

MDT WIRELESS
v.
SAMSUNG ELECTRONICS AMERICA, INC. et al

Case No. 2:24-cv-00435-JRG-RSP

Asserted U.S. Patent No. 8,825,801

“Method, apparatus and system for management of information content for enhanced accessibility over wireless communication networks”

Ex. 1. MDT PR 3-1 Infringement Charts
for Asserted Claims of US8825801

This claim chart specifically addresses infringement of Claims 1, 7-12, 15, 17, 20, and 22-25. (“Asserted Claims”) of the ’801 Patent by Defendants’ social media and advertising software, and merely demonstrates one way in which Defendants infringe these claims of the ’801 Patent.

This chart is based on publicly available information regarding Defendants’ Accused Instrumentalities (as defined in the Complaint, which is hereby incorporated by reference). Plaintiff will be seeking Defendants’ internal documentation, including without limitation technical documentation, in discovery and therefore Plaintiff reserves the right to amend or further supplement this chart as allowed by the PR and this Court.

The term “Accused Products” or “Accused Instrumentalities” refers to all Samsung products manufactured, used, tested, imported, sold or offered to sell by or on behalf of Defendants practicing the Patents-in-Suit and all processes employed by Defendants that practice the patents-in-suit, consisting of at least: (a) Defendants’ Samsung Members mobile application and in-app browser (including the app formerly known as the Samsung+ app); and (b) all current and former Samsung smartphones capable of using the Samsung Members mobile application. A list of these smartphones is included herein. The list of Samsung smartphones specifically accused in this case (hereafter the “Accused Samsung Smartphones”) includes all Samsung smartphones made, used, tested, designed, distributed, offered for sale, or sold in the United States or imported into the United States since June 10, 2018 including without limitation any Samsung smartphones available at any time since June 10, 2018 on Samsung’s U.S. website at [Samsung.com](https://www.samsung.com/us/smartphones/), including Samsungs webpage at <https://www.samsung.com/us/smartphones/> including without limitation all variations (including all available options for RAM, storage, color, and carrier) of the following Samsung smartphones:

(a) Galaxy Z Series, including without limitation the following:

1. Galaxy Fold Series smartphones, including without limitation Galaxy Fold, Galaxy Fold 5G, Galaxy Z Fold, Galaxy Z Fold 2, Galaxy Z Fold 3, Galaxy Z Fold 4, Galaxy Z Fold 5, and Galaxy Z Fold 6)
2. Galaxy Flip Series smartphones, including without limitation Galaxy Z Flip, Z Flip 5G, Z Flip 3, Z Flip 4, Z Flip 5, and Z Flip 6)

(b) Galaxy S Series, including without limitation the following:

1. Galaxy S5, including without limitation Galaxy S5, GalaxyS5 mini, and GalaxyS5 Neo), Galaxy S6 (including without limitation Galaxy S6, Galaxy S6 Edge, and Galaxy S6 Edge+, Galaxy S6 Active), Galaxy S7 (including without limitation Galaxy S7, Galaxy S7 Edge, Galaxy S7 Active), Galaxy S8 (including without limitation Galaxy S8, Galaxy S8+, Galaxy S8 Active), Galaxy S9 (including without limitation Galaxy S9, Galaxy S9+, Galaxy S9 Active), Galaxy S10 (including without limitation Galaxy S10, Galaxy S10e, Galaxy S10+, Galaxy S10 5G, Galaxy S10 Lite), Galaxy S20 (including without limitation Galaxy S20 (including without limitation Galaxy S20, Galaxy S20+, Galaxy S20+ 5G, Galaxy S20 Ultra, Galaxy S20 Ultra LTE/5G, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 FE 2022, Galaxy S20 5G UW), Galaxy S21 (including without limitation Galaxy S21, Galaxy S21 5G, Galaxy S21 FE 5G, Galaxy S21+ 5G, Galaxy S21 Ultra 5G, Galaxy S22 (including without limitation Galaxy S22 5G, Galaxy S22+ 5G, Galaxy S22 Ultra 5G), Galaxy S23 (including without limitation Galaxy S23, Galaxy S23+, Galaxy S23 Ultra, Galaxy S23 FE), and Galaxy S24 (including without limitation Galaxy S24 FE, Galaxy S24 Ultra, Galaxy S24+, and Galaxy 24)).

(c) Galaxy A Series, including without limitation the following:

MATERIAL DESIGNATED AS CONFIDENTIAL

1. Galaxy A 2016 including without limitation Galaxy A3 (2016), Galaxy A5 (2016), Galaxy A7 (2016), Galaxy A8 (2016), Galaxy A9 (2016), Galaxy A9 Pro (2016).
2. Galaxy A 2017 including without limitation Galaxy A3 (2017), Galaxy A5 (2017), Galaxy A7 (2017).
3. Galaxy A 2018 including without limitation Galaxy A6 (2018), Galaxy A6+ (2018), Galaxy A6s (2018), Galaxy A7 (2018), Galaxy A8 (2018), Galaxy A8+ (2018), Galaxy A8 Star (2018), Galaxy A8s (2018), Galaxy A9 (2018).
4. Galaxy Ax0 Series (aka 2019 Galaxy A Series), including without limitation the following: Galaxy A2 Core (2019), Galaxy A10e (2019), Galaxy A10 (2019), Galaxy A10s (2019), Galaxy A20e (2019), Galaxy A20 (2019), Galaxy A20s (2019), Galaxy A30 (2019), Galaxy A30s (2019), Galaxy A40 (2019), Galaxy A50 (2019), Galaxy A50s (2019), Galaxy A60 (2019), Galaxy A70 (2019), Galaxy A80 (2019), Galaxy A90 5G (2019).
5. Galaxy Ax1 Series (aka 2020 Galaxy A Series), including without limitation the following: Galaxy A01 Core (2020), Galaxy A01 (2020), Galaxy A11 (2020), Galaxy A21 (2020), Galaxy A21s (2020), Galaxy A31 (2020), Galaxy A41 (2020), Galaxy A51 (2020), Galaxy A51 5G (2020), Galaxy A51 5G UW (2020), Galaxy A71 (2020), Galaxy A71 5G (2020), Galaxy A71 5G UW (2020).
6. Galaxy Ax2 Series (aka 2021 Galaxy A Series), including without limitation the following: Galaxy A02 (2021), Galaxy A02s (2021), Galaxy A12 (2021), Galaxy A22 (2021), Galaxy A22 5G (2021), Galaxy A32 (2021), Galaxy 32 5G (2021), Galaxy A42 5G (2021), Galaxy A52 (2021), Galaxy A52 5G (2021), Galaxy A52s 5G (2021), Galaxy A72 (2021).
7. Galaxy Ax3 Series (aka 2022 Galaxy A Series), including without limitation the following: Galaxy A03 Core (2022), Galaxy A03 (2022), Galaxy A03s (2022), Galaxy A13 (2022), Galaxy A13 5G (2022), Galaxy A23 (2022), Galaxy A23 5G (2022), Galaxy A33 5G (2022), Galaxy A53 5G (2022), Galaxy A73 5G (2022).
8. Galaxy Ax4 Series (aka 2023 Galaxy A Series), including without limitation the following: Galaxy A04e (2023), Galaxy A04 (2023), Galaxy A04s (2023), Galaxy A14 (2023), Galaxy A14 5G (2023), Galaxy A24 (2023), Galaxy A34 5G (2023), Galaxy A54 (2023).
9. Galaxy Ax5 Series (aka 2024 Galaxy A Series), including without limitation the following: Galaxy A05 (2024), Galaxy A05s (2024), Galaxy A15 (2024), Galaxy A15 5G (2024), A25 5G (2024), A35 5G (2024), A55 5G (2024).
10. Galaxy Ax6 Series (aka 2025 Galaxy A Series), including without limitation the following: Galaxy A06 (2025).

- (d) Galaxy M Series, including without limitation the following: **MATERIAL DESIGNATED AS CONFIDENTIAL**
1. 2019 lineup (1st generation), including without limitation Galaxy M10 (2019), Galaxy M10 (2019), Galaxy M10s (2019), Galaxy M20 (2019), Galaxy M30 (2019), Galaxy M30s (2019), Galaxy M40 (2019).
 2. 2020 lineup (2nd generation), including without limitation Galaxy M01, Galaxy M01s, Galaxy M11, Galaxy M21, Galaxy M21s, Galaxy M31, Galaxy M31s, Galaxy M51.
 3. 2021 lineup (3rd generation), including without limitation Galaxy M02, Galaxy M02s, Galaxy M12, Galaxy M22, Galaxy M32, Galaxy M32 5G, Galaxy M42 5G, Galaxy M52 5G, Galaxy M62.
 4. 2022 lineup (4th generation), including without limitation Galaxy M13, Galaxy M13 5G, Galaxy M23, Galaxy M33 5G, Galaxy M53 5G.
 5. 2023 lineup (5th generation), including without limitation Galaxy M04, Galaxy M14 5G, Galaxy M34 5G, Galaxy M54 5G.
 6. 2024 lineup (6th generation), including without limitation Galaxy M15 5G, Galaxy M35 5G, Galaxy M55 5G.
- (e) Galaxy XCover Series, including without limitation the following:
1. Galaxy XCover smartphones including without limitation Galaxy XCover 4, Galaxy XCover 4s, Galaxy XCover 5, Galaxy XCover Pro, Galaxy XCover 6 Pro, Galaxy XCover 7.
- (f) Galaxy Note Series, including without limitation the following:
1. Galaxy Note smartphones including without limitation Galaxy Note 7, Galaxy Note Fan Edition, Galaxy Note 8, Galaxy Note 9, Galaxy Note 10, Galaxy Note 10+, Galaxy Note 10 Lite, Galaxy Note 20, Galaxy Note 20 Ultra.

(h) Galaxy J Series, including without limitation the following:

1. Galaxy J2 smartphones including without limitation Galaxy J2, Galaxy J2 Duos, Galaxy J2 (2016), Galaxy J2 Pro (2016), Galaxy J2 Prime, Galaxy J2 (2018), Galaxy Grand Prime Pro, Galaxy J2 Pro (2018), Galaxy J2 Core, Galaxy J2 Pure, Galaxy J2 Core (2020).
2. Galaxy J3 smartphones including without limitation Galaxy J3 (2016), Galaxy J3 Pro, Galaxy J3 V, Galaxy Amp Prime, Galaxy J3 Prime, Galaxy J3 Emerge, Galaxy J3 Eclipse, Galaxy Express Prime 2, Galaxy Amp Prime 2, Galaxy J3 (2017), Galaxy J3 Pro (2017), Galaxy J3 (2017) Duos, Galaxy J3 (2018), Galaxy J3 Star, Galaxy Amp Prime 3, Galaxy J3 V 2018, Galaxy J3 Aura, Galaxy J3 Orbit.
3. Galaxy J4 smartphones including without limitation Galaxy J4, Galaxy J4+, Galaxy J4 Core.
4. Galaxy J5 smartphones including without limitation Galaxy J5, Galaxy J5 (2016), Galaxy J5 Metal, Galaxy J5 Prime, Galaxy J5 (2017), Galaxy J5 Pro (2017), Galaxy J5 (2017) Duos.
5. Galaxy J6 smartphones including without limitation Galaxy J6, Galaxy J6+.
6. Galaxy J7 smartphones including without limitation Galaxy J7 (2016), J7 Duos (2016), Galaxy J7 Prime, Galaxy On Nxt, Galaxy J7 V, Galaxy J7 Sky Pro, Galaxy J7 Max, Galaxy On Max. Galaxy J7 Nxt, Galaxy J7 Duos, Galaxy J7 Neo, Galaxy J7 Core, Galaxy J7 (2017), Galaxy J7 Pro, Galaxy J7+, Galaxy J7 Prime, Galaxy J7 On7 Prime (2018).
7. Galaxy J8 smartphones including without limitation Galaxy J8.

The asserted claims of the Patents-in-Suit are identified in the attached infringement charts (Exs. 1-4). SEA and SEC infringe in the exact same way, so each chart applies to both SEA and SEC. Similarly, each of the Accused Samsung Smartphones (see definition below) infringe in the exact same way as every other Accused Samsung Smartphone, so each chart applies to all Accused Samsung Smartphones. Rather than create identical charts for each of the Accused Samsung Smartphones, Plaintiff represents that each of the Accused Samsung Smartphones is equivalent for the purposes of infringement such that each infringement chart applies to all Accused Samsung Smartphones.

Each of referenced Accused Samsung Smartphones has been made, used, tested, designed, distributed, offered for sale, and/or sold in the United States and/or imported into the United States by Defendants Samsung Electronics America, Inc. (“SEA”) and Samsung Electronics Co., Ltd. (“SEC”) and each Accused Samsung Smartphone is accused in this lawsuit. The infringement charts show infringement by each of the Accused Samsung Smartphones.

Subject to ongoing discovery and investigation, MDT provides the attached infringement charts (Exs. 1-4) pertaining setting forth where in the Accused Instrumentalities each element of the asserted claim(s) are found. These infringement contentions serve a notice function and are not required to—and therefore do not—present every possible permutation or theory of Plaintiff’s case.

With respect to system claims, if certain of the system claims are interpreted as requiring ‘use’ of elements by more than one actor, to be held a direct infringer, “a party must put the invention into service, i.e., control the system as a whole and obtain benefit from it.” *Centillion Data Sys., LLC v. Qwest Commc’ns Int’l, Inc.*, 631 F.3d 1279, 1284 (Fed. Cir. 2011).

With respect to method claims, in *Akamai Technologies Inc. v. Limelight Networks, Inc.*, 797 F.3d 1020 (Fed. Cir. 2015), the Federal Circuit held that the acts of multiple parties can be combined for the purposes of direct infringement, and the requisite direction and control, when the first party: (1) “conditions participation in an activity or receipt of a benefit upon performance of a step,” and (2) “establishes the manner or timing of that performance.” *Akamai*, 797 F.3d at 1023. Applying these principles set forth by the Federal Circuit, Samsung is directly infringing each of the asserted claims of the Patents-in-Suit. Samsung is, *inter alia*, placing the Accused Instrumentalities into service, exercising control over the systems, and obtaining beneficial use of the infringing systems and methods, and is thus liable for direct infringement under 35 U.S.C. § 271(a) based on making, having made and using systems and methods covered by the Patents-in-Suit.

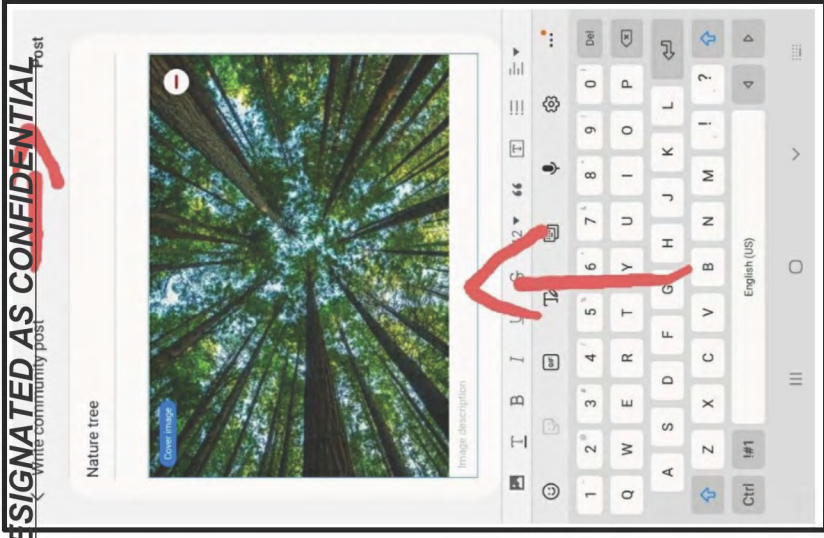
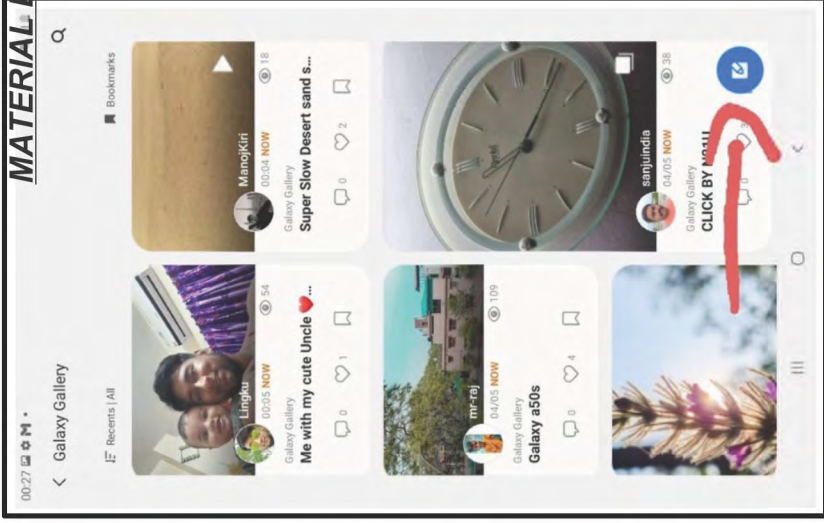
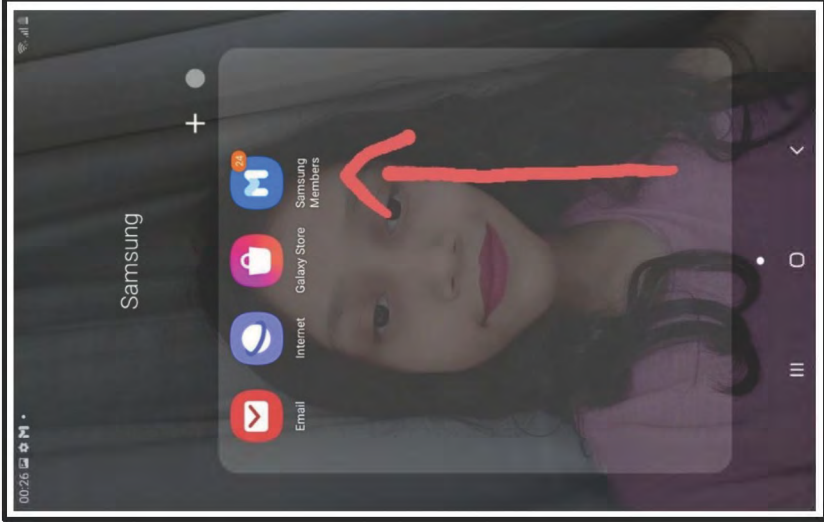
To the extent that any component or step of an asserted claim is determined to have been supplied or practiced by an end-user of the Accused Instrumentalities, Samsung is nevertheless liable as a direct infringer under *Akamai*. To the extent that end-users are determined to have independently directly infringed the claims of the Patents-in-Suit, Samsung has induced such acts of direct infringement by the end-users pursuant to 35 U.S.C. § 271(b).

MDT contends that the Accused Instrumentalities literally infringe the asserted claims of each of Patents-in-Suit as more specifically explained in the attached infringement charts. MDT asserts that to the extent the Court determines that any element of the asserted claims of the Patents-in-Suit are literally infringed, each such element is infringed under the doctrine of equivalents because the difference between any component of any product or system and any step of any service or method and any claim element is insubstantial.

Claim: 1 –Element (A)

A method comprising: providing an interface permitting a first user to control activation of a mobile information channel through which the first user can share access to content with a plurality of additional users;

- The “**Samsung Members**” app provides an interface that allows users to control activation of a mobile information channel (Samsung Members).
- The information channel accessed with the app “**Samsung Members**” allows a first user to share access to content (e.g. pictures of trees) with a plurality of users.
- The app “**Samsung Members**” community has almost 19 million members.



<https://r2.community.samsung.com/t5/Tech-Talk/How-to-post-on-Samsung-Members/td-p/8220552>

Original topic: How to post on Samsung Members

Date acquired: 2/12/2024

Welcome to the Samsung Members Community

Explore your new hub for all things Samsung and beyond. Connect with Samsung experts, super-fans, and other Community members for tips on features and how to get the most out of your Samsung product.

Search all content

MEMBERS	TOPICS	SOLUTIONS	ONLINE
18,883,993	21,172	16,035	98,364

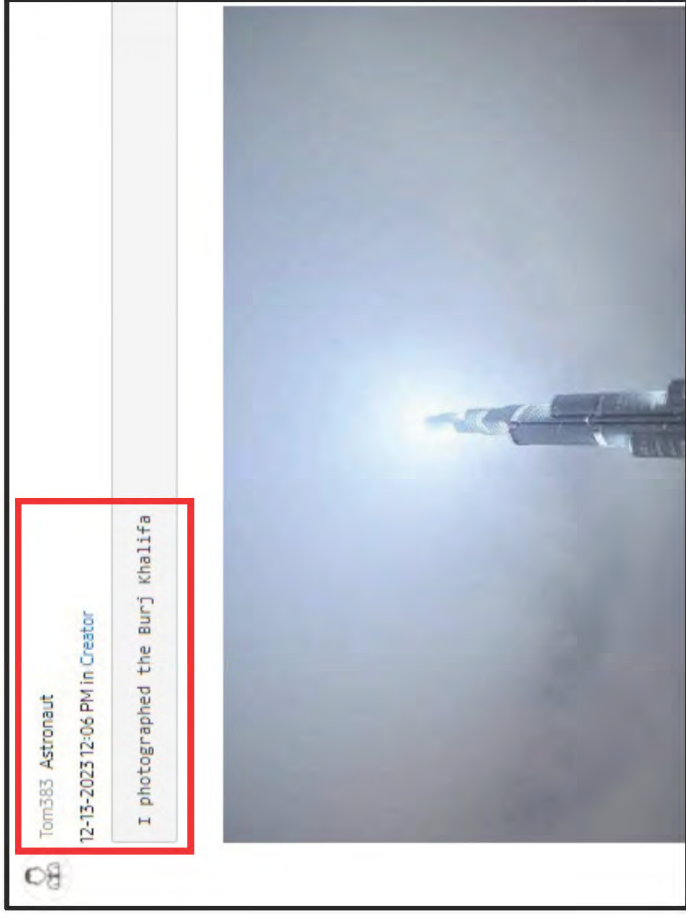
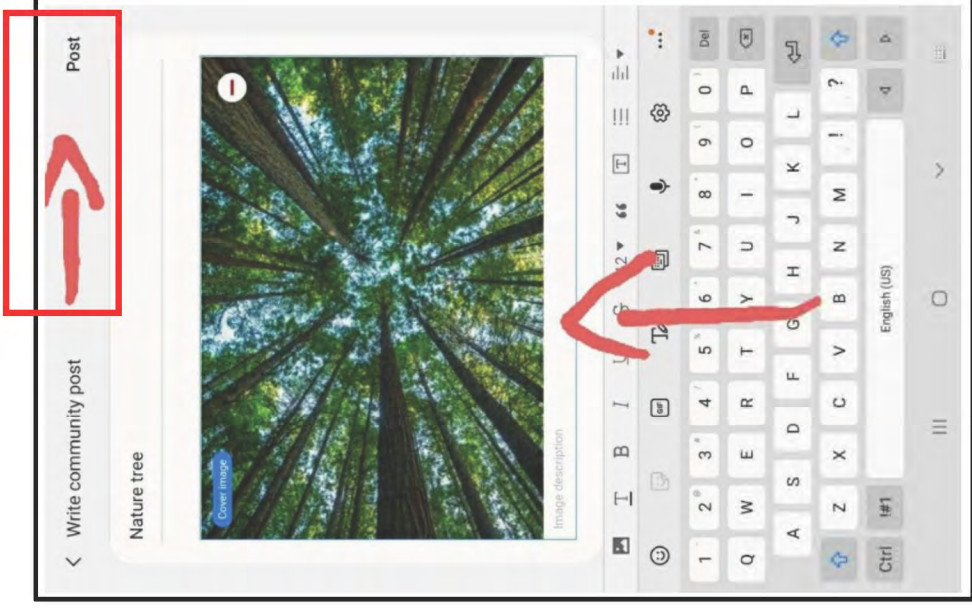
https://us.community.samsung.com/t5/Samsung-Community/ct-p/us?page=1&tab=recent_topics
Welcome to the Samsung Members Community
Date acquired: 2/12/2024

Claim 1, Element (A) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 1 – Element (B)

activating the mobile information channel responsive to input received from the first user via the interface;

- The mobile information channel is activated, responsive to input received from the first user.
- As shown previously, a new thread (mobile information channel) is created (activated) when a user clicks the “post” button.
- At right is an original post titled “Burj Khalifa.” This post is an information channel that was activated by user Tom383 after inputting information into his Samsung phone.



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

<https://r2.community.samsung.com/t5/Tech-Talk/How-to-post-on-Samsung-Members/td-p/8220552>

Original topic: How to post on Samsung Members

Date acquired: 2/12/2024

Claim 1, Element (B) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

inserting content provided by the first user into the mobile information channel;

- The content is inserted by the first user into the mobile information channel (Burj Khalifa thread in Samsung Members Community).
- The content is provided by the first user (Tom383).



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

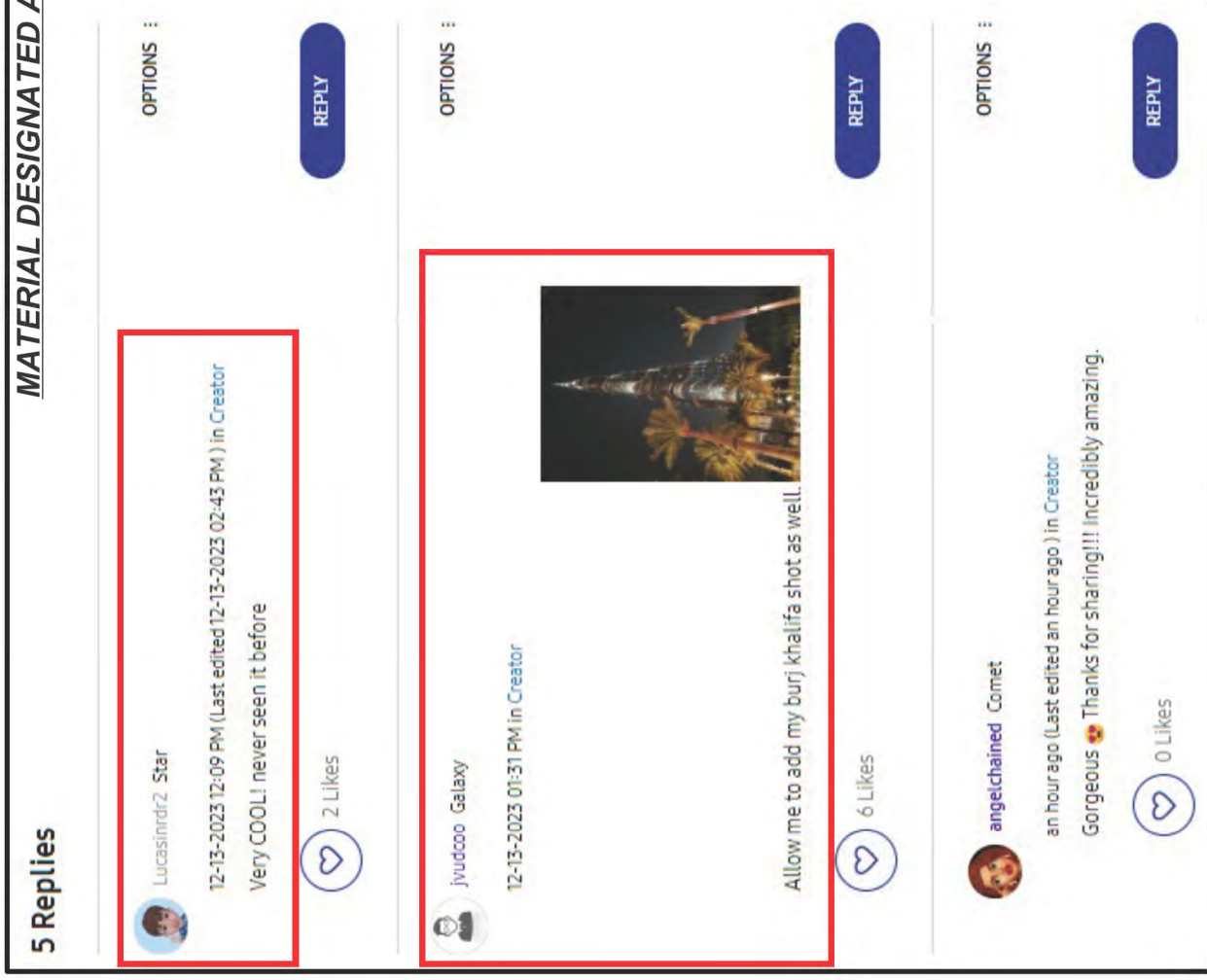
Claim 1, Element (C) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 1 – Element (D)

receiving additional content relating to the mobile information channel from one or more of said additional users via one or more respective mobile devices associated with at least one wireless network;

- The “Samsung Members” app receives additional content (photos, comments) relating to the mobile information channel (Burj Khalifa thread in Samsung Members Community) from additional users (Lucasinrdr2 and jvudcoo).

- The users provide the content via a Samsung mobile device, which necessarily is associated with at least one wireless network.



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

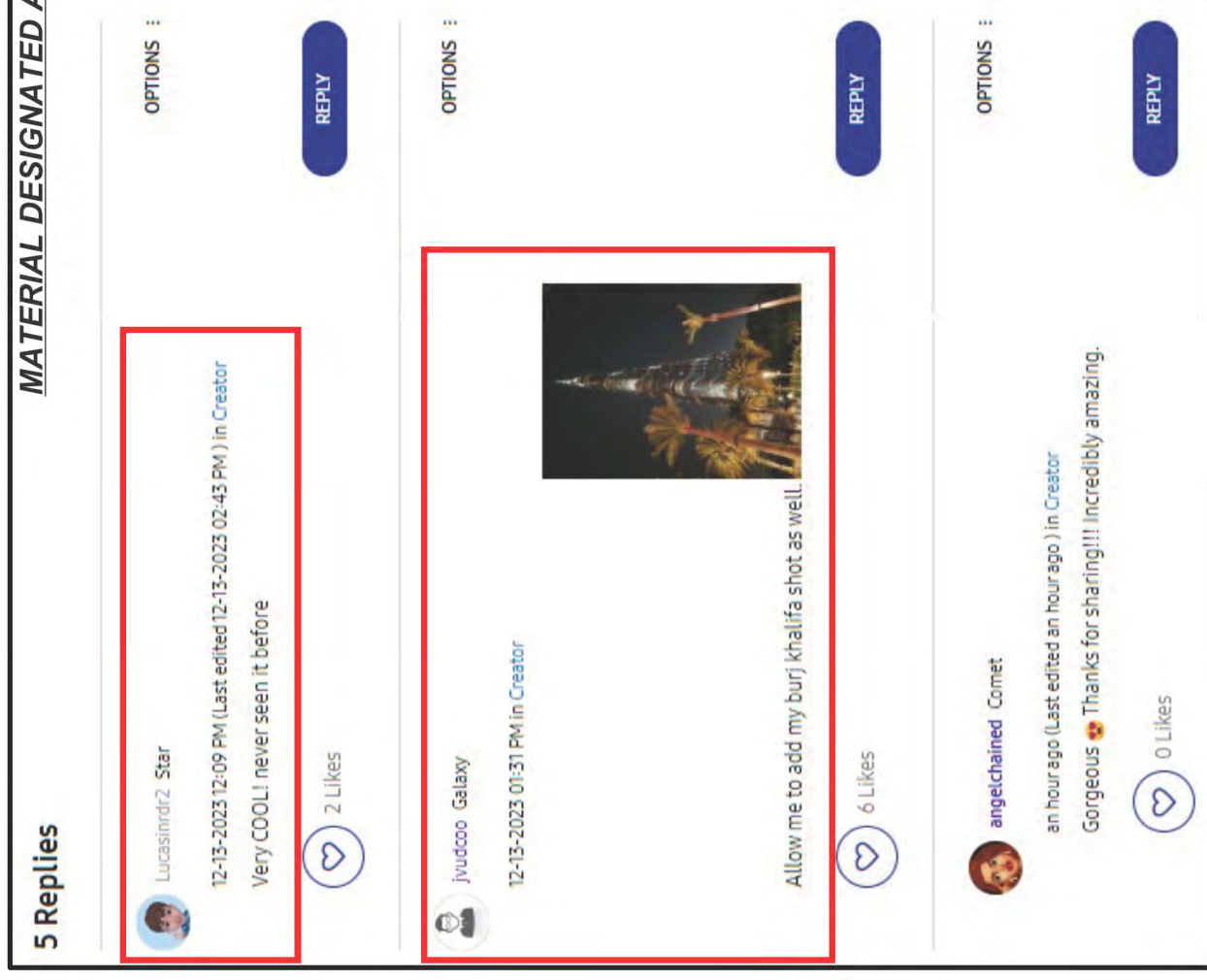
Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 1, Element (D) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

inserting at least a portion of the additional content into the mobile information channel; and

- The “Samsung Members” app inserts the additional content (photos, comments) into the mobile information channel (Burj Khalifa thread in Samsung Members Community).



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 1, Element (E) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 1 – Element (F)

integrating into the mobile information channel information associated with at least one wireless networking functionality of said at least one wireless network.

- The “Samsung Members” app integrates information associated with at least one wireless networking functionality (messaging action) of said at least one wireless network.

- As shown, the “Samsung Members” app can integrate information (e.g. username, date, time, Group) that is associated with a messaging action performed by a user (Tom383) while messaging other users via the Samsung Members Community.



I photographed the Burj Khalifa



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa
Date acquired: 2/12/2024

Advantageously, the information content of a given mobile site generated in the system 10 may be configured so as to integrate therewith information associated with at least one wireless networking functionality of the wireless network 12. This information may be determinable based at least in part on one or more parameters associated with the above-noted mobile information channels or M-channels. Examples of such information include information specifying at least one messaging action implementable over the wireless network, information specifying at least one collaboration action implementable over the wireless network, and information specifying at least one location-based service action implementable over the wireless network. Other types of information associated with wireless networking functionalities may also or alternatively be used.

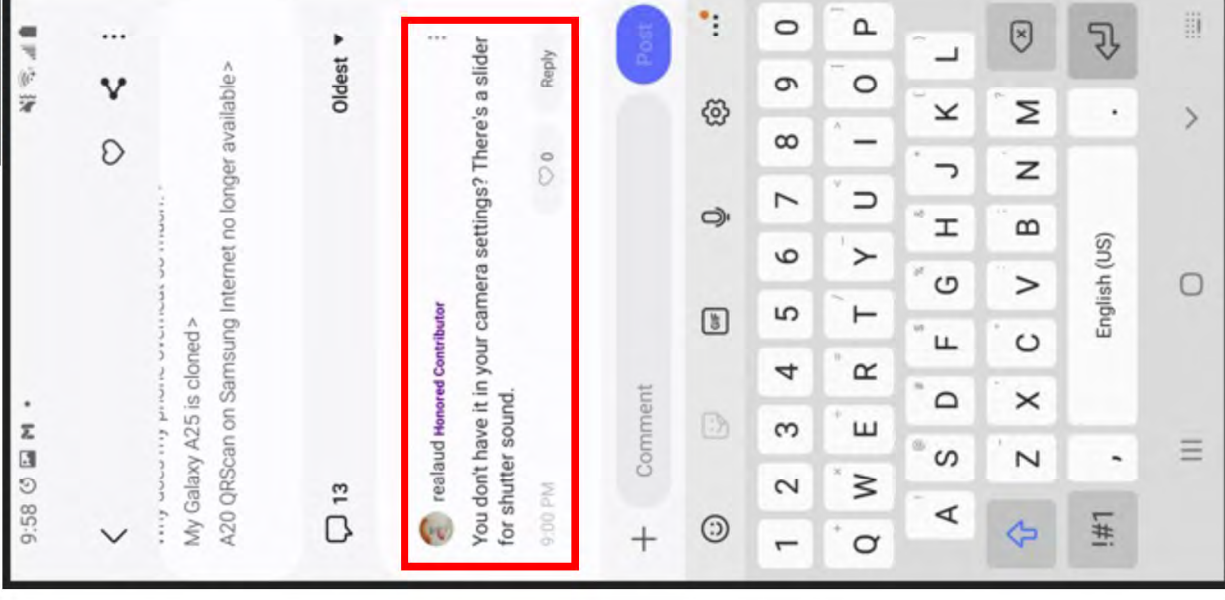
9,032,039 patent at 5:55-65

Claim 1, Element (F) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 7

The method of claim 1 wherein the information associated with at least one wireless networking functionality of said at least one wireless network comprises one or more messaging actions implementable over the wireless network.

- By way of example, the Accused Product includes a messaging action (reply) through the user's wireless device.



Samsung Members Screenshot from S9+ Mobile device

Date acquired: 8/29/2024

Claim 7 - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 8

The method of claim 1 wherein the information associated with at least one wireless networking functionality of said at least one wireless network comprises one or more collaboration actions implementable over the wireless network.

- “Samsung Members” offers collaborative spaces where users work together to solve product issues.
- The information (e.g. Group, Topic Title) associated with the wireless networking functionality (a messaging action performed by users) includes collaboration actions via a mobile device over a wireless network.

POSTS

USERS

PRIVATE MESSAGES

Advanced

Location

Author

Date

Metadata

Type of Post

Contains

Sorted by:

11-24-2021 03:26 PM

6 results

The Frame 50" 2021: JPG files won't save even tho...

by Rick_MILlCreek in QLED and The Frame TVs

I have my own fine art photographs, trying to add them to My Collection, can't. They're true JPGs, resolution 3840x2160. When I try to save them from thumb drive to My Collection, an error mes...

Topics:

art mode

jpg

my collection

The Frame

Samsung Text Messaging App

by catcat71 in Galaxy S23

...eature. I'm asking for all of us Samsung community members and/or users. I don't feel like I'm the only one who would like this option if it was available. You could create a POLL to see if it would even b...

Unable to select text within text message

by jsva420 in Galaxy S23

How do you select text within a text message? For example, if I received a text with: your temporary code is 123456 click below to reset your password How do I select JUST the code? I do see that ...

Topics:

Copy And Paste Issue

Messaging

Texting

<https://us.community.samsung.com/t5/forums/searchpage/tab/message?q=poll>

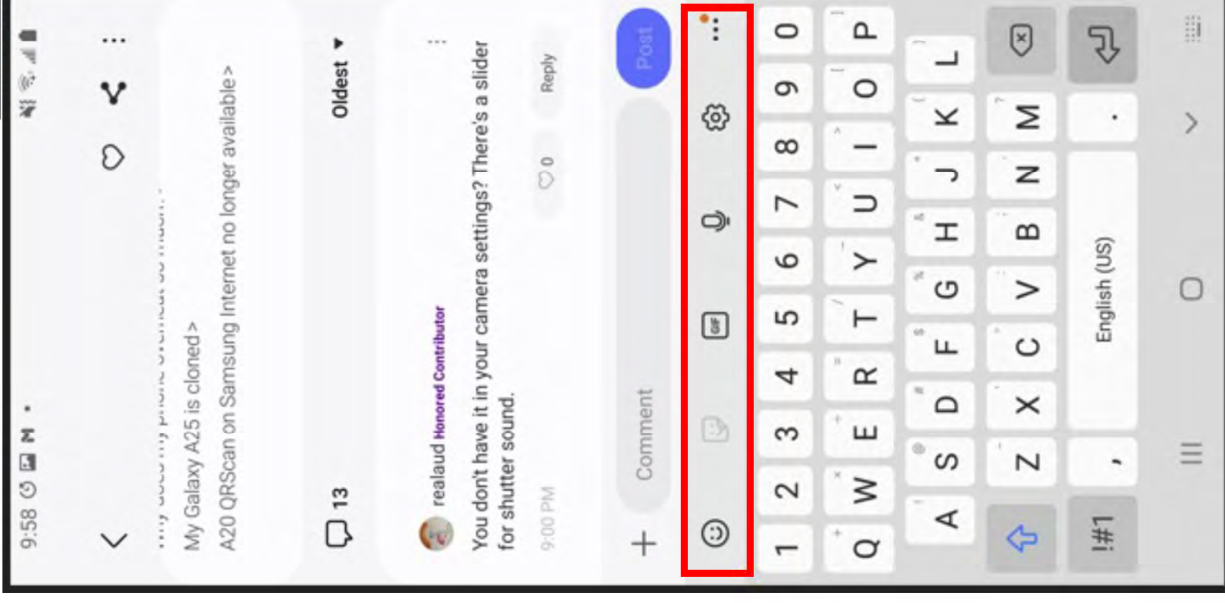
Date acquired: 8/29/2024

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Claim 8 - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

The method of claim 1 further comprising providing one or more content integration options to the first user and the plurality of additional users.

- The Accused Product includes multiple options to include content in an information channel.
- For example, not only can the first user choose different options to create and post content to an information channel (emoji, gif, audio), but additional users have multiple options to contribute as well.



Samsung Members Screenshot from S9+ Mobile device

Date acquired: 8/29/2024

Claim 9 - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

The method of claim 9 wherein the one or more content integration options are based in part on respective wireless networking functionalities available to the first user and the plurality of additional users.

- The Accused Product has access to the functionalities of the user's wireless device, such as the camera.

- For example, "Samsung Members" can integrate available wireless networking functionalities such as an additional user replying with a message.

Samsung Community / Groups / Creator / My my she is so beautiful... The camera of **MY MATERIAL** DESIGNATED AS CONFIDENTIAL

Original topic:

My my she is so beautiful... The camera on my phone is crazy good
(Topic created: yesterday) 88 Views



BBM410 Constellation
yesterday in Creator



OPTIONS :

Related Content

The Best Pictures >
in Creator 01-23-2023

Nature pics >
in Creator 12-19-2022

GC110 Galaxy Camera >
in Creator 03-14-2022

BLUE hour and GOLDEN hour are magical hours in photography >
in Creator 02-14-2022

You have autosaved content from 02:52 PM.

[Load](#) or [Discard](#)

Replying to BBM410

B I U S



PREVIEW

<https://us.community.samsung.com/t5/Creator/My-my-she-is-so-beautiful-The-camera-on-my-phone-is-crazy-good/m-p/2992224#M6216>

Date acquired: 8/29/2024

Claim 10 - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

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The method of claim 1 wherein the additional content is associated with the mobile information channel via one or more user-activatable control mechanisms.

- The additional content (commentary from user MrGhoul) is associated with the mobile information channel, and is included via a user-control activation mechanism (hitting the reply button).



<https://us.community.samsung.com/t5/Creator/My-my-she-is-so-beautiful-The-camera-on-my-phone-is-crazy-good/m-p/2992224#M6216>

Date acquired: 8/29/2024

Claim 11 - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

The method of claim 11 wherein the one or more user-activatable control mechanisms comprise a hyperlink.

- The Accused Product includes mechanisms that allow users to share and post hyperlinks or create hyperlinks to content.



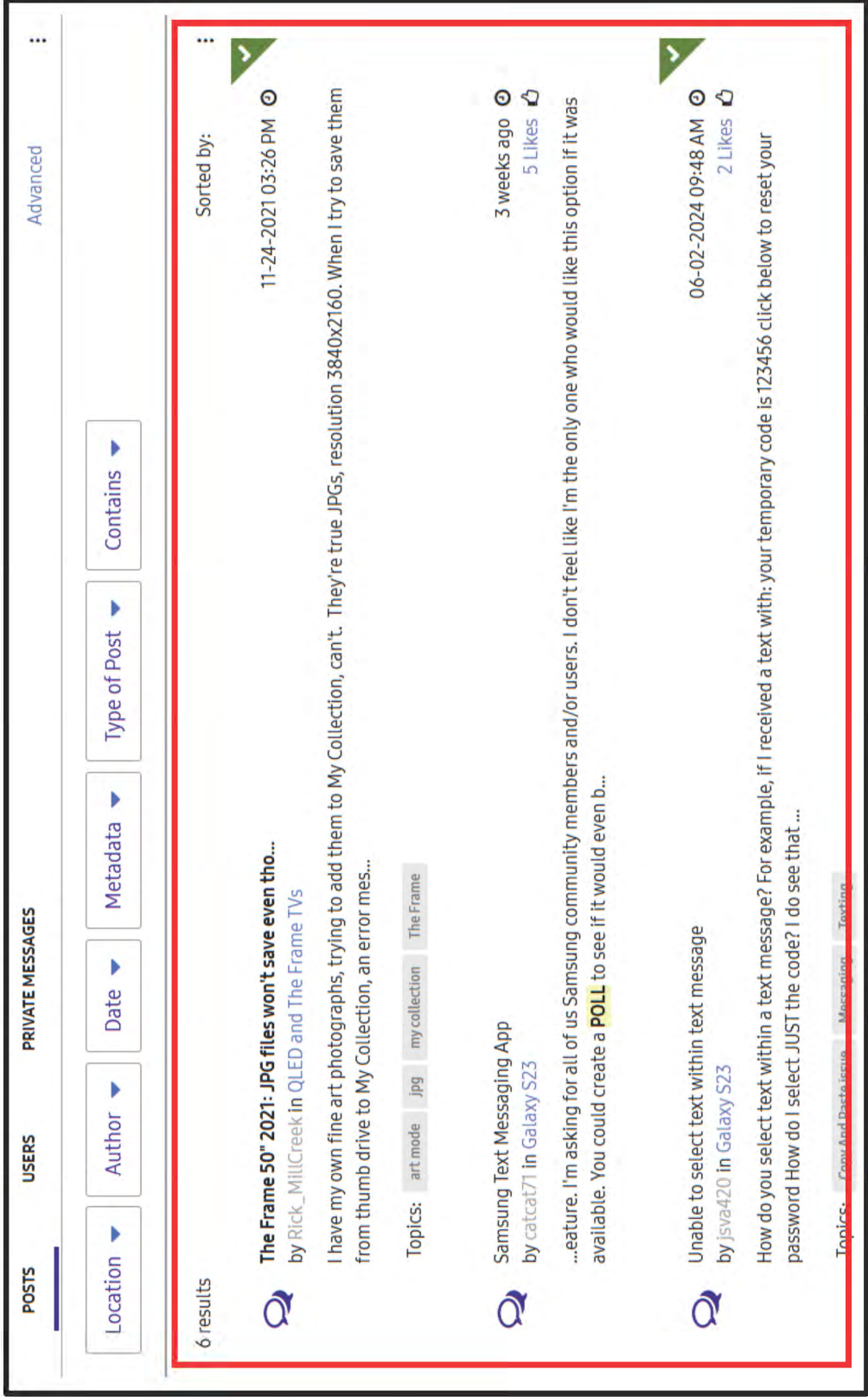
<https://us.community.samsung.com/t5/Creator/My-my-she-is-so-beautiful-The-camera-on-my-phone-is-crazy-good/m-p/2992224#M6216>

Date acquired: 8/29/2024

Claim 12 - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

The method of claim 1, wherein the mobile information channel comprises a collaborative workspace.

- The information channel supporting “Samsung Members” has group areas where multiple users contribute to the group.
- For example, one such user collaboration is a forum where a user poses a question and other users supply the answers to the question.



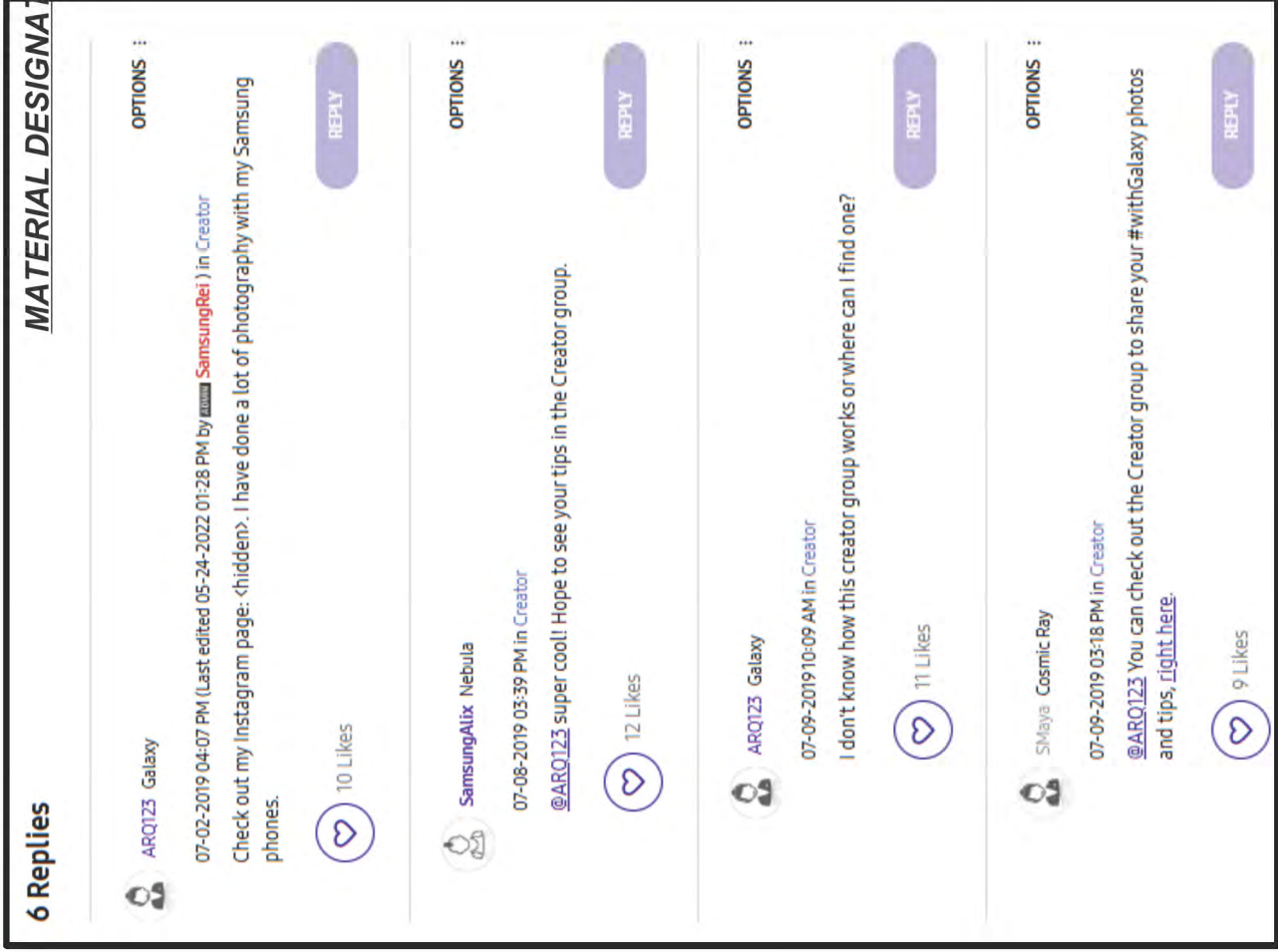
<https://us.community.samsung.com/t5/forums/searchpage/tab/message?q=poll>

Date acquired: 8/29/2024

Claim 15 - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

The method of claim 1 wherein the mobile information channel comprises a chat channel facilitating interaction between the first user and the plurality of additional users.

- The information channel supporting “Samsung Members” includes a two-way communication platform where users can interact with one another.
- For example, comments can be made on the original post and reply comments can be made facilitating interaction between users.



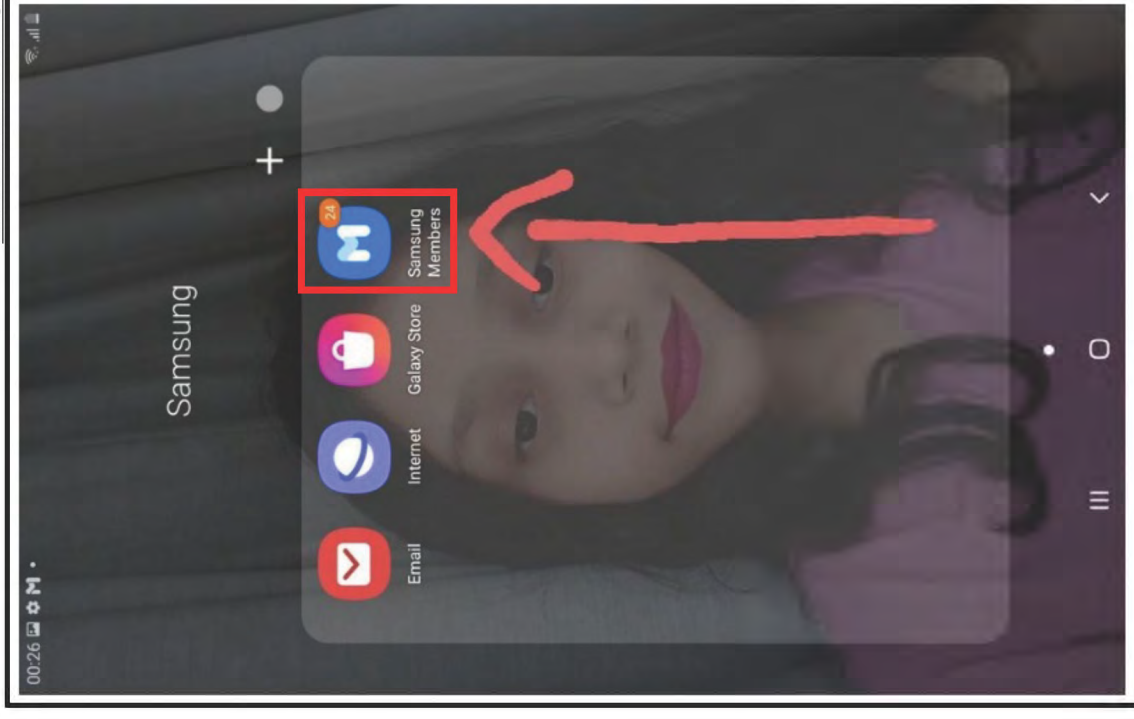
[rules, guidelines, and do's and don'ts for Samsung Community's Creator Group](#)

Date acquired: 8/29/2024

Claim 17 - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

The method of claim 1 wherein the mobile information channel is associated with a mobile device application.

- The Accused Product can operate as an app on mobile wireless device.
- For example, the “Samsung Members” app allows users to create, view, interact, and contribute to mobile information channels.



<https://r2.community.samsung.com/t5/Tech-Talk/How-to-post-on-Samsung-Members/td-p/8220552>

Original topic: How to post on Samsung Members

Date acquired: 2/12/2024

Claim 20 - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

A non-transitory computer-readable storage medium having embodied therein executable code of one or more software programs for use in managing information content in a network-based communication system, wherein said executable program code when executed by a processing element of the communication system implements the steps of the method of claim 1.

- The Accused Product includes software programs stored on a non-transitory computer-readable storage mediums in mobile phones that implements moving user content into mobile information channels.

- For example, the app “Samsung Members” frequently comes pre-installed on a non-transitory storage medium on Samsung mobile phones, which are a key part of the communication system of claim 1.

Processor



Qualcomm Snapdragon 8 Gen 3 for Galaxy

Storage Options



128GB | 256GB

Cellular & Wireless



The latest network technology with the power of 5G.³

<https://www.samsung.com/us/smartphones/galaxy-s24/buy/galaxy-s24-256gb-unlocked-sm-s921uzyexaa/>

Galaxy S24 Specifications

Date acquired: 2/9/2024



Samsung Members

Get more and do more from your Galaxy device. Enjoy DIY support tools and exclusive experiences and content — for Samsung members only. Samsung Members may be preloaded on your device, or you can download and install it from Galaxy Store or the Google Play store.

Galaxy S21 User Manual. Page 82

Date acquired: 8/29/2024

Claim 22 - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 22

A non-transitory computer-readable storage medium having embodied therein executable code of one or more software programs for use in managing information content in a network-based communication system, wherein said executable program code when executed by a processing element of the communication system implements the steps of the method of claim 1.

- The Accused Product also includes software programs stored on non-transitory computer-readable storage mediums in servers that implement moving user content into mobile information channels.
- For example, the software that runs websites supporting the mobile app "Samsung Members" is necessarily installed on non-transitory storage mediums on Samsung servers, which are also a key part of the communication system of claim 1.

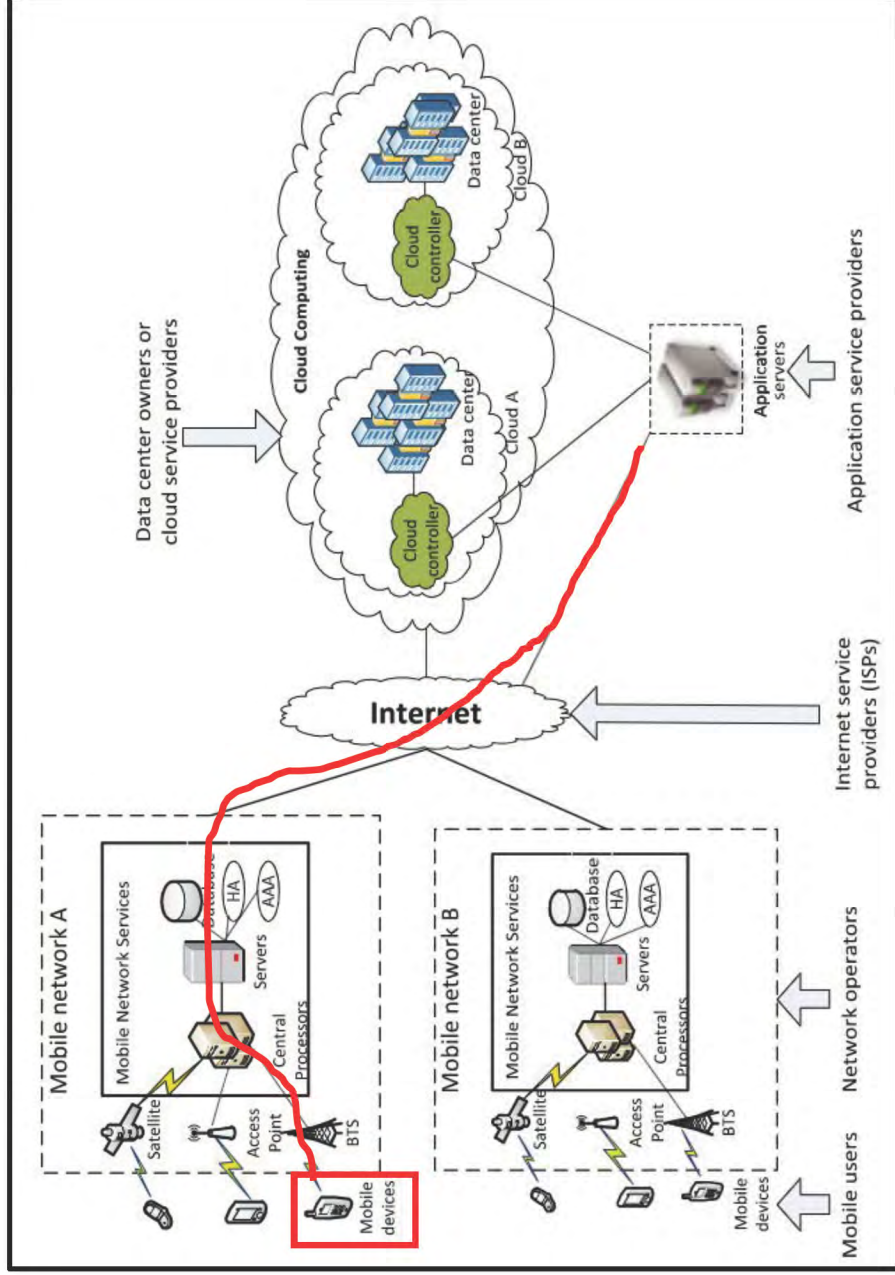


Source: <https://www.samsung.com/global/business/networks/insights/blog/north-america/>

Claim 22 - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

An apparatus comprising: a processing element comprising a processor coupled to a memory;

- The “**Samsung Members**” mobile app operates from servers located at us.community.samsung.com.
- The servers at this location necessarily have a processing element that includes a processor coupled to a memory.
- The servers can connect to a plurality of mobile devices via a wireless network.



Source:

<https://onlinelibrary.wiley.com/doi/epdf/10.1002/wcm.1203>

Claim 23, Element (A) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

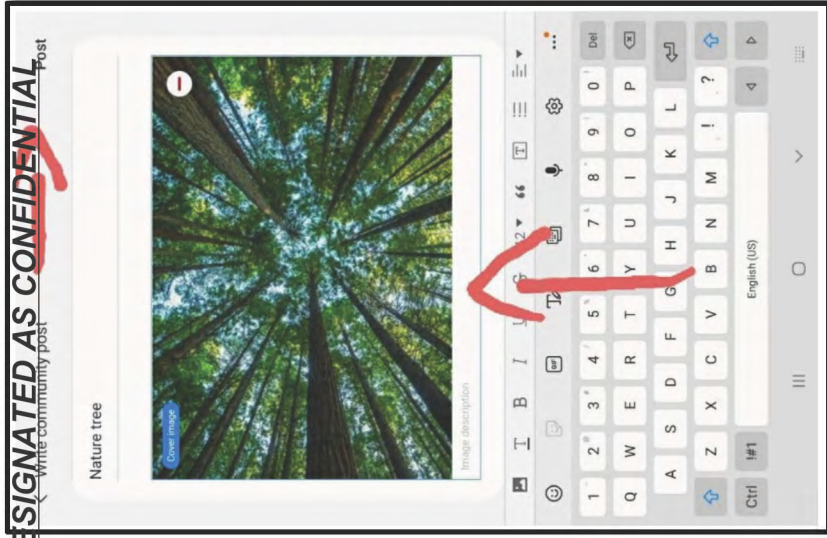
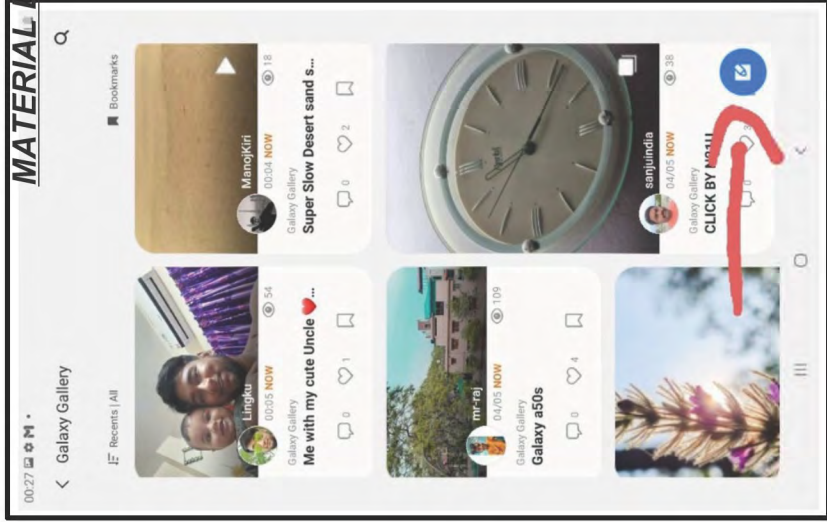
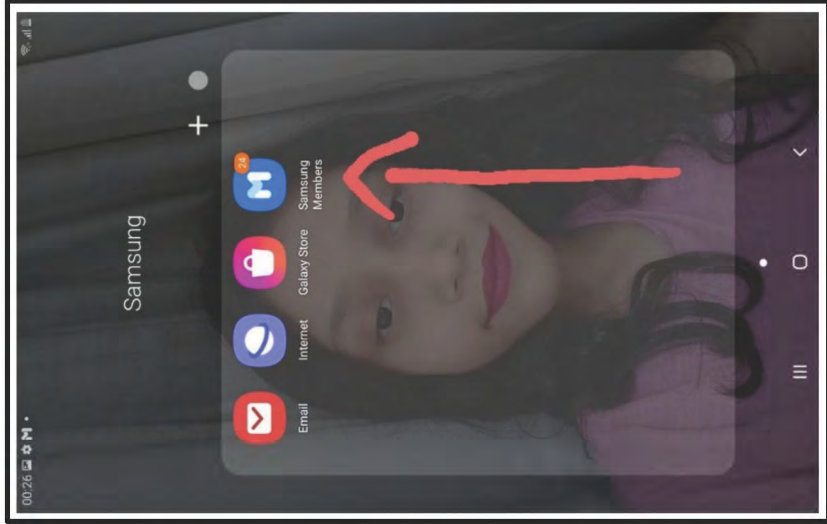
Claim: 23 – Element (B)

the processing element providing at least a portion of an interface permitting a first user to control activation of a mobile information channel through which the first user can share access to content with a plurality of additional users;

- The processing element in the “**Samsung Members**” app server provides at least a portion of an interface that allows users to control activation of a mobile information channel (Samsung Members).

- The information channel accessed with the app “**Samsung Members**” allows a first user to share access to content (e.g. pictures of trees) with a plurality of users.

- The app “**Samsung Members**” community has almost 19 million members.



<https://r2.community.samsung.com/t5/Tech-Talk/How-to-post-on-Samsung-Members/td-p/8220552>

Original topic: How to post on Samsung Members

Date acquired: 2/12/2024

Welcome to the Samsung Members Community

Explore your new hub for all things Samsung and beyond. Connect with Samsung experts, super-fans, and other Community members for tips on features and how to get the most out of your Samsung product.

Search all content

MEMBERS	TOPICS	SOLUTIONS	ONLINE
18,883,993	21,172	16,035	98,364

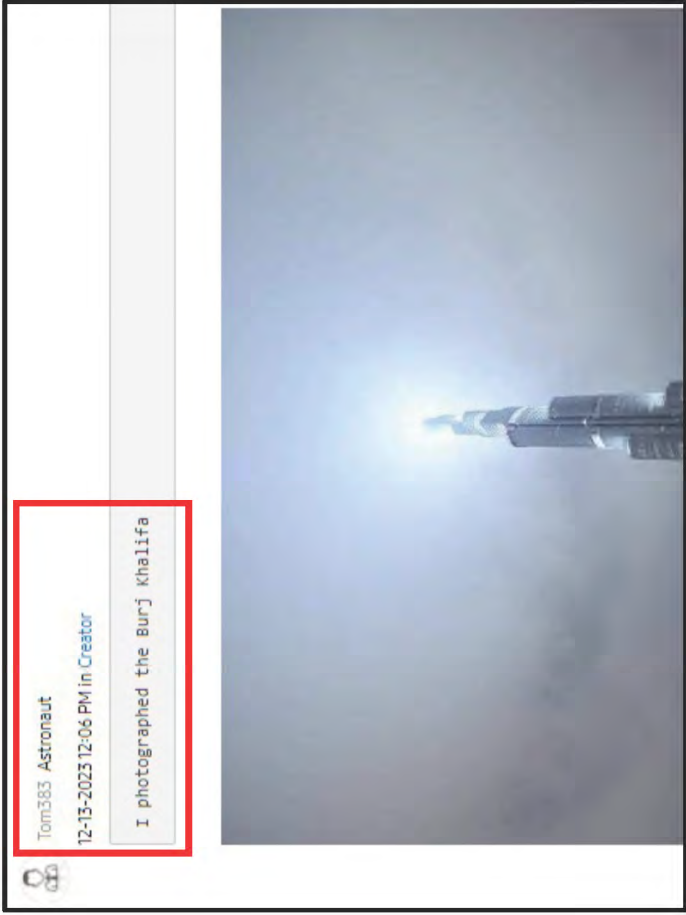
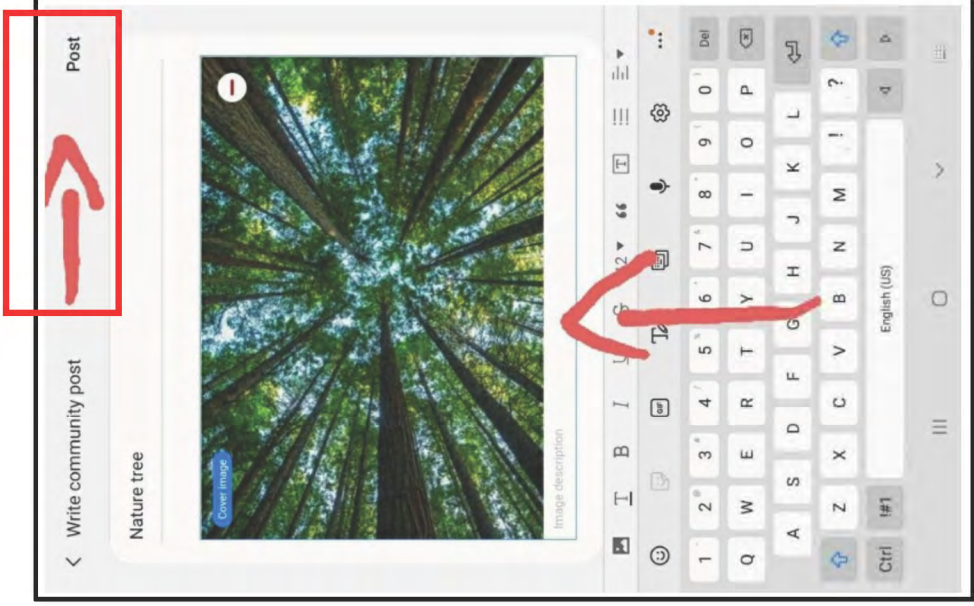
https://us.community.samsung.com/t5/Samsung-Community/ct-p/us?page=1&tab=recent_topics
Welcome to the Samsung Members Community
Date acquired: 2/12/2024

Claim 23, Element (B) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 23 – Element (C)(1)

the processing element being configured to: activate the mobile information channel responsive to input received from the first user via the interface;

- The processing element in the “Samsung Members” app server is configured to activate the mobile information channel, responsive to input received from the first user.
- As shown previously, a new thread (mobile information channel) is created (activated) when a user clicks the “post” button.
- At right is an original post titled “Burj Khalifa.” This post is an information channel that was activated by user Tom383 after inputting information into his Samsung phone.



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

<https://r2.community.samsung.com/t5/Tech-Talk/How-to-post-on-Samsung-Members/td-p/8220552>

Original topic: How to post on Samsung Members

Date acquired: 2/12/2024

Claim 23, Element (C1) – The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 23 – Element (C)(2)

insert content provided by the first user into the mobile information channel;

- The processing element in the “Samsung Members” app server is configured to insert the integrated content item (photo and information) into the mobile information channel (Burj Khalifa thread in Samsung Members Community).
- The content is provided by the first user (Tom383).



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

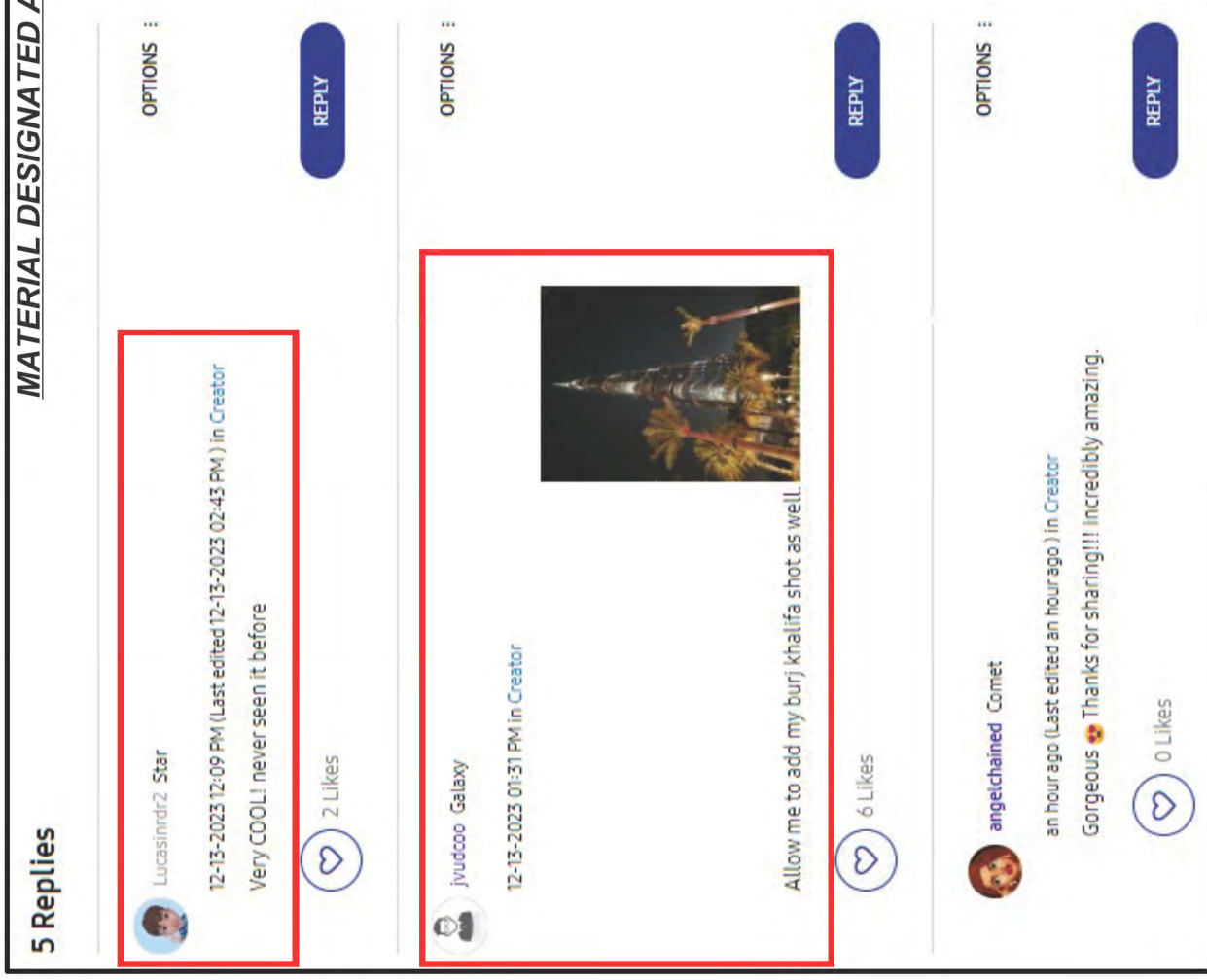
Claim 23, Element (C2) – The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 23 – Element (C)(3)

receive additional content relating to the mobile information channel from one or more of said additional users via one or more respective mobile devices associated with at least one wireless network;

- The processing element in the “Samsung Members” app server is configured to receive additional content (photos, comments) relating to the mobile information channel (Burj Khalifa thread in Samsung Members Community) from additional users (Lucasinrdr2 and jvudcoo).

- The users provide the content via a Samsung mobile device, which necessarily is associated with at least one wireless network.



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

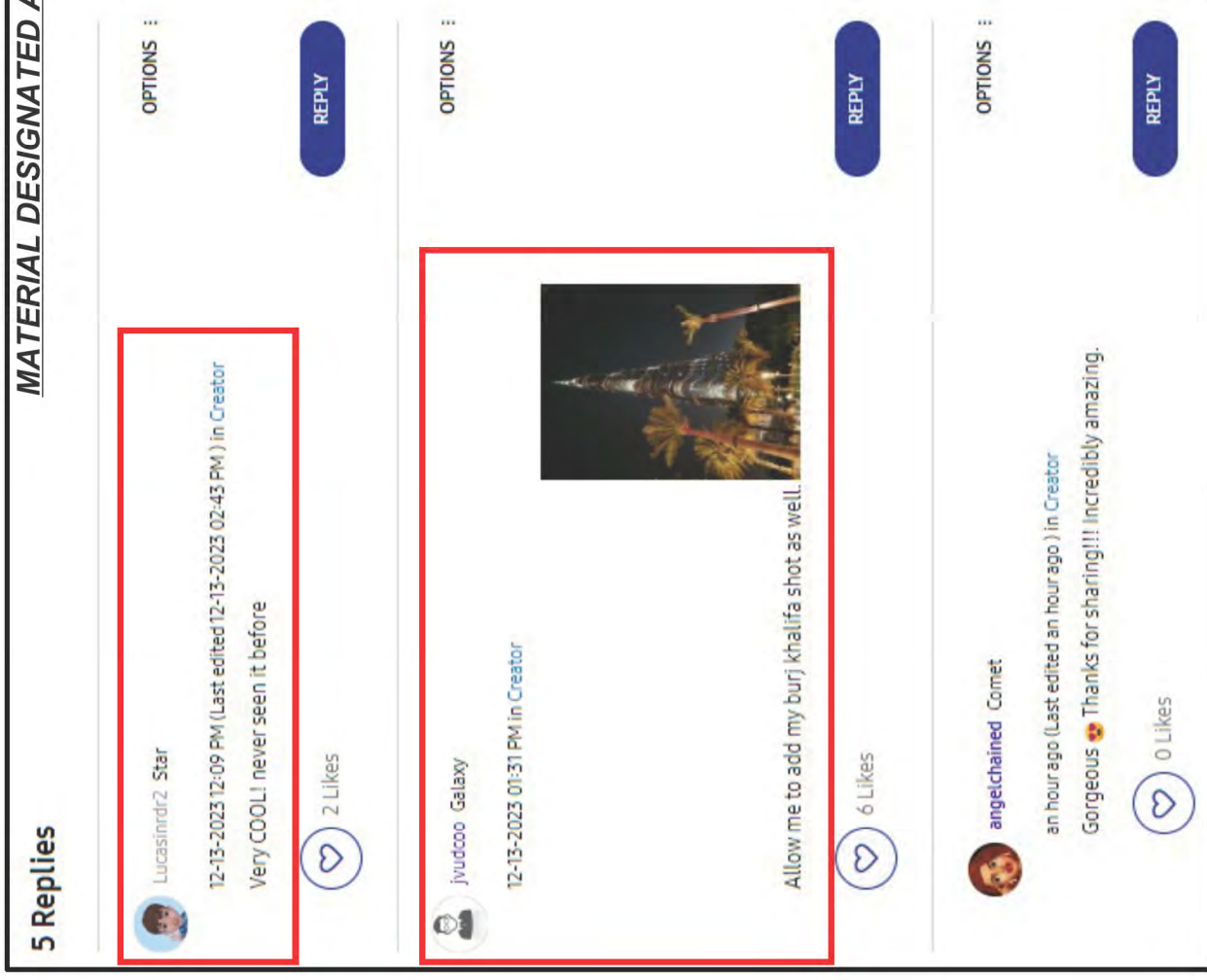
Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 23, Element (C3) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

insert at least a portion of the additional content into the mobile information channel; and

- The processing element in the “Samsung Members” app server is configured to insert the additional content (photos, comments) into the mobile information channel (Burj Khalifa thread in Samsung Members Community).



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 23, Element (C4) – The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 23 – Element (C)(5)

integrate into the mobile information channel information associated with at least one wireless networking functionality of said at least one wireless network.

- The processor is configured to integrate information associated with at least one wireless networking functionality (messaging action) of said at least one wireless network.

- As shown, the processing element in the “Samsung Members” app server can integrate information (e.g. username, date, time, Group) that is associated with a messaging action performed by a user (Tom383) while messaging other users via the Samsung Members Community.

 Tom383 Astronaut
12-13-2023 12:06 PM in Creator

I photographed the Burj Khalifa



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa
Date acquired: 2/12/2024

Advantageously, the information content of a given mobile site generated in the system 10 may be configured so as to integrate therewith information associated with at least one wireless networking functionality of the wireless network 12. This information may be determinable based at least in part on one or more parameters associated with the above-noted mobile information channels or M-channels. Examples of such information include information specifying at least one messaging action implementable over the wireless network, information specifying at least one collaboration action implementable over the wireless network, and information specifying at least one location-based service action implementable over the wireless network. Other types of information associated with wireless networking functionalities may also or alternatively be used.

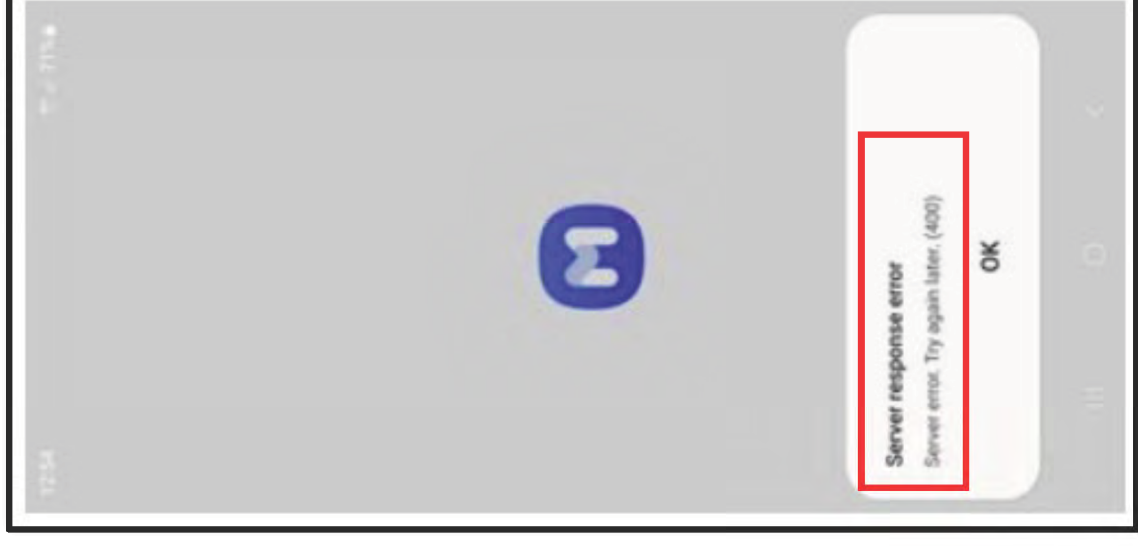
65

9,032,039 patent at 5:55-65

Claim 23, Element (C5) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

The **apparatus** of claim 23 **wherein the processing element comprises at least one server** accessible over the Internet **via a network interface**.

- The Accused Product includes servers in a data center on a network-based communication system attached to the Internet accessible to users.
- By way of example, Samsung Members servers practice the steps of the patented method. Shown is an example of when the server is not responding.



Source: <https://r1.community.samsung.com/t5/galaxy-s/samsung-members-not-working/td-p/20624138>

A network-based communication system, comprising:

- The Accused Product includes a network-based communication system.
- For example, Samsung servers hosting the “Samsung Members” app functionality practice the steps of the patented method.

Samsung Networks has extensive facilities and personnel advancing network technology to drive new opportunities and experiences. From our network facilities to manufacturing factories and R&D centers, Samsung is committed to the communities and people throughout the region. For more than 15 years, Samsung Networks has been working with operators in North America, helping them deploy a powerful network to satisfy customer experiences and offer diverse services. Our customers are located in various locations within the region and we are closely partnering with them to provide only the best network solutions.

Source: <https://www.samsung.com/global/business/networks/insights/blog/north-america/>

¹By charting the preamble, we do not concede that the preamble is a limitation and reserve the right to contend that the preamble is not a limitation of the claim.

Claim: 25 – Element (A)

a plurality of servers configured to communicate over a network;

- The Accused Product includes plurality of servers configured to communicate with Customers (for example, Samsung Members) over a network.



Source: <https://www.samsung.com/global/business/networks/insights/blog/north-america/>

Claim 25, Element (A) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

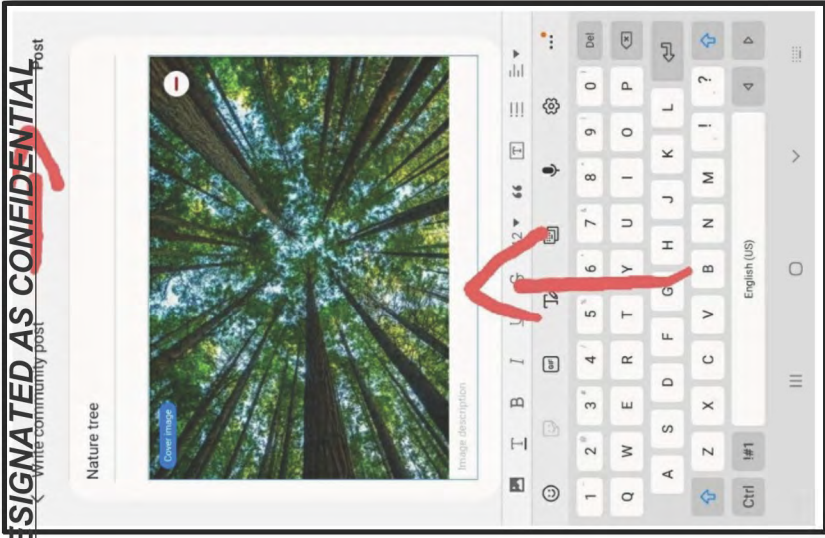
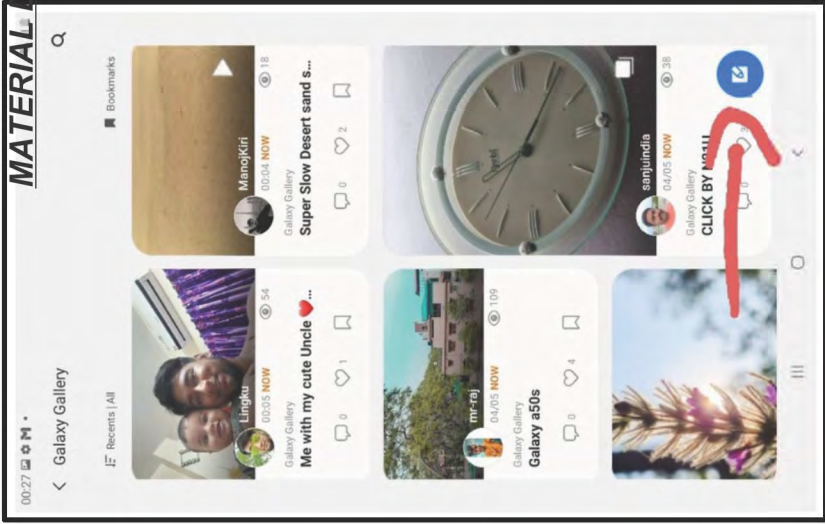
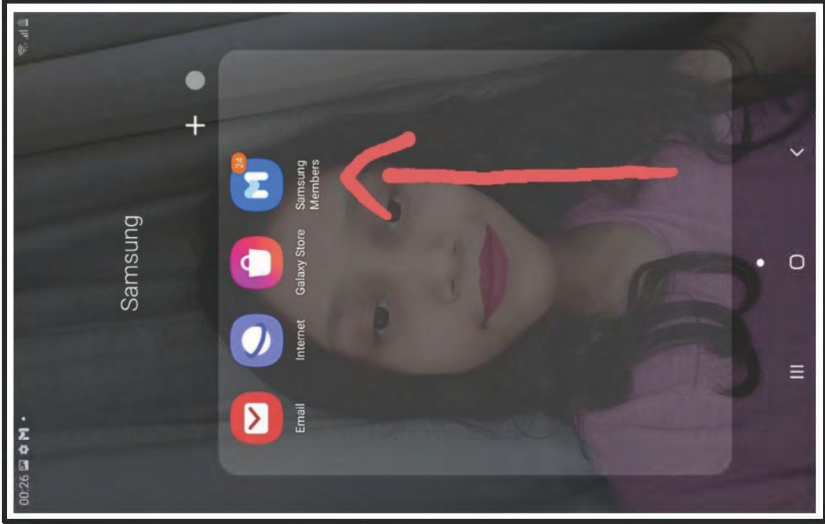
Claim: 25 – Element (B)

at least one of the servers providing at least a portion of an interface permitting a first user to control activation of a mobile information channel through which the first user can share access to content with a plurality of additional users;

• The “**Samsung Members**” app server provides at least a portion of an interface that allows users to control activation of a mobile information channel (Samsung Members).

• The information channel accessed with the app “**Samsung Members**” allows a first user to share access to content (e.g. pictures of trees) with a plurality of users.

• The app “**Samsung Members**” community has almost 19 million members.



<https://r2.community.samsung.com/t5/Tech-Talk/How-to-post-on-Samsung-Members/td-p/8220552>

Original topic: How to post on Samsung Members

Date acquired: 2/12/2024

Welcome to the Samsung Members Community

Explore your new hub for all things Samsung and beyond. Connect with Samsung experts, super-fans, and other Community members for tips on features and how to get the most out of your Samsung product.

Search all content

MEMBERS	TOPICS	SOLUTIONS	ONLINE
18,883,993	21,172	16,035	98,364

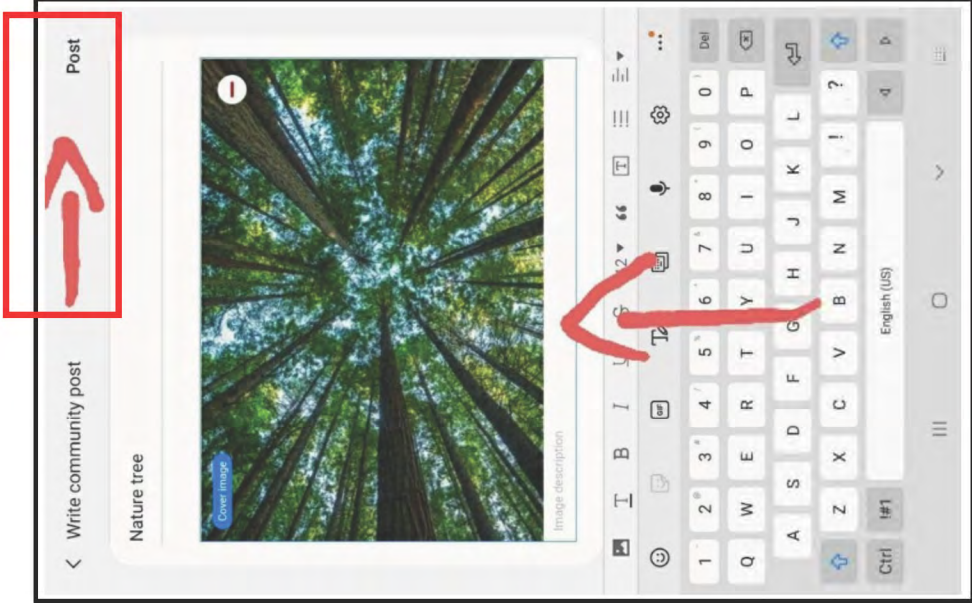
https://us.community.samsung.com/t5/Samsung-Community/ct-p/us?page=1&tab=recent_topics
Welcome to the Samsung Members Community
Date acquired: 2/12/2024

Claim 25, Element (B) – The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 25 – Element (C)

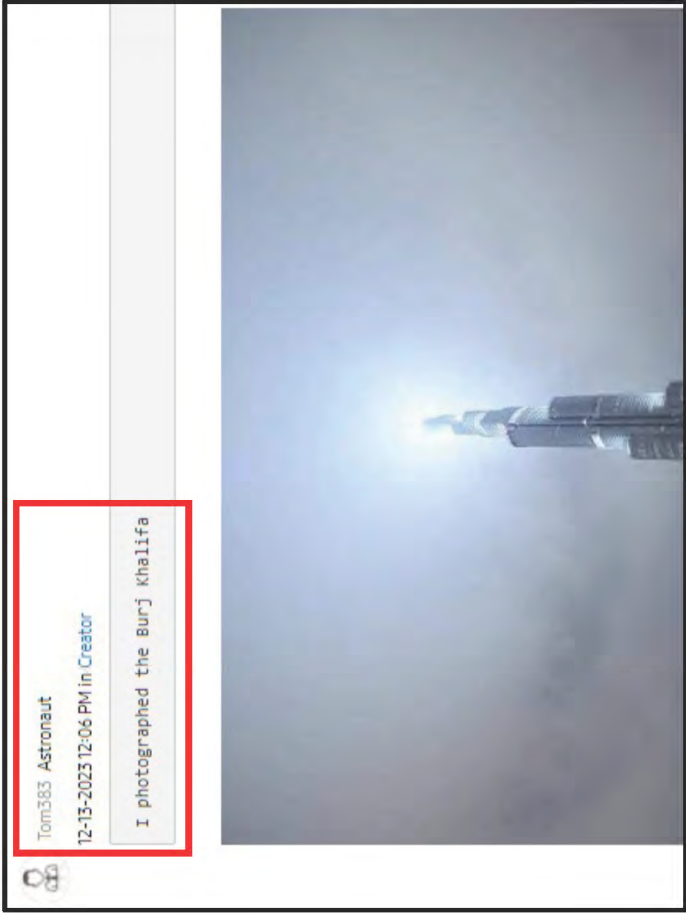
wherein said at least one server is configured to: activate the mobile information channel responsive to input received from the first user via the interface;

- The “Samsung Members” app server is configured to activate the mobile information channel, responsive to input received from the first user.
- As shown previously, a new thread (mobile information channel) is created (activated) when a user clicks the “post” button.
- At right is an original post titled “Burj Khalifa.” This post is an information channel that was activated by user Tom383 after inputting information into his Samsung phone.



<https://r2.community.samsung.com/t5/Tech-Talk/How-to-post-on-Samsung-Members/td-p/8220552>

Original topic: How to post on Samsung Members
Date acquired: 2/12/2024



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>
Original topic: Burj Khalifa
Date acquired: 2/12/2024

Claim 25, Element (C) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 25 – Element (C)

insert content provided by the first user into the mobile information channel;

- The “Samsung Members” app server is configured to insert the integrated content item (photo and information) into the mobile information channel (Burj Khalifa thread in Samsung Members Community).
- The content is provided by the first user (Tom383).



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

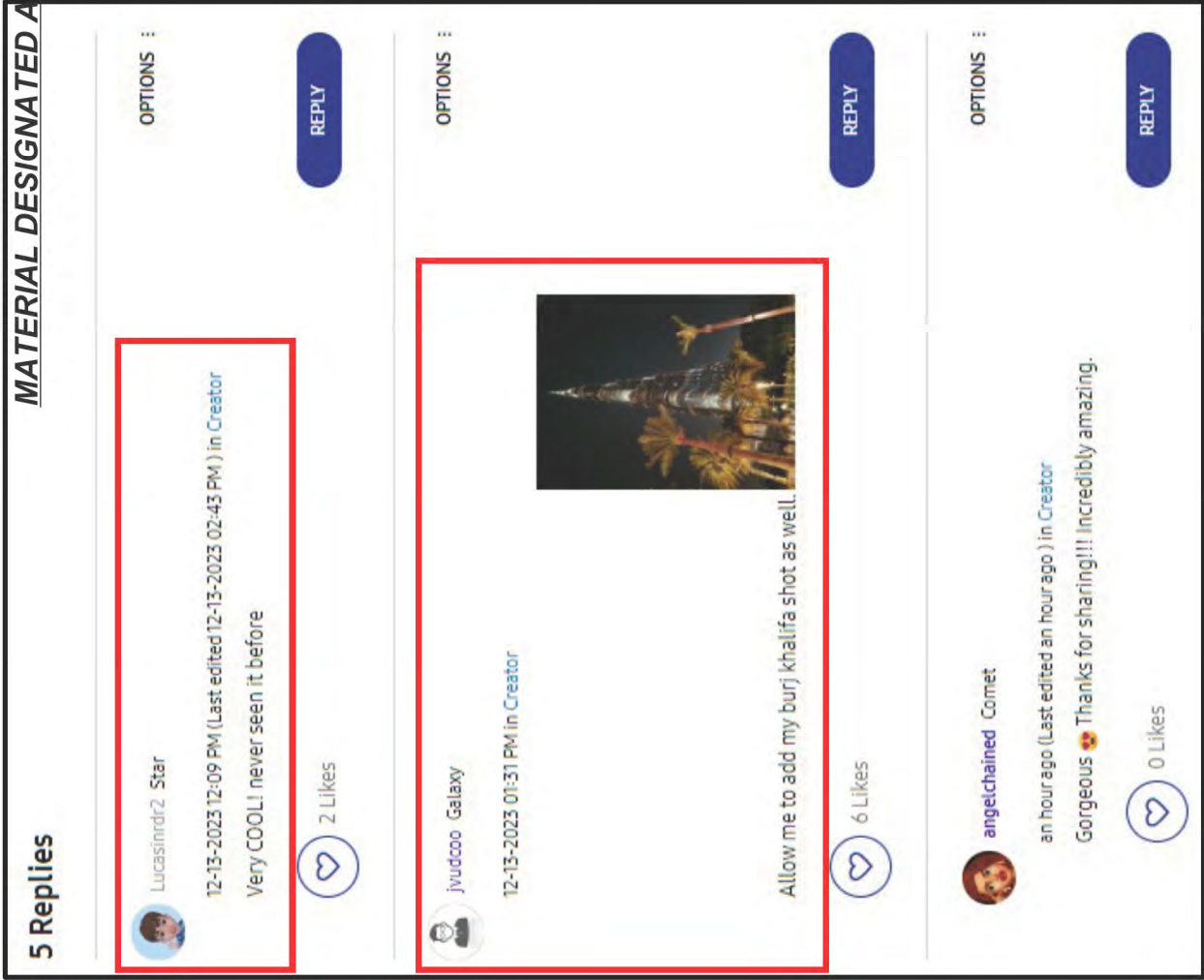
Claim 25, Element (C) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 25 – Element (D)

receive additional content relating to the mobile information channel from one or more of said additional users via one or more respective mobile devices associated with at least one wireless network;

• The “Samsung Members” app server is configured to receive additional content (photos, comments) relating to the mobile information channel (Burj Khalifa thread in Samsung Members Community) from additional users (Lucasinrdr2 and jvudcoo).

• The users provide the content via a Samsung mobile device, which necessarily is associated with at least one wireless network.



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

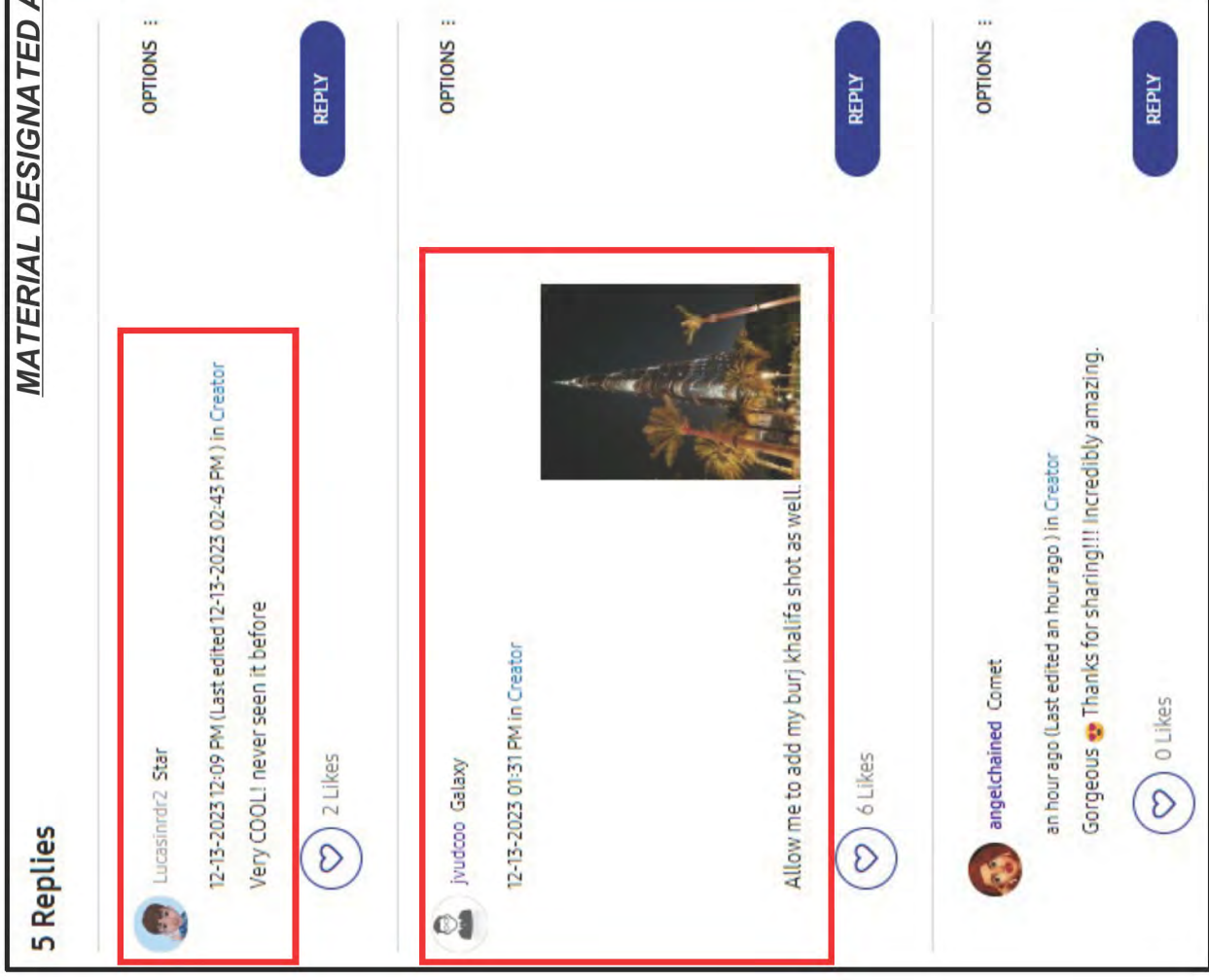
Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 25, Element (D) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

insert at least a portion of the additional content into the mobile information channel; and

- The “Samsung Members” app server is configured to insert the additional content (photos, comments) into the mobile information channel (Burj Khalifa thread in Samsung Members Community).



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 25, Element (E) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 25 – Element (F)

integrate into the mobile information channel information associated with at least one wireless networking functionality of said at least one wireless network.

- The server is configured to integrate information associated with at least one wireless networking functionality (messaging action) of said at least one wireless network.

- As shown, the “Samsung Members” app server can integrate information (e.g. username, date, time, Group) that is associated with a messaging action performed by a user (Tom383) while messaging other users via the Samsung Members Community.



I photographed the Burj Khalifa



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa
Date acquired: 2/12/2024

Advantageously, the information content of a given mobile site generated in the system 10 may be configured so as to integrate therewith information associated with at least one wireless networking functionality of the wireless network 12. This information may be determinable based at least in part on one or more parameters associated with the above-noted mobile information channels or M-channels. Examples of such information include information specifying at least one messaging action implementable over the wireless network, information specifying at least one collaboration action implementable over the wireless network, and information specifying at least one location-based service action implementable over the wireless network. Other types of information associated with wireless networking functionalities may also or alternatively be used.

9,032,039 patent at 5:55-65

41

Claim 25, Element (F) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.