

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

KEYLESS LICENSING LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD, and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:24-cv-00464-JRG

JURY TRIAL DEMANDED

**PLAINTIFF’S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT
CONTENTIONS PURSUANT TO PATENT LOCAL RULES 3-1 AND 3-2**

Plaintiff Keyless Licensing LLC (“Keyless” or “Plaintiff”) serves its Disclosure of Asserted Claims and Preliminary Infringement Contentions (“Disclosure”) regarding infringement of U.S. Patent Nos. 9,304,602 (“the ’602 Patent”), 10,976,922 (“the ’922 Patent”), and 11,503,144 (“the ’144 Patent”) (collectively, the “Patents-in-Suit” or the “Asserted Patents”) in accordance with Eastern District of Texas Patent Local Rules (“P.L.R.” or “Patent Local Rule(s)”) 3-1. A document production accompanies this disclosure in accordance with Patent Local Rule 3-2.

Plaintiff bases this Disclosure on its current knowledge, understanding, and belief as to the facts and information available as of the date of this Disclosure. Plaintiff has not yet completed its investigation, collection of information, discovery, or analysis relating to this action, and additional discovery, including discovery from Defendants Samsung Electronics America Inc., and Samsung Electronics Co. Ltd. (collectively, “Samsung” or “Defendants”) and third parties, may lead Plaintiff to amend, revise, and/or supplement this Disclosure. Plaintiff specifically

reserves the right to amend, revise, and/or supplement this Disclosure and/or accompanying exhibits in accordance with any Orders of record in this matter, Patent Local Rule 3-6, and Federal Rule of Civil Procedure 26(e), as additional documents, source code, and information become available and as discovery and investigation proceed. Plaintiff reserves the right to supplement, modify or amend the Disclosure to include additional products or services made, used, sold, or offered for sale in, or imported into, the United States by Samsung.

This Disclosure is made without prejudice to any position Keyless may take with respect to claim construction. Plaintiff reserves its right to supplement this Disclosure and exhibits based on the Court's claim construction. Plaintiff further reserves the right to introduce and use such supplemental materials at trial.

The information in this Disclosure is not an admission regarding the scope of any claims or the proper construction of those claims or any terms contained therein. The production of documents accompanying this Disclosure is not an admission that such documents are admissible, and Plaintiff does not waive any objections regarding admissibility. Plaintiff reserves the right to supplement its production of documents accompanying this disclosure upon identification or receipt of additional documents, including documents from third parties.

I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS (PATENT LOCAL RULE 3-1)

A. Asserted Claims (Patent Local Rule 3-1(a))

Patent	Asserted Claims
'602 Patent	1-13, 15-19, 21-36
'922 Patent	1-21
'144 Patent	1-5, 7-20

Plaintiff specifically reserves the right to amend, revise, and/or supplement its asserted claims and statutory bases as it acquires additional information about Samsung's activities, the

Accused Instrumentalities (referenced below), and any other additional Accused Instrumentalities that are identified.

B. Accused Instrumentalities (Patent Local Rule 3-1(b))

Plaintiff accuses Samsung smartphones and tablets of infringement of the Patents-in-Suit. Plaintiff identifies below Samsung smartphones and tablets of which it is presently aware. Plaintiff has identified Accused Instrumentalities by the name and model as described by Samsung on Samsung's publicly available website (e.g., <https://www.samsung.com/us/support/downloads/>). Plaintiff's list of model numbers is also based on its current investigation of publicly available model numbers listed on third-party websites. Plaintiff reserves the right to add additional products and model numbers as they are identified during discovery. To the extent that Samsung has renamed its products, the list of Accused Instrumentalities below should be read to include both prior naming and any renaming Samsung may adopt in the future.

"Accused Instrumentalities" with respect to the '602 Patent and '922 Patent means all Samsung Galaxy smartphones and tablets, including such products that implement OneUI, including without limitation:

- Galaxy S9, Galaxy S9+, Galaxy S10, Galaxy S10 Lite, Galaxy S10+, Galaxy S10e, Galaxy S20, Galaxy S20 FE, Galaxy S20 Ultra, Galaxy S20+, Galaxy S21, Galaxy S21 FE, Galaxy S21 Ultra, Galaxy S21+, Galaxy S22, Galaxy S22 FE, Galaxy S22 Ultra, Galaxy S22+, Galaxy S23, Galaxy S23 FE, Galaxy S23 Ultra, Galaxy S23+, Galaxy S24, Galaxy S24 FE, Galaxy S24 Ultra, Galaxy S24+;
- Galaxy Fold, Galaxy Z Fold2, Galaxy Z Fold3, Galaxy Z Fold4, Galaxy Z Fold5, Galaxy Z Fold6;
- Galaxy Z Flip, Galaxy Z Flip5G, Galaxy Z Flip3, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Flip6;
- Galaxy A01, Galaxy A02s, Galaxy A03s, Galaxy A6, Galaxy A10e, Galaxy A11, Galaxy A12, Galaxy A13, Galaxy A14, Galaxy A15, Galaxy A20, Galaxy A21, Galaxy

A23, Galaxy A25, Galaxy A32, Galaxy A35, Galaxy A42, Galaxy A50, Galaxy A51, Galaxy A52, Galaxy A53, Galaxy A54, Galaxy A71;

- Galaxy XCover Pro, Galaxy XCover6 Pro;
- Galaxy Note5, Galaxy Note8, Galaxy Note9, Galaxy Note10, Galaxy Note10+, Galaxy Note20, Galaxy Note20 FE, Galaxy Note20 Ultra;
- Galaxy Tab A, Galaxy Tab A7, Galaxy Tab A7 Lite, Galaxy Tab A8, Galaxy Tab A9+;
- Galaxy Tab S4, Galaxy Tab S5e, Galaxy Tab S6, Galaxy Tab S6 Lite, Galaxy Tab S7, Galaxy Tab S7 FE, Galaxy Tab S7+, Galaxy Tab S8, Galaxy Tab S8 Ultra, Galaxy Tab S8+, Galaxy Tab S9, Galaxy Tab S9 FE, Galaxy Tab S9 FE+, Galaxy Tab S9 Ultra, Galaxy Tab S9+;
- Galaxy View2;
- Galaxy J3, Galaxy J3 Achieve, Galaxy J3 Aura, Galaxy J3 Star, Galaxy J3 V;
- Galaxy J7, Galaxy J7 Prime, Galaxy J7 Refine, Galaxy J7 Star, Galaxy J7 V; and
- Galaxy Amp Prime 3, Galaxy Express Prime 3, Galaxy Sol 3;

including any editions, collaborations, model numbers, levels of connectivity (e.g., 4G, 5G, UW), and screen sizes for the identified models.

With respect to the '144 Patent, "Accused Instrumentalities" means all Samsung Galaxy smartphones, including without limitation:

- Galaxy S20, Galaxy S20 FE, Galaxy S20 Ultra, Galaxy S20+, Galaxy S21, Galaxy S21 Ultra, Galaxy S21+, Galaxy S22, Galaxy S22 Ultra, Galaxy S22+, Galaxy S23, Galaxy S23 FE, Galaxy S23 Ultra, Galaxy S23+, Galaxy S24, Galaxy S24 FE, Galaxy S24 Ultra, Galaxy S24+;
- Galaxy Z Fold3, Galaxy Z Fold4, Galaxy Z Fold5, Galaxy Z Fold6;
- Galaxy Z Flip3, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Flip6;
- Galaxy A03s, Galaxy A12, Galaxy A13, Galaxy A14, Galaxy A15, Galaxy A20, Galaxy A23, Galaxy A25, Galaxy A32, Galaxy A35, Galaxy A42, Galaxy A52, Galaxy A53, Galaxy A54;

- Galaxy XCover6 Pro;
- Galaxy Note10, Galaxy Note20, Galaxy Note20 Ultra;

including any editions, collaborations, model numbers, levels of connectivity (e.g., 4G, 5G, UW), and screen sizes for the identified models.

Patent	Asserted Claims	Accused Instrumentalities
'602 Patent	1-13, 15-19, 21-36	All Accused Instrumentalities (defined above) including all Samsung phones and tablets implementing OneUI, including without limitation Samsung's Galaxy S9, Galaxy S9+, Galaxy S10, Galaxy S10 Lite, Galaxy S10+, Galaxy S10e, Galaxy S20, Galaxy S20 FE, Galaxy S20 Ultra, Galaxy S20+, Galaxy S21, Galaxy S21 FE, Galaxy S21 Ultra, Galaxy S21+, Galaxy S22, Galaxy S22 FE, Galaxy S22 Ultra, Galaxy S22+, Galaxy S23, Galaxy S23 FE, Galaxy S23 Ultra, Galaxy S23+, Galaxy S24, Galaxy S24 FE, Galaxy S24 Ultra, Galaxy S24+; Galaxy Fold, Galaxy Z Fold2, Galaxy Z Fold3, Galaxy Z Fold4, Galaxy Z Fold5, Galaxy Z Fold6; Galaxy Z Flip, Galaxy Z Flip5G, Galaxy Z Flip3, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Flip6; Galaxy A01, Galaxy A02s, Galaxy A03s, Galaxy A6, Galaxy A10e, Galaxy A11, Galaxy A12, Galaxy A13, Galaxy A14, Galaxy A15, Galaxy A20, Galaxy A21, Galaxy A23, Galaxy A25, Galaxy A32, Galaxy A35, Galaxy A42, Galaxy A50, Galaxy A51, Galaxy A52, Galaxy A53, Galaxy A54, Galaxy A71; Galaxy XCover Pro, Galaxy XCover6 Pro; Galaxy Note5, Galaxy Note8, Galaxy Note9, Galaxy Note10, Galaxy Note10+, Galaxy Note20, Galaxy Note20 FE, Galaxy Note20 Ultra; Galaxy Tab A, Galaxy Tab A7, Galaxy Tab A7 Lite, Galaxy Tab A8, Galaxy Tab A9+; Galaxy Tab S4, Galaxy Tab S5e, Galaxy Tab S6, Galaxy Tab S6 Lite, Galaxy Tab S7, Galaxy Tab S7 FE, Galaxy Tab S7+, Galaxy Tab S8, Galaxy Tab S8 Ultra, Galaxy Tab S8+, Galaxy Tab S9, Galaxy Tab S9 FE, Galaxy Tab S9 FE+, Galaxy Tab S9 Ultra, Galaxy Tab S9+; Galaxy View2; Galaxy J3, Galaxy J3 Achieve, Galaxy J3 Aura, Galaxy J3 Star, Galaxy J3 V; Galaxy J7, Galaxy J7 Prime, Galaxy J7 Refine, Galaxy J7 Star, Galaxy J7 V; Galaxy Amp Prime 3, Galaxy Express Prime 3, Galaxy Sol 3, including any editions, collaborations, model numbers, levels of connectivity (e.g., 4G, 5G, UW), and screen sizes for the identified models.
'922 Patent	1-21	All Accused Instrumentalities (defined above) including all Samsung phones and tablets implementing OneUI, including without limitation Samsung's Galaxy S9, Galaxy S9+, Galaxy S10, Galaxy S10 Lite, Galaxy S10+, Galaxy S10e, Galaxy S20, Galaxy S20 FE, Galaxy S20 Ultra, Galaxy S20+, Galaxy S21, Galaxy S21 FE, Galaxy S21 Ultra, Galaxy S21+, Galaxy S22, Galaxy S22 FE, Galaxy S22 Ultra, Galaxy S22+, Galaxy S23, Galaxy S23 FE, Galaxy S23 Ultra, Galaxy S23+, Galaxy S24, Galaxy S24 FE, Galaxy S24 Ultra, Galaxy S24+; Galaxy

Patent	Asserted Claims	Accused Instrumentalities
		Fold, Galaxy Z Fold2, Galaxy Z Fold3, Galaxy Z Fold4, Galaxy Z Fold5, Galaxy Z Fold6; Galaxy Z Flip, Galaxy Z Flip5G, Galaxy Z Flip3, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Flip6; Galaxy A01, Galaxy A02s, Galaxy A03s, Galaxy A10e, Galaxy A11, Galaxy A12, Galaxy A13, Galaxy A14, Galaxy A15, Galaxy A20, Galaxy A21, Galaxy A23, Galaxy A25, Galaxy A32, Galaxy A35, Galaxy A42, Galaxy A50, Galaxy A51, Galaxy A52, Galaxy A53, Galaxy A54, Galaxy A71; Galaxy XCover Pro, Galaxy XCover6 Pro; Galaxy Note9, Galaxy Note10, Galaxy Note10+, Galaxy Note20, Galaxy Note20 FE, Galaxy Note20 Ultra; Galaxy Tab A, Galaxy Tab A7, Galaxy Tab A7 Lite, Galaxy Tab A8, Galaxy Tab A9+; Galaxy Tab S4, Galaxy Tab S5e, Galaxy Tab S6, Galaxy Tab S6 Lite, Galaxy Tab S7, Galaxy Tab S7 FE, Galaxy Tab S7+, Galaxy Tab S8, Galaxy Tab S8 Ultra, Galaxy Tab S8+, Galaxy Tab S9, Galaxy Tab S9 FE, Galaxy Tab S9 FE+, Galaxy Tab S9 Ultra, Galaxy Tab S9+; Galaxy View2, including any editions, collaborations, model numbers, levels of connectivity (e.g., 4G, 5G, UW), and screen sizes for the identified models.
'144 Patent	1-5, 7-20	All Accused Instrumentalities (defined above) including all Samsung Galaxy phones, including without limitation Samsung's Galaxy S20, Galaxy S20 FE, Galaxy S20 Ultra, Galaxy S20+, Galaxy S21, Galaxy S21 Ultra, Galaxy S21+, Galaxy S22, Galaxy S22 Ultra, Galaxy S22+, Galaxy S23, Galaxy S23 FE, Galaxy S23 Ultra, Galaxy S23+, Galaxy S24, Galaxy S24 FE, Galaxy S24 Ultra, Galaxy S24+; Galaxy Z Fold3, Galaxy Z Fold4, Galaxy Z Fold5, Galaxy Z Fold6; Galaxy Z Flip3, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Flip6; Galaxy A03s, Galaxy A12, Galaxy A13, Galaxy A14, Galaxy A15, Galaxy A20, Galaxy A23, Galaxy A25, Galaxy A32, Galaxy A35, Galaxy A42, Galaxy A52, Galaxy A53, Galaxy A54; Galaxy XCover6 Pro; Galaxy Note10, Galaxy Note20, Galaxy Note20 Ultra, including any editions, collaborations, model numbers, levels of connectivity (e.g., 4G, 5G, UW), and screen sizes for any identified model.

Plaintiff's identification of Accused Instrumentalities is based on its current knowledge, understanding, and belief as to the facts and information available as of the date of this Disclosure. Plaintiff specifically reserves the right to amend, revise, or supplement its identification of Accused Instrumentalities as it acquires additional information about the Accused Instrumentalities, including, but not limited to, discovery received from Samsung.

C. Claim Charts (Patent Local Rule 3-1(c))

Patent	Claim Chart
'602 Patent	Exhibit A [Samsung Smartphones and Tablets]
'922 Patent	Exhibit B [Samsung Smartphones and Tablets]
'144 Patent	Exhibit C [Samsung Smartphones]

The claim charts in Exhibit A are representative of all the Accused Instrumentalities listed under the category “The ’602 Patent Accused Instrumentalities (Samsung Smartphones and Tablets).”

The claim charts in Exhibit B are representative of all the Accused Instrumentalities listed under the category “The ’922 Patent Accused Instrumentalities (Samsung Smartphones and Tablets).”

The claim charts in Exhibit C are representative of all the Accused Instrumentalities listed under the category “The ’144 Patent Accused Instrumentalities (Samsung Smartphones).”

D. Literal Infringement or Infringement Under the Doctrine of Equivalents (Patent Local Rule 3-1(d))

Each limitation of the asserted claims is literally present in all the Accused Instrumentalities, as detailed in the attached claim charts. The claim charts include, on an element-by-element basis, a statement explaining how each claim element is literally present in the Accused Instrumentalities, which include Samsung smartphones and tablets.

Samsung directly or indirectly provides the Accused Instrumentalities to wholesalers, retailers, and end users of Samsung’s products in the United States. The wholesalers, retailers, and end users directly infringe the Patents-in-Suit by making, using, selling, offering for sale, and/or importing the Accused Instrumentalities in the United States. Samsung actively induces these acts of direct infringement by the wholesalers, retailers, and end users as demonstrated by the following facts: (A) Samsung aids, instructs, or otherwise acts with the intent to cause the wholesalers, retailers, and end users to perform acts of direct infringement. See, e.g., <https://www.samsung.com/us/support/answer/ANS10001611/> (providing user manuals for the Accused Instrumentalities); <https://www.youtube.com/@Samsung> (demonstrating use of the

Accused Instrumentalities); <https://www.youtube.com/watch?v=ulRYkjIpDOc> (introducing OneUI); <https://www.youtube.com/watch?v=wxwycoG41fc> (demonstrating OneUI 2); <https://www.youtube.com/watch?v=D0hF9Ys4PWA> (demonstrating OneUI 3); https://www.youtube.com/watch?v=_yiPlFGY4B0 (demonstrating OneUI 4); <https://www.youtube.com/watch?v=vruCVhuOGdU> (demonstrating OneUI 6). For example, Samsung's purpose and intent for providing the Accused Instrumentalities to wholesalers and retailers is for the wholesalers and retailers to offer, resell, and distribute the Accused Instrumentalities throughout the United States so that they can be purchased and used by end users. Such offers for sale, sales, and use of the Accused Instrumentalities constitute acts of direct infringement. (B) At least since the filing of the complaint in this action, Samsung has known of the Asserted Patents. (C) Samsung knew that the actions of wholesalers, retailers, and end users would infringe the Asserted Patents because their downstream offers for sale, sales, and use of the Accused Instrumentalities constitute acts of infringement. (D) Because the claims of the Asserted Patents read on the Accused Instrumentalities, every offer for sale, sale, or use of the Accused Instrumentalities in the United States constitutes an act of direct infringement.

Samsung also contributes to infringement of the Asserted Patents by offering to sell, selling (including licensing) and importing into the United States the Accused Instrumentality, which is especially made or adapted for use in an infringement of the Asserted Patents. The Accused Instrumentalities are a material component for use in practicing the Asserted Patents and are not a staple article of commerce suitable for substantial non-infringing use. For example, Samsung's Accused Instrumentalities constitute a material portion of the inventions of the Asserted Patents and have no substantial non-infringing uses. Samsung's clients, customers, and end users, direct or otherwise, cause the performance of each and every limitation of the asserted claims, as shown in the accompanying charts. Samsung is thereby liable for contributory infringement of the asserted claims of the patent under 35 U.S.C. § 271(c).

While Plaintiff contends that each claim element is literally present and present under the doctrine of equivalents, Plaintiff expressly reserves the right to amend its contentions to further

assert infringement under the doctrine of equivalents, as it obtains and analyzes the necessary discovery from Samsung, as well as any relevant third parties. Plaintiff also reserves the right to amend its infringement contentions after receiving the Court's claim construction order.

This disclosure is based upon information that Plaintiff has been able to obtain publicly, as Samsung has not yet made any production of documents relating to the Accused Instrumentalities in this matter. Plaintiff reserves the right to supplement or amend these contentions as additional facts are ascertained during discovery.

Patent	Claim Chart
'602 Patent	Exhibit A [Samsung Smartphones and Tablets]
'922 Patent	Exhibit B [Samsung Smartphones and Tablets]
'144 Patent	Exhibit C [Samsung Smartphones]

E. Priority Dates (Patent Local Rule 3-1(e))

The asserted claims are entitled to the priority dates identified below.

Patent	Asserted Claims	Priority Date
'602 Patent	1-13, 15-19, 21-36	The asserted claims are entitled to a priority date at least as early as December 20, 2009, and possibly earlier than this date.
'922 Patent	1-21	The asserted claims are entitled to a priority date at least as early as February 17, 2013, and possibly earlier than this date.
'144 Patent	1-5, 7-20	The asserted claims are entitled to a priority date at least as early as April 18, 2003, and possibly earlier than this date.

F. Plaintiff's Products (Patent Local Rule 3-1(f))

Keyless is not currently relying on its own products or methods as practicing the asserted claims of the Patents-in-Suit.

II. DOCUMENT PRODUCTION ACCOMPANYING DISCLOSURE (PATENT LOCAL RULE 3-2)

Pursuant to Patent Local Rule 3-2, Plaintiff identifies documents corresponding to the following categories by production number below:

Category	Production Bates Numbers
Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party of joint development agreements) sufficient to evidence each discussion with, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, the claimed invention prior to the date of application for the patent in suit. Plaintiff's production of any documents as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. § 102. Patent R. 3-2(a).	Documents of this type will be produced insofar as Plaintiff has them. Plaintiff's investigation is ongoing, and it reserves the right to produce documents as discovery in this case continues.
All documents evidencing the conception, reduction to practice, design, and development of each claimed invention, which were created on or before the date of application for the patent in suit or the priority date identified pursuant to P.R. 3-1(e), whichever is earlier.	Documents of this type will be produced insofar as Plaintiff has them. Plaintiff's investigation is ongoing, and it reserves the right to produce documents as discovery in this case continues.
A copy of the file history for each patent in suit.	KL0000001-KL0001989

October 9, 2024

/s/ Robert F. Kramer

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Keyless Licensing LLC

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served on counsel of record for Defendants via electronic mail on October 9, 2024.

/s/ Robert F. Kramer
Robert F. Kramer

Exhibit A: Infringement Contentions for U.S. Patent No. 9,304,602 v. Samsung

Plaintiff Keyless Licensing LLC (“Keyless”) accuses Defendants Samsung Electronics America, Inc., and Samsung Electronics Co., Ltd. (collectively, “Samsung”) of making, using, offering for sale, selling in and/or importing into the United States the Accused Instrumentalities in violation of 35 U.S.C. § 271. “Accused Instrumentalities” means all Samsung Galaxy smartphones and tablets, including such products that implement OneUI, including without limitation:

- Galaxy S9, Galaxy S9+, Galaxy S10, Galaxy S10 Lite, Galaxy S10+, Galaxy S10e, Galaxy S20, Galaxy S20 FE, Galaxy S20 Ultra, Galaxy S20+, Galaxy S21, Galaxy S21 FE, Galaxy S21 Ultra, Galaxy S21+, Galaxy S22, Galaxy S22 FE, Galaxy S22 Ultra, Galaxy S22+, Galaxy S23, Galaxy S23 FE, Galaxy S23 Ultra, Galaxy S23+, Galaxy S24, Galaxy S24 FE, Galaxy S24 Ultra, Galaxy S24+;
- Galaxy Fold, Galaxy Z Fold2, Galaxy Z Fold3, Galaxy Z Fold4, Galaxy Z Fold5, Galaxy Z Fold6;
- Galaxy Z Flip, Galaxy Z Flip5G, Galaxy Z Flip3, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Flip6;
- Galaxy A01, Galaxy A02s, Galaxy A03s, Galaxy A6, Galaxy A10e, Galaxy A11, Galaxy A12, Galaxy A13, Galaxy A14, Galaxy A15, Galaxy A20, Galaxy A21, Galaxy A23, Galaxy A25, Galaxy A32, Galaxy A35, Galaxy A42, Galaxy A50, Galaxy A51, Galaxy A52, Galaxy A53, Galaxy A54, Galaxy A71;
- Galaxy XCover Pro, Galaxy XCover6 Pro;
- Galaxy Note5, Galaxy Note8, Galaxy Note9, Galaxy Note10, Galaxy Note10+, Galaxy Note20, Galaxy Note20 FE, Galaxy Note20 Ultra;
- Galaxy Tab A, Galaxy Tab A7, Galaxy Tab A7 Lite, Galaxy Tab A8, Galaxy Tab A9+;
- Galaxy Tab S4, Galaxy Tab S5e, Galaxy Tab S6, Galaxy Tab S6 Lite, Galaxy Tab S7, Galaxy Tab S7 FE, Galaxy Tab S7+, Galaxy Tab S8, Galaxy Tab S8 Ultra, Galaxy Tab S8+, Galaxy Tab S9, Galaxy Tab S9 FE, Galaxy Tab S9 FE+, Galaxy Tab S9 Ultra, Galaxy Tab S9+;
- Galaxy View2;
- Galaxy J3, Galaxy J3 Achieve, Galaxy J3 Aura, Galaxy J3 Star, Galaxy J3 V;
- Galaxy J7, Galaxy J7 Prime, Galaxy J7 Refine, Galaxy J7 Star, Galaxy J7 V; and
- Galaxy Amp Prime 3, Galaxy Express Prime 3, Galaxy Sol 3;

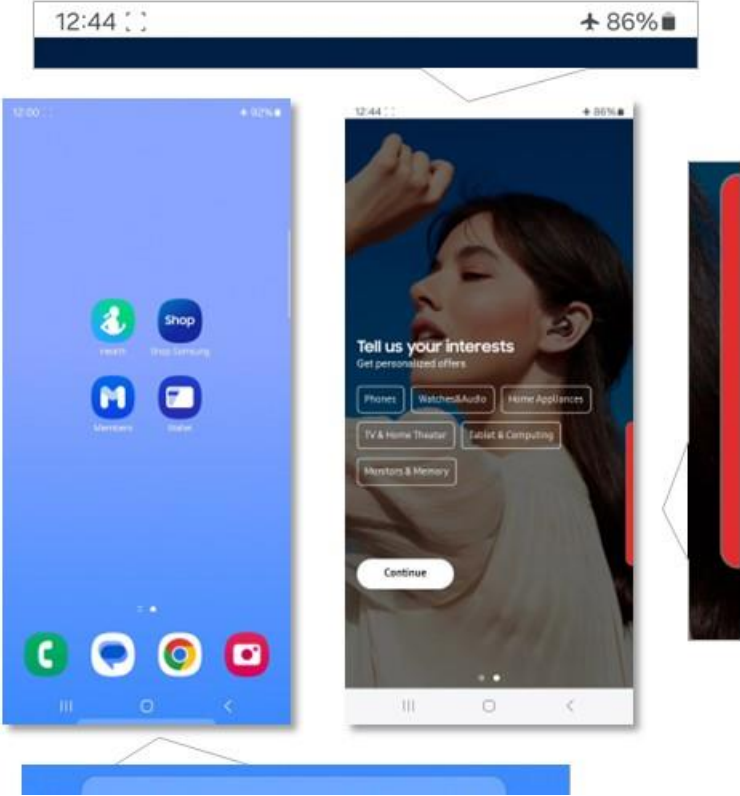
including any editions, collaborations, model numbers, levels of connectivity (e.g., 4G, 5G, UW), and screen sizes for the identified models.

Samsung directly infringes U.S. Patent No. 9,304,602 (“the ’602 patent”) by making, using, offering for sale, selling in and/or importing into the United States the Accused Instrumentalities, which meet each and every limitation of the claims as shown in the charts below. Samsung also directly infringes the asserted claims of the ’602 patent to the extent Samsung contracted with, or directed, a third party to perform any of the steps of the asserted claims. Samsung also directly infringes the asserted claims of the ’602 patent to the extent it conditions participation in an activity or receipt of a benefit upon performance of a step or steps of a patented method and establishes the manner or timing of that performance. Samsung may have infringed and continues to infringe the ’602 patent through other devices utilizing the same or reasonably similar functionality, including other versions of the Accused Instrumentalities. Samsung is therefore liable for infringement of the ’602 patent under 35 U.S.C. § 271(a).

Samsung directly or indirectly provides the Accused Instrumentalities to wholesalers, retailers, and end users of Samsung’s products in the United States. The wholesalers, retailers, and end users directly infringe claims 1-13, 15-19, and 21-36 of the ’602 patent by making, using, selling, offering for sale, and/or importing the Accused Instrumentalities in the United States. Samsung actively induces these acts of direct infringement by the wholesalers, retailers, and end users as demonstrated by the following facts: (A) Samsung aids, instructs, or otherwise acts with the intent to cause the wholesalers, retailers, and end users to perform acts of direct infringement. See, e.g., <https://www.samsung.com/us/support/answer/ANS10001611/> (providing user manuals for the Accused Instrumentalities); <https://www.youtube.com/@Samsung> (demonstrating the Accused Instrumentalities); <https://www.youtube.com/watch?v=ulRYkjIpDOc> (introducing OneUI); <https://www.youtube.com/watch?v=wxwycoG41fc> (demonstrating OneUI 2); <https://www.youtube.com/watch?v=D0hF9Ys4PWA> (demonstrating OneUI 3); <https://www.youtube.com/watch?v=yiPIFGY4B0> (demonstrating OneUI 4); <https://www.youtube.com/watch?v=vruCVhuOGdU> (demonstrating OneUI 6); <https://www.youtube.com/watch?v=q-1dNsPJlnw> (demonstrating Samsung Wallet). For example, Samsung’s purpose and intent for providing the Accused Instrumentalities to wholesalers and retailers is for the wholesalers and retailers to offer, resell, and distribute the Accused Instrumentalities throughout the United States so that they can be purchased and used by end users. Such offers for sale, sales, and use of the Accused Instrumentalities constitute acts of direct infringement. (B) At least since the filing of the complaint in this action, Samsung has known of the ’602 patent. (C) Samsung knew that the actions of wholesalers, retailers, and end users would infringe claims 1-13, 15-19, and 21-36 of the ’602 patent because their downstream offers for sale, sales, and use of the Accused Instrumentalities constitute acts of infringement. (D) Because claims 1-13, 15-19, and 21-36 of the ’602 patent read on the Accused Instrumentalities, every offer for sale, sale, or use of the Accused Instrumentalities in the United States constitutes an act of direct infringement.

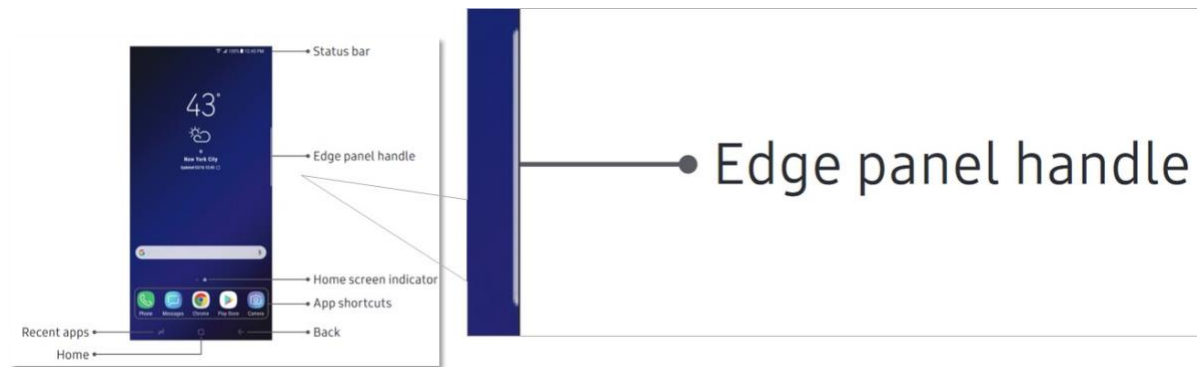
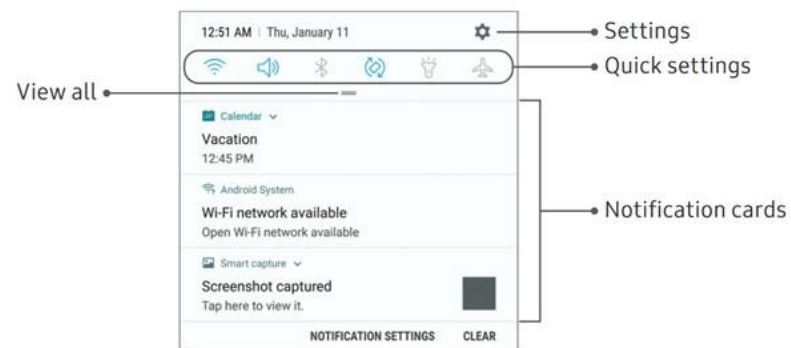
Samsung also contributes to infringement of the ’602 patent by offering to sell, selling (including licensing) and importing into the United States the Accused Instrumentality, which is specially made or adapted for use in an infringement of the ’602 patent. The Accused Instrumentalities are a material component for use in practicing the ’602 patent and are not a staple article of commerce suitable for substantial non-infringing use. For example, Samsung’s Accused Instrumentalities constitute a material portion of the invention and have no substantial non-infringing uses. Samsung’s clients, customers, and end users, direct or otherwise, cause the performance of each and every limitation of the claims, as shown below. Samsung is thereby liable for contributory infringement of the asserted claims of the ’602 patent under 35 U.S.C. § 271(c).

The asserted claims include elements that are implemented, at least in part, by proprietary and specialized electronics in the Accused Instrumentalities. The precise designs used in them are held secret, at least in part, and are not publicly available in their entirety. An analysis of Samsung’s documentation and/or source code may be necessary to fully and accurately describe all infringing features and functionality of the Accused Instrumentalities, and accordingly, Plaintiff reserves the right to supplement these contentions once such information is made available to Plaintiff. Furthermore, Plaintiff reserves the right to revise these contentions, including as discovery in the case progresses, in view of any non-infringement arguments Samsung may make (e.g., to allege infringement under the doctrine of equivalents), in view of the Court’s final claim construction in this action, and in connection with the provision of expert reports.

U.S. Patent No. 9,304,602	Samsung
[1a] A system for capturing an event provided from an edge of a touch screen comprising:	To the extent the preamble is determined to be a limitation, the Accused Instrumentalities implement a system for capturing an event provided from an edge of a touch screen. For example, phones and tablets running Samsung's OneUI 6.1 capture events provided from an edge of a touch screen that relates to the notification panel (from the top of the screen), the Edge panel (from the left or right side of the screen), and the Wallet app (from the bottom of the screen).  Screen recording of Galaxy S24 Ultra running OneUI 6.1. The Accused Instrumentalities run Samsung's OneUI software. The notification panel and Edge panel have been features of OneUI since the first version of OneUI (version 1.0), as shown in the following user manual dated 2018 for the Galaxy S9:

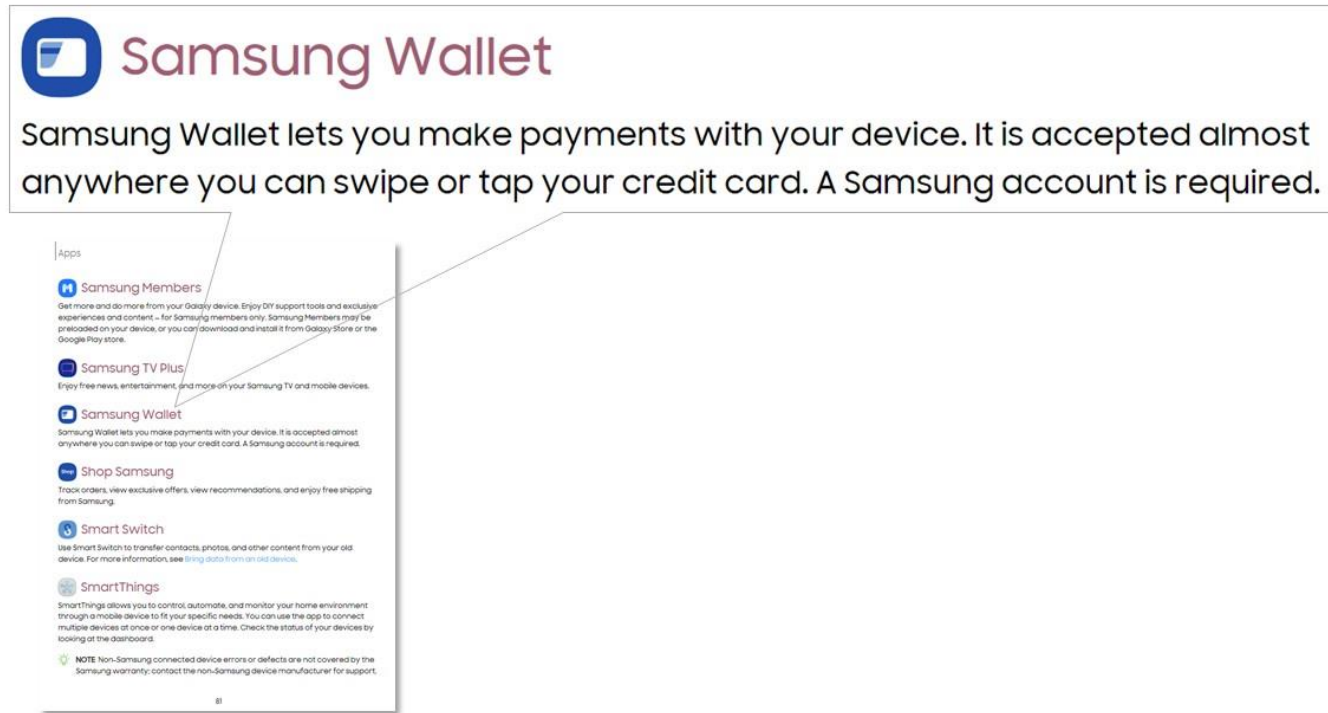
Notification Panel

Notification Panel



Available at: KL0016980-KL0017219 (<https://www.att.com/ecms/dam/att/devicesupport/5000-5499/5206/Samsung-Galaxy-S9-G960U-S9plus-G965U.pdf/jcr:content/renditions/original.pdf>) (Galaxy S9 user manual at pp. 22, 31).

The Samsung Wallet app has been a feature of OneUI since at least version 4.1, as shown in the 2022 user manual for the Galaxy Z Fold4 / Z Flip4:



Available at: <https://www.att.com/idpassets/images/support/device-support/SAM-F936-F721-EN-UM-OS12-081122-FINAL.pdf> (Galaxy Z Fold4/Z Flip4 user manual at p. 81).

An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to the preamble and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for the preamble have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.

[1b] a device having a touch screen;

The Accused Instrumentalities are devices having a touch screen. For example, Samsung Galaxy phones and tablets feature a touchscreen display.

Touchscreen issues on a Galaxy

SAMSUNG



Touchscreen issues on a Galaxy phone or tablet

Your Galaxy device's touchscreen is its center of navigation, so we understand how worrisome it can be when the touch function isn't working properly. However, there are some simple ways to get the touchscreen working again when it's frozen or unresponsive.



Your Galaxy device's touchscreen is its center of navigation

Available at: <https://www.samsung.com/us/support/troubleshoot/TSG10001974/> (Samsung support page on touchscreen issues).

Exemplary touch screens of the Accused Instrumentalities are shown below:

Galaxy S24 series.



S24

S24+

S24 Ultra

S24 FE

Galaxy S23 series.



S23

S23+

S23 Ultra

S23 FE

Galaxy S22 series.



S22

S22+

S22 Ultra

Galaxy S21 series.



S21

S21+

S21 Ultra

S21 FE

Galaxy S20 series.



Galaxy A series.



Galaxy Z Flip series.



Z Flip

Z Flip 5G

Z Flip3

Z Flip4

Z Flip5

Galaxy Z Fold series.



Z Fold2

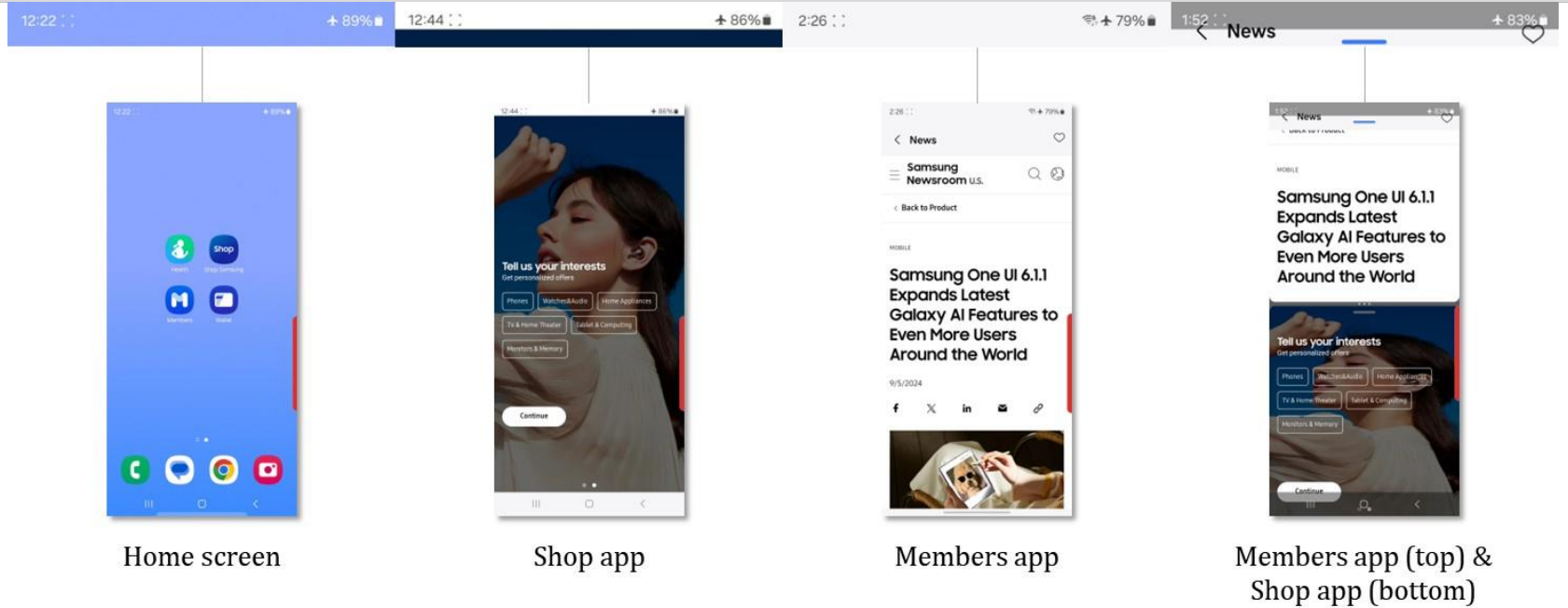
Z Fold3

Z Fold4

Z Fold5

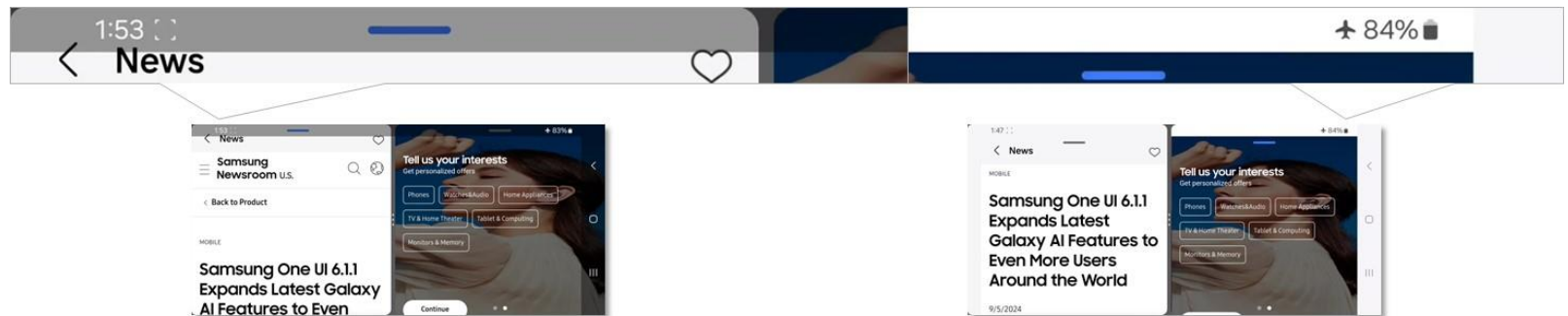
Galaxy Note series.

U.S. Patent No. 9,304,602	Samsung
	 Photos of phones available at https://www.samsung.com/us/smartphones/galaxy-s24-ultra/compare The arguments, evidence, and functionality cited for this limitation have been demonstrated by exemplary models of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.
[1c] at least one window located in the touch screen on an edge of the touch screen, wherein said at least one window functions independently of an interface of an application in use on the touch screen; and	The Accused Instrumentalities include at least one window located in the touch screen on an edge of the touch screen, wherein said at least one window functions independently of an interface of an application in use on the touch screen. For example, as shown below, OneUI includes a notification bar located in the touch screen on the top edge of the display that functions independently of an application in use on the touch screen. The notification bar may be displayed with a fully transparent background, solid white background, or translucent background, for example. For example, the notification bar is displayed at the top edge when the device is showing the Home screen, an application, or multiple applications.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

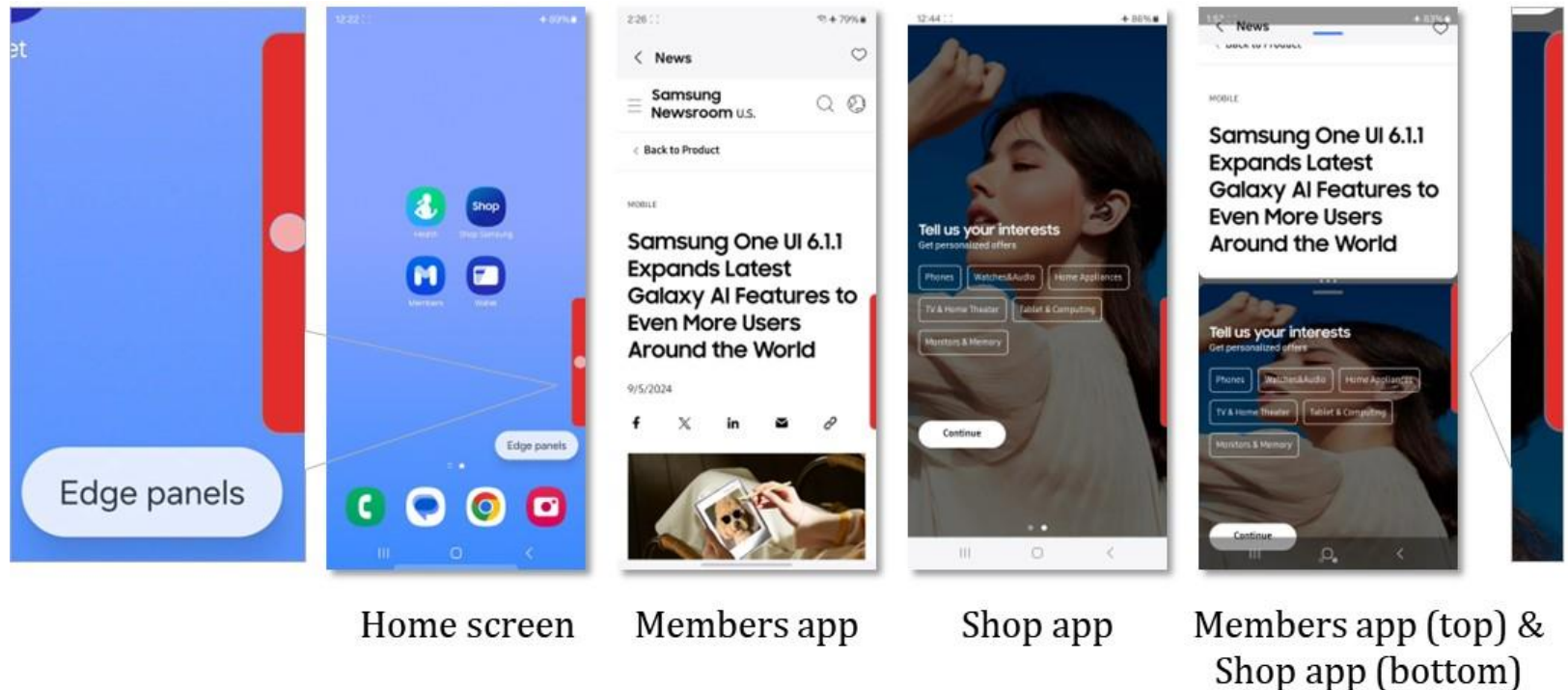
As another example, the notification bar is displayed at the top edge when the device is in landscape mode, including when the device is showing two applications.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

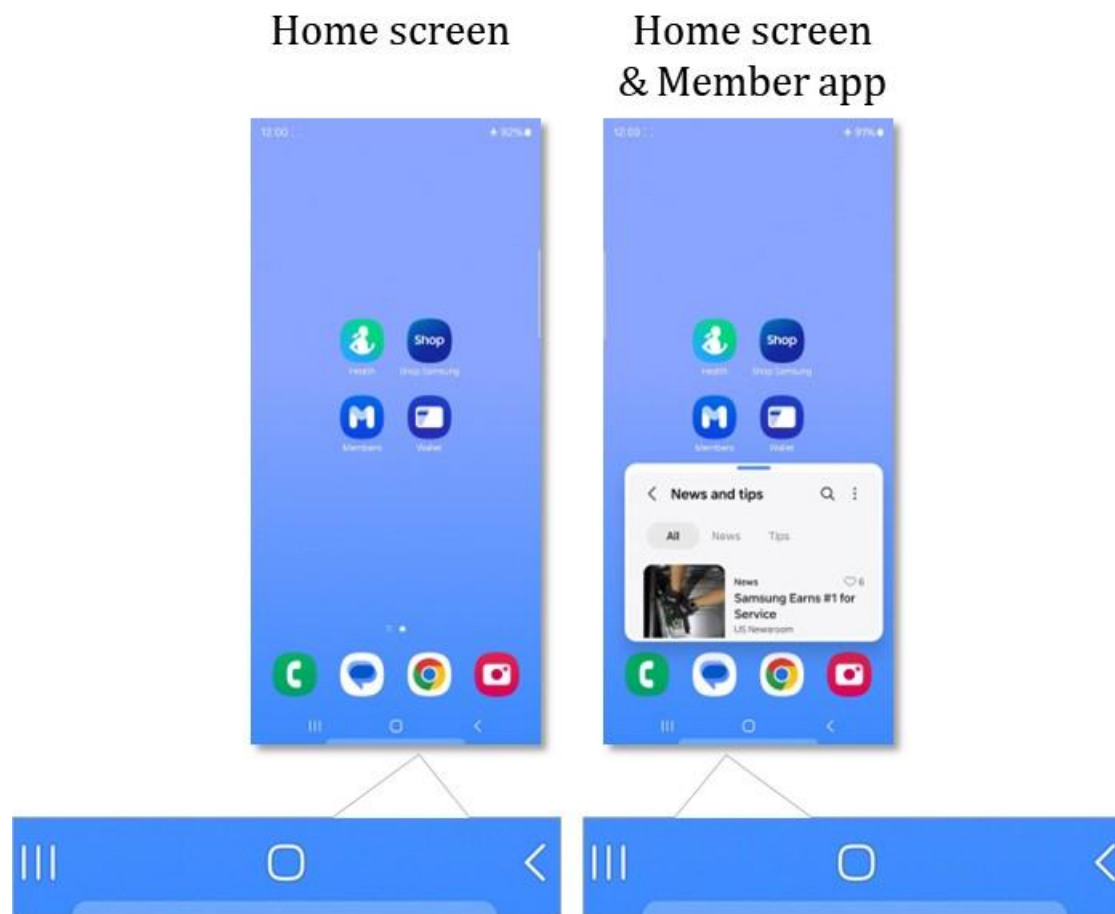
As another example, OneUI includes “Edge panels.” By default, the Edge panel “handle” is displayed on the right side of the screen. The handle may be moved to other locations on the edge. The handle’s size and color can be adjusted. In the examples

below, the handle is red and is on the right edge of the display. For example, the Edge panel is displayed on a side edge when the device is showing the Home screen, an application, or multiple applications.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, OneUI includes a window for the Wallet app that allows the Wallet app to be launched by swiping up from the bottom of the OneUI Home screen. The window for the wallet application is shown on the bottom of the screen as a translucent bar. The wallet app window on the edge functions the same way when another application is also visible on the display



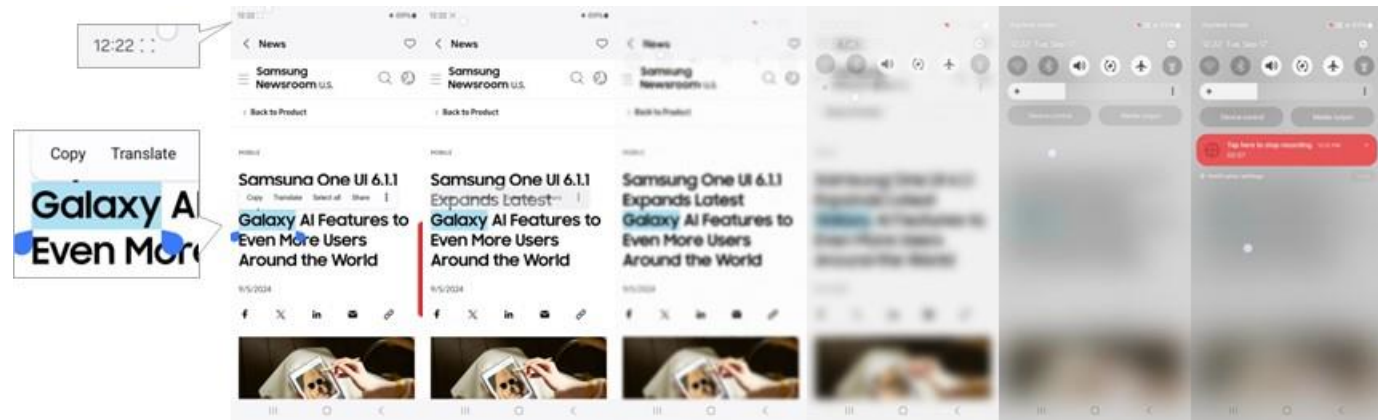
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

Each window on the edge of the screen shown above functions independently of an interface of an application in use on the touch screen. The notification bar and Edge panels windows on the edges function the same way regardless of what applications are active. The wallet window on the bottom edge of the Home screen functions the same way regardless of whether another application is also in use. Similarly, the applications shown on the screen function independently of the windows shown on the edge.

In the examples shown below, the windows on the edge of the screen function without affecting the text that is highlighted in the Members app. The Members app allows highlighting text or scrolling through content in the app, for example, independently of

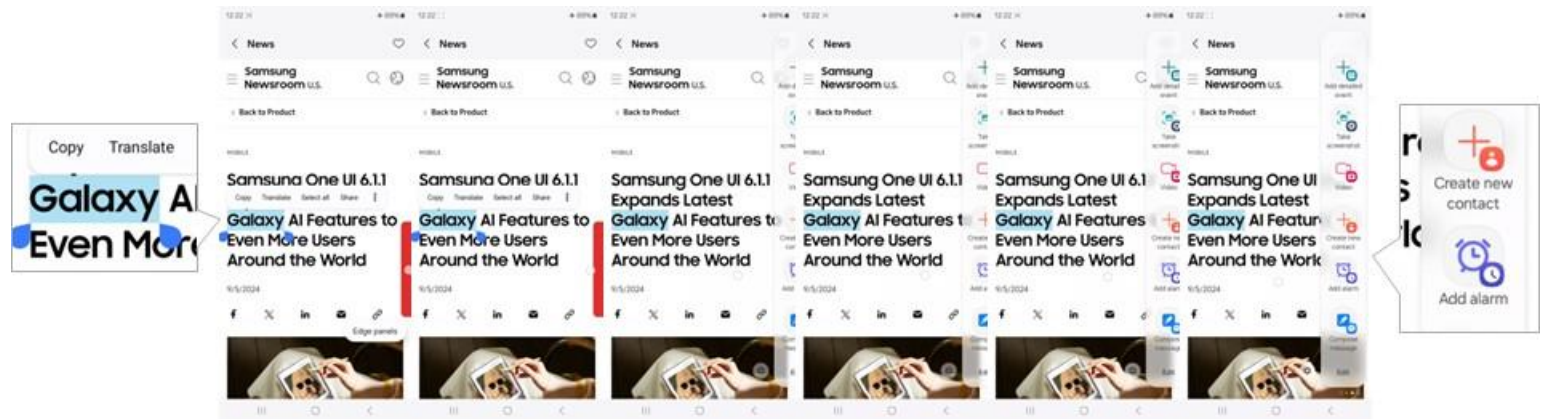
the windows shown at the edge of the screen.

In the example shown below, the Member app continues to highlight the word “Galaxy” that the user previously selected, while a gliding action independently interacts with the notification bar on top to display a full-screen interface.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

In the example shown below, the Member app continues to highlight the word “Galaxy” that the user previously selected, while a gliding action independently interacts with the red handle for the Edge panels and opens the Edge panels user interface.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

U.S. Patent No. 9,304,602	Samsung
	In the example shown below, the Member app continues to highlight the word “Galaxy” that the user previously selected, while a gliding action independently interacts with the Wallet app window at the bottom edge of the screen.  Screen recording of Galaxy S24 Ultra running OneUI 6.1. An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.
[1d] a processor;	The Accused Instrumentalities include a processor. For example, the Galaxy S24 series has a Snapdragon 8 Gen 3 processor.

Samsung
Galaxy S24 Ultra

Samsung
Galaxy S24+

Samsung
Galaxy S24

Processor



**Snapdragon 8 Gen 3
Mobile Platform for
Galaxy**



**Snapdragon 8 Gen 3
Mobile Platform for
Galaxy**



**Snapdragon 8 Gen 3
Mobile Platform for
Galaxy**

Available at: <https://www.samsung.com/us/smartphones/galaxy-s24-ultra/compare>.

As additional examples, Samsung at <https://www.samsung.com/us/smartphones/galaxy-s24-ultra/compare> shows the different processors for a large number of models, including the S21 Ultra, Note20 5G, and Z Fold3 5G shown below.

Samsung
Galaxy S21 Ultra 5G

Samsung
Galaxy Note20 5G

Samsung
Galaxy Z Fold3 5G



**Octa-Core (2.8GHz,
2.4GHz, 1.8GHz)**



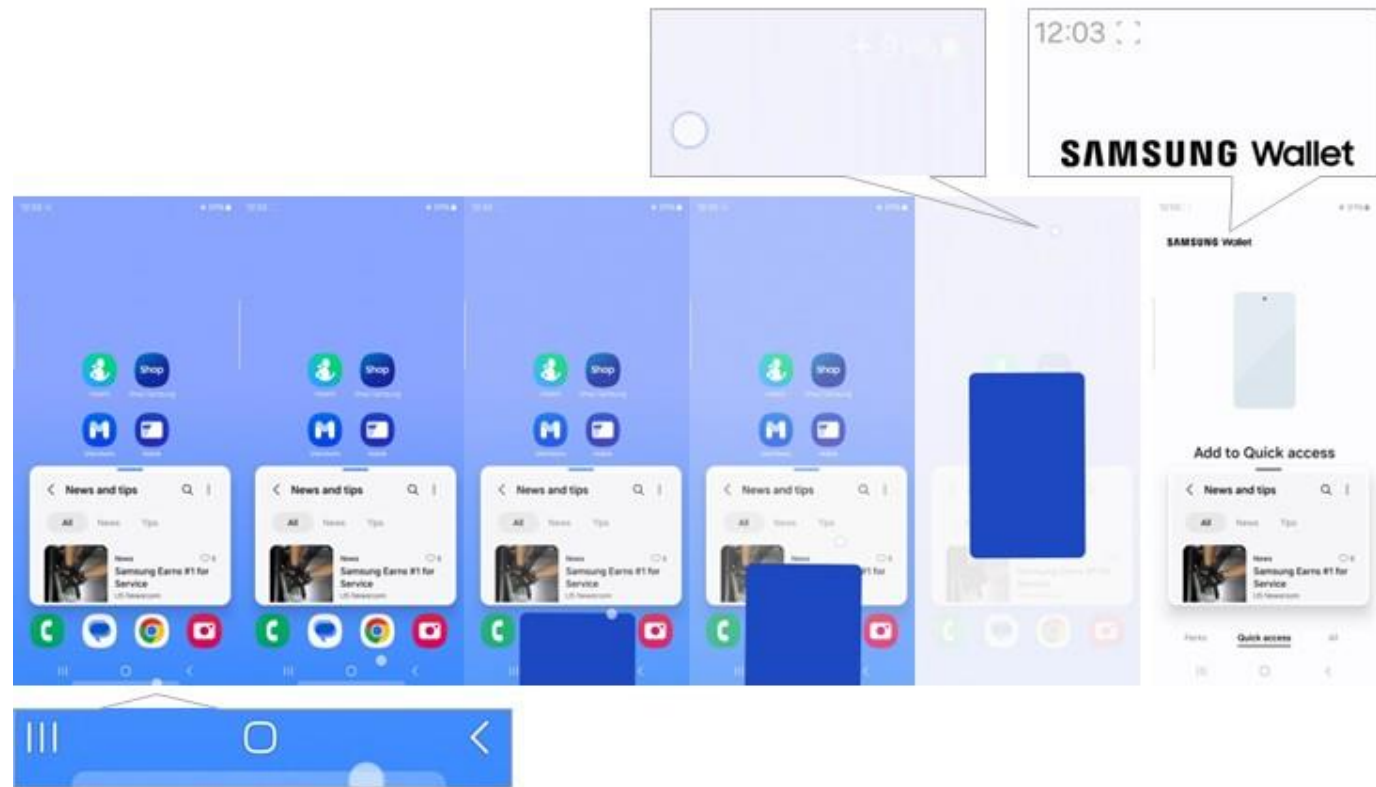
**Octa-Core
(3.1GHz, 2.4GHz, 1.8GHz)**



Snapdragon 888

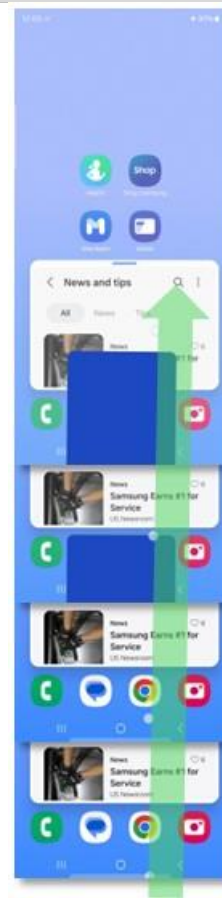
Available at: <https://www.samsung.com/us/smartphones/galaxy-s24-ultra/compare>.

U.S. Patent No. 9,304,602	Samsung
	The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.
[1e] wherein a gliding action provided from outside of the touch screen towards inside of the touch screen, said gliding action at first interacting with said at least one window on the touch screen, is processed by said processor to cause an action assigned to said window, and wherein said at least one window is located on the touch screen before said gliding action begins.	When a user performs a gliding action from outside of the touch screen towards inside of the touch screen in the Accused Instrumentalities, and at least one window is located on the touch screen before said gliding action begins, the gliding action at first interacts with the at least one window on the touch screen, and is processed by said processor to cause an action assigned to the window. For example, the gliding action provided from outside of the touch screen towards inside of the touch screen is processed by the processor to cause an action assigned to said window, such as opening and displaying an interface. The gliding action first interacts with the window that is visible on the edge of the touch screen. The window is located on the edge of the touch screen before the gliding begins. The Samsung wallet app, notification bar, and edge Panel are three examples of windows that interact with a gliding action provided from outside of the touch screen towards inside of the touch screen, where the gliding action first interacts with a window that is visible on the edge of the touch screen. In the example below, a gliding action from the outside of the touch screen first interacts with the window for the Samsung Wallet app at the bottom of the screen, then continues towards the inside of the touch screen. A blue credit card graphic indicates that the app will open, and the Samsung Wallet app opens.



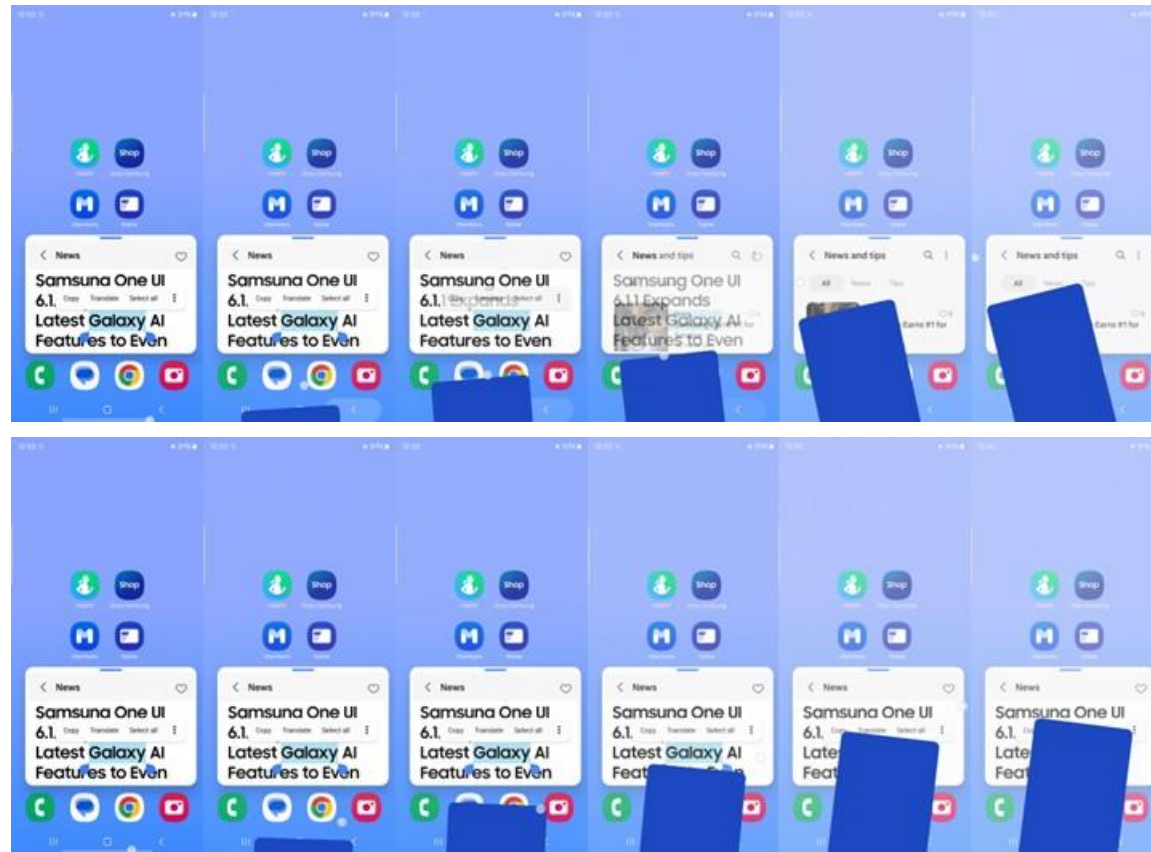
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The gliding action in this example was provided from outside of the touch screen toward the inside of the touch screen, almost straight up.



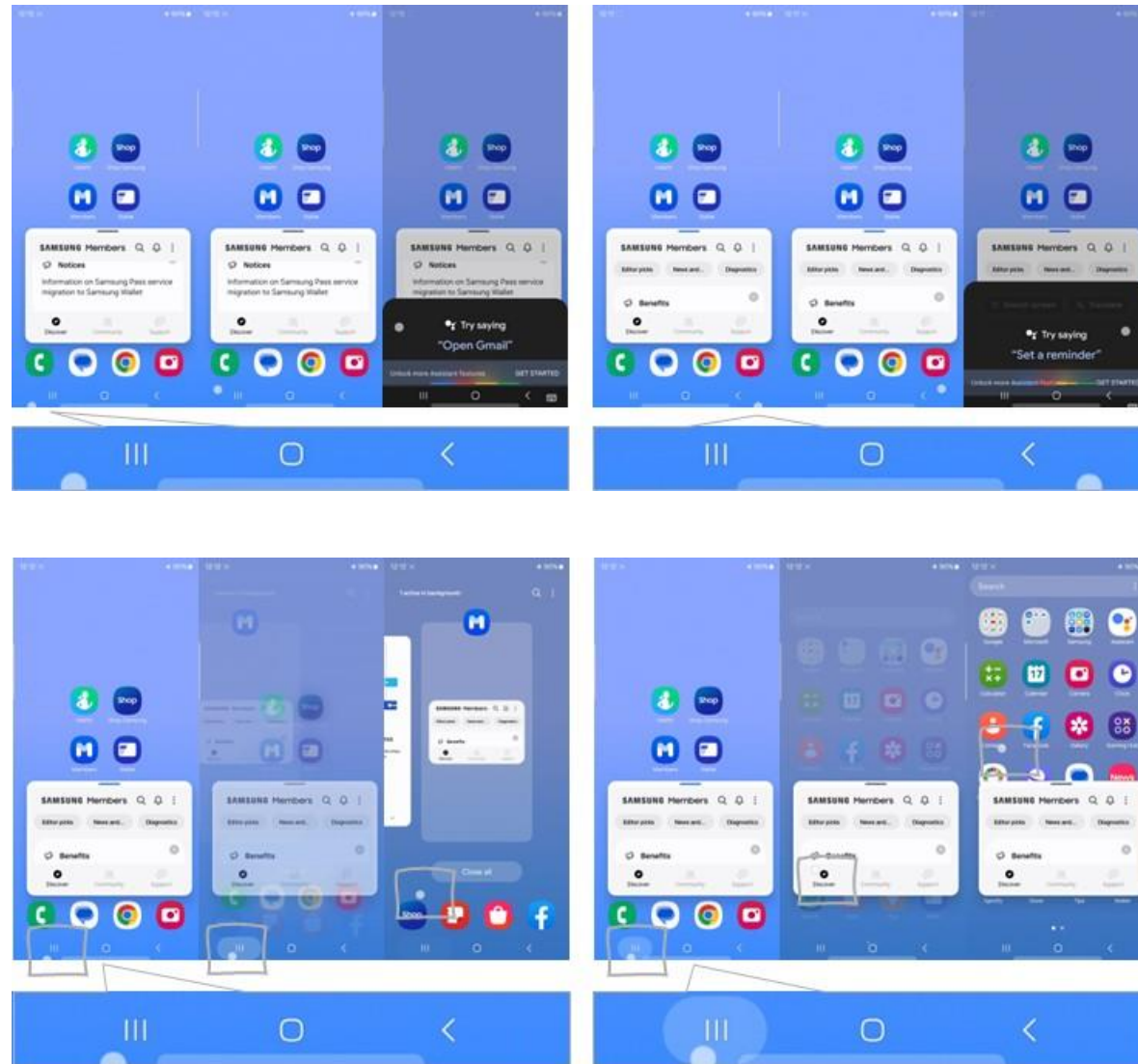
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

During the gliding action, the blue credit card graphic indicates the direction of the gliding action. In the example above, the blue credit card rose straight up. In the examples below, one gliding action is provided toward the inside and left of the screen and the credit card graphic rises up and to the left. In the next example, a gliding action is provided toward the inside and right of the screen, and the credit card graphic rises up and to the right. In both examples, the Members app is also visible.



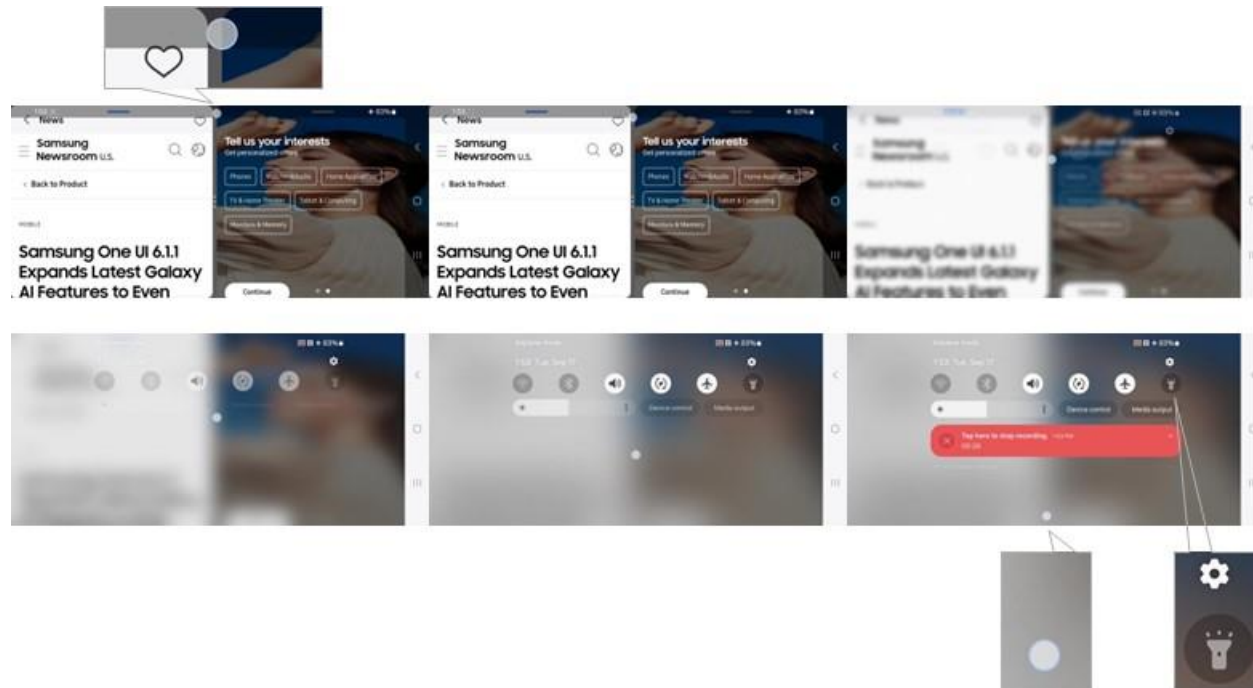
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The gliding action first interacts with the Wallet window at the bottom of the screen. In contrast, a gliding action from the bottom of the screen that does not first interact with the Wallet window at the bottom of the screen does not launch the Wallet app. For example, if the gliding action starts to the left or right of the Wallet window at the bottom of the screen, the gliding action can result in no functionality, or other functionality, such as launching an AI assistant, showing recent apps, or showing all apps.



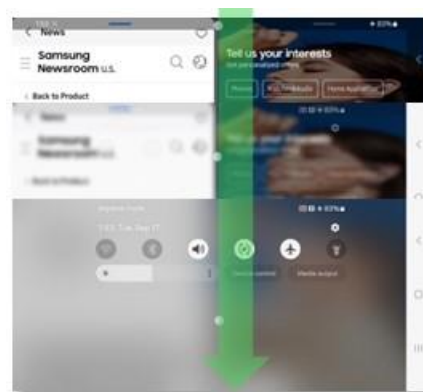
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, a gliding action that first interacts with the notification bar and that is provided from the outside of the screen towards the inside of the screen (e.g., down from the top) causes the notification bar to launch a full-screen display. In the following example, the device is in landscape mode and is displaying the Member app (left portion) and Shop app (right).



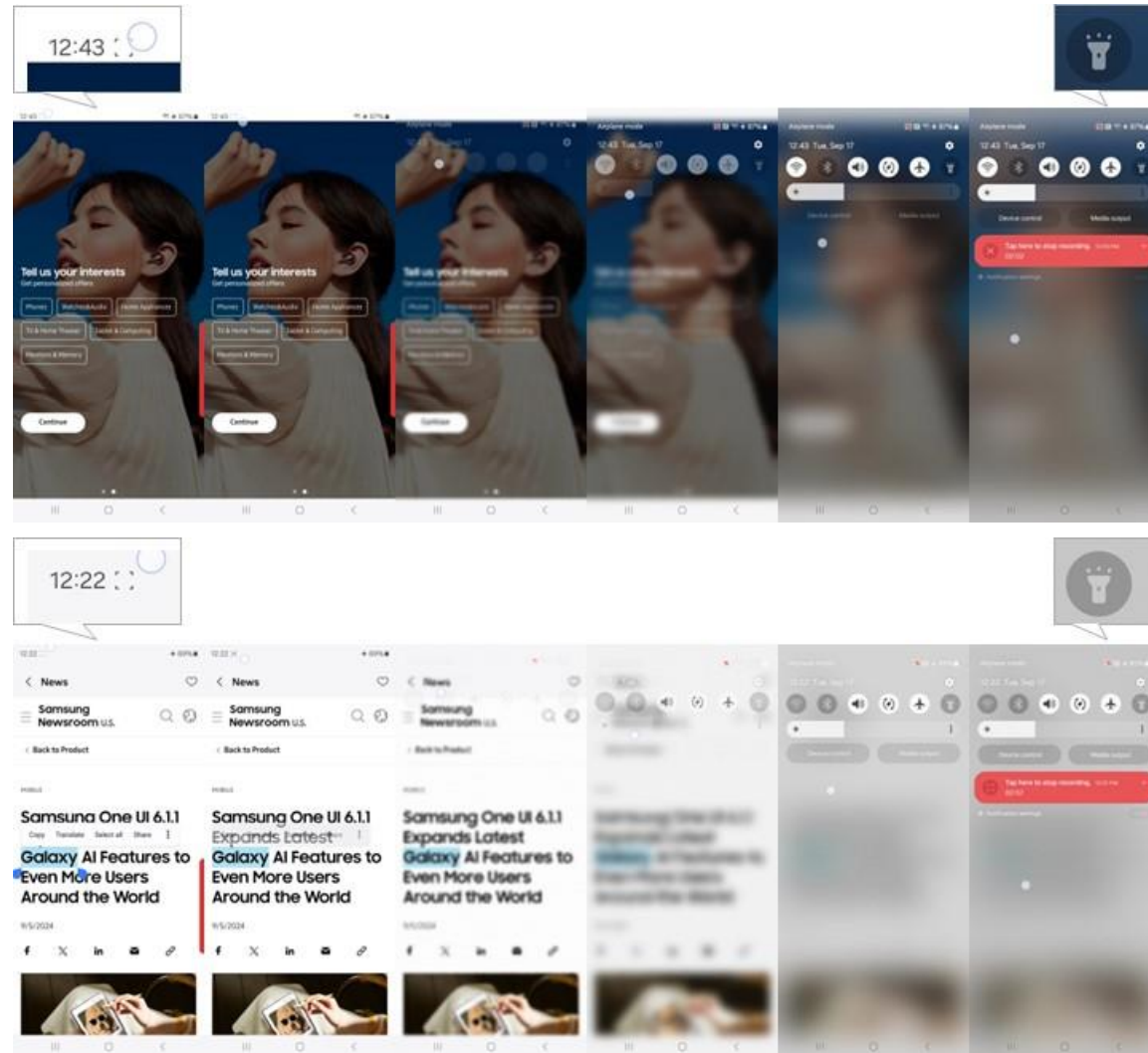
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The gliding action in this example was provided from outside of the touch screen toward the inside of the touch screen straight down.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

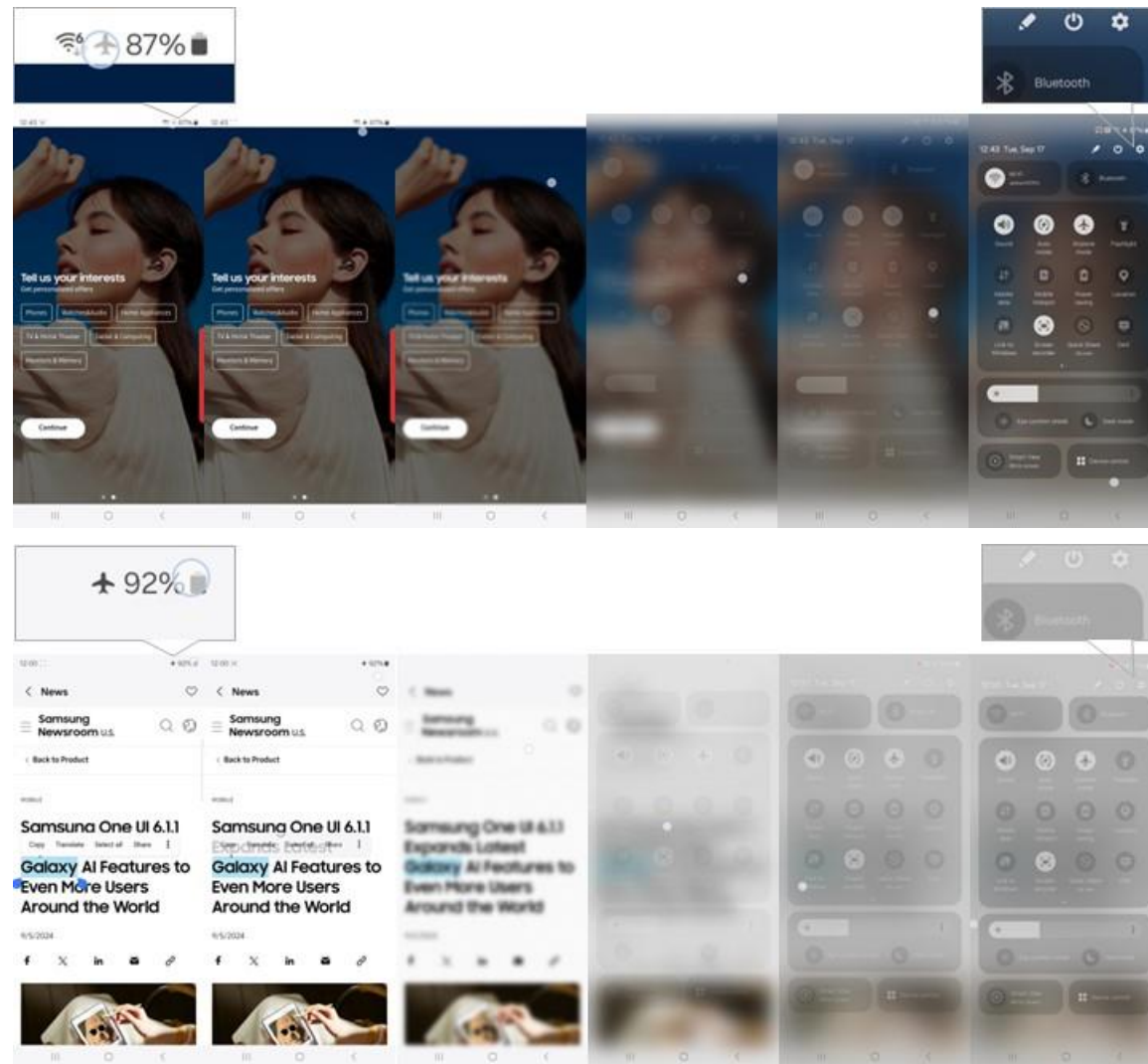
The notification bar functionality is the same when the device is in portrait display mode. In the next example, the device is displaying the Shop app, and in the example after that, the device is displaying the Member app.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

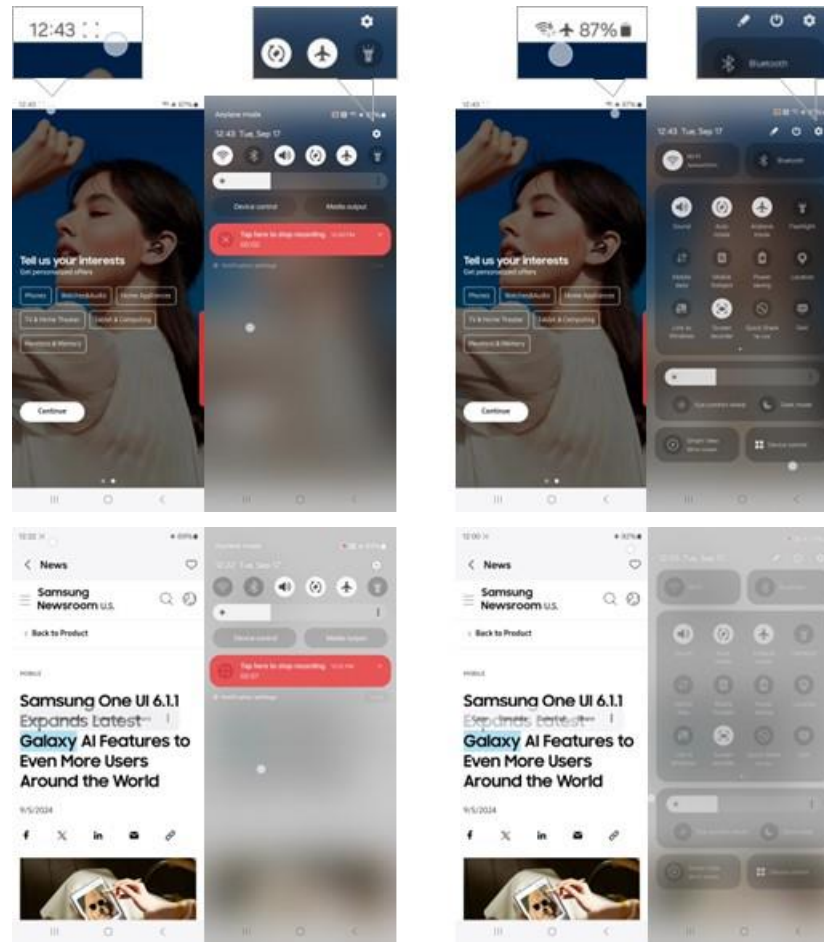
The gliding action first interacts with the notification bar at the top edge of the screen, as the examples above demonstrate. In contrast, if the gliding action does not first interact with the notification bar, Samsung's OneUI interface behaves differently.

Samsung's OneUI determines whether the gliding action interacts with the notification bar and if so, determines the relevant location within the notification bar. For example, the gliding action can launch different full screen interfaces depending on where the gliding action first interacted with the notification bar. A gliding action that interacts with the right (as opposed to left or middle) of the notification bar can launch a different screen than a gliding interaction that first interacts with the left or middle of the notification bar, if the relevant setting ("quick settings instant access") is enabled.



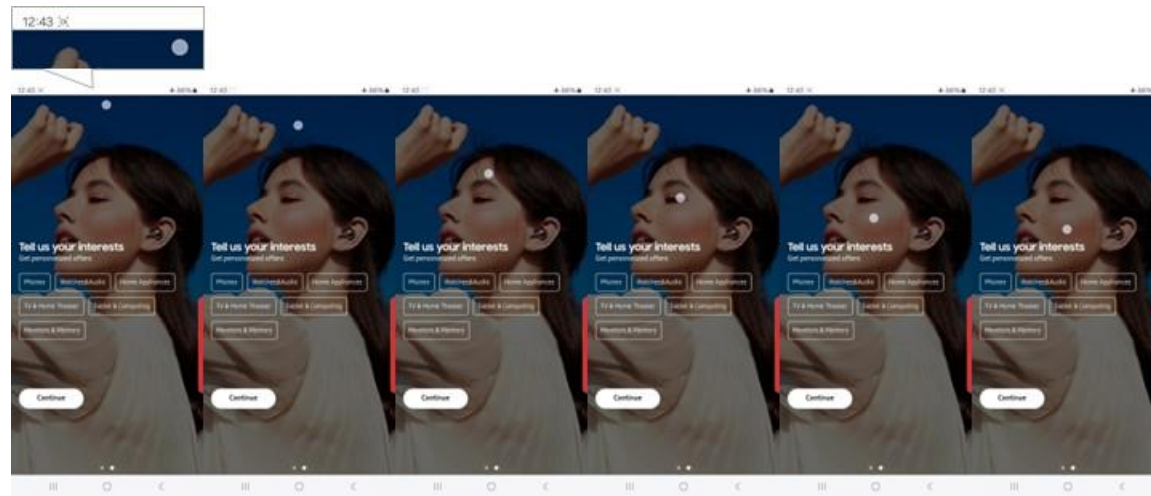
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The following graphic compares the examples shown above, where a gliding action that first interacts with the left or right portion of the notification bar results in the display of different screens.



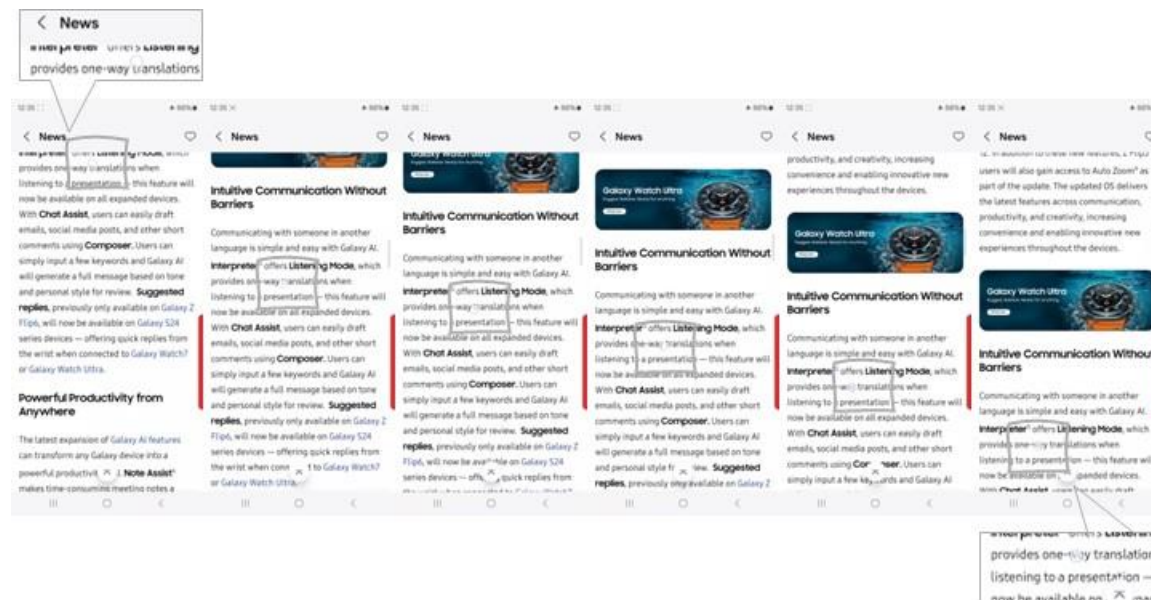
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

Another example demonstrating that the gliding action first interacts with the notification bar at the top edge of the screen is that when a gliding action begins below the notification bar, the notification bar remains the same. For example, a gliding action that begins below the notification bar may perform no function.



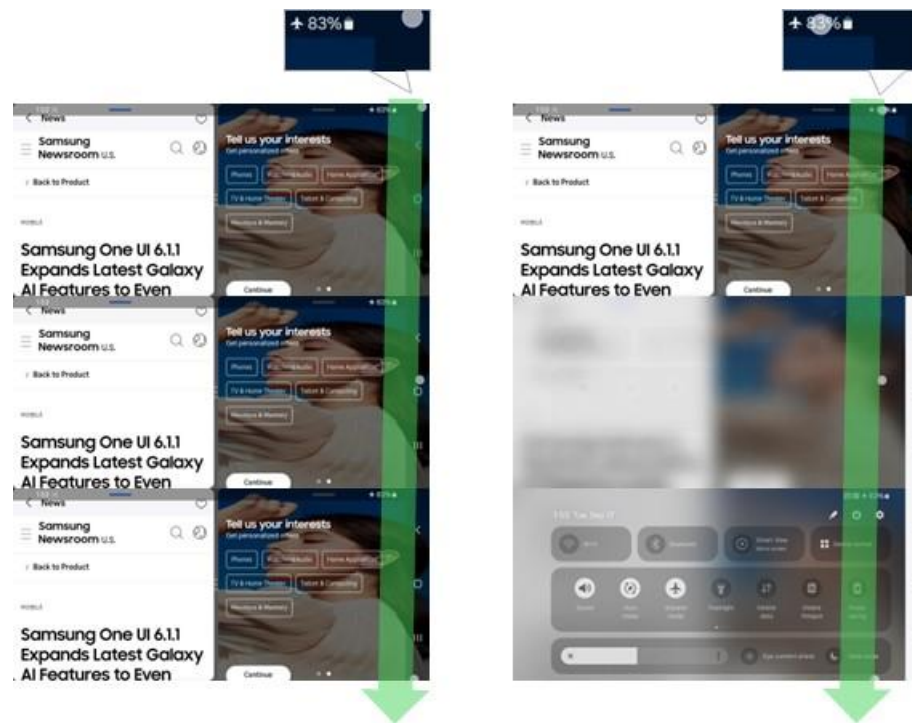
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the gliding action may interact with the app that is displayed (and not the notification bar), for example to scroll through an interface within in the application.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

Another example demonstrating that the gliding action first interacts with the notification bar at the top edge of the screen is that when the notification bar is displayed in landscape mode, and another bar (normally at the bottom of the screen when the display is in portrait mode), is also displayed to the right (that is, the edge closest to the bottom of the screen when the display is in portrait mode), the notification bar does not occupy the top right corner of the screen. A gliding action that interacts with that upper right corner but does not interact with the notification bar does not result in displaying a fuller interface. In the example displayed on the left below, the gliding action was to the right of the notification bar and did not result in any change of interface. In contrast, in the example displayed on the right below, the gliding action interacted with the notification bar.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

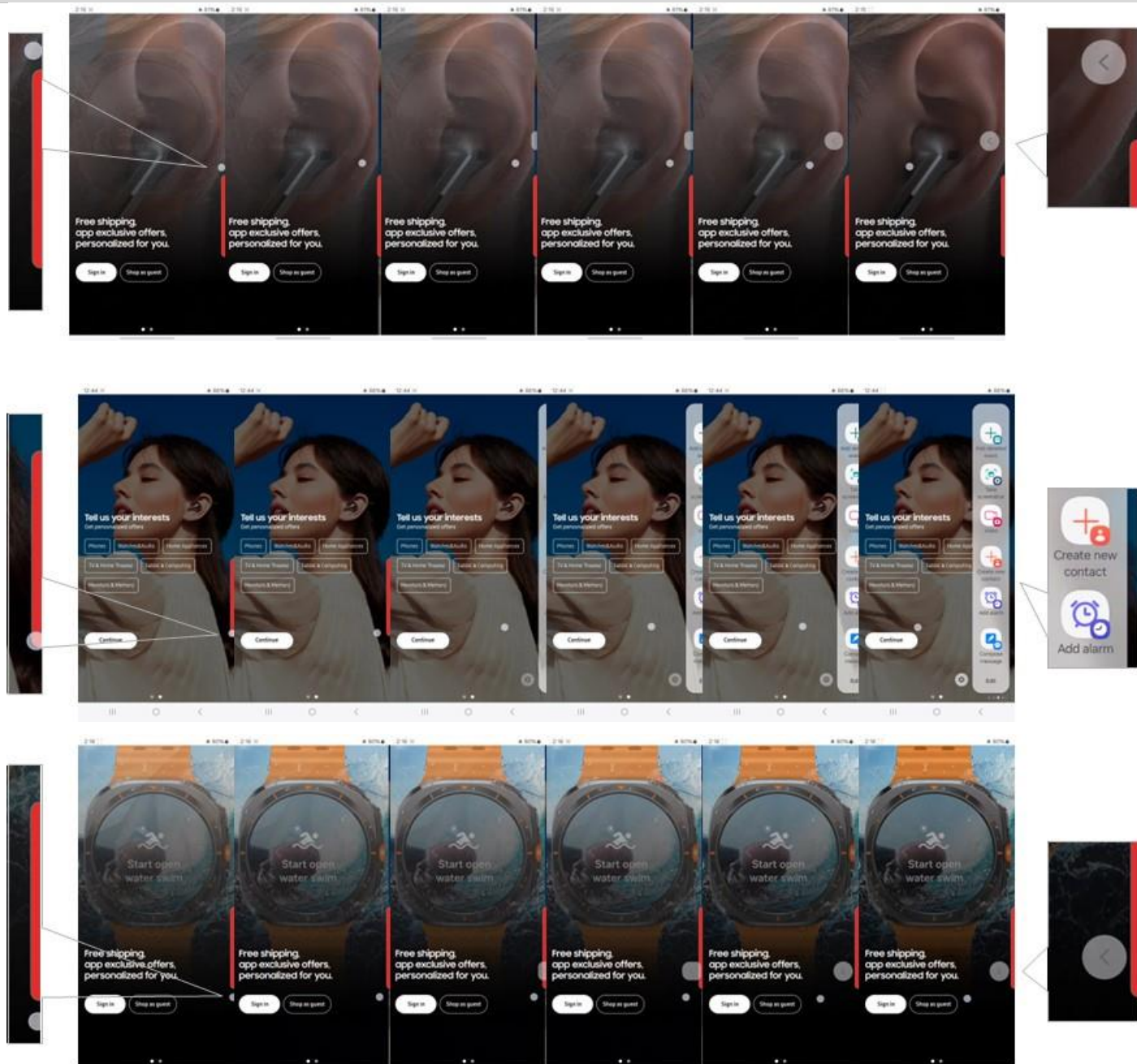
As another example, a gliding action that first interacts with the handle of the Edge panels and that is provided from the outside of the screen towards the inside of the screen (e.g., from one side toward the other side) causes the Edge panels user interface to be displayed.

In the example below, a gliding action from the outside of the touch screen first interacts with the red window (“handle”) for the Edge panels at the left edge of the screen, then continues towards the inside of the touch screen.

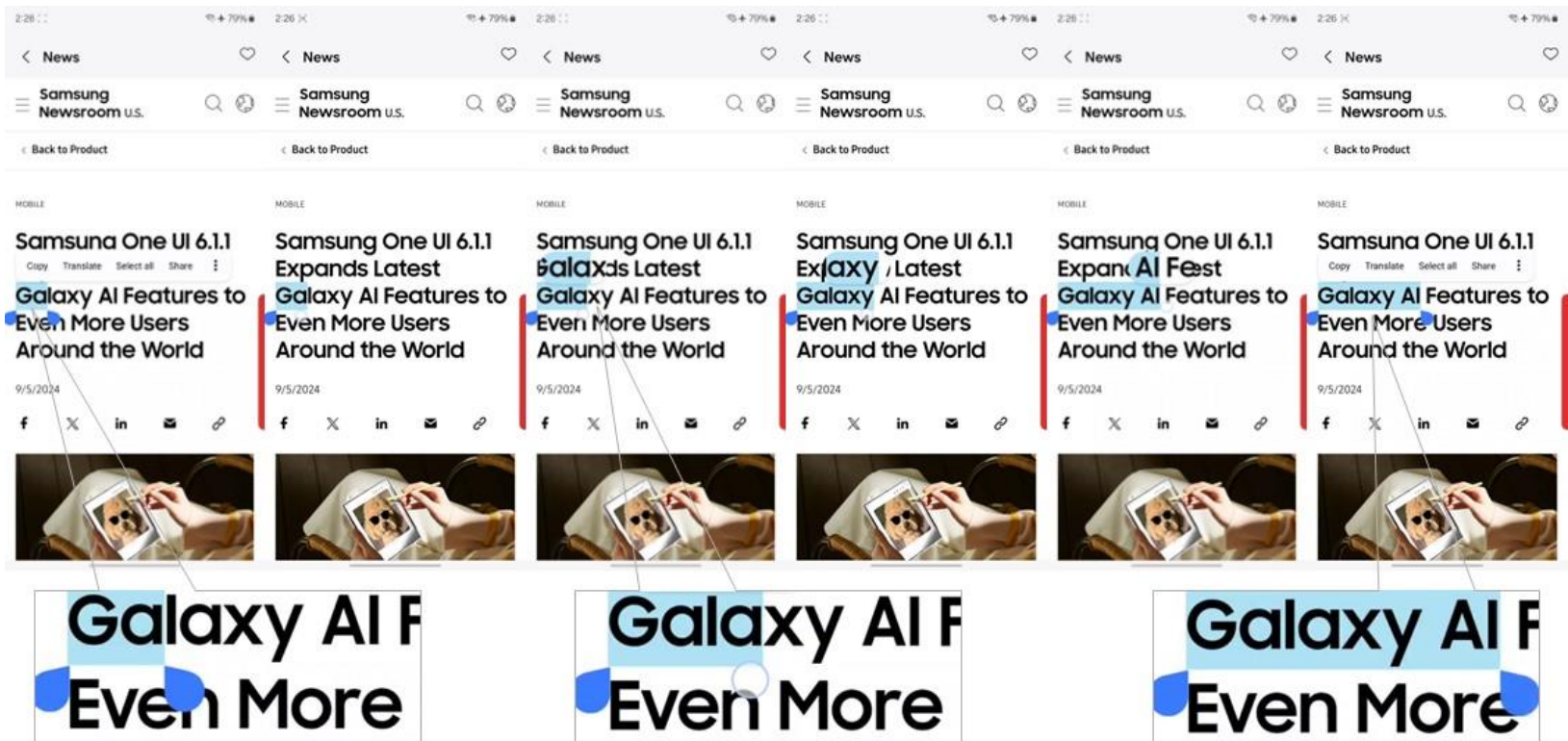


Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The handle for the Edge panels is on the right (rather than left) edge of the screen by default, and in the screen shots shown below. The gliding action first interacts with the window for Edge panels at the side edge of the screen. In contrast, a gliding action that does not first interact with the window for Edge panels does not open the Edge panels interface, and instead may interact with an application being shown on the screen, or may perform no function. In the examples below, a gliding action that interacts with the very bottom of the handle causes the Edge panels interface to open, but a similar gliding action that is below or above the red handle does not cause the Edge panel interface to open, and instead causes a different graphic (a circle with “<” meaning “back”) to appear.



U.S. Patent No. 9,304,602	Samsung
	Screen recording of Galaxy S24 Ultra running OneUI 6.1. An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.
[2] The system of claim 1, wherein the system relates said gliding action to a function which is not related to a mouse function.	The Accused Instrumentalities relate a gliding action to a function which is not related to a mouse function. For example, in every example of a gliding action shown in connection with claim 1, the system relates the gliding action to a function that is not related to a mouse function. For example, the gliding function is related to opening and displaying an interface. In contrast, a mouse function includes, for example, a gliding function that selects text. In the example below, a gliding function expands the amount of selected text. The initial text selection is noted with solid blue pointer graphics to the left and right of the selected text, and the selected text is highlighted in blue. The gliding action causes the blue graphic on the right side of the selected text to disappear, and the gliding selects additional text to the right of the original selection, to expand the selection from “Ga” to “Gala”, “Galaxy”, and “Galaxy AI”.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

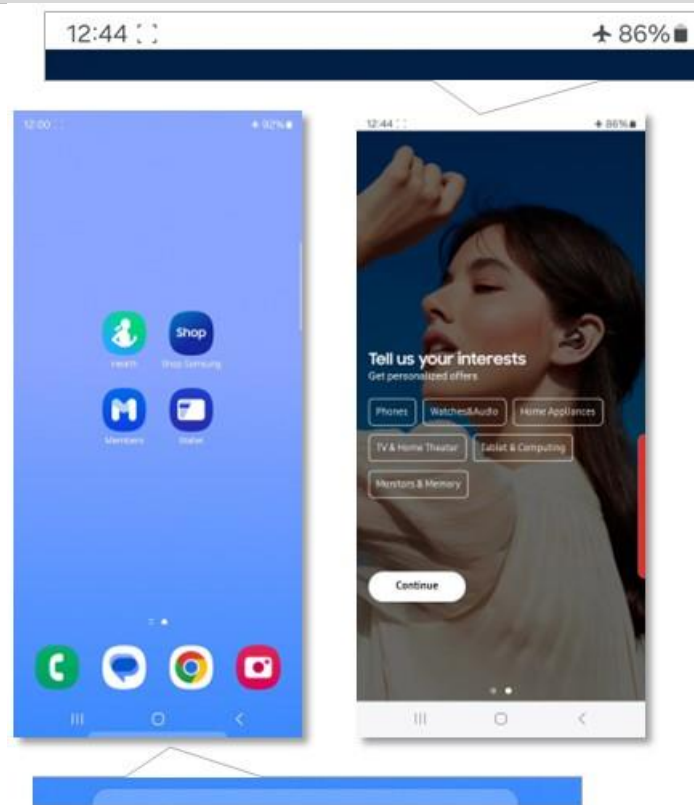
An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.

[3] The system of claim 1, wherein said at least one window comprises at least one bar located on said edge of the screen.

The Accused Instrumentalities include at least one window that comprises at least one bar located on the edge of the screen.

The windows on the edge of the screen that were discussed in connection with claim 1 each comprise at least one bar located on the edge of the screen. For example, the notification bar is a bar located on the top edge of the screen. As another example, the wallet window at the bottom of the Home screen is a bar. As another example, the handle of the Edge panels is a bar.

U.S. Patent No. 9,304,602	Samsung
	Screen recording of Galaxy S24 Ultra running OneUI 6.1. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.
[4] The system of claim 3, wherein said at least one bar extends along a substantial portion of an edge of the touch screen.	The Accused Instrumentalities include at least one bar that extends along a substantial portion of an edge of the touch screen. For example, the notification bar extends along the entire top edge of the touch screen, in portrait mode. As another example, the bar for the Wallet app extends along a substantial portion of the bottom edge.

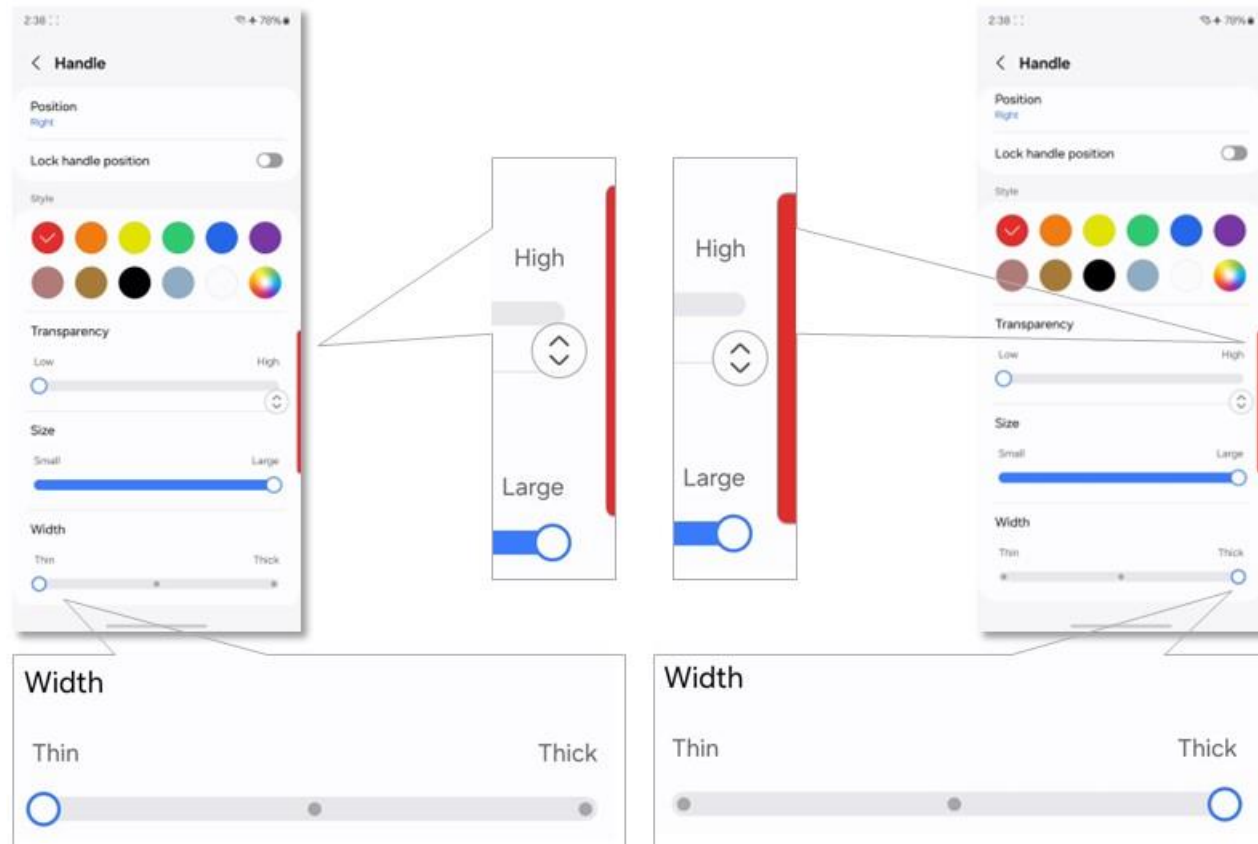


Screen recording of Galaxy S24 Ultra running OneUI 6.1.

In landscape mode, the notification bar extends along the entire top edge or may extend along nearly the entire edge if another bar is displayed on the right edge of the screen.

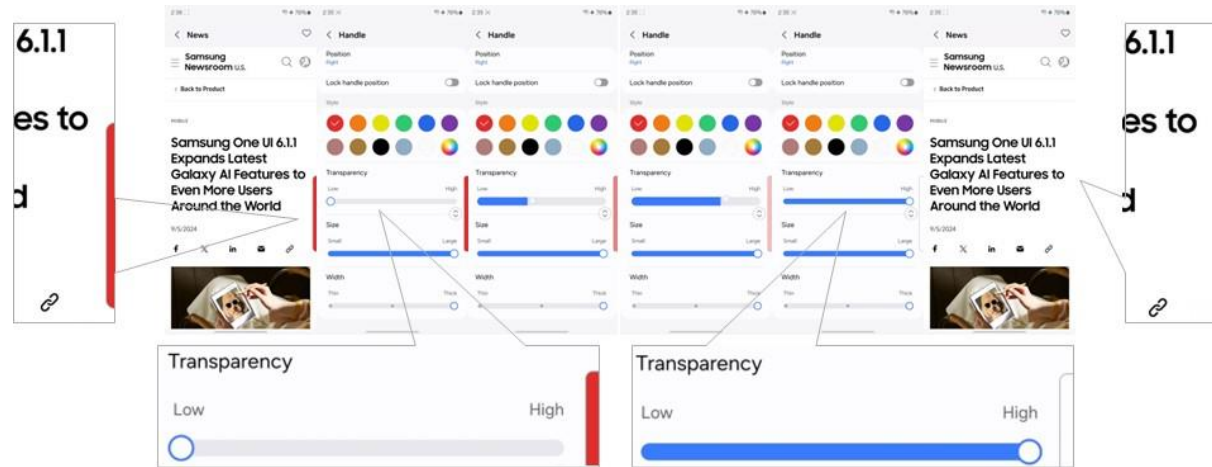


U.S. Patent No. 9,304,602	Samsung
	Screen recording of Galaxy S24 Ultra running OneUI 6.1. An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.
[5] The system of claim 3, wherein said bar is in a form of a line.	The Accused Instrumentalities include a bar that is in the form of a line. For example, the bar for the Wallet app is a line, and the bar (“handle”) for the Edge panels is a line. The handle for the Edge panels is a thin line by default. Screen recording of Galaxy S24 Ultra running OneUI 6.1. The visual properties, including width, transparency, and color, of the handle for the Edge panels can be adjusted.



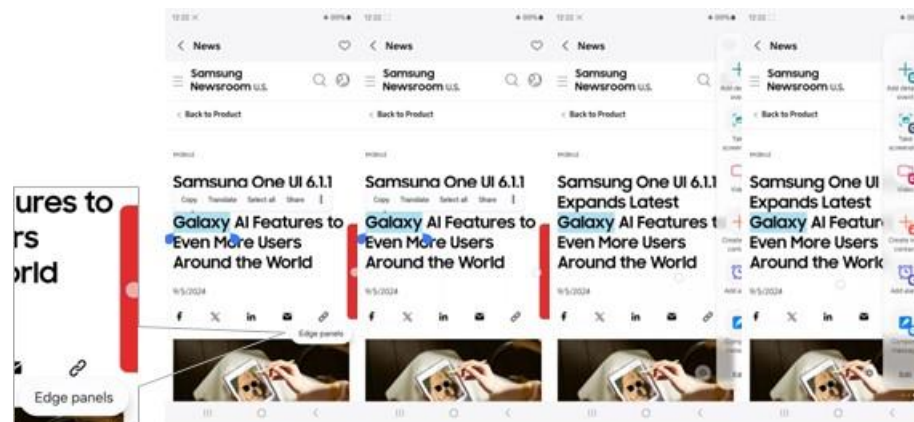
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

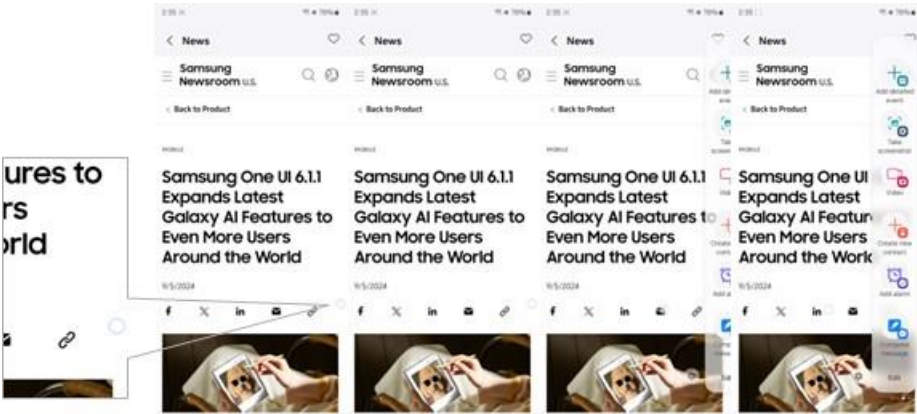
For example, the transparency of the handle for the Edge panels can be set to “high,” which is completely transparent, and invisible.

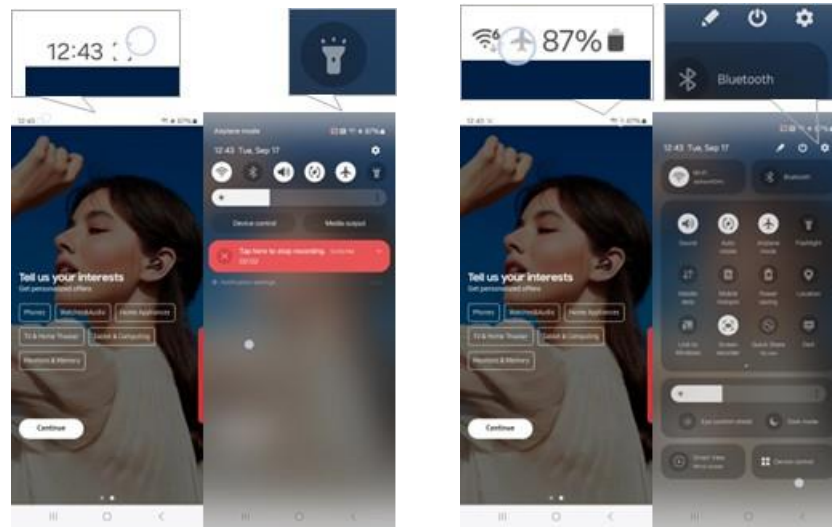


Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The invisible handle functions the same way as a visible handle.

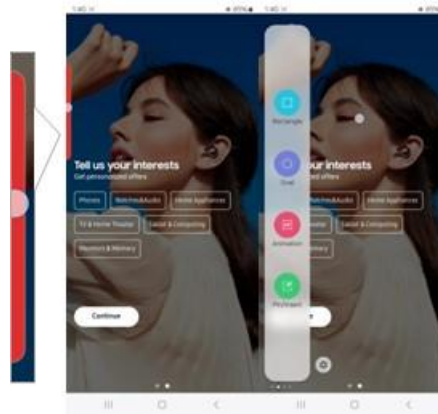


U.S. Patent No. 9,304,602	Samsung
	 Screen recording of Galaxy S24 Ultra running OneUI 6.1. An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.
[6] The system of claim 5, wherein said action is displaying an interface on the screen.	In the Accused Instrumentalities, the action caused by the processor displays an interface on the screen. For example, in the Accused Instrumentalities, the gliding action described in claim 1 causes actions assigned to the window (for example, the notification bar window, Edge panel window, or Wallet app window) including an action that is displaying an interface on the screen. For example, the gliding action that first interacts with the notification bar window is processed by a processor to cause the display of a full-screen interface. The interface may be different depending on whether the gliding action started on the left or right side of the notification bar.



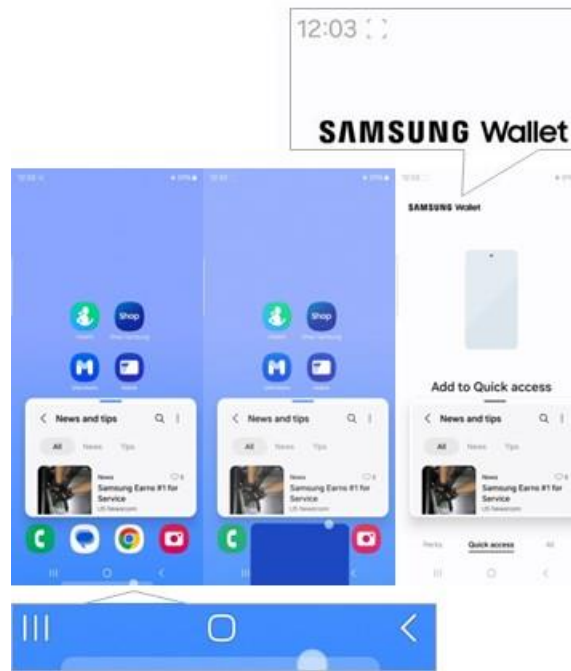
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the gliding action that first interacts with the Edge panel handle is processed by a processor to cause the display of the Edge panel.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the gliding action that first interacts with the Wallet handle is processed by a processor to cause the display of the Wallet app.



Screen recording of Galaxy S24 Ultra running OneUI 6.1. See also [1e]. The discussion and evidence disclosed in the section on [1e] is incorporated here by reference.

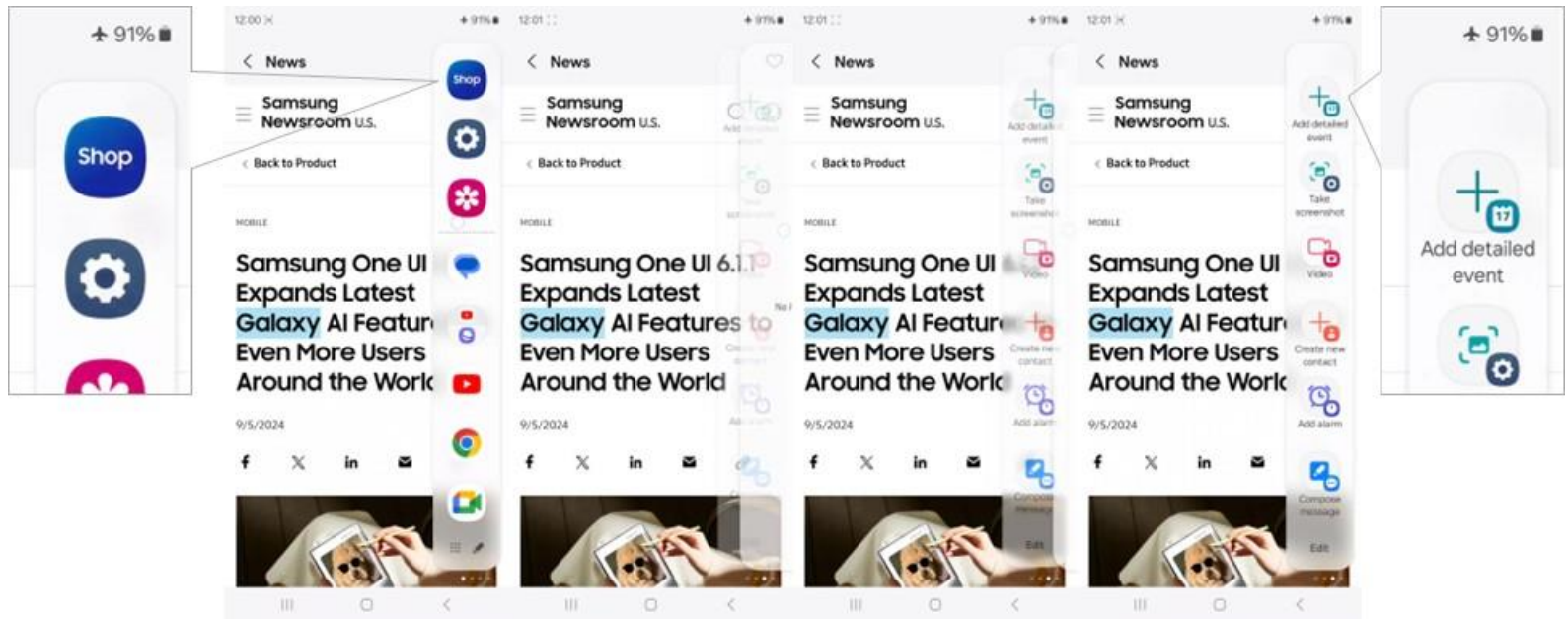
An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.

[7] The system of claim 5, wherein said action is displaying a portion of an interface on the screen.

In the Accused Instrumentalities, the gliding action displays a portion of an interface on the screen.

For example, in the Accused Instrumentalities, the gliding action described in claim 1 causes actions assigned to the window (for example, the notification bar window, Edge panel window, or Wallet app window) including an action that is displaying a portion of an interface on the screen.

For example, the gliding action that first interacts with the Edge panel handle is processed by a processor to cause the display of the Edge panel. The Edge panel is an interface that comprises one or more panels. The first panel displayed can be the previously-displayed panel, for example, and the panel can be changed to a different panel.



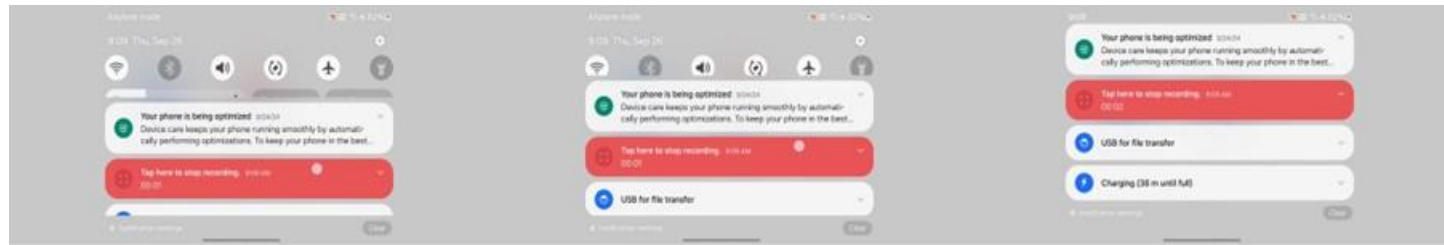
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the gliding action that first interacts with the notification bar window is processed by a processor to cause the display of a full-screen interface. The interface is only a portion of the full interface when, for example, there are many notifications and viewing the last notification requires scrolling down the interface to make the last notification visible. In the screen recording below, the red notification regarding screen recording is initially shown at the bottom of the notifications.



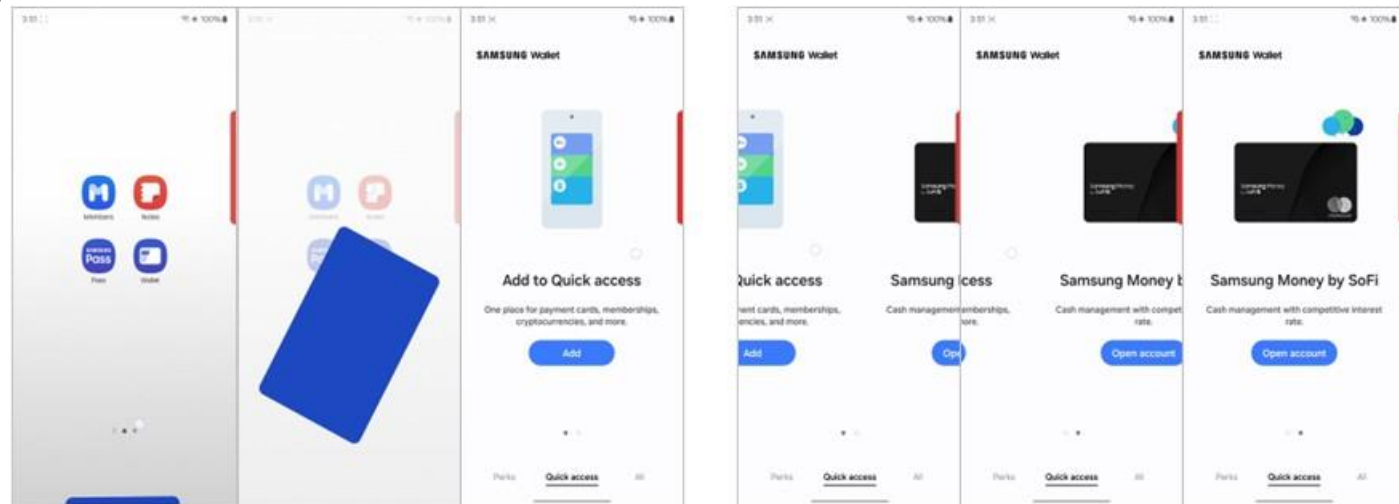
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

After the top portion of the interface is initially shown, scrolling down further hides the top portion of the initially-shown interface (circular buttons for sound, etc.) and shows additional notifications as the red screen recording notification moves up.



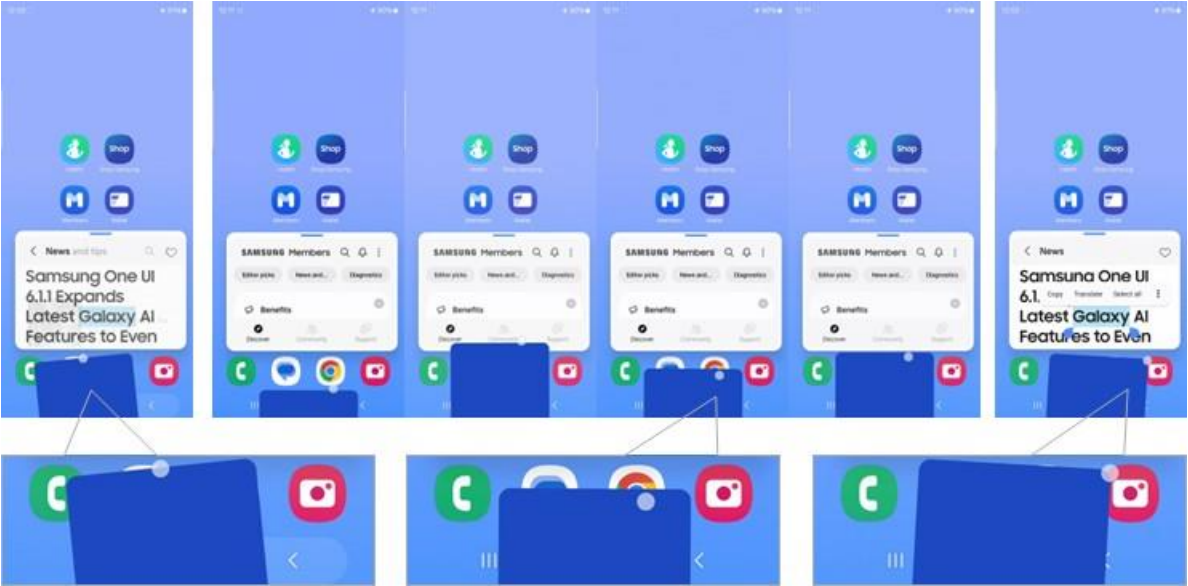
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the gliding action that first interacts with the Wallet handle is processed by a processor to cause the display of the Wallet app. The Wallet app can open to the “Quick access” portion of the Wallet app, for example, which can display one of many credit cards in the user’s account. The user can swipe to change the credit card that is shown on top of all other cards, for example to select that credit card to make a payment using Samsung mobile pay. As an additional example, as shown below, the Wallet app first opens to the “Quick access” view that shows a blue “Add” button to add credit cards (shown in the first three frames to the left, below). Swiping from right to left (shown in the last three frames to the right, below) shows an additional portion of the “Quick access” interface, specifically, a portion of the interface to the right that shows a black card icon and the text “Samsung Money by SoFi.”



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an

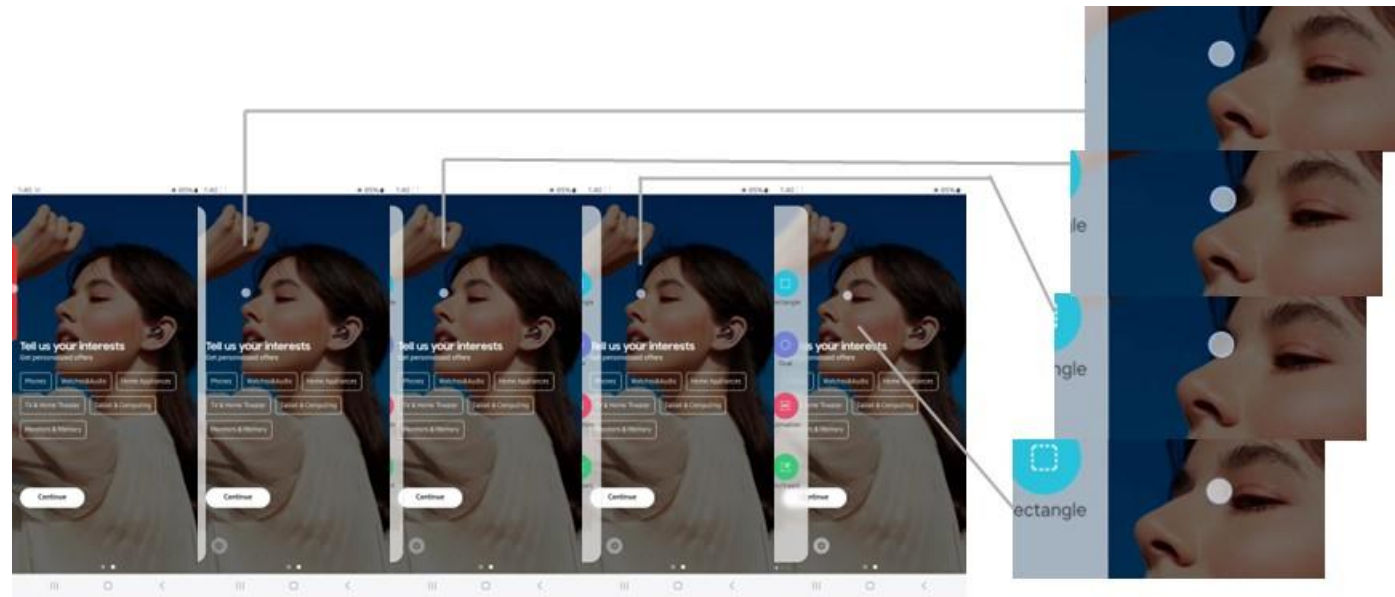
U.S. Patent No. 9,304,602	Samsung
[8] The system of claim 7, wherein during said gliding action, a length of the portion of the interface being displayed is substantially equal to a length of the gliding action.	exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities. In the Accused Instrumentalities, during a gliding action, a length of the portion of the interface being displayed is substantially equal to a length of the gliding action. During the gliding action discussed in connection with claims 7, 5, 3, and 1, a length of the portion of the interface being displayed is substantially equal to a length of the gliding action. For example, in all of the examples described above, if the gliding action goes back toward the edge of the screen where the gliding action originated, the interface that is shown during the gliding action also goes back toward that edge of the screen. For example, a user can make the interface go back and forth. For example, the gliding action that first interacts with the Wallet window shows a blue credit card graphic that moves up, down, left, and right in a manner that can track the current screen position of the user's gliding action.  Screen recording of Galaxy S24 Ultra running OneUI 6.1. As another example, the gliding action that first interacts with the notification bar window causes a full-screen interface to be shown, and the interface may be displayed in stages where the interface becomes translucent and then opaque as the gliding action continues down the screen. For example, the interface is visible above the portion of the screen that the user's gliding action is currently touching and is not visible below that portion of the screen, although the portion of the screen below the current glide position is obscured. There can be a constant relative distance between the current position of the gliding position and the visible edge of the interface, for example, the visible bottom portion of the red rectangular box that denotes that a screen recording is in

progress.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, during the gliding action that first interacts with the Edge panels, after the gliding action progresses toward the inside of the screen, the Edge panel becomes partially visible, and thereafter becomes increasingly visible as gliding action continues, and can keep a constant relative distance between the current position of the gliding action and the visible side of the Edge panel.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.

[9] The system of claim 3, wherein said action is displaying an interface on the screen.

In the Accused Instrumentalities, the gliding action displays an interface on the screen.

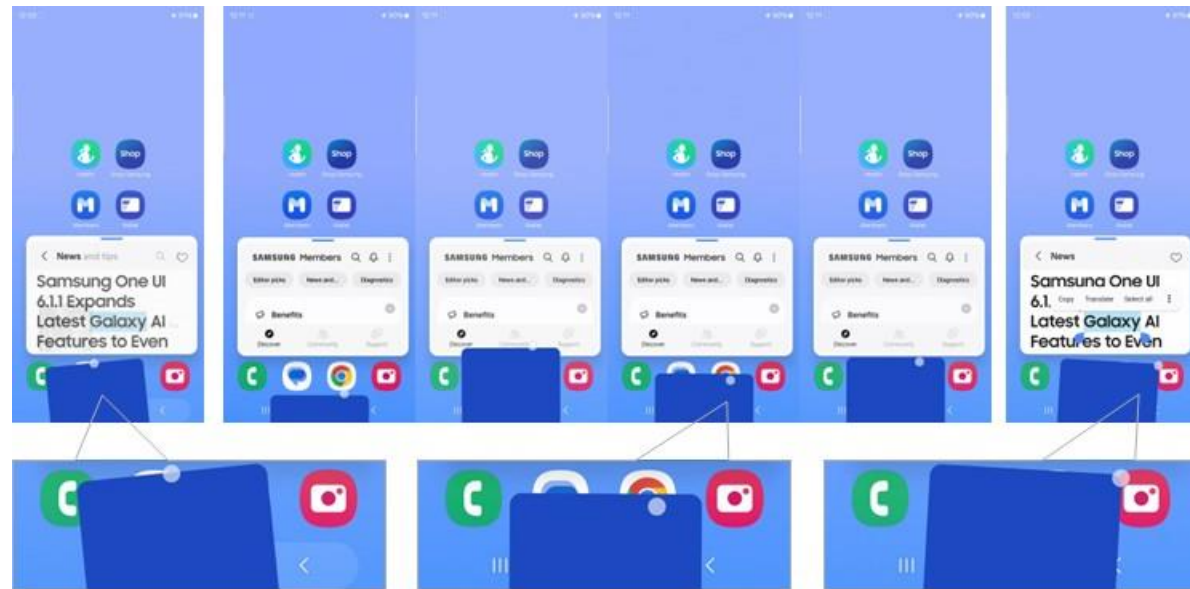
See, e.g., claim [6]. The discussion and evidence disclosed in the section on claim [6] is incorporated here by reference.

[10] The system of claim 3, wherein said action is displaying a portion of an

In the Accused Instrumentalities, the gliding action displays a portion of an interface on the screen.

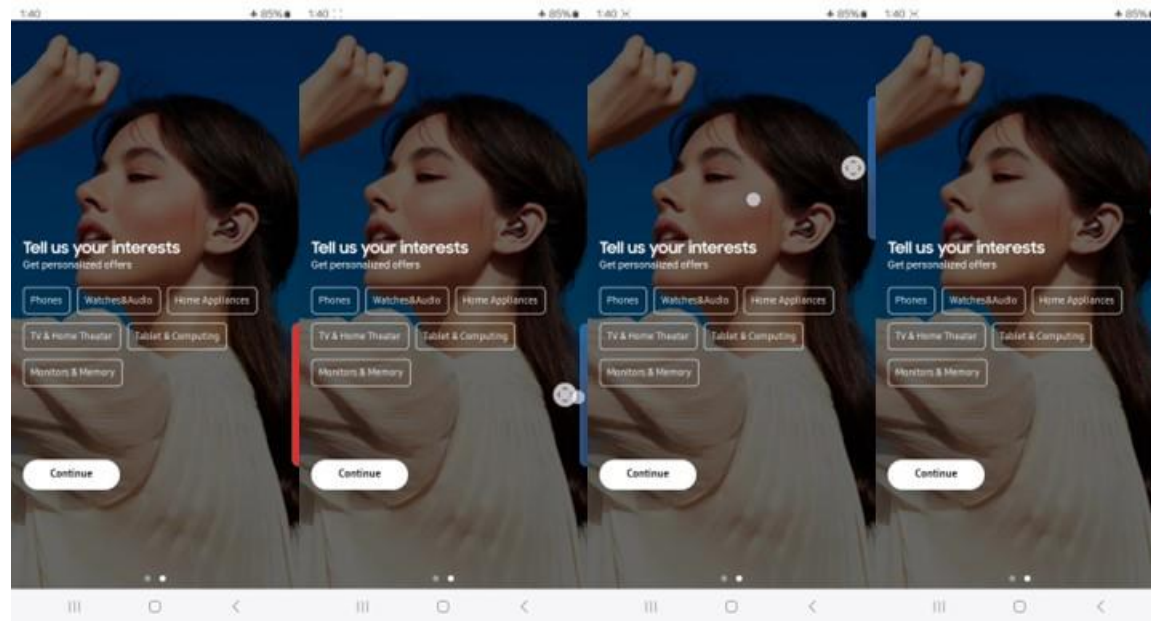
See, e.g., claim [7]. The discussion and evidence disclosed in the section on claim [7] is incorporated here by reference.

U.S. Patent No. 9,304,602	Samsung
interface on the screen.	
[11] The system of claim 10, wherein during said gliding action, a length of the portion of the interface being displayed is substantially equal to a length of the gliding action.	In the Accused Instrumentalities, during the gliding action, the length of the portion of the interface being displayed is substantially equal to a length of the gliding action. <i>See, e.g.</i>, claim [8]. The discussion and evidence disclosed in the section on claim [8] is incorporated here by reference.
[12] The system of claim 1, wherein upon detecting said gliding action, the system displays an interface on said touch screen.	In the Accused Instrumentalities, when the system detects a gliding action, the system displays an interface on the touch screen. <i>See, e.g.</i>, claim limitations [1c] and [1e]. The discussion and evidence disclosed in the sections on limitations [1c] and [1e] is incorporated here by reference. In all of the examples discussed in limitations [1c] and [1e], the interface is displayed upon detecting a gliding action. For example, before a gliding action is detected, the Accused Instrumentalities do not display the interface that they display after a gliding action is detected. For example, Wallet window, Edge panel, and notification bar are visible at the edge of the screen.
[13] The system of claim 12, wherein upon detecting said gliding action, the system relates said gliding action to setting the location of said interface on said touch screen.	In the Accused Instrumentalities, when the system detects a gliding action, the system relates the gliding action to setting the location of the interface on the touch screen. For example, the gliding action that first interacts with the Wallet window shows a blue credit card graphic with a location that is set, and that moves up, down, left, and right, in a manner that can track the current screen position of the user's gliding action. <i>See, e.g.</i>, claim [8]. The discussion and evidence disclosed in the section on claim [8] is incorporated here by reference.



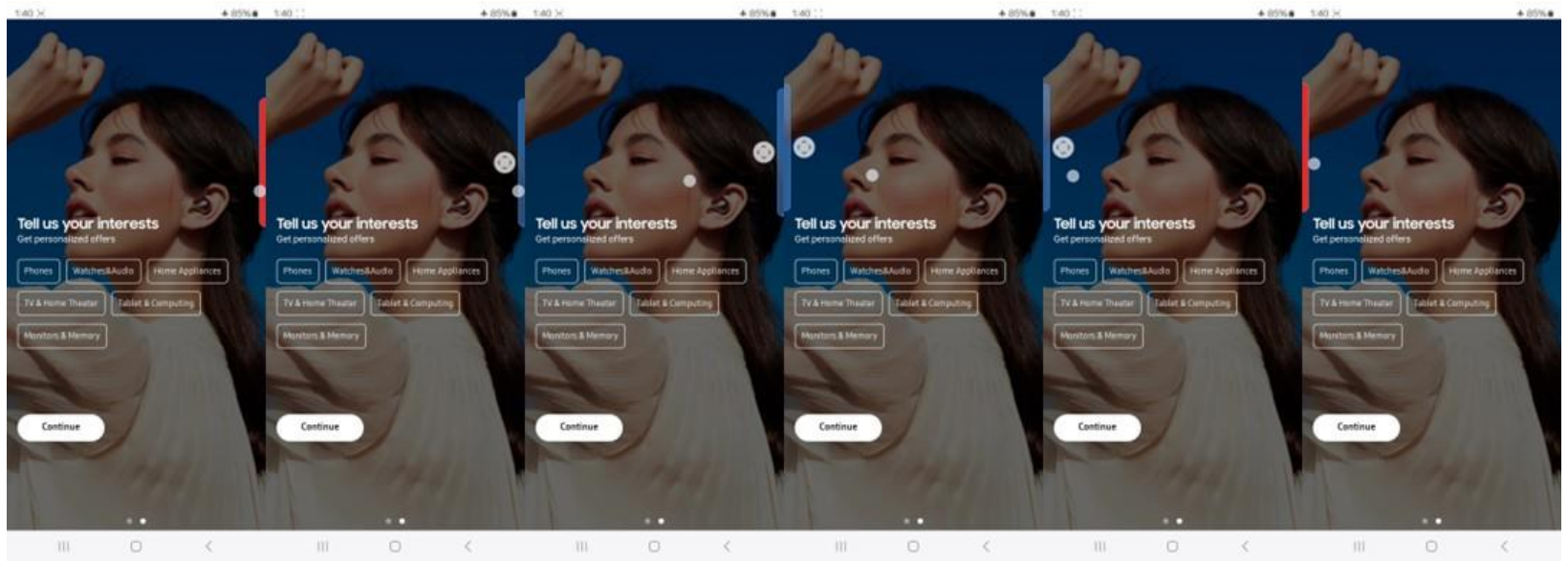
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the Edge panel handle can be moved to a different position on the same edge of the screen, upon detecting a gliding action.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the Edge panel handle can be moved to the opposite edge of the screen, upon detecting a gliding action.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

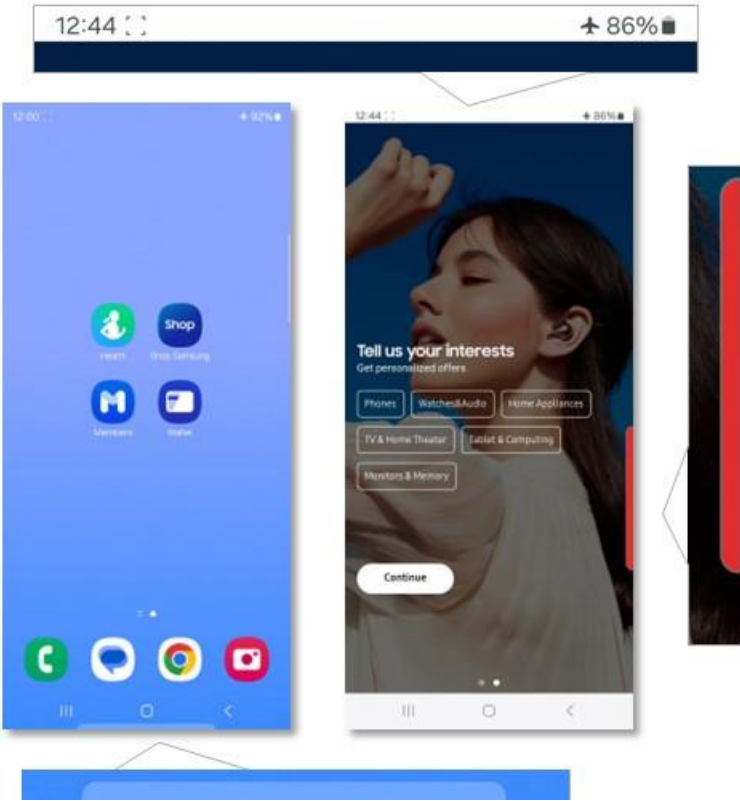
After the Edge panel handle is moved to a different edge location, the handle may remain in that location until it is moved again.

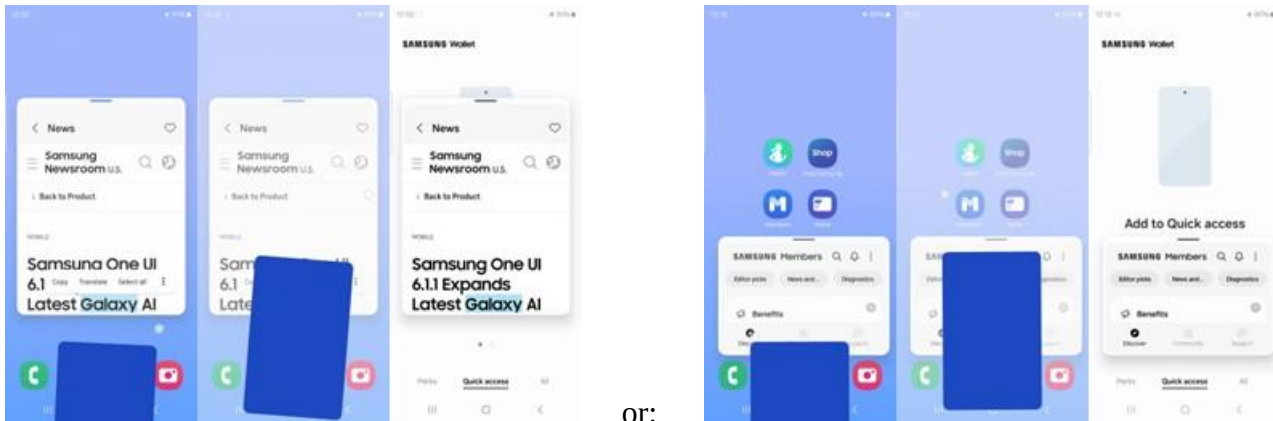
An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.

[15] The system of claim 1, wherein said at least one window comprises more than one window located on one or more edges of the touch screen.

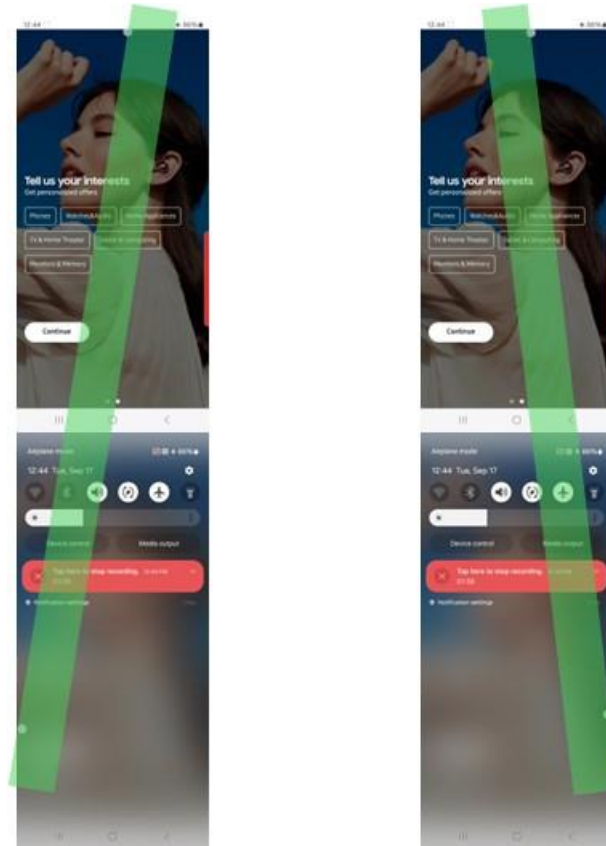
The Accused Instrumentalities include at least one window that comprises more than one window located on one or more edges of the touch screen.

The windows on the edge of the screen that were discussed in connection with claim 1 comprise three different windows located on three different edges of the touch screen. For example, the notification bar is located on the top edge of the screen. As another example, the wallet window is located at the bottom edge of the screen. As another example, the handle of the Edge panels is located on a side edge of the screen.

U.S. Patent No. 9,304,602	Samsung
	 Screen recording of Galaxy S24 Ultra running OneUI 6.1. An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.
[16] The system of claim 15, wherein said at least one window extends along a substantial portion of an edge	The Accused Instrumentalities include at least one window that extends along a substantial portion of an edge of the touch screen. <i>See, e.g.,</i> claim [4]. The discussion and evidence disclosed in the section on claim [4] is incorporated here by reference.

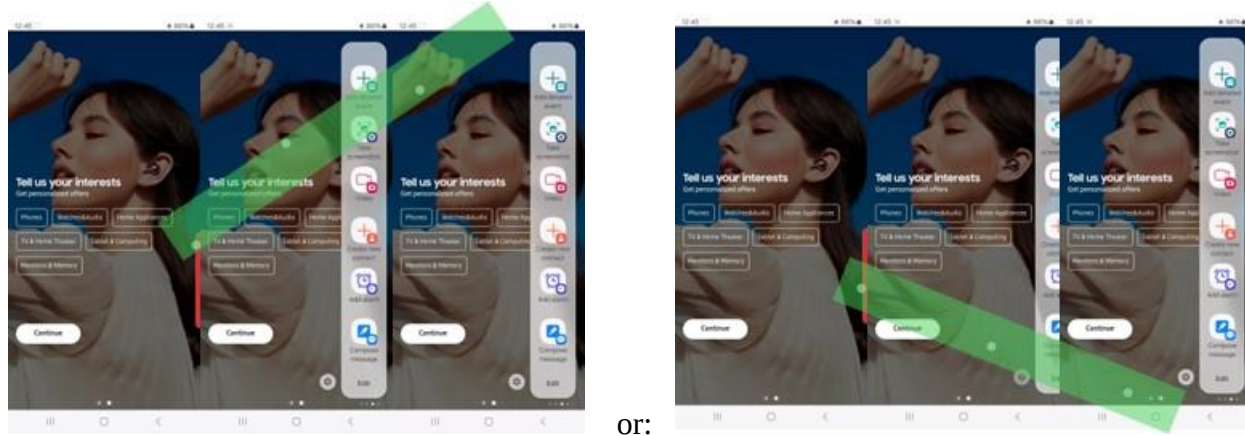
U.S. Patent No. 9,304,602	Samsung
of the touch screen.	
[17] The system of claim 1, wherein during providing said gliding action, the system dynamically drags and shows an interface or a portion of an interface on the touch screen.	In the Accused Instrumentalities, during a gliding action, the system dynamically drags and shows an interface or a portion of an interface on the touch screen. <i>See, e.g.,</i> claim [8]. The discussion and evidence disclosed in the section on claim [8] is incorporated here by reference.
[18] The system of claim 1, wherein the processor relates a gliding action provided towards any arbitrary direction inside the screen to presenting a same interface.	The Accused Instrumentalities include a processor that relates a gliding action provided towards any arbitrary direction inside the screen to presenting the same interface. For example, a gliding action provided towards the left, right, or straight up towards inside the screen from the Wallet window at the bottom of the screen presents the same interface, specifically, the Wallet app. The blue credit card icon may move to the left or right before the Wallet app is opened, but the same app is opened regardless.  Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, a gliding action provided toward the left, right, or straight down towards inside the screen from the notification bar at the top of the screen presents the same interface.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, a gliding action provided toward the top, bottom, or straight sideways inside the screen from the Edge panel handle at the side of the screen presents the same Edge panel interface.



or:

Screen recording of Galaxy S24 Ultra running OneUI 6.1. *See, e.g.*, claim limitation [1e]. The discussion and evidence disclosed in the section on claim limitation [1e] is incorporated here by reference.

An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.

[19a]. A system for capturing an event provided from an edge of a touch screen comprising:

The Accused Instrumentalities implement a system for capturing an event provided from an edge of a touch screen.

See, e.g., [1a]. The discussion and evidence disclosed in the section on [1a] is incorporated here by reference.

[19b] a device having a touch screen;

The Accused Instrumentalities are devices having a touch screen.

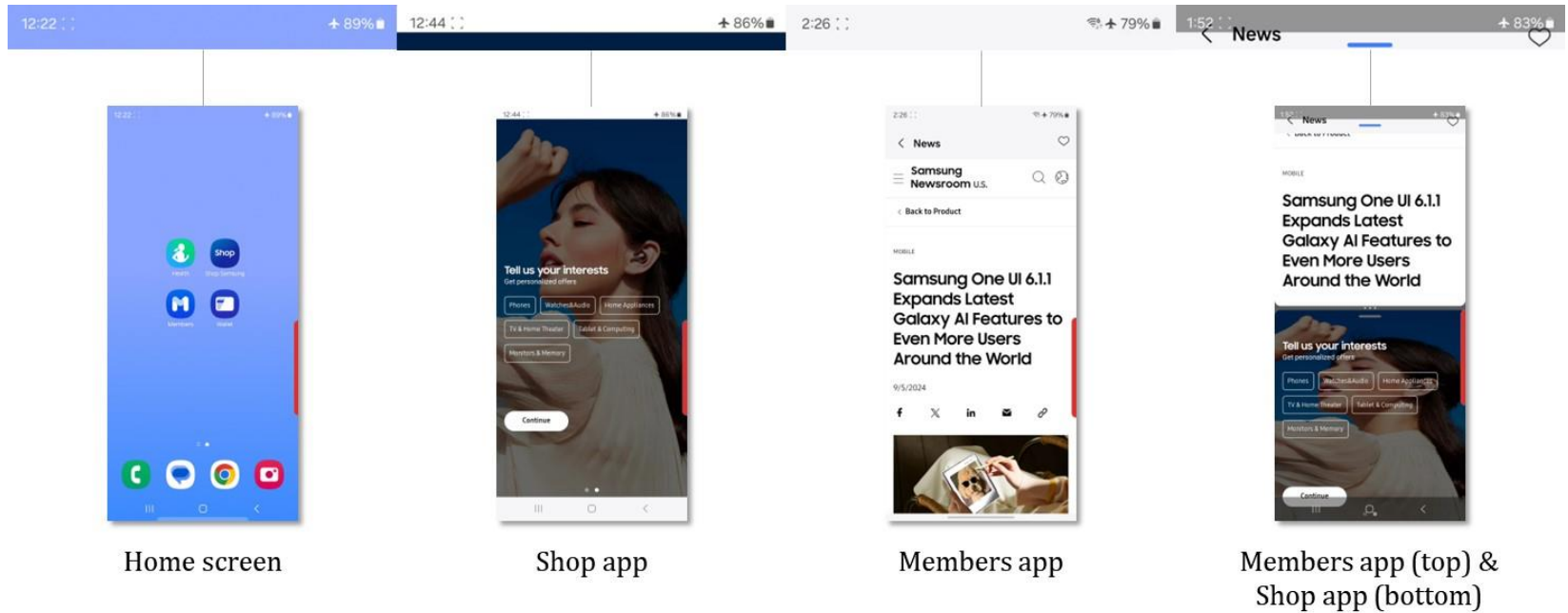
See, e.g., [1b]. The discussion and evidence disclosed in the section on [1b] is incorporated here by reference.

[19c] a zone in form of a bar located in the touch screen on an edge of the touch screen; and

The Accused Instrumentalities include a zone in form of a bar located in the touch screen on an edge of the touch screen.

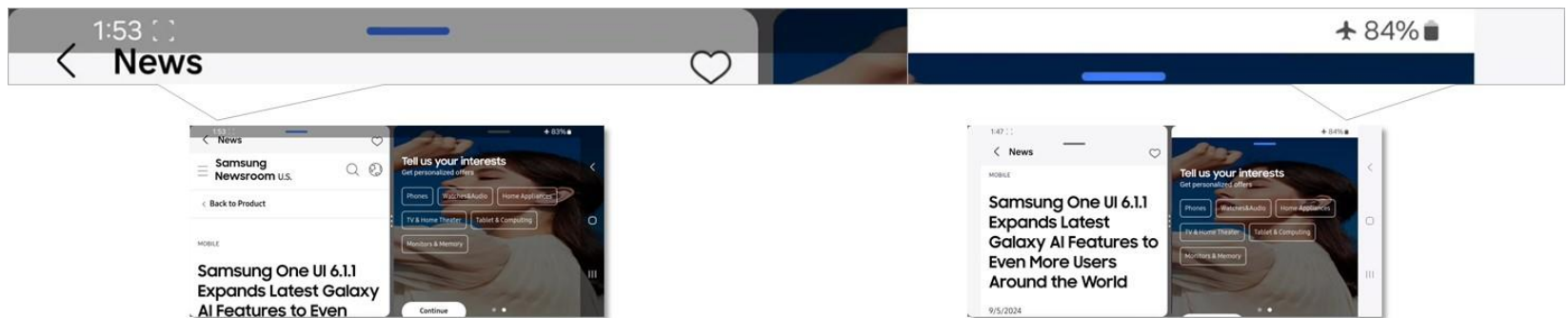
See, e.g., [3]. The discussion and evidence disclosed in the section on [3] is incorporated here by reference.

U.S. Patent No. 9,304,602	Samsung
[19d] a processor;	The Accused Instrumentalities include a processor. <i>See, e.g.,</i> [1d]. The discussion and evidence disclosed in the section on [1d] is incorporated here by reference.
[19e] wherein a gliding action provided from said zone of the touch screen towards any arbitrary direction inside the touch screen at first interacts with said zone, and wherein the processor executes a function related to said zone, and wherein said zone is present on said edge regardless of the interface of an application on said touch screen, and wherein said at least one window is located on the touch screen before said gliding action begins.	In the Accused Instrumentalities, a gliding action provided from a zone of the touch screen towards any arbitrary direction inside the touch screen at first interacts with said zone, and the processor executes a function related to said zone, and wherein said zone is present on said edge regardless of the interface of an application on said touch screen, and wherein said at least one window is located on the touch screen before said gliding action begins <i>See e.g.,</i> [1c] and [1e]. The discussion and evidence disclosed in the section on [1c] and [1e] is incorporated here by reference. The gliding action first interacts with the zone. <i>See</i> [1e]. The processor executes a function related to said zone. For example, the processor executes functions relating to the user interface to indicate that the relevant window is being opened. <i>See</i> [1e]. The window is located on the touch screen before the gliding action begins. <i>See</i> [1e]. Additionally, the gliding action discussed in the sections on claim limitations [1c], [1e], and claim [18] relate to a gliding action provided from said zone of the touch screen towards any arbitrary direction inside the touch screen. The discussion and evidence disclosed in the sections on claim limitations [1c], [1e], and claim [18] are incorporated here by reference. Additionally, the zone is present on the edge of the touch screen regardless of the interface of an application on the touch screen. For example, the notification bar and Edge panel handle may each be present on the top edge of the top screen regardless of which application is active, and when multiple applications are active.



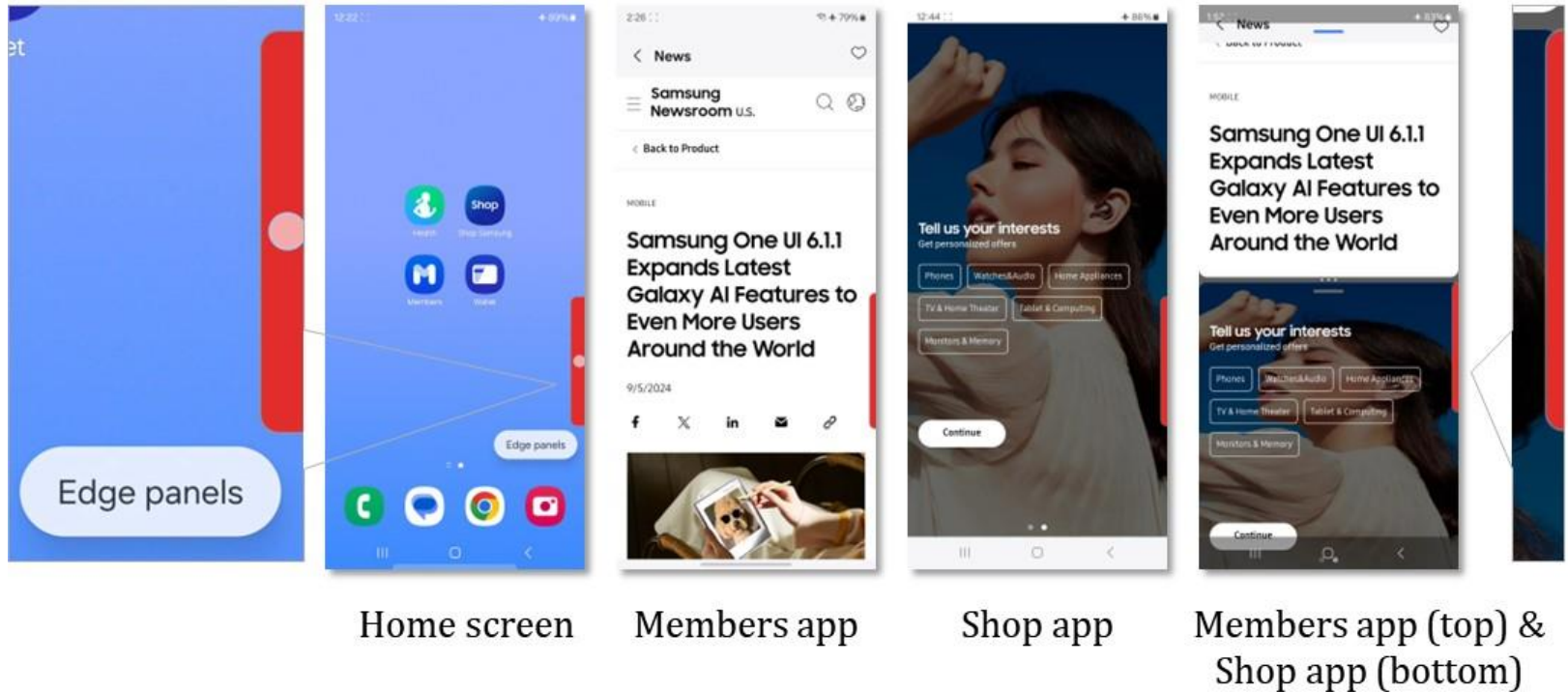
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the notification bar is displayed at the top edge when the device is in landscape mode, including when the device is showing two applications.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, OneUI includes “Edge panels.” By default, the Edge panel “handle” is displayed on the right side of the screen. The handle may be moved to other locations on the edge. The handle’s size and color can be adjusted. In the examples below, the handle is red and is on the right edge of the display. For example, the Edge panel is displayed on a side edge when the device is showing the Home screen, an application, or multiple applications.



Screen recording of Galaxy S24 Ultra running OneUI 6.1. See also claim limitation [1c].

As another example, the Wallet app window is visible from the OneUI Home screen, regardless of whether another application is also in use.

Home screen

Home screen
& Member app



Screen recording of Galaxy S24 Ultra running OneUI 6.1. See also claim limitation [1c].

An analysis of source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.

[21] The system of claim 19, wherein upon detecting said

In the Accused Instrumentalities, when the system detects a gliding action, it relates the gliding action to setting the location of the interface on the touch screen.

See, e.g., [13]. The discussion and evidence disclosed in the section on [13] is incorporated here by reference.

U.S. Patent No. 9,304,602	Samsung
gliding action, the system relates said gliding action to setting the location of an interface on the touch screen.	
[22] The system of claim 19, wherein said bar comprises more than one bar located on one or more edges of the touch screen.	The Accused Instrumentalities include a bar that comprises more than one bar on one or more edges of the touch screen. <i>See, e.g., [15].</i> The discussion and evidence disclosed in the section on [15] is incorporated here by reference.
[23] The system of claim 19, wherein said zone is in a form of a visible or invisible line.	The Accused Instrumentalities include a zone in the form of a visible or invisible line. <i>See, e.g., [5].</i> The discussion and evidence disclosed in the section on [5] is incorporated here by reference.
[24] The system of claim 23, wherein said function is displaying an interface on the screen.	In the Accused Instrumentalities, the function the processor executes displays an interface on the screen. <i>See, e.g., [6].</i> The discussion and evidence disclosed in the section on [6] is incorporated here by reference.
[25] The system of claim 23, wherein said function is displaying a portion of an interface on the screen.	In the Accused Instrumentalities, the function the processor executes displays a portion of an interface on the screen. <i>See, e.g., [7].</i> The discussion and evidence disclosed in the section on [7] is incorporated here by reference.

U.S. Patent No. 9,304,602	Samsung
[26] The system of claim 23, wherein said function is displaying a portion of an interface on the screen, and wherein a length of said portion of the interface is substantially equal to a length of the gliding action.	In the Accused Instrumentalities, the function the processor executes displays a portion of an interface on the screen, and the portion of the interface is substantially equal to the length of the gliding action. <i>See, e.g.</i>, [7] and [8]. The discussion and evidence disclosed in the section on [7] and [8] is incorporated here by reference.
[27] The system of claim 19, wherein said bar is visible or invisible.	The Accused Instrumentalities include a bar that is visible or invisible. <i>See, e.g.</i>, [5]. The discussion and evidence disclosed in the section on [5] is incorporated here by reference. For example, the transparency of the handle for the Edge panels can be set to “high,” which is completely transparent, and invisible.
[28] The system of claim 27, wherein said function is displaying an interface on the screen.	In the Accused Instrumentalities the function executed by the processor is displaying an interface on the screen. <i>See, e.g.</i>, [6]. The discussion and evidence disclosed in the section on [6] is incorporated here by reference.
[29] The system of claim 27, wherein said function is displaying a portion of an interface on the screen.	In the Accused Instrumentalities, the function the processor executes displays a portion of an interface on the screen. <i>See, e.g.</i>, [7]. The discussion and evidence disclosed in the section on [7] is incorporated here by reference.
[30] The system of claim 29,	In the Accused Instrumentalities, during the gliding action, the length of the portion of the interface being displayed is substantially equal to the length of the gliding action.

U.S. Patent No. 9,304,602	Samsung
wherein during said gliding action, a length of the portion of the interface being displayed is substantially equal to a length of the gliding action.	<i>See, e.g., [8].</i> The discussion and evidence disclosed in the section on [8] is incorporated here by reference.
[31] The system of claim 19, wherein during providing said gliding action, the system dynamically drags and shows an interface or a portion of an interface on the touch screen.	In the Accused Instrumentalities, during the gliding action, the system dynamically drags and shows an interface or a portion of an interface on the touch screen. <i>See, e.g., [8].</i> The discussion and evidence disclosed in the section on [8] is incorporated here by reference.
[32] The system of claim 19, wherein said function is displaying a same interface for any said gliding action, said gliding action interacting with any portion of said zone.	In the Accused Instrumentalities, the function the processor executes displays the same interface for any gliding action where the gliding action interacts with any portion of the zone. <i>See, e.g., [18].</i> The discussion and evidence disclosed in the section on [18] is incorporated here by reference.
[33] The system of claim 32, wherein said	In the Accused Instrumentalities, the gliding action starts from outside the touchscreen towards inside the touchscreen, and the gliding action at first interacts with the zone on the touch screen.

U.S. Patent No. 9,304,602	Samsung
gliding action is provided from outside the touchscreen towards inside the touch screen, wherein said gliding action at first interacts with said zone on said touch screen.	See, e.g., [1e] and [19e]. The discussion and evidence disclosed in the sections on [1e] and [19e] are incorporated here by reference. For example, the gliding action first interacts with the zone for the notification bar, Wallet app, or Edge panel, as disclosed in the sections on [1e] and [19e].
[34] The system of claim 19, wherein said function is displaying a portion of an interface on the screen.	In the Accused Instrumentalities, the function the processor executes displays a portion of an interface on the screen. See, e.g., [7]. The discussion and evidence disclosed in the section on [7] is incorporated here by reference.
[35] The system of claim 34, wherein during said gliding action, a length of the portion of the interface being displayed is substantially equal to a length of the gliding action.	In the Accused Instrumentalities, during the gliding action, the length of the portion of the interface being displayed is substantially equal to the length of the gliding action. See, e.g., [8]. The discussion and evidence disclosed in the section on [8] is incorporated here by reference.
[36] The system of claim 19, wherein said zone extends along a substantial portion of said	The Accused Instrumentalities include a zone that extends along a substantial portion of an edge. See, e.g., [4]. The discussion and evidence disclosed in the section on [4] is incorporated here by reference.

U.S. Patent No. 9,304,602	Samsung
edge.	