaxy F04 Android smartphone; Samsung Galaxy M04 Android smartphone; Samsung Galaxy A04e Android smartphone; Samsung Galaxy A04 Android smartphone; Samsung Galaxy A04s Android smartphone; Samsung Galaxy A23 5G Android smartphone; Samsung Galaxy Z Flip4 Android smartphone; Samsung Galaxy Z Fold4 Android smartphone; Samsung Galaxy M13 5G Android smartphone; Samsung Galaxy A13 (SM-A137) Android smartphone; Samsung Galaxy F13 Android smartphone; Samsung Galaxy Xcover6 Pro Android smartphone; Samsung Galaxy M13 Android smartphone; Samsung Galaxy M53 Android smartphone; Samsung Galaxy S20 FE 2022 Android smartphone; Samsung Galaxy A13 Android smartphone; Samsung Galaxy A23 Android smartphone; Samsung Galaxy A33 5G Android smartphone; Samsung Galaxy A53 5G Android smartphone; Samsung Galaxy A73 5G Android smartphone; Samsung Galaxy F23 Android smartphone; Samsung Galaxy M23 Android smartphone; Samsung Galaxy M33 Android smartphone; Samsung Galaxy S22 5G Android smartphone; Samsung Galaxy S22 Ultra 5G Android smartphone; Samsung Galaxy S22+ 5G Android smartphone; Samsung Galaxy S21 FE 5G Android smartphone; Samsung Galaxy A13 5G Android smartphone; Samsung Galaxy A03 Android smartphone; Samsung Galaxy A03 Core Android smartphone; Samsung Galaxy F42 5G Android smartphone; Samsung Galaxy M22 Android smartphone; Samsung Galaxy M52 5G Android smartphone; Samsung Galaxy A03s Android smartphone; Samsung Galaxy A12 (India) Android smartphone; Samsung Galaxy A12 Nacho Android smartphone; Samsung Galaxy A52s 5G Android smartphone; Samsung Galaxy

Patent	Infringing Instrumentalities
	M32 5G Android smartphone; Samsung Galaxy Z Flip3 5G Android smartphone; Samsung Galaxy Z Fold3 5G Android smartphone; Samsung Galaxy F22 Android smartphone; Samsung Galaxy M21 2021 Android smartphone; Samsung Galaxy A22 5G Android smartphone; Samsung Galaxy A22 Android smartphone; Samsung Galaxy M32 Android smartphone; Samsung Galaxy F52 5G Android smartphone; Samsung Galaxy F02s Android smartphone; Samsung Galaxy F12 Android smartphone; Samsung Galaxy M12 Android smartphone; Samsung Galaxy M42 5G Android smartphone; Samsung Galaxy Quantum 2 Android smartphone; Samsung Galaxy A52 5G Android smartphone; Samsung Galaxy A52 Android smartphone; Samsung Galaxy A72 Android smartphone; Samsung Galaxy Xcover 5 Android smartphone; Samsung Galaxy A32 Android smartphone; Samsung Galaxy F62 Android smartphone; Samsung Galaxy M02 Android smartphone; Samsung Galaxy M12 (India) Android smartphone; Samsung Galaxy M62 Android smartphone; Samsung Galaxy A02 Android smartphone; Samsung Galaxy A32 5G Android smartphone; Samsung Galaxy M02s Android smartphone; Samsung Galaxy S21 5G Android smartphone; Samsung Galaxy S21 Ultra 5G Android smartphone; Samsung Galaxy S21+ 5G Android smartphone; Samsung Galaxy A02s Android smartphone; Samsung Galaxy A12 Android smartphone; Samsung Galaxy M21s Android smartphone; Samsung Galaxy F41 Android smartphone; Samsung Galaxy M31 Prime Android smartphone; Samsung Galaxy A42 5G Android smartphone; Samsung Galaxy S20 FE 5G Android smartphone; Samsung Galaxy S20 FE Android smartphone; Samsung Galaxy A51 5G UW Android smartphone; Samsung Galaxy M51 Android smartphone; Samsung Galaxy Note20 5G Android smartphone; Samsung Galaxy Note20 Android smartphone; Samsung Galaxy Note20 Ultra 5G Android smartphone; Samsung Galaxy Note20 Ultra Android smartphone; Samsung Galaxy Z Fold2 5G Android smartphone; Samsung Galaxy A01 Core Android smartphone; Samsung Galaxy A71 5G UW Android smartphone; Samsung Galaxy M01 Core Android smartphone; Samsung Galaxy M01s Android smartphone; Samsung Galaxy M31s Android smartphone; Samsung Galaxy Z Flip 5G Android smartphone; Samsung Galaxy M01 Android smartphone; Samsung Galaxy A Quantum Android smartphone; Samsung Galaxy A21s Android smartphone; Samsung Galaxy S20 5G UW Android smartphone; Samsung Galaxy A21 Android smartphone; Samsung Galaxy A51 5G Android smartphone; Samsung Galaxy A71 5G Android smartphone; Samsung Galaxy A11 Android smartphone; Samsung Galaxy A31 Android smartphone; Samsung Galaxy A41 Android smartphone; Samsung Galaxy M11 Android smartphone; Samsung Galaxy M21 Android smartphone; Samsung Galaxy M31 Android smartphone; Samsung Galaxy S20 5G Android smartphone; Samsung Galaxy S20 Android smartphone; Samsung Galaxy S20 Ultra 5G Android smartphone; Samsung Galaxy S20 Ultra Android smartphone; Samsung Galaxy S20+ 5G Android smartphone; Samsung Galaxy S20+ Android smartphone; Samsung Galaxy Z Flip Android smartphone; Samsung Galaxy Note10 Lite Android smartphone; Samsung Galaxy S10 Lite Android smartphone; Samsung Galaxy Xcover Pro Android smartphone; Samsung

Patent	Infringing Instrumentalities
	Galaxy A01 Android smartphone; Samsung Galaxy A51 Android smartphone; Samsung Galaxy A71 Android smartphone; Samsung Galaxy A20s Android smartphone; Samsung Galaxy A70s Android smartphone; Samsung Galaxy A90 5G Android smartphone; Samsung Galaxy M10s Android smartphone; Samsung Galaxy M30s Android smartphone; Samsung Galaxy A10s Android smartphone; Samsung Galaxy A30s Android smartphone; Samsung Galaxy A50s Android smartphone; Samsung Galaxy Note10 5G Android smartphone; Samsung Galaxy Note10 Android smartphone; Samsung Galaxy Note10+ 5G Android smartphone; Samsung Galaxy Note10+ Android smartphone; Samsung Galaxy A10e Android smartphone; Samsung Galaxy M40 Android smartphone; Samsung Galaxy Xcover 4s Android smartphone; Samsung Galaxy A20e Android smartphone; Samsung Galaxy A60 Android smartphone; Samsung Galaxy A80 Android smartphone; Samsung Galaxy A20 Android smartphone; Samsung Galaxy A40 Android smartphone; Samsung Galaxy A70 Android smartphone; Samsung Galaxy A10 Android smartphone; Samsung Galaxy A30 Android smartphone; Samsung Galaxy A50 Android smartphone; Samsung Galaxy Fold 5G Android smartphone; Samsung Galaxy Fold Android smartphone; Samsung Galaxy M30 Android smartphone; Samsung Galaxy S10 5G Android smartphone; Samsung Galaxy S10 Android smartphone; Samsung Galaxy S10+ Android smartphone; Samsung Galaxy S10e Android smartphone; Samsung Galaxy M10 Android smartphone; Samsung Galaxy M20 Android smartphone; Samsung Galaxy A8s Android smartphone; Samsung Galaxy J4 Core Android smartphone; Samsung Galaxy A6s Android smartphone; Samsung Galaxy A9 (2018) Android smartphone; Samsung Galaxy A7 (2018) Android smartphone; Samsung Galaxy J4+ Android smartphone; Samsung Galaxy J6+ Android smartphone; Samsung Galaxy J2 Core Android smartphone; Samsung Galaxy Note9 Android smartphone; Samsung Galaxy On6 Android smartphone; Samsung Galaxy A8 Star (A9 Star) Android smartphone; Samsung Galaxy J3 (2018) Android smartphone; Samsung Galaxy J7 (2018) Android smartphone; Samsung Galaxy A6 (2018) Android smartphone; Samsung Galaxy A6+ (2018) Android smartphone; Samsung Galaxy J4 Android smartphone; Samsung Galaxy J6 Android smartphone; Samsung Galaxy J8 Android smartphone; Samsung Galaxy S Light Luxury Android smartphone; Samsung Galaxy J7 Duo Android smartphone; Samsung Galaxy J7 Prime 2 Android smartphone; Samsung Galaxy S9 Android smartphone; Samsung Galaxy S9+ Android smartphone; Samsung Galaxy J2 Pro (2018) Android smartphone; Samsung Galaxy A8 (2018) Android smartphone; Samsung Galaxy A8+ (2018) Android smartphone; Samsung Galaxy J2 (2017) Android smartphone; Samsung Galaxy C7 (2017) Android smartphone; Samsung Galaxy Note8 Android smartphone; Samsung Galaxy S8 Active Android smartphone; Samsung Galaxy Folder2 Android smartphone; Samsung Galaxy J7 Nxt Android smartphone; Samsung Galaxy Note FE Android smartphone; Samsung Galaxy J3 (2017) Android smartphone; Samsung Galaxy J5 (2017) Android smartphone; Samsung Galaxy J7 (2017) Android smartphone; Samsung Galaxy J7 Max Android smartphone; Samsung Galaxy J7 Pro Android

Patent	Infringing Instrumentalities
	smartphone; Samsung Galaxy C5 Pro Android smartphone; Samsung Galaxy J7 V Android smartphone; Samsung Galaxy S8 Android smartphone; Samsung Galaxy S8+ Android smartphone; Samsung Galaxy Xcover 4 Android smartphone; Samsung Galaxy A3 (2017) Android smartphone; Samsung Galaxy A5 (2017) Android smartphone; Samsung Galaxy A7 (2017) Android smartphone; Samsung Galaxy C7 Pro Android smartphone; Samsung Galaxy J3 Emerge Android smartphone; Samsung Galaxy Tab S6 Lite (2024) Android tablet; Samsung Galaxy Tab Active5 Android tablet; Samsung Galaxy Tab A9 Android tablet; Samsung Galaxy Tab A9+ Android tablet; Samsung Galaxy Tab S9 FE Android tablet; Samsung Galaxy Tab S9 FE+ Android tablet; Samsung Galaxy Tab S9 Android tablet; Samsung Galaxy Tab S9 Ultra Android tablet; Samsung Galaxy Tab S9+ Android tablet; Samsung Galaxy Tab A7 10.5; Samsung Galaxy Tab Active4 Pro Android tablet; Samsung Galaxy Tab S6 Lite (2022) Android tablet; Samsung Galaxy Tab S8 Android tablet; Samsung Galaxy Tab S8 Ultra Android tablet; Samsung Galaxy Tab S8+ Android tablet; Samsung Galaxy Tab A8 10.5; Samsung Galaxy Tab A7 Lite Android tablet; Samsung Galaxy Tab S7 FE Android tablet; Samsung Galaxy Tab A7 10.5; Samsung Galaxy Tab Active3 Android tablet; Samsung Galaxy Tab S7 Android tablet; Samsung Galaxy Tab S7+ Android tablet; Samsung Galaxy Tab S6 Lite (2020) Android tablet; Samsung Galaxy Tab S6 5G Android tablet; Samsung Galaxy Tab A 8.5; Samsung Galaxy Tab S6 Android tablet; Samsung Galaxy Tab S5e Android tablet; Samsung Galaxy Tab S4 10.5; Samsung Galaxy Tab A 10.5; Samsung Galaxy Tab Active 2 Android tablet; Samsung Galaxy Tab S3 9.7.

More complete information about the devices that Defendants have made, sold, offered for sale, imported into the United States, or used is in the possession of Defendants and is expected to be obtained through discovery. Four Batons reserves the right to augment and supplement its preliminary identification of infringing products based upon additional information obtained through discovery.

C. <u>Claim Charts for Literal Infringement</u>

Four Baton's preliminary infringement charts are provided as attached Exhibits 1–4, which map the asserted claims to a representative product. In each claim chart, the discussion for dependent claims should be read as incorporating by reference the discussion corresponding to the claims on which they depend. In addition, the discussion for each row in the chart should be read

within the context of the discussion for the entire claim to which that row pertains. Where the charts incorporate excerpts of particular versions of technical specification documents, the reference to those versions is exemplary and not to the exclusion of any prior or subsequent versions of the document or any versions of related documents.

Defendants directly infringe the asserted claims under 35 U.S.C. § 271(a) by making, using, selling, offering for sale, and/or importing into the United States the Infringing Instrumentalities. Furthermore, Defendants infringe the asserted claims under 35 U.S.C. § 271(b) by taking active steps to encourage and facilitate direct infringement by others, including customers and/or end users using the Infringing Instrumentalities, with knowledge and the specific intent that its efforts will result in the direct infringement of the asserted claims. In addition, Defendants infringe the asserted claims under 35 U.S.C. § 271(c) by selling or offering to sell the Infringing Instrumentalities with knowledge that they are especially designed or adapted to operate in a manner that infringes the asserted claims and despite the fact that the infringing technology or aspects of the Infringing Instrumentalities are not a staple article of commerce suitable for substantial non-infringing use. Four Batons reserves the right to augment and supplement its preliminary claim charts based upon additional information obtained through discovery.

D. Doctrine of Equivalents

Unless otherwise noted in the claim charts, Four Batons alleges that Defendants infringe literally all claims identified above. To the extent any differences are alleged to exist between the above-identified claims and Defendants' infringing conduct, such differences are insubstantial and Defendants' products and processes perform substantially the same function, in substantially the same way, to yield substantially the same result, and therefore defendants infringe under the doctrine of equivalents.

Four Batons reserves the right to augment and supplement its disclosure concerning the doctrine of equivalents based upon additional information obtained through discovery or based upon the Court's claim construction.

E. Priority Claim to an Earlier Application

The table below shows, for patents that claim priority to an earlier application, the priority date to which each asserted claim is entitled based on such earlier application.

Patent	Claims	Priority Date from Earlier Application
8,798,006	1–8, 16	March 17, 2005, as well as the dates of any subsequent applications
8,239,671	1–4, 6–8, 10–11, 18–19	April 20, 2006
7,502,348	1–6, 13–17	April 1, 2005
8,073,436	1–17, 19	January 31, 2006, as well as the dates of any subsequent applications

Four Batons reserves the right to augment and supplement its disclosure concerning the priority date based upon the Court's claim construction, additional information obtained through discovery, or other information.

F. Practice of the Claimed Invention

Four Batons is not relying on an assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the asserted claims of the patents-in-suit.

II. Document Production Accompanying Disclosure

A. Local Patent Rule 3-2(a)

Four Batons is not aware of any documents potentially responsive to P.R. 3-2(a) within its possession, custody, or control at this time. Four Batons reserves the right to augment and supplement its disclosure under P.R. 3-2(a) based upon additional information obtained through

discovery or other information.

B. Local Patent Rule 3-2(b)

Four Batons is not aware of any documents potentially responsive to P.R. 3-2(b) within its possession, custody, or control at this time. Four Batons reserves the right to augment and supplement its disclosure under P.R. 3-2(b) based upon additional information obtained through discovery or other information.

C. Local Patent Rule 3-2(c)

Four Batons identifies the following documents as potentially responsive to P.R. 3-2(c): 4B-SAM_00000001 – 4B-SAM_00001667. Four Batons reserves the right to augment and supplement its disclosure under P.R. 3-2(c) based upon additional information obtained through discovery or other information.

DATED: July 25, 2024

Respectfully submitted,

By: */s/ Meng Xi*

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CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2024, a true and correct copy of the foregoing was served upon all counsel of record by email.

/s/ Allen J. Hernandez
Allen J. Hernandez