

**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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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 B: Infringement Contentions for U.S. Patent No. 10,976,922 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 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.

Samsung directly infringes U.S. Patent No. 10,976,922 (“the ’922 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 ’922 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 ’922 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 '922 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 '922 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 1-11 of the '922 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. 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 '922 patent. (C) Samsung knew that the actions of wholesalers, retailers, and end users would infringe claims 1-11 of the '922 patent because their downstream offers for sale, sales, and use of the Accused Instrumentalities constitute acts of infringement. (D) Because claims 1-11 of the '922 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 directly or indirectly provides the Accused Instrumentalities to end users of the Accused Instrumentalities in the United States. The end users directly infringe claims 12-21 of the '922 patent by using the Accused Instrumentalities to perform the Accused Functionalities in the United States. Samsung actively induces these acts of direct infringement by the end users as demonstrated by the following facts: (A) Samsung aids, instructs, or otherwise acts with the intent to cause the 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=R_BLNy_qRns (demonstrating Samsung Pass). For example, Samsung's purpose and intent for equipping the Accused Instrumentalities with the Accused Functionalities is for end users to use the Accused Functionalities. In other words, Samsung intends for end users to use the built-in functions of its products. (B) At least since the filing of the complaint in this action, Samsung has known of the '922 patent. (C) Samsung knew that the end users would infringe claims 12-21 of the '922 patent when they used the Accused Instrumentalities to perform the Accused Functionalities. (D) Because the claims 12-21 of the '922 patent read on the use of the Accused Instrumentalities to perform the Accused Functionalities, every end user's use of the Accused Instrumentalities to perform the Accused Functionalities in the United States constitutes an act of direct infringement.

Samsung also contributes to infringement of the '922 patent 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 '922 patent. The Accused Instrumentalities are a material component for use in practicing the '922 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 '922 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

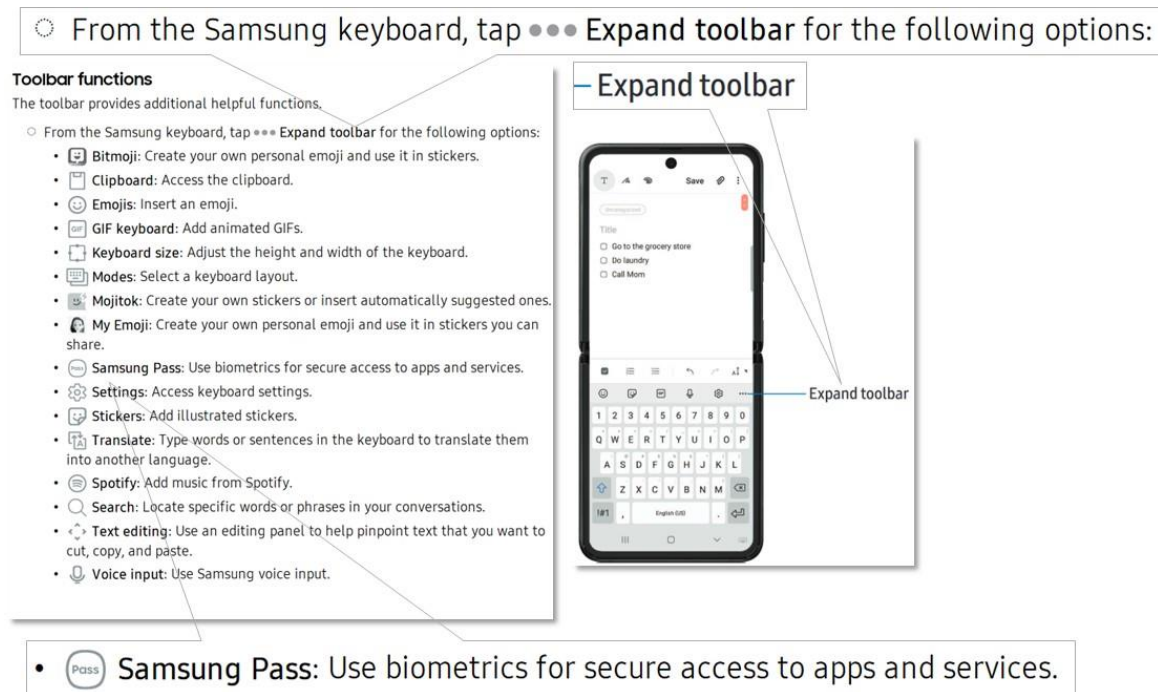
and/or source code may be necessary to fully and accurately describe all infringing features and functionality of the Accused Instrumentalities, and accordingly, Plaintiff reserves the right to supplement these contentions once such information is made available to Plaintiff. Furthermore, Plaintiff reserves 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.

[1a] A system for using multiple applications on a screen of a device, comprising:

The Accused Instrumentalities implement a system for using multiple applications on a screen of a device.

For example, phones and tablets running Samsung's OneUI 6.1 simultaneously show a first application on one part of the screen (e.g., the top half), a second application that was launched via the keyboard on another part (e.g., the bottom half) of the screen (e.g., the Samsung AI ("Advanced Intelligence") app, the clipboard app, the Samsung pass app, or the Samsung or Google voice input app), and a reduced interface for the keyboard.

The Accused Instrumentalities run Samsung's OneUI software. The Samsung Advanced Application app has been part of OneUI and accessible via the keyboard since at least the current version 6.1. The Samsung Pass app has been part of OneUI and accessible via the keyboard since at least OneUI version 2.1, as shown in the following user manual dated 2020 for the Galaxy Z Flip:



Available at: <https://www.att.com/ecms/dam/att/devicesupport/ATT-F700U-EN-UM-TN-TAH-020420-FINAL-WEB.pdf> (Galaxy Z Flip user manual at pp. 39-40).

The clipboard app and Samsung voice input was accessible from the keyboard of OneUI starting in the first version of OneUI (version 1.0), as shown in the following Galaxy S9 user manual from 2018:

U.S. Patent No. 10,976,922	Samsung
	•  Clipboard: Access the clipboard. •  Voice input: Use Samsung voice input.   From the Samsung keyboard, tap  Voice input. Enter Text Text can be entered using an on-screen keyboard or your voice. Option keys/Predictive text  ► Tap a field to display the Samsung keyboard. • Tap  Symbol to insert symbols. Learn About Your Device 52 Use Samsung Voice Input Instead of typing, enter text by speaking.  1. From the Samsung keyboard, tap  Voice input. 2. Tap the screen and speak your text. Learn About Your Device 54 Option Keys From the Samsung keyboard, the following option keys are along the top of the keyboard: •  Toggle: Switch to predictive text. •  Emoji: Insert an emotion. •  Sticker: Add illustrated stickers. •  Clipboard: Access the clipboard. •  Voice input: Use Samsung voice input. •  Settings: Access keyboard settings. •  More: Tap to view and reorder additional options.
[1b] an electronic device having a touchscreen;	The Accused Instrumentalities are electronic devices having a touchscreen. 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/>.

[1c] an on-screen keyboard for entering text in a first application running within said device wherein

The Accused Instrumentalities include an on-screen keyboard for entering text in a first application running within the device.



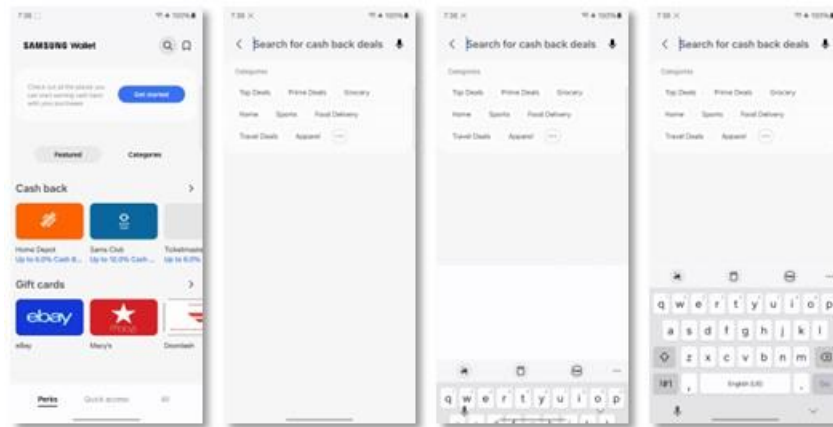
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

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.

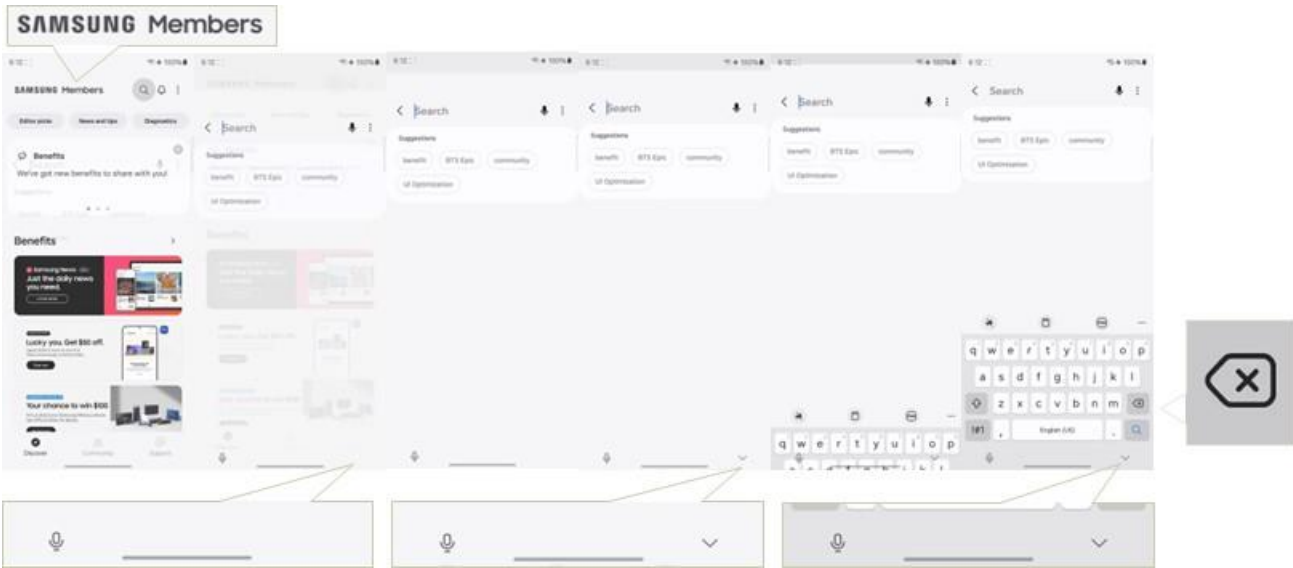
[1d] a first zone of said touchscreen is assigned to an interface of said first application and

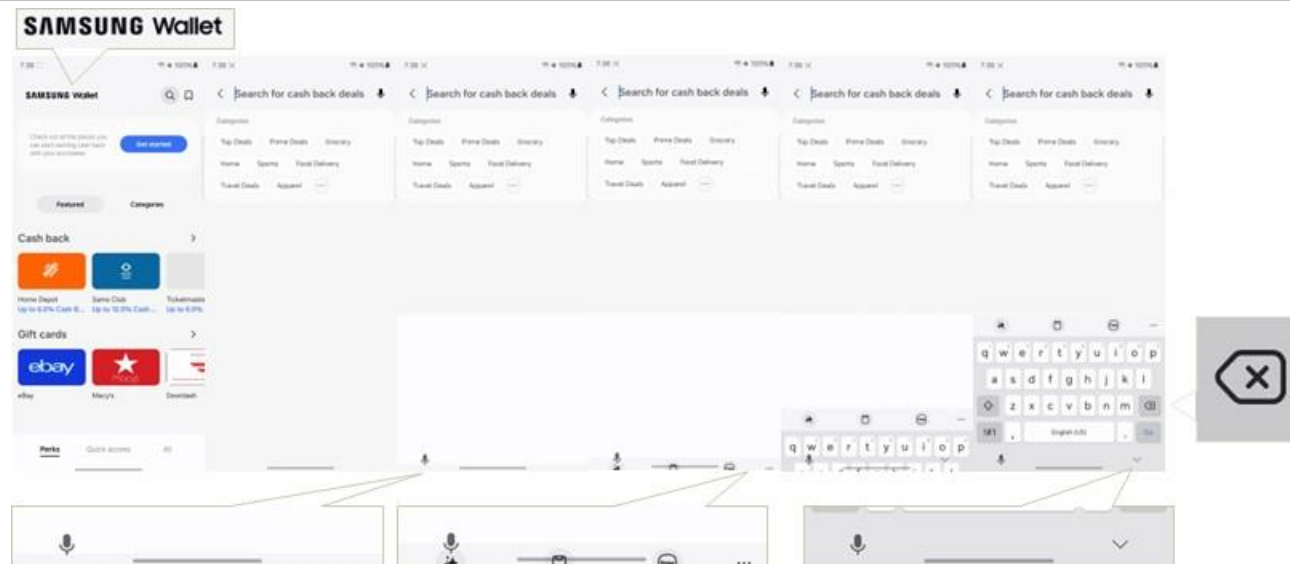
The Accused Instrumentalities include a first zone of a touchscreen that is assigned to an interface of a first application.

For example, the Samsung Wallet application can take up the entire touchscreen, or just the top portion of the touchscreen so that, for example, a keyboard can occupy the bottom portion of the touchscreen.



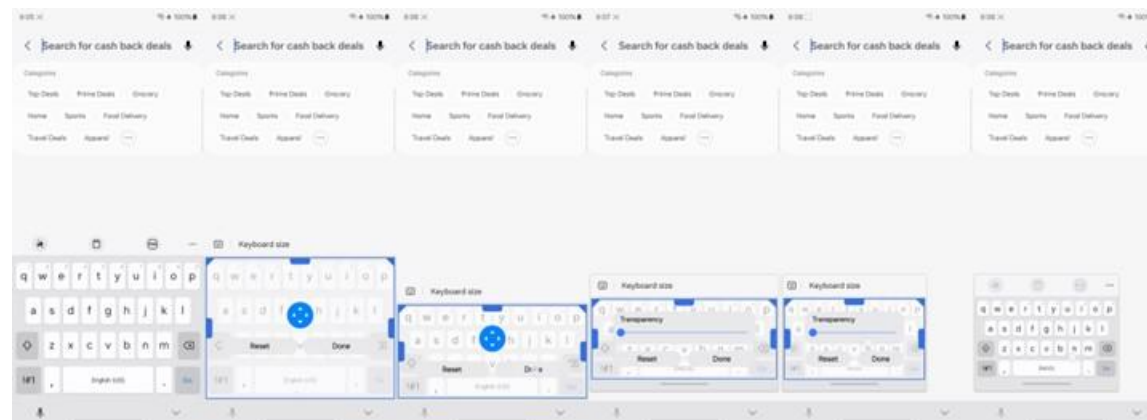
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

U.S. Patent No. 10,976,922	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] a second zone of said touchscreen is assigned to said keyboard; and	The Accused Instrumentalities include a second zone of a touchscreen that is assigned to a keyboard. A second zone of the touchscreen is assigned to the on-screen keyboard. In the following example, the “first” application (Samsung Members app) initially takes up the entire screen. Tapping the search bar results in a second zone being assigned to the keyboard. The keyboard includes a bottom key (denoted by ▼), which is not present when the “first” application takes up the entire screen. The keyboard also includes a delete key (denoted by ✕).  Screen recording of Galaxy S24 Ultra running OneUI 6.1. In the following example, the “first” application (Samsung Wallet app) initially takes up the entire screen. Tapping the search bar results in a second zone being assigned to the keyboard. The zone for the keyboard is visible when, for example, the touchscreen transitions from showing no keyboard to showing the keyboard in the zone. The keyboard is the same as the keyboard shown in the previous example with the Samsung Member app, and includes a bottom key (denoted by ▼), which is not present when the “first” application takes up the entire screen, and a delete key (denoted by ✕).



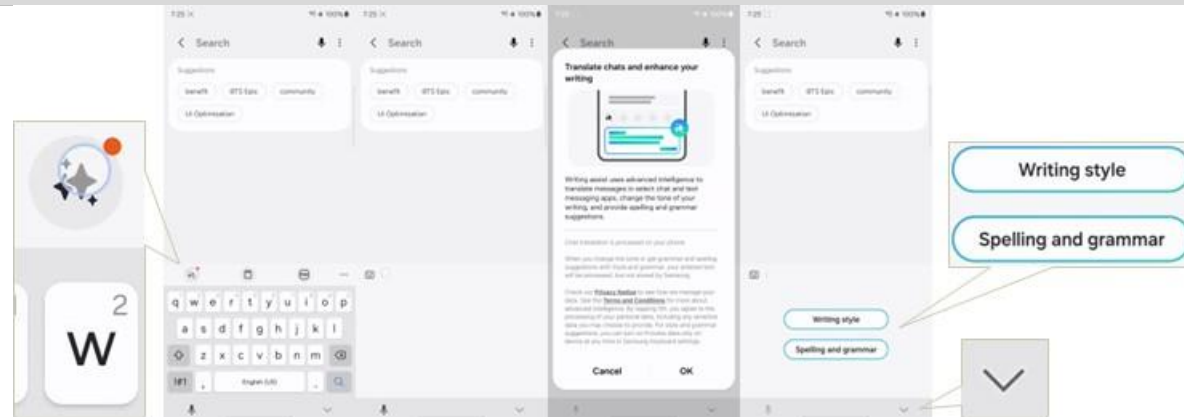
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The zone for the keyboard is set by default but can be adjusted. Adjusting the zone for the keyboard may also adjust the zone for the interface of the “first” application. If the keyboard zone is adjusted, then it may remain in this adjusted state until it is adjusted again.



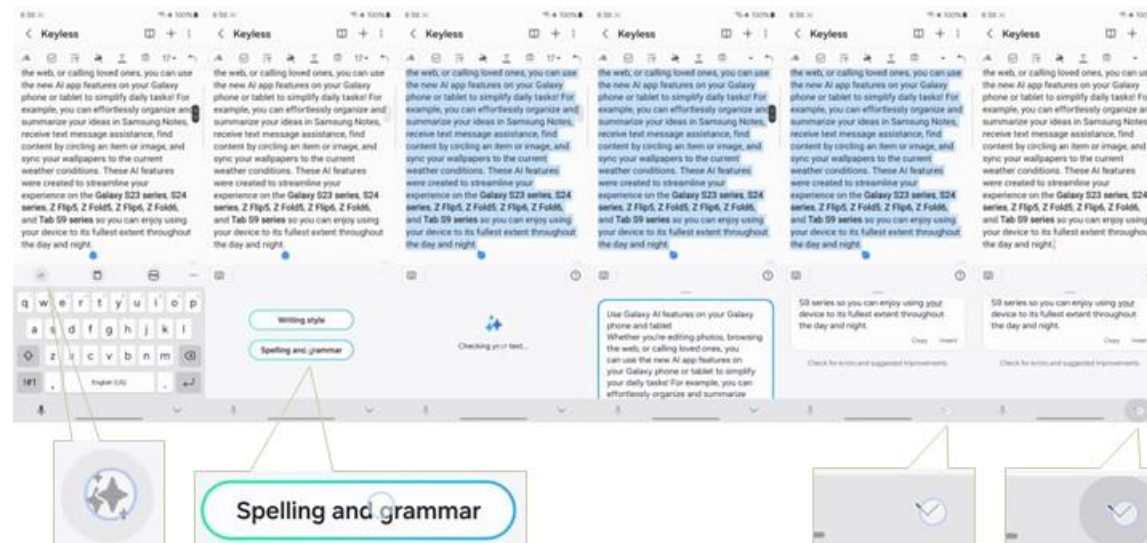
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

U.S. Patent No. 10,976,922	Samsung
[1f] wherein based on accomplishment of a condition under the control of said keyboard, the system activates a second application and displays an interface of the second application and a reduced interface corresponding to the keyboard on at least a portion of a second zone, and the interface of a first application, the interface of a second application, and the reduced interface corresponding to said keyboard are simultaneously displayed on a touchscreen. wherein said interface of said first application, said interface of said second application, and the reduced interface corresponding to said keyboard are simultaneously displayed on said touchscreen.	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. In the Accused Instrumentalities, based on accomplishment of a condition under the control of a keyboard, the system activates a second application and displays an interface of the second application and a reduced interface corresponding to the keyboard on at least a portion of a second zone, and the interface of a first application, the interface of a second application, and the reduced interface corresponding to said keyboard are simultaneously displayed on a touchscreen. The on-screen keyboard has buttons that activate other (“second”) applications, including for example, the AI, clipboard, or Pass applications. The interface of the second application, and a reduced interface corresponding to the keyboard, is displayed on a portion of the “second” zone of the keyboard. The second application interface may occupy a rectangle within the zone for the keyboard, for example, and the reduced interface corresponding to the keyboard can include the delete key (⌫), for example, or the bottom key (↵). The interfaces of the first and second applications, and the reduced interface corresponding to the keyboard, are simultaneously displayed on the touchscreen. For example, in all of the examples displayed below, including the first row of examples below, the first application is on the top portion of the screen, and the second application and reduced interface are on the bottom portion of the screen. top: first app bottom: keyboard AI clipboard voice top: first app bottom: second apps & reduced keyboard interface Screen recording of Galaxy S24 Ultra running OneUI 6.1. For example, the AI (“Advanced Intelligence”) application can be launched by pressing the AI button (🧠) on the keyboard, which can launch, for example, the “Writing assist” function of the AI app. The reduced interface of the keyboard includes, for example, the bottom key (↵).



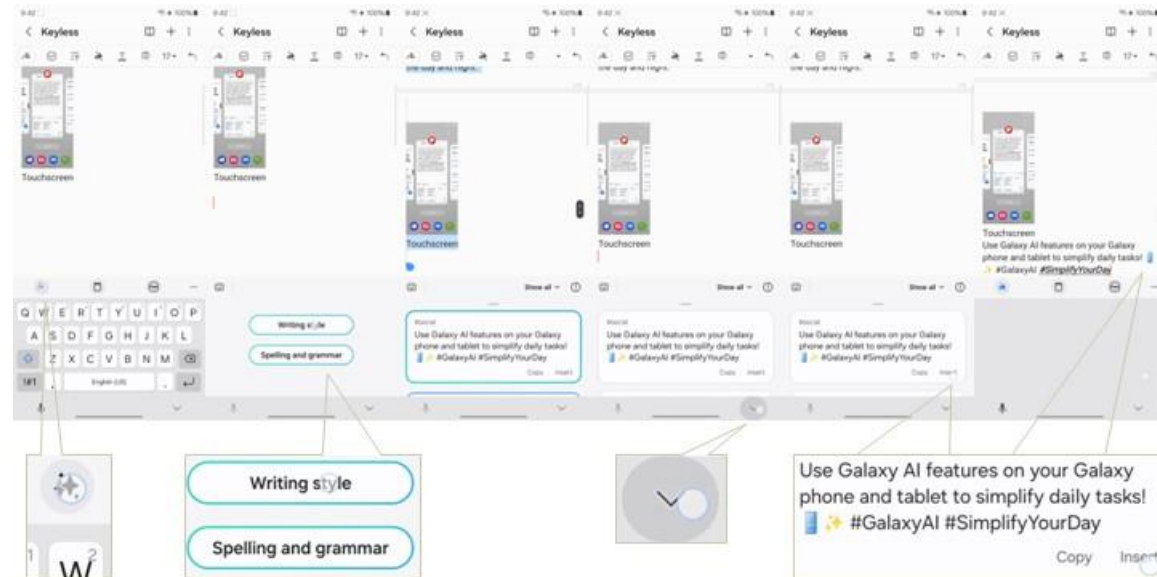
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The AI app is a “second” app that is distinct from the “first” app (for example, the Wallet, Member, or Note app) and is distinct from the keyboard. For example, the AI app can suggest spelling and grammar corrections. The AI app provides an interface for scrolling through different versions of text that the AI app suggests. The reduced interface of the keyboard (which includes the upside-down caret, ) remains functional to, for example, deselect the selected text (the text is highlighted in blue when selected).



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

For example, the AI app can suggest different writing styles for text. In addition to the scrolling and reduced interface of the keyboard noted in the previous paragraph, the AI app provides “copy” and “insert” functions to copy the text it suggests, or to insert the text at the current cursor position in the “first” application.



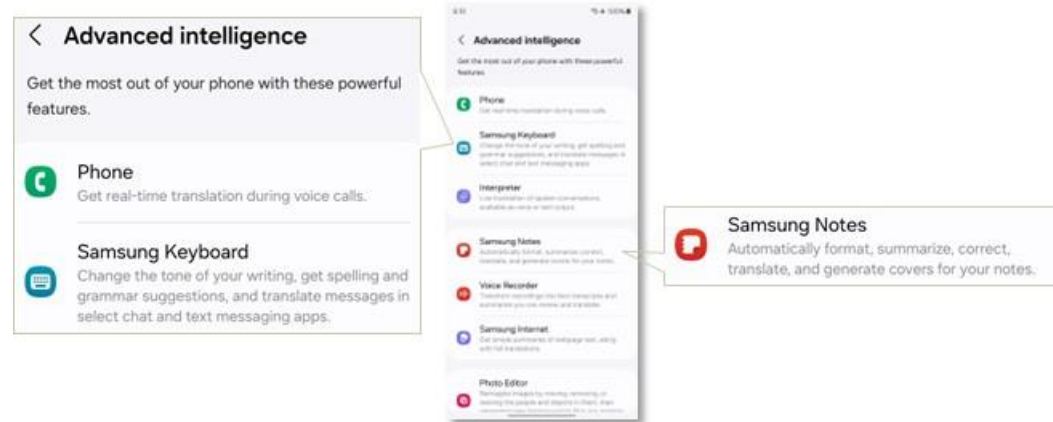
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The AI app offers additional functionality, such as “Chat translation,” when launched within the keyboard in conjunction with a different “first” application, such as a messaging app.



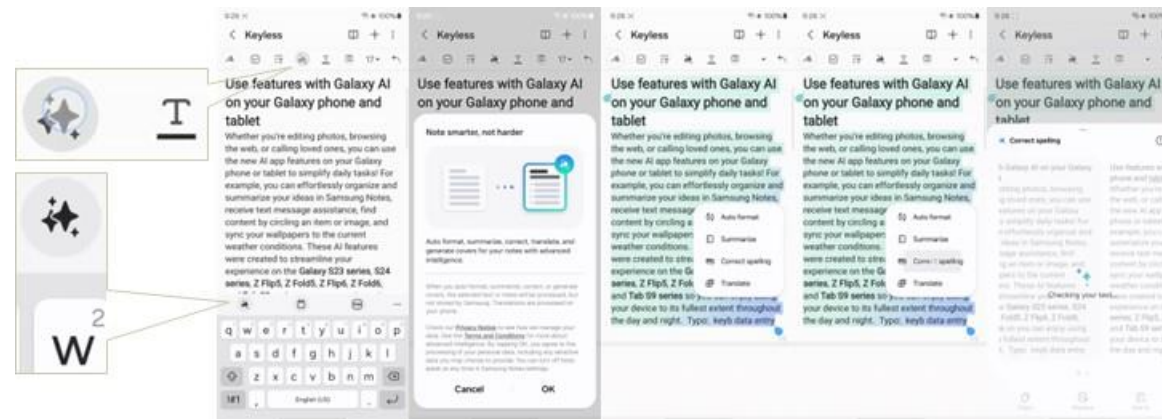
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

In addition to performing the “Writing assist” and “Chat translation” functions when launched from the keyboard (as shown above), the AI app performs different functions in numerous contexts.



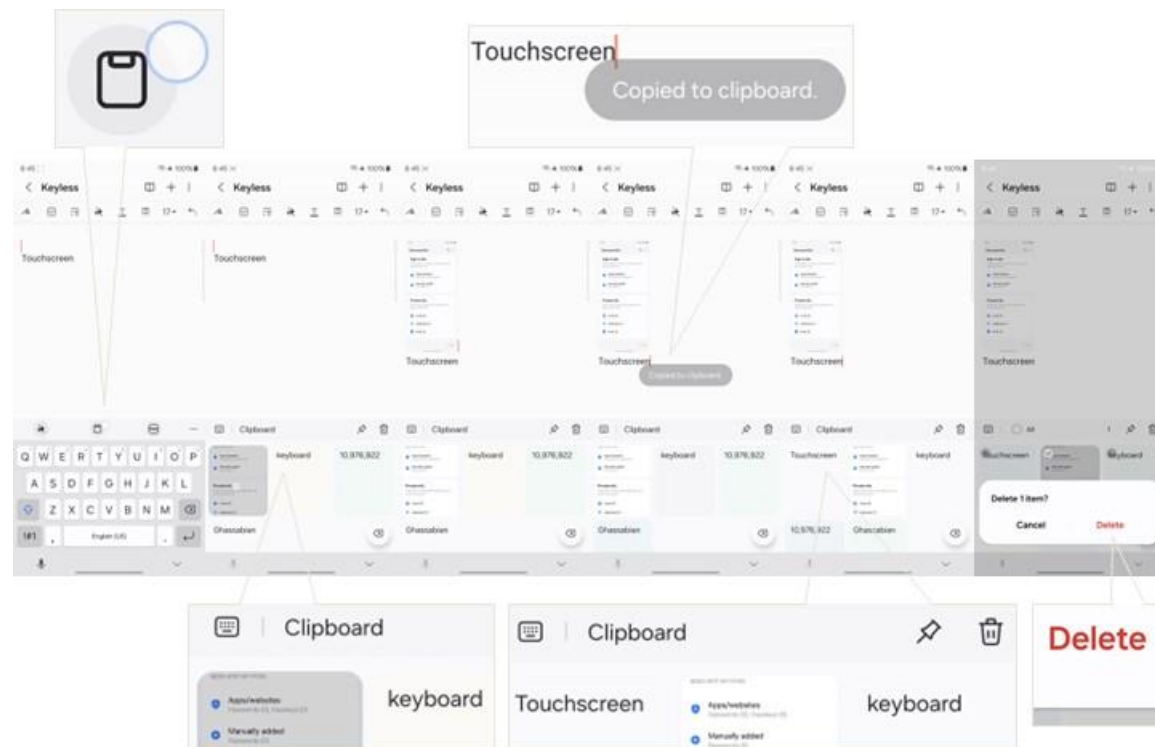
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

For example, the AI app performs a “Note assist” function when the AI button on the Note toolbar is pressed. The AI button on the Note toolbar has the same icon as the AI button on the keyboard, but the distinct buttons from two different interfaces launch different functions of the AI app.



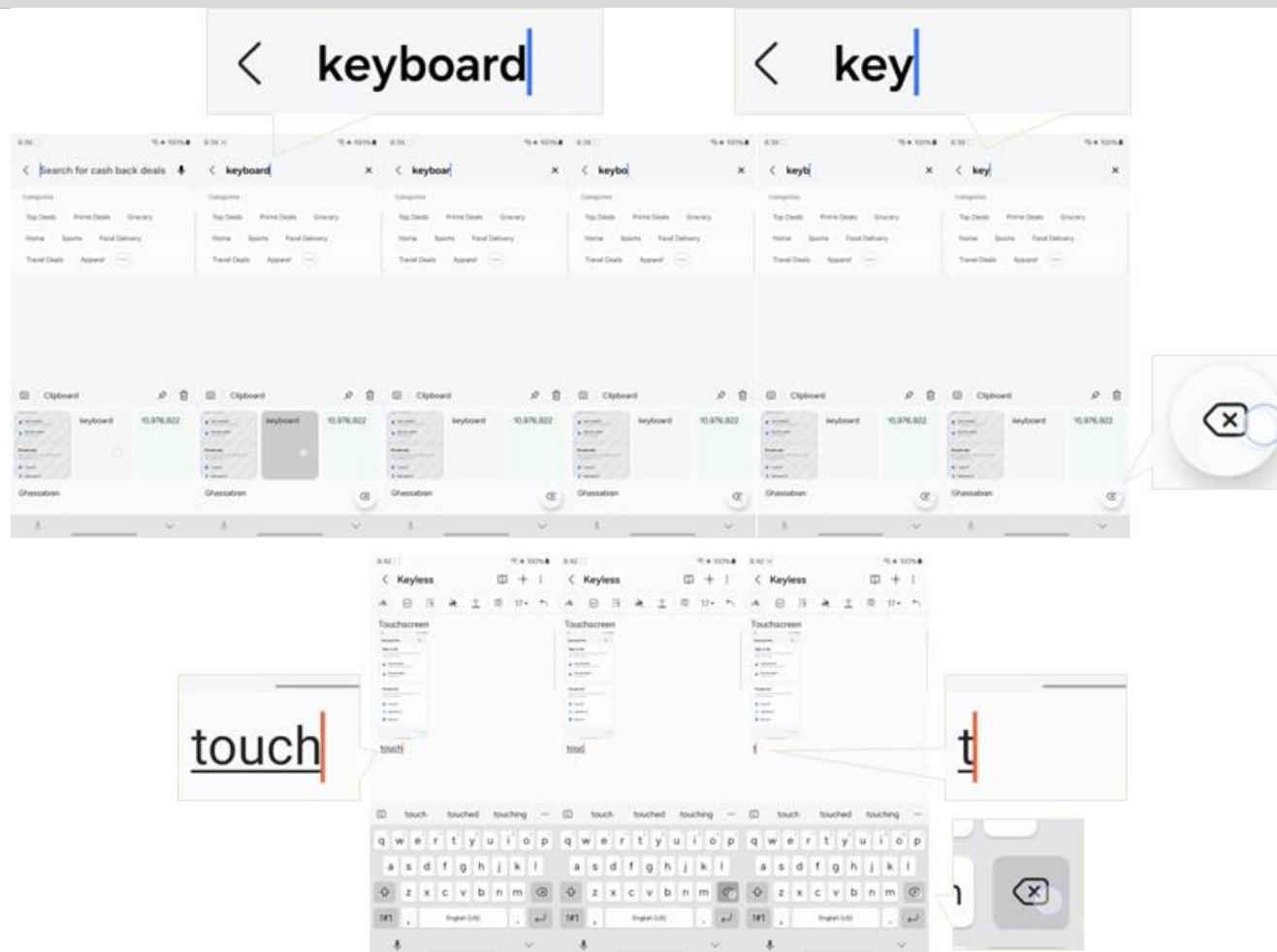
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the clipboard application can be launched by pressing the clipboard button (denoted by ) on the keyboard. The clipboard app is a “second” app that is distinct from the “first” app (for example, the Wallet, Member, or Note app) and is distinct from the keyboard. The clipboard app can copy and paste images and text, for example, including when the keyboard is not displayed and is not in use. Images and text copied anywhere on the device, for example when taking a screenshot or copying all or part of a photo from the camera or image gallery, are copied into the clipboard. The clipboard app displays the data that is contained in the clipboard, and allows selecting items to paste them, including into the “first” app (the Note app in the example below). The clipboard app interface also includes a trash can icon (denoted by ) that allows deleting items from the clipboard.



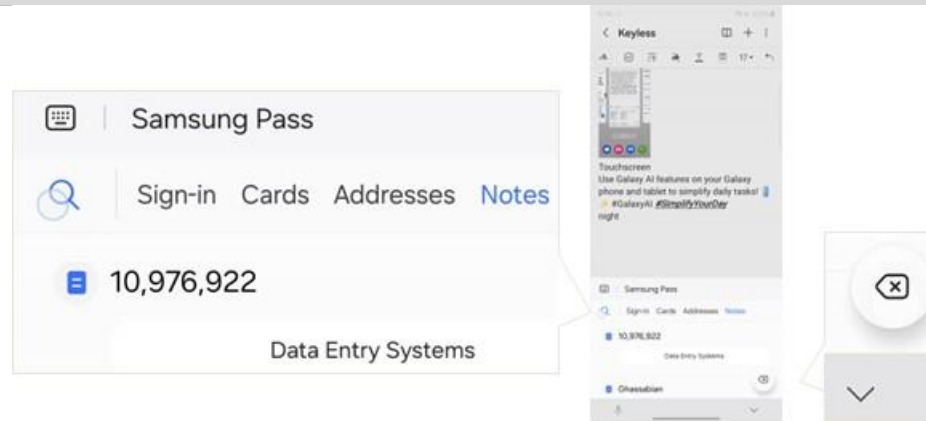
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

When the clipboard app is running within the keyboard zone, the reduced interface of the keyboard (which includes the bottom key, ) remains functional to, for example, deselect the selected text (as shown in the discussion regarding the AI app). The reduced interface of the keyboard also includes a delete key () , which performs the same delete function when, for example, the reduced interface delete key is tapped, or when the delete key on the keyboard is tapped.



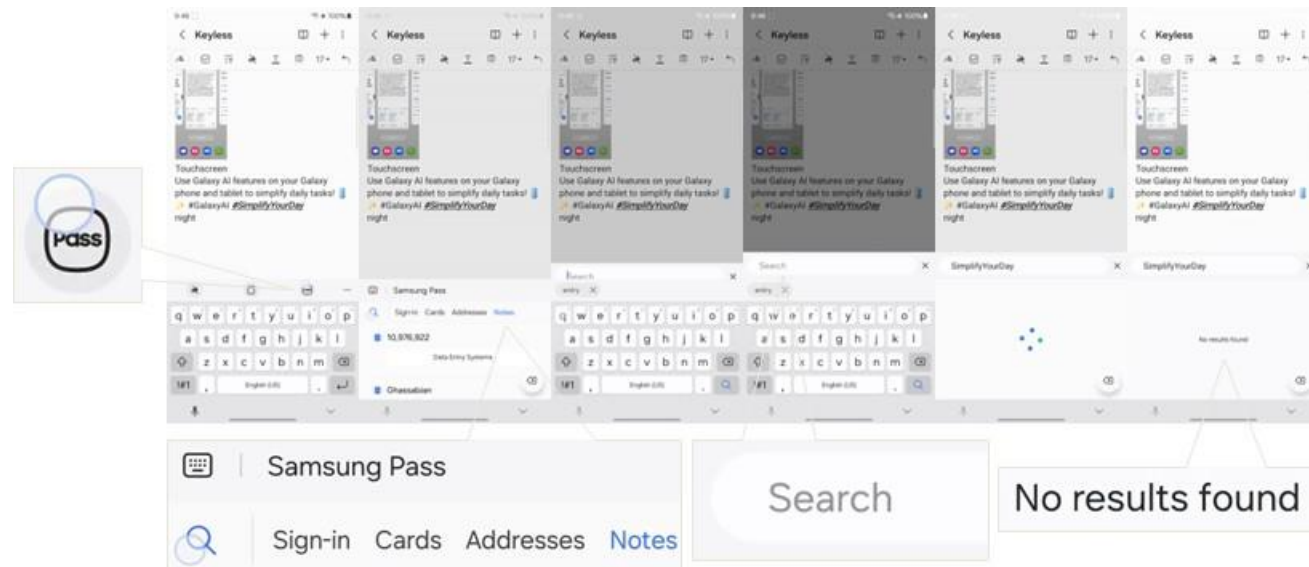
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

Another example of a “second” app that can be launched from the keyboard is the Samsung Pass application. The Samsung Pass app has functionality including search (denoted by a magnifying glass icon, ) and stores data in categories including “Sign-in,” “Cards,” “Addresses,” and “Notes.” In the example below, the Notes data is shown within the Samsung Pass interface, and the first note file is shown, with the text “Data Entry Systems.” The reduced interface of the keyboard includes the delete key () and the bottom key () which have the same functionality that has been discussed in connection with other “second” applications.



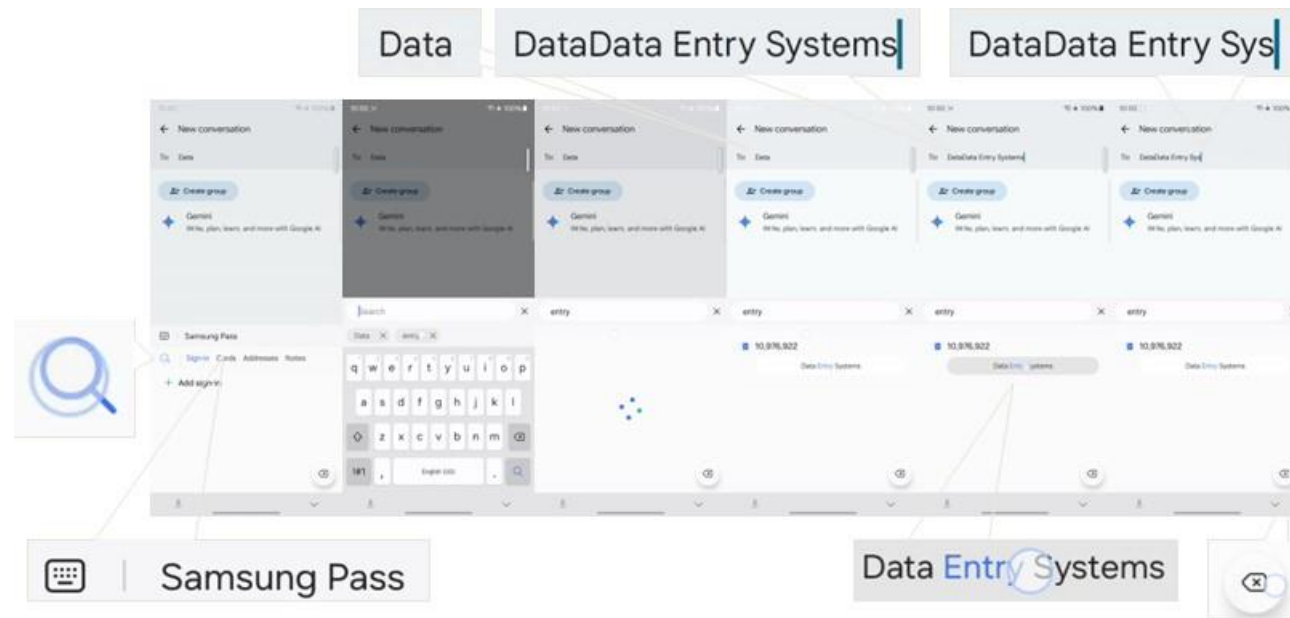
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The Samsung Pass application can be launched by pressing the Pass button () on the keyboard. The Pass application can then run a search, for example, which uses the keyboard to enter search terms. The Samsung Pass app then runs the search. In the following example, there are no search results within the Samsung Pass app for the search term “SimplifyYourDay”.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

In the following example, there is a search result within the Samsung Pass app for the search term “entry.” The search result is a note (shown in the screen shot above, in the “Notes” portion). Selecting that note inserts text from the note into the messaging (“first”) application. Afterwards, the delete key of the reduced interface of the keyboard is used to delete the letters from one of the words (“System”) that was copied from the note.



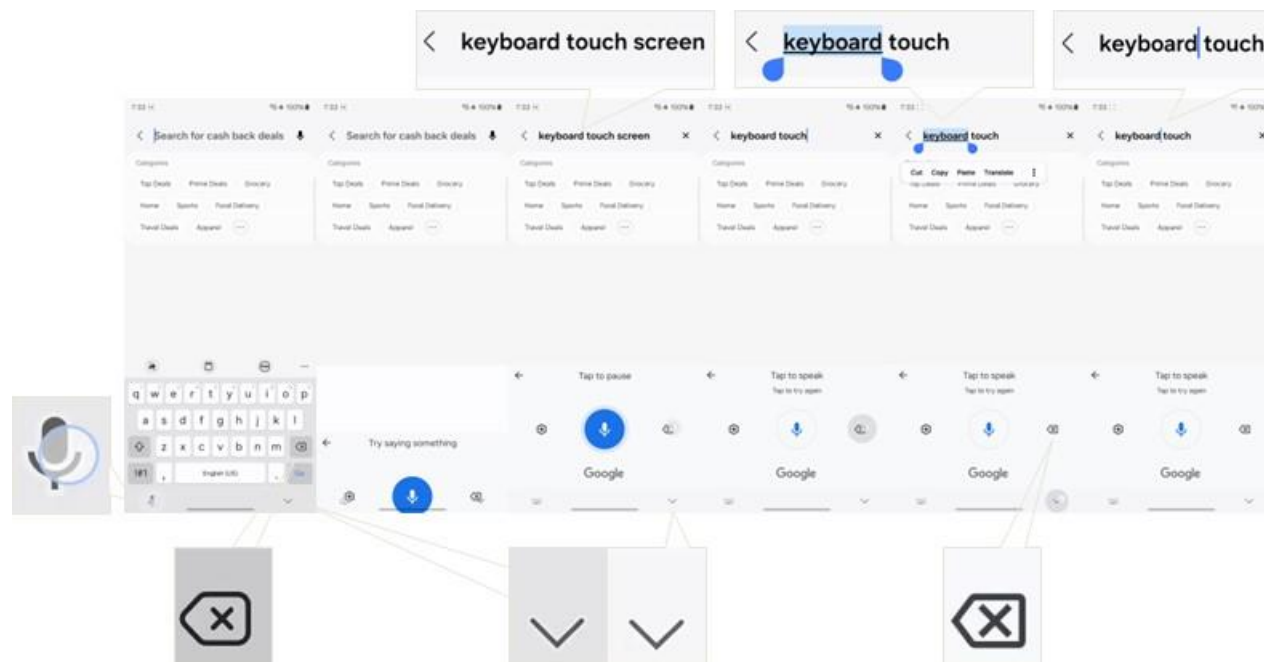
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The Samsung Pass app is a “second” app that is distinct from the “first” app (for example, the Wallet, Member, or Note app) and is distinct from the keyboard. For example, the Samsung Pass app can be downloaded as a standalone app from Galaxy Store, which is Samsung’s app store.



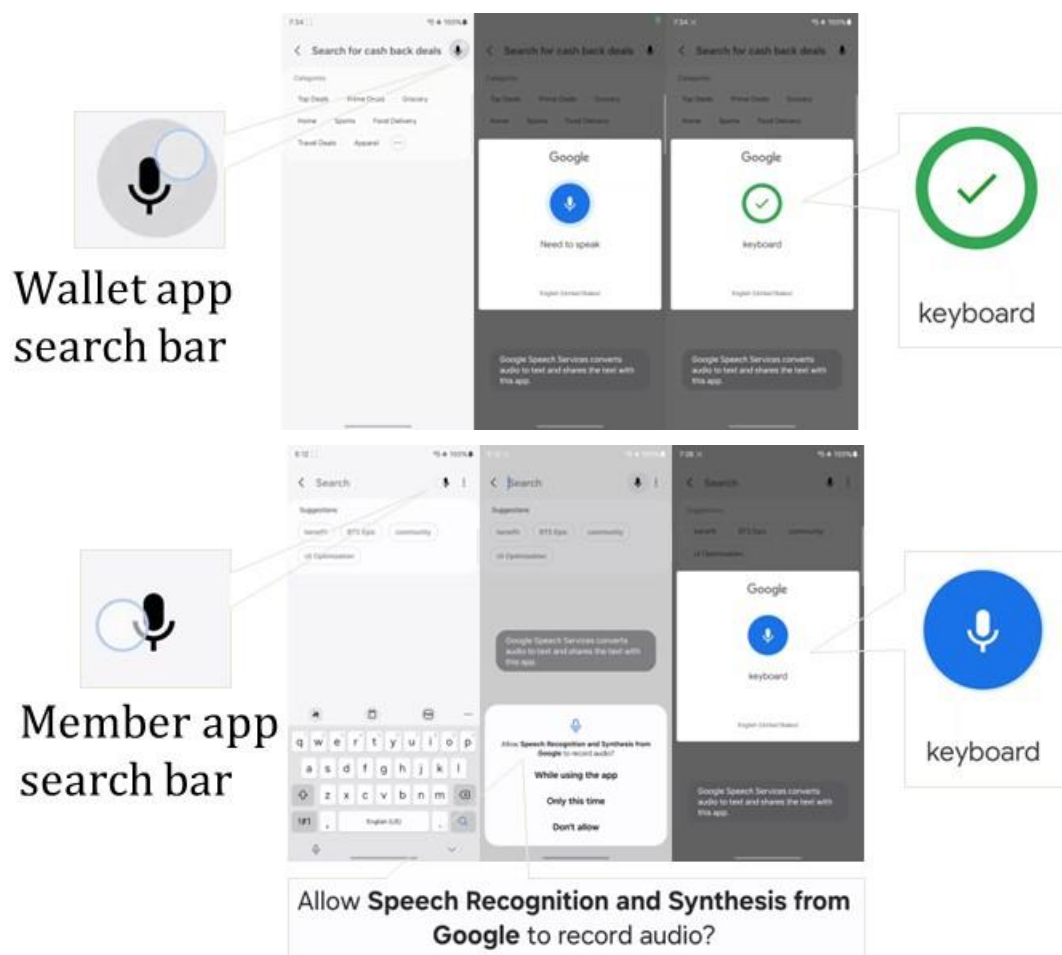
Available at: <https://galaxystore.samsung.com/prepost/000005295090> (Galaxy Store webpage to install Samsung Pass).

As another example, the Google Voice Typing application (which is pre-installed on many or all of the Accused Instrumentalities) can be launched by pressing the microphone icon (🎤) on the keyboard. The Google Voice Typing application converts speech to text and enters the relevant text on the display, for example. When the Google Voice Typing application is running within the keyboard zone, the reduced interface of the keyboard (which includes the bottom key, ↵) remains functional to, for example, deselect the selected text (as shown in the discussion regarding the AI app). The reduced interface of the keyboard also includes a delete key (⌫), which performs the same delete function when, for example, the reduced interface delete key is tapped, or when the delete key on the keyboard is tapped (as shown in the discussion regarding the clipboard app). The following screen shots show an example of launching the Google Voice Typing application from the keyboard, converting speech to text, deleting text using the reduced interface delete key, and deselecting text using the bottom key (↵).



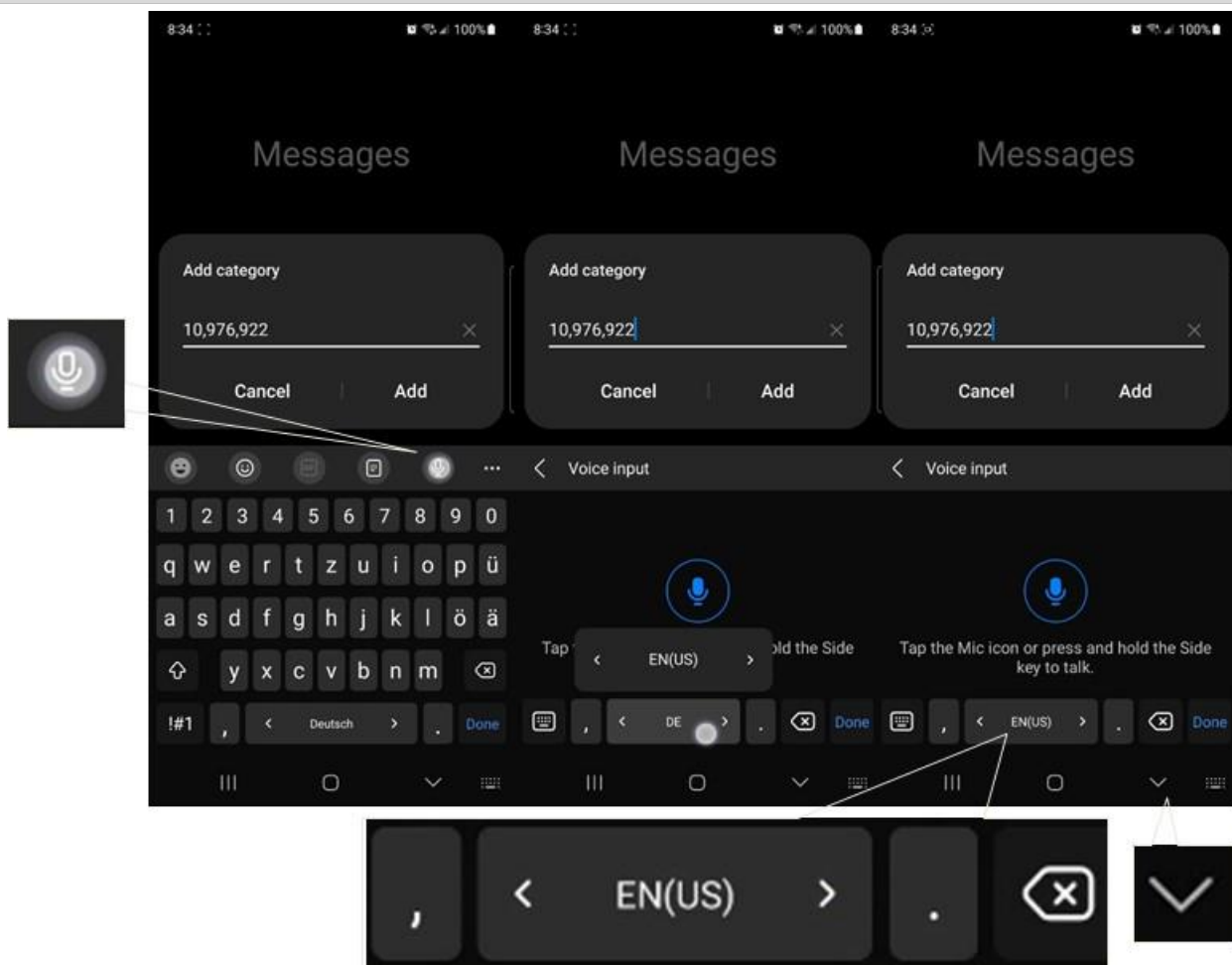
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The Google Voice Typing app is a “second” app that is distinct from the “first” app (for example, the Wallet, Member, or Note app) and is distinct from the keyboard. For example, the Google Voice Typing app is available without the keyboard, for example, in connection with the search bar in the Samsung Wallet app, and the search bar in the Samsung Member app. As another example, the Google Voice Typing app (and Speech Recognition and Synthesis from Google) requires permission to use the microphone, separate and apart from the permissions that the keyboard requires.



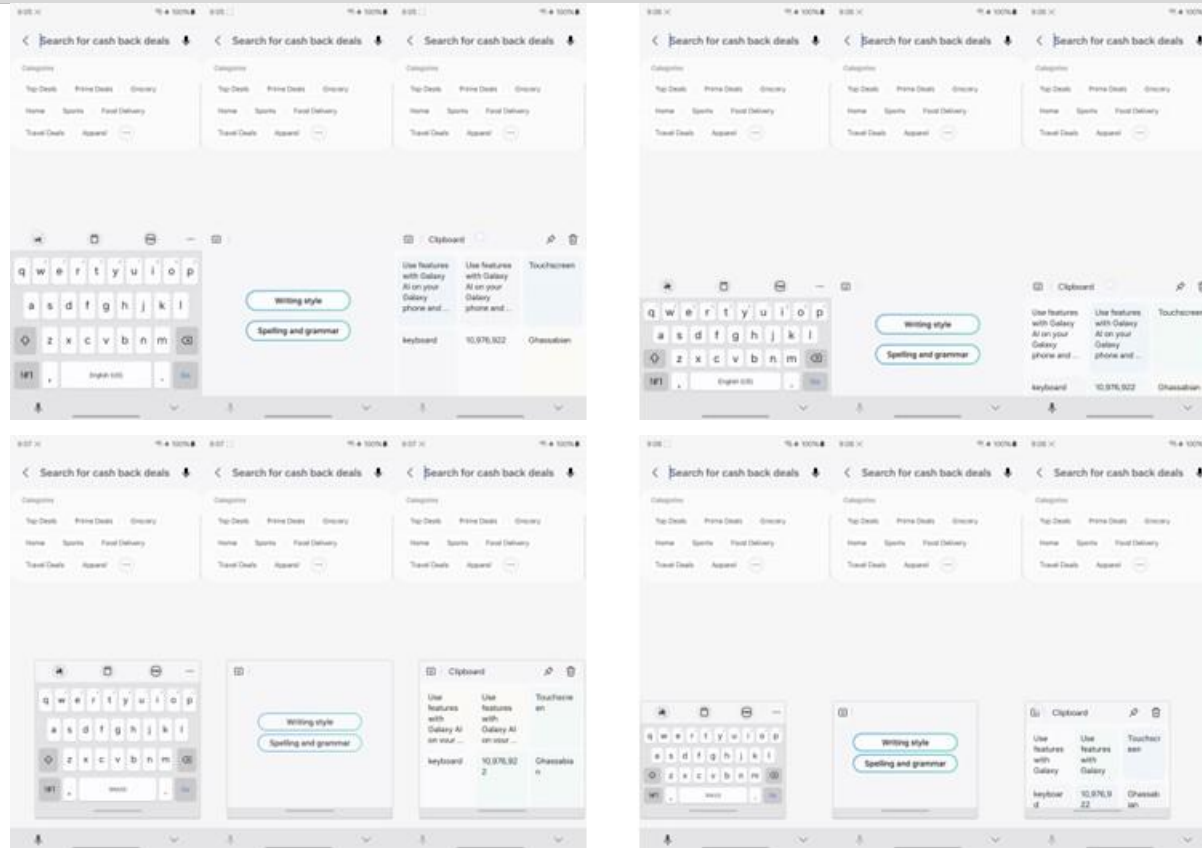
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the Samsung voice input app used in OneUI version 6.0 and earlier can be launched by pressing the microphone icon on the keyboard. The Samsung voice input app is similar to the Google Voice Typing app (discussed above) and has additional keys from the reduced keyboard interface. In addition to the bottom key and the delete key (shown with the Google Voice Typing app), the Samsung voice input app has a comma key, space bar (which also offers the ability to control a cursor and to switch languages, for example from German to English in the example below), and a period key that functions the same as the corresponding keys in the full keyboard interface.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

If the zone for the on-screen keyboard is adjusted, the interface of the second application is also adjusted so that it remains in a portion of the zone for the keyboard. The examples below show adjusted interfaces of the AI and clipboard apps, and the same adjustment applies to the Samsung Pass app and Google Voice Typing app.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

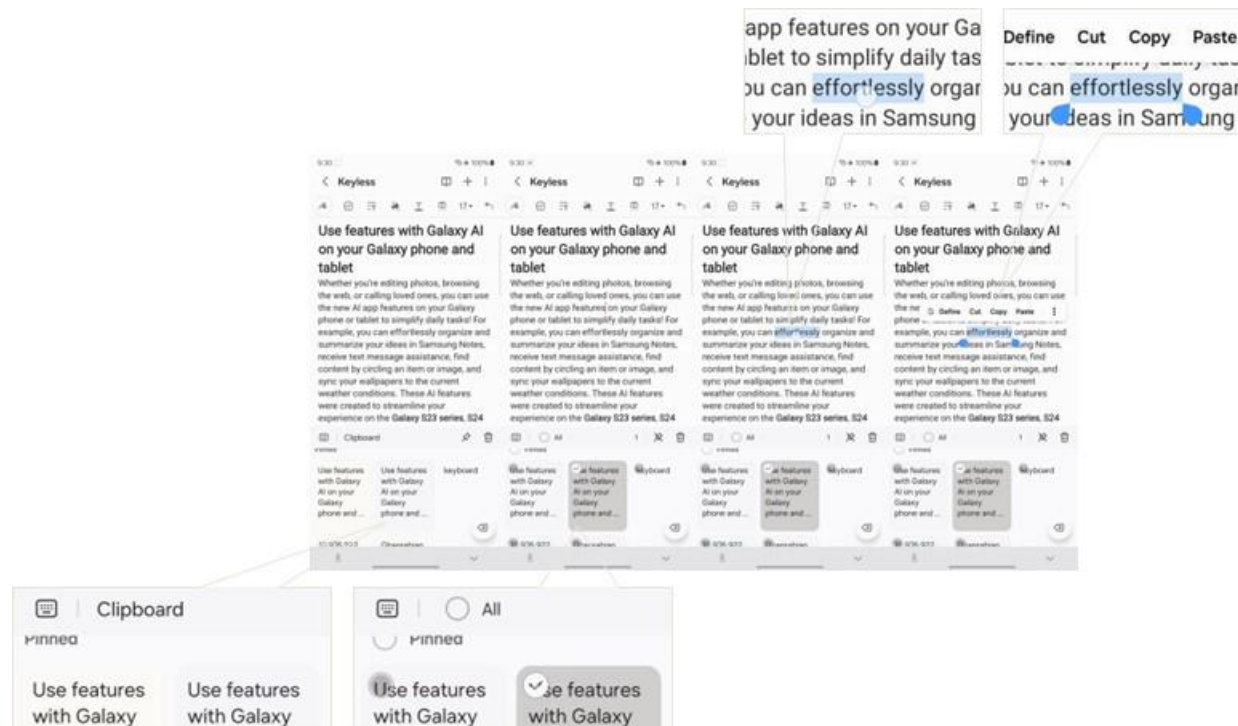
The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.

[2] The system of claim 1, wherein upon interacting with the interface of any of said applications, the focus of the system is given to the interacted application.

In the Accused Instrumentalities, when a user interacts with the interface of an application, the focus of the system is given to the interacted application.

For example, in all of the examples shown in connection with claim 1, interacting with the interface of the “first” application causes the focus of the system to be given to the “first” application, and interacting with the interface of the “second” application causes the focus to be given to the “second” application. The focus can shift back and forth between the applications.

In the additional example below, the clipboard application at the bottom of the screen is interacted with, to select one of the items in the clipboard, which receives a check after being selected. The clipboard item remains selected. Next, the focus of the system switches from the clipboard app to the Notes app, when the Notes application at the top of the screen is interacted with, to select the word “effortlessly.”



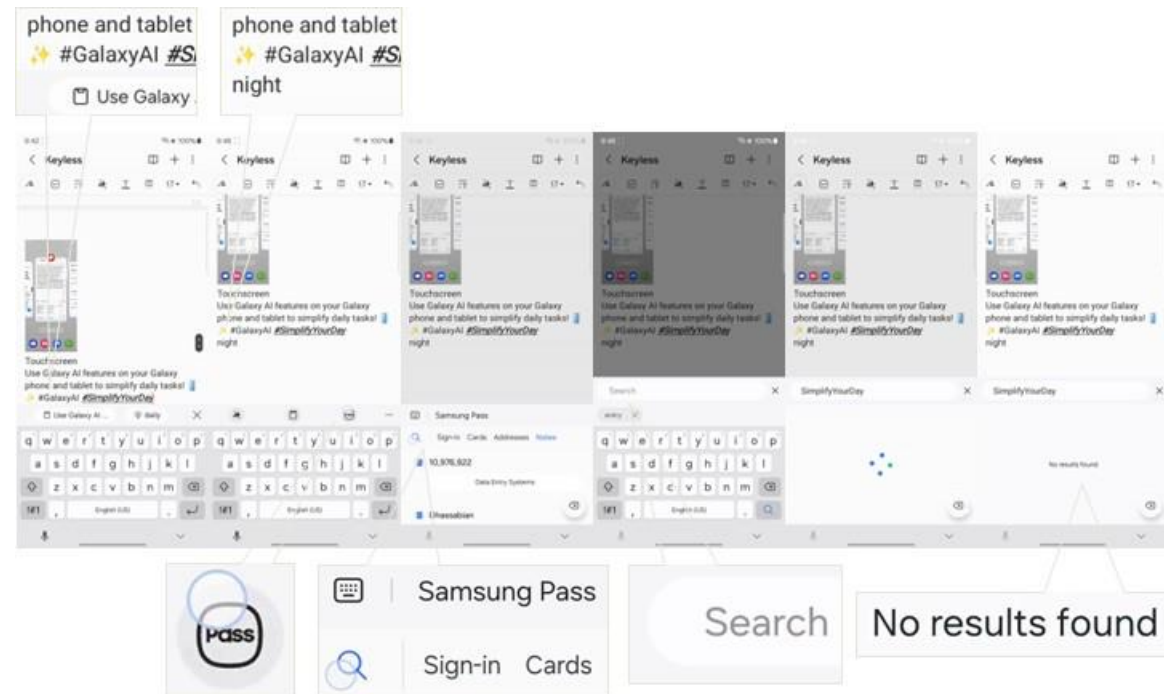
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

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.

[3] The system of claim 1, wherein said keyboard is used with both of said applications.

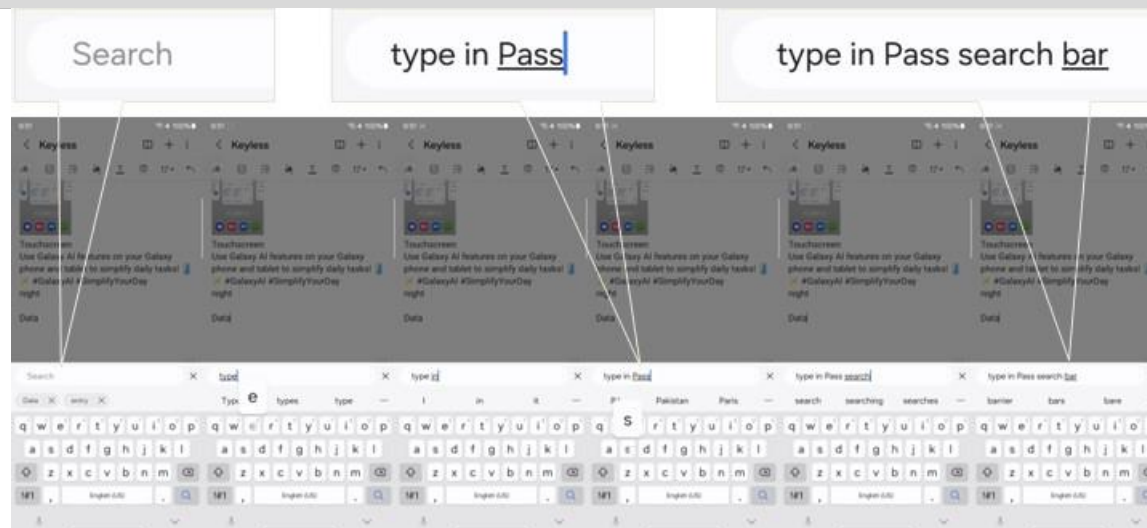
In the Accused Instrumentalities the keyboard is used with both applications.

For example, the Samsung Pass app has a search function. The Samsung Pass search function uses the keyboard. In the example below, the keyboard is used with the Note application on the top part of the screen to type the word “night” on a new line after the word “day.” Then the Samsung Pass app is launched in bottom half of the screen, within the zone for the keyboard, using the keyboard button that launches the Samsung Pass app. Then the Samsung Pass app’s search functionality is launched, which, in turn, causes the on-screen keyboard to appear.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

The Samsung Pass search application uses text typed through the keyboard to perform searches. In the example shown below, the text “type in Pass search bar” is typed through the keyboard into the Samsung Pass app search bar. As noted in the previous example, the Samsung Pass app search bar uses the on-screen keyboard.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

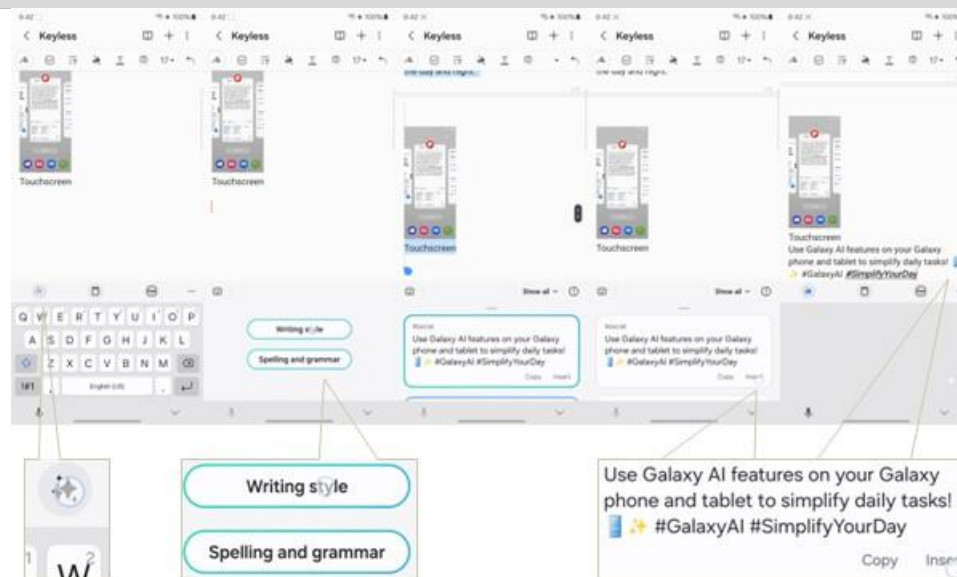
The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.

[4] The system of claim 1, wherein an information received from one of said applications is shared with at least the other application while said interface of said first application and said interface of said second application are simultaneously displayed on said touchscreen.

In the Accused Instrumentalities information received from one application is shared with at least the other application while the interface of the first application and the interface of the second application are simultaneously displayed on the touchscreen.

The examples discussed in connection with claim 1 include examples of information that is received from one of the applications and is shared with the other application while both applications are being displayed.

For example, the AI app receives text that “first” application received, for example from typing words. The AI app processes that text to suggest other text, and with each version of suggested text, provides an option to “Insert” (provide) the processed text to the “first” application. In the example below, the AI app analyzed all of the text in the Note app, suggested a shortened version of the text, and that shortened text is inserted into the text of the Note app, after the original text.



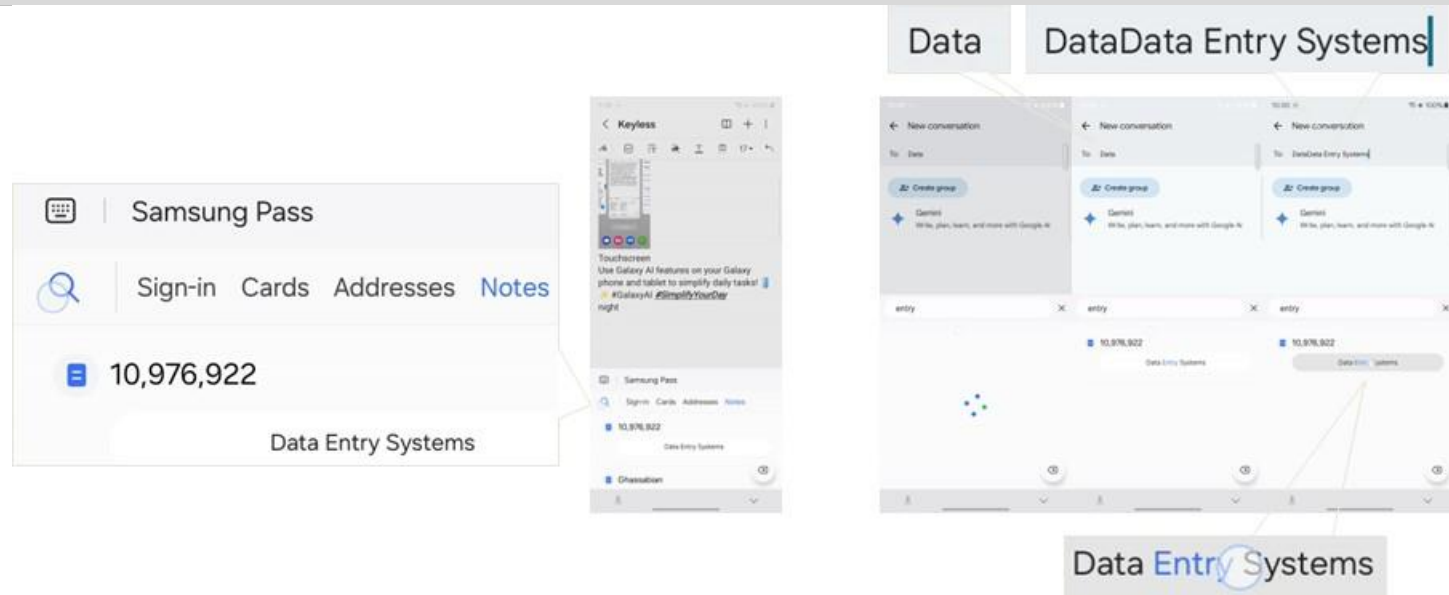
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the clipboard app receives information from the “first” application, for example from copying items from the “first” application to the clipboard. Similarly, the “first” application receives information from the clipboard, for example when information is pasted from the clipboard to the first application. In the example below, an image from the clipboard is shared with (and pasted into) the Notes app, then the text “Touchscreen” is shared with (and pasted into) the Notes app from the clipboard app. Next, the text “night” is copied from the Notes app, then shared with the clipboard app, which then stores the text “night” in the clipboard.



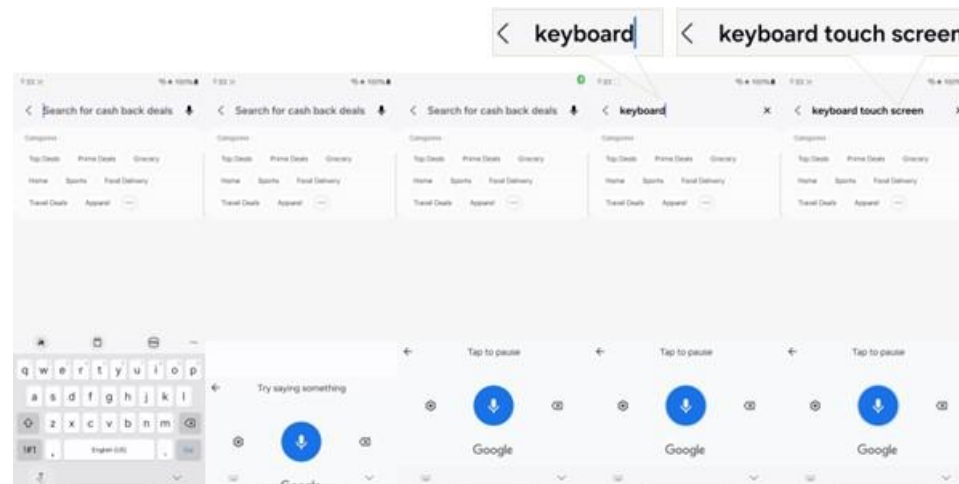
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the “first” application receives information from Samsung Pass, when for example Samsung Pass provides stored data to the “first” application, or when the clipboard is used to copy information from Samsung Pass and then provide it to the “first” application. Similarly, Samsung Pass receives information from the “first” application, for example when the clipboard pastes text from the first application into the Samsung Pass search bar. In the example shown below, the text “Data Entry Systems” is stored in the note entitled “10,976,922” in the Samsung Pass app. That text is selected from the Samsung Pass app (specifically, search results using the Samsung Pass app) at the bottom of the screen and provided to the messaging (“first”) application at the top of the screen.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, Google and Samsung voice input receives spoken words, and converts speech to text, then provides the text to the “first” application so that, for example, the “first” application receives the text that the user provided by speaking instead of typing. In the example shown below, the Samsung Wallet (“first”) application search bar at the top of the screen receives the words “keyboard” and then “keyboard touch screen” from the Google voice input (“second”) application.

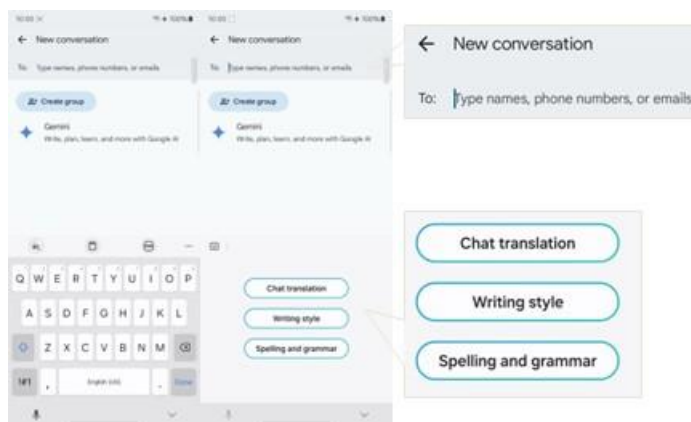


U.S. Patent No. 10,976,922	Samsung
	Screen recording of Galaxy S24 Ultra running OneUI 6.1. The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.
[5] The system of claim 4, wherein said information includes at least one of, a text, an image, a video, a webpage and a URL.	In the Accused Instrumentalities, information includes at least one of, a text, an image, a video, a webpage and a URL. All of the examples discussed in connection with claim 4 involve information that includes text or images. See, e.g., [4]. The discussion and evidence disclosed in the section on [4] is incorporated here by reference.
[6] The system of claim 4, wherein said information is copied from one of said applications and pasted in the other application.	In the Accused Instrumentalities, information can be copied from one application and pasted in another application. The examples discussed in connection with claims 1 and 4 include examples of copying information that is copied from one (“first” or “second”) application and pasted to the other (“second” or “first”), including the examples that discuss using the clipboard to copy information from one of the apps and pasting it into the other app. For example, an image and the text “Touchscreen” is copied from the clipboard and pated into the Notes app. See, e.g., [1a]-[1f] and [4]. The discussion and evidence disclosed in the section on [1a]-[1f] and [4] is incorporated here by reference.
[7] The system of claim 1, wherein at least one of the applications is a messaging application.	The Accused Instrumentalities include at least one application that is a messaging application. The functionality described in connection with claim 1 works the same when the “first” application is a messaging application. Google Messages is the default messaging app for Samsung Galaxy S24 Ultra phones, for example, and the screen shots shown in the examples below use Google Messages as the messaging application. The same functionality is relevant to other messaging applications.



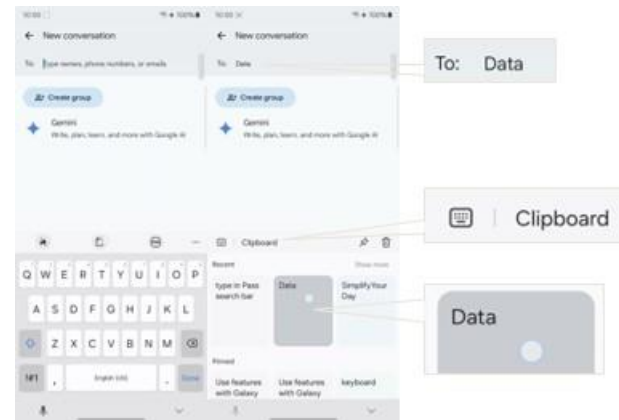
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

For example, the Google and Samsung voice input apps work with messaging applications. As another example, the AI (“second”) app provides the writing assistance functionality to messaging apps, including “Chat translation”.



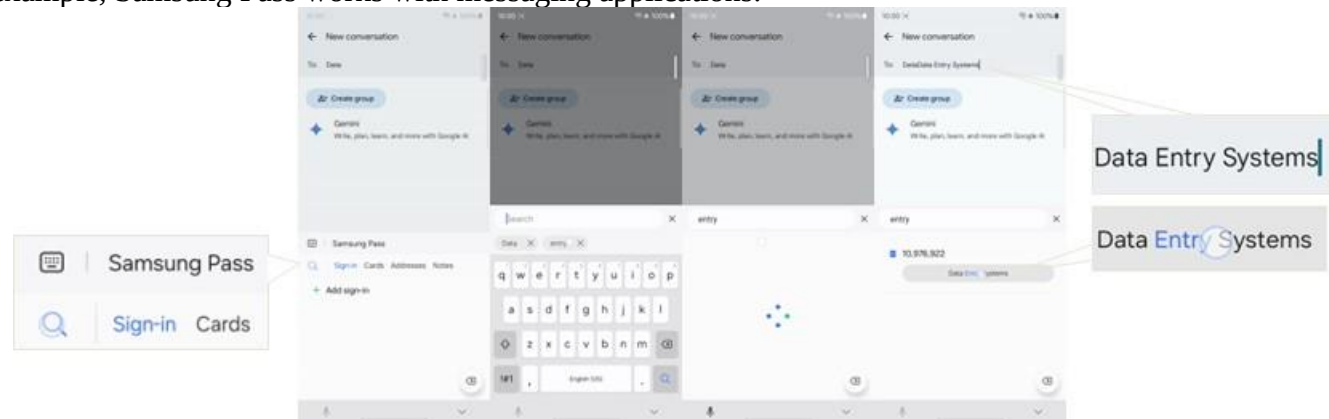
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, the clipboard (“second”) app works with messaging apps.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

As another example, Samsung Pass works with messaging applications.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

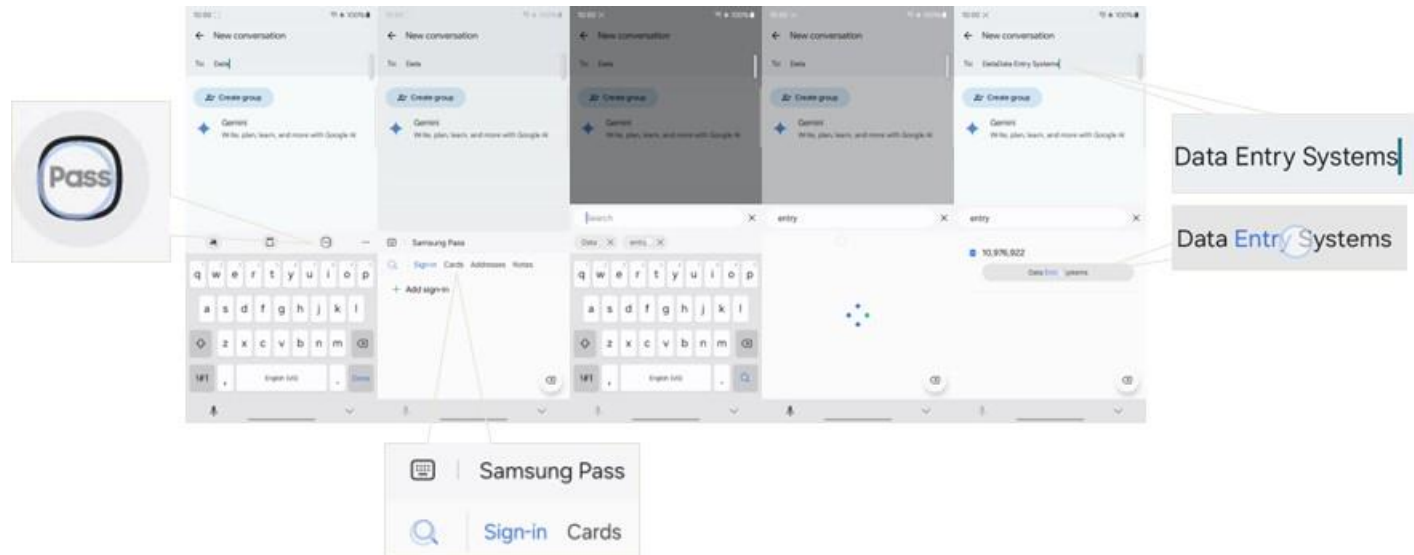
The arguments, evidence, and functionality cited for this limitation have been demonstrated by an exemplary model of the Accused Instrumentalities but apply equally to all Accused Instrumentalities.

**U.S. Patent No.
10,976,922**

Samsung

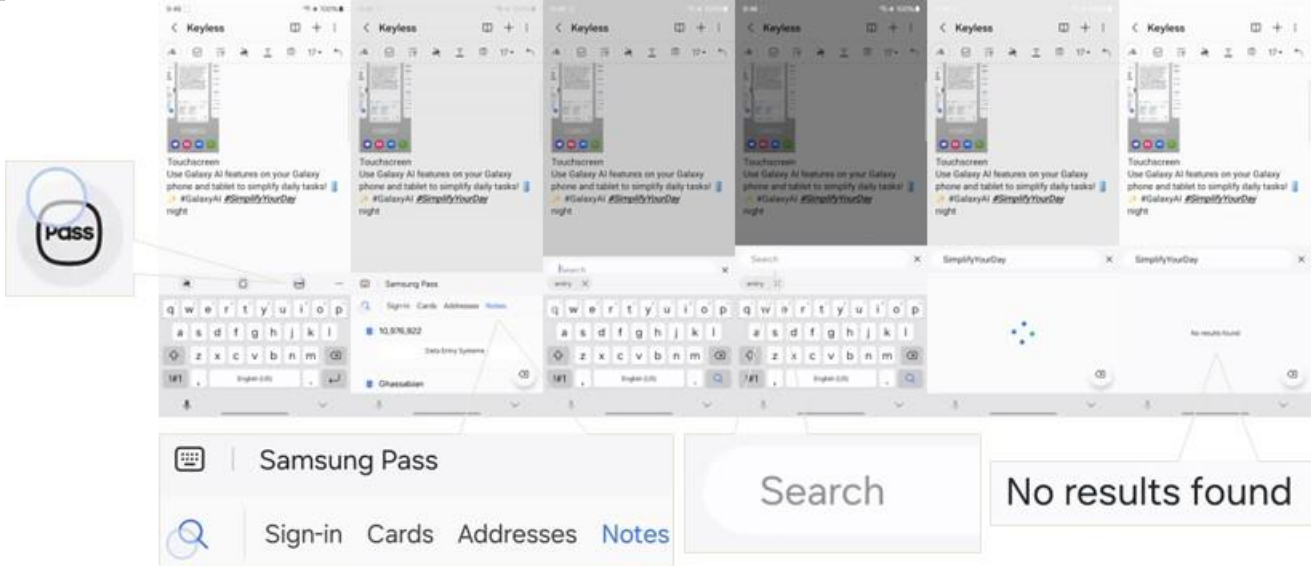
[8] The system of claim 1, wherein said second application is a search application activated by interacting with a button of said keyboard assigned to activating said search application.

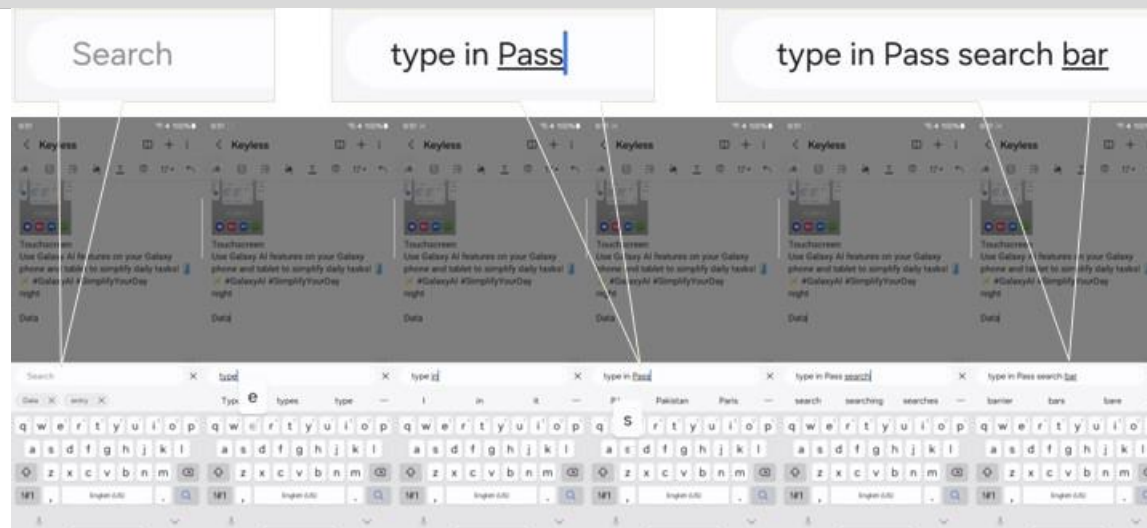
The Accused Instrumentalities include a search application activated by interacting with a button of said keyboard assigned to activating said search application. For example, the Samsung Pass button (🔑) on the keyboard is assigned to activate the Samsung Pass application. In the example below, the Samsung Pass button on the keyboard is tapped, which activates the Samsung Pass app. The search icon (denoted by the magnifying glass, 🔍) in the Samsung Pass app is tapped, which activates the Samsung Pass search bar. Then the search bar is used to perform a search for the keyword “entry.” The Samsung Pass app then shows a search result.



Screen recording of Galaxy S24 Ultra running OneUI 6.1.

In contrast, if a search performed using the Samsung Pass app yields no search results, the Samsung Pass app reports “No results found.”

U.S. Patent No. 10,976,922	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.
[9] The system of claim 8, wherein said search application use at least one keyword typed through said keyboard.	The Accused Instrumentalities include a search application that can use a keyword typed through a keyboard. The Samsung Pass search application performs searches. See, e.g., [8]. The discussion and evidence disclosed in the section on [8] is incorporated here by reference. The Samsung Pass search application uses keywords typed through the keyboard to perform searches. In the example shown below, the keywords “type in Pass search bar” are typed through the keyboard into the Samsung Pass app search bar.



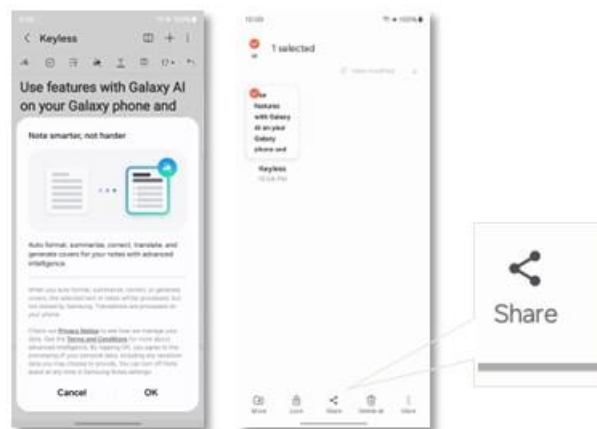
Screen recording of Galaxy S24 Ultra running OneUI 6.1.

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.

[10] The system of claim 1, wherein at least one of the applications is used for sharing at least one of text, pictures, or videos.

The Accused Instrumentalities include an application used for sharing at least one of text, pictures, or videos.

For example, applications such as Note are used to share text and pictures.



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	Screen recording of Galaxy S24 Ultra running OneUI 6.1. Note is one of the “first” applications disclosed in [1f]. See, e.g., [1f]. The discussion and evidence disclosed in the section on [1f] is incorporated here by reference. As another example, messaging applications are used for sharing text, pictures, or videos. See, e.g., [7]. The discussion and evidence disclosed in the section on [7] is incorporated here by reference. 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.
[11] The system of claim 1, wherein said device is a mobile phone.	The Accused Instrumentalities are devices that include mobile phones. For example, all of the screen shots are from the Galaxy Samsung S24 Ultra or S23 mobile phones. 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.
[12a] A method comprising:	The Accused Instrumentalities implement a method. See, e.g., [1a]. The discussion and evidence disclosed in the section on [1a] is incorporated here by reference.
[12b] assigning a first zone of a touch screen to an interface of a first application;	The Accused Instrumentalities include a first zone of a touch screen that is assigned to an interface of a first application. See, e.g., [1d]. The discussion and evidence disclosed in the section on [1d] is incorporated here by reference.
[12c] assigning a second zone of said touch screen to an on-screen keyboard; and	The Accused Instrumentalities include a second zone of a touch screen that is assigned to an on-screen keyboard. See, e.g., [1e]. The discussion and evidence disclosed in the section on [1e] is incorporated here by reference.

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[12d] based on accomplishment of a condition under the control of said keyboard, activating a second application and displaying an interface of the second application and a reduced interface corresponding to said keyboard on at least a portion of said second zone of said touch screen and wherein said interface of said first application, said interface of said second application, and the reduced interface corresponding to said keyboard are simultaneously displayed on said touch screen.	In the Accused Instrumentalities, based on accomplishment of a condition under the control of a keyboard, the system activates a second application and displays an interface of the second application and a reduced interface corresponding to said keyboard on at least a portion of a second zone of the touch screen, and the interface of a first application, the interface of a second application, and the reduced interface corresponding to the keyboard are simultaneously displayed on a touch screen. See, e.g., [1f]. The discussion and evidence disclosed in the section on [1f] is incorporated here by reference.

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[13] The method of claim 12, comprising using said keyboard with both of said applications.	When the Accused Instrumentalities simultaneously display an interface of a first application, an interface of a second application, and a reduced interface corresponding to the keyboard on a touch screen, the keyboard is used with both of the applications. See, e.g., [3]. The discussion and evidence disclosed in the section on [3] is incorporated here by reference.
[14] The method of claim 12, wherein at least one of said applications is one of, a text messaging application and an image sharing application.	When the Accused Instrumentalities simultaneously display an interface of a first application, an interface of a second application, and a reduced interface corresponding to the keyboard on a touch screen, at least one of the applications is one of, a text messaging application and an image sharing application. See, e.g., [7] and [10]. The discussion and evidence disclosed in the sections on [7] and [10] is incorporated here by reference.
[15] The method of claim 12, wherein said interface of said second application is displayed on the touch screen by using a search application activated by providing a predefined interaction with a button of said keyboard that is related to activating said search application.	When the Accused Instrumentalities simultaneously display an interface of a first application, an interface of a second application, and a reduced interface corresponding to the keyboard on a touch screen, the interface of the second application is displayed on the touch screen by using a search application activated by providing a predefined interaction with a button of the keyboard that is related to activating the search application. See, e.g., [8]. The discussion and evidence disclosed in the section on [8] is incorporated here by reference.

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[16] The method of claim 15, wherein said search application use at least one keyword typed through said keyboard.	When the Accused Instrumentalities simultaneously display an interface of a first application, an interface of a second application, and a reduced interface corresponding to the keyboard on a touch screen, the interface of the second application is displayed on the touch screen by using a search application activated by providing a predefined interaction with a button of the keyboard that is related to activating the search application, and the search application uses at least one keyword typed through the keyboard. See, e.g., [9]. The discussion and evidence disclosed in the section on [9] is incorporated here by reference.
[17] The method of claim 15, wherein said search application use at least one keyword typed through said keyboard after said search application is activated.	When the Accused Instrumentalities simultaneously display an interface of a first application, an interface of a second application, and a reduced interface corresponding to the keyboard on a touch screen, the interface of the second application is displayed on the touch screen by using a search application activated by providing a predefined interaction with a button of the keyboard that is related to activating the search application, and the search application uses at least one keyword typed through said keyboard after said search application is activated. See, e.g., [9]. The discussion and evidence disclosed in the section on [9] is incorporated here by reference.

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[18] The method of claim 12, wherein an information received from one of said applications is shared with at least the other application while said interface of said first application and said interface of said second application are simultaneously displayed on said touch screen.	When the Accused Instrumentalities simultaneously display an interface of a first application, an interface of a second application, and a reduced interface corresponding to the keyboard on a touch screen, the information received from one application is shared with at least the other application while the interface of the first application and the interface of the second application are simultaneously displayed on the touch screen. See, e.g., [4]. The discussion and evidence disclosed in the section on [4] is incorporated here by reference.
[19] The method of claim 18, wherein said information includes at least one of a text, an image, a video, a webpage and a URL.	When the Accused Instrumentalities simultaneously display an interface of a first application, an interface of a second application, and a reduced interface corresponding to the keyboard on a touch screen, the information received from one application is shared with at least the other application while the interface of the first application and the interface of the second application are simultaneously displayed on the touch screen, and the information includes at least one of a text, an image, a video, a webpage and a URL. See, e.g., [5]. The discussion and evidence disclosed in the section on [5] is incorporated here by reference.

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[20] The method of claim 12, wherein upon interacting with the interface of any of said applications, the focus of the system is given to the interacted application.	When the Accused Instrumentalities simultaneously display an interface of a first application, an interface of a second application, and a reduced interface corresponding to the keyboard on a touch screen, where upon interacting with the interface of any of the applications, the focus of the system is given to the interacted application. See, e.g., [2]. The discussion and evidence disclosed in the section on [2] is incorporated here by reference.
[21] The method of claim 12, wherein said touch screen is integrated within a mobile communication device.	The Accused Instrumentalities integrate a touch screen within a mobile communication device. For example, all of the screen shots are from the Galaxy Samsung S24 Ultra or S23 mobile phones. As an additional example, the Accused Instrumentalities that are tablets and that are connected to mobile networks are mobile communication devices, and the tablets that run Samsung OneUI Home function in substantially the same way as the examples provided using screen shots of mobile phones described in connection with claim 12. See, e.g., [12]. The discussion and evidence disclosed in the section on [12] is incorporated here by reference.