

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

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

Asserted U.S. Patent No. 9,922,348

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

Ex. 4. MDT PR 3-1 Infringement Charts for
Asserted Claims of US9922348

This claim chart specifically addresses infringement of Claims 1, 2, 6-9, 12-14, and 17-18 (“Asserted Claims”) of the ‘348 Patent and merely demonstrates one way in which Defendants infringe this claim of the ‘348 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, 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 5G, 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+ 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:

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:

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: **MATERIAL DESIGNATED AS CONFIDENTIAL**

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.

~~MATERIAL DESIGNATED AS CONFIDENTIAL~~
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).

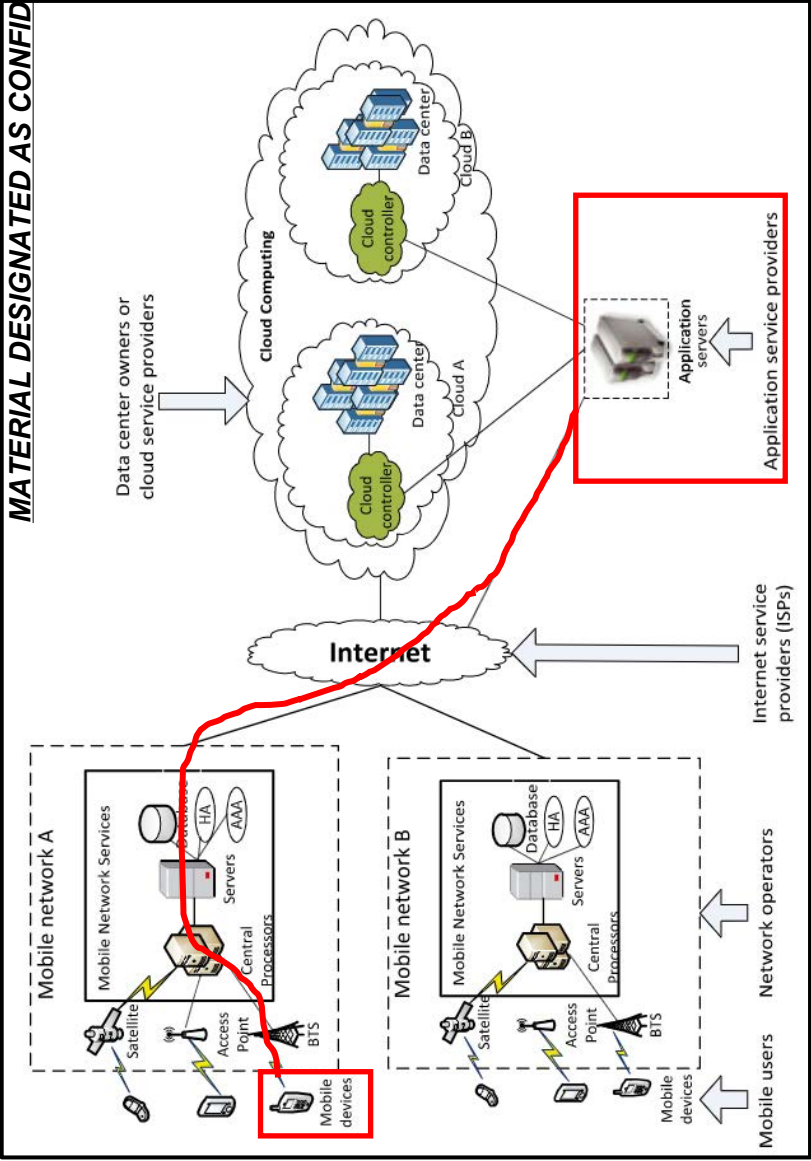
To the extent that any component or step of an asserted claim is determined to have been supplied or practiced by an end-user of the Accused Instrumentalities, Samsung is nevertheless liable as a direct infringer under *Akamai*. To the extent that end-users are determined to have independently directly 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)

An apparatus comprising:
a processing element comprising a processor coupled to a memory; and
a network interface coupled to the processing element and configured to communicate with a plurality of mobile devices over at least one network;

- The “**Samsung Members**” app operates from servers located at us.community.samsung.com.
- The servers at this location necessarily have a processing element that is coupled to a memory.
- The servers also necessarily have a network interface that can communicate with a plurality of mobile devices over the network.
- The app “**Samsung Members**” community has almost 19 million members.



Source:

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

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

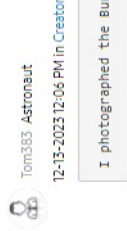
Claim 1, Element (A) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are 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)

the processing element being configured:

to receive first device-captured data from a first one of the mobile devices via the network interface;

- The processing element at the “**Samsung Members**” server is configured to receive first device-captured data from a first mobile device.
- The image at right shows device-captured image data from a 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 (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: 1 – Element (C1)

to receive second device-captured data from a second one of the mobile devices via the network interface; and

- The processing element at the “**Samsung Members**” server is configured to receive second device-captured data from a second mobile device.
- The image at right shows device-captured image data from a second user “jvudcoo.”



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

Original topic: Burj Khalifa

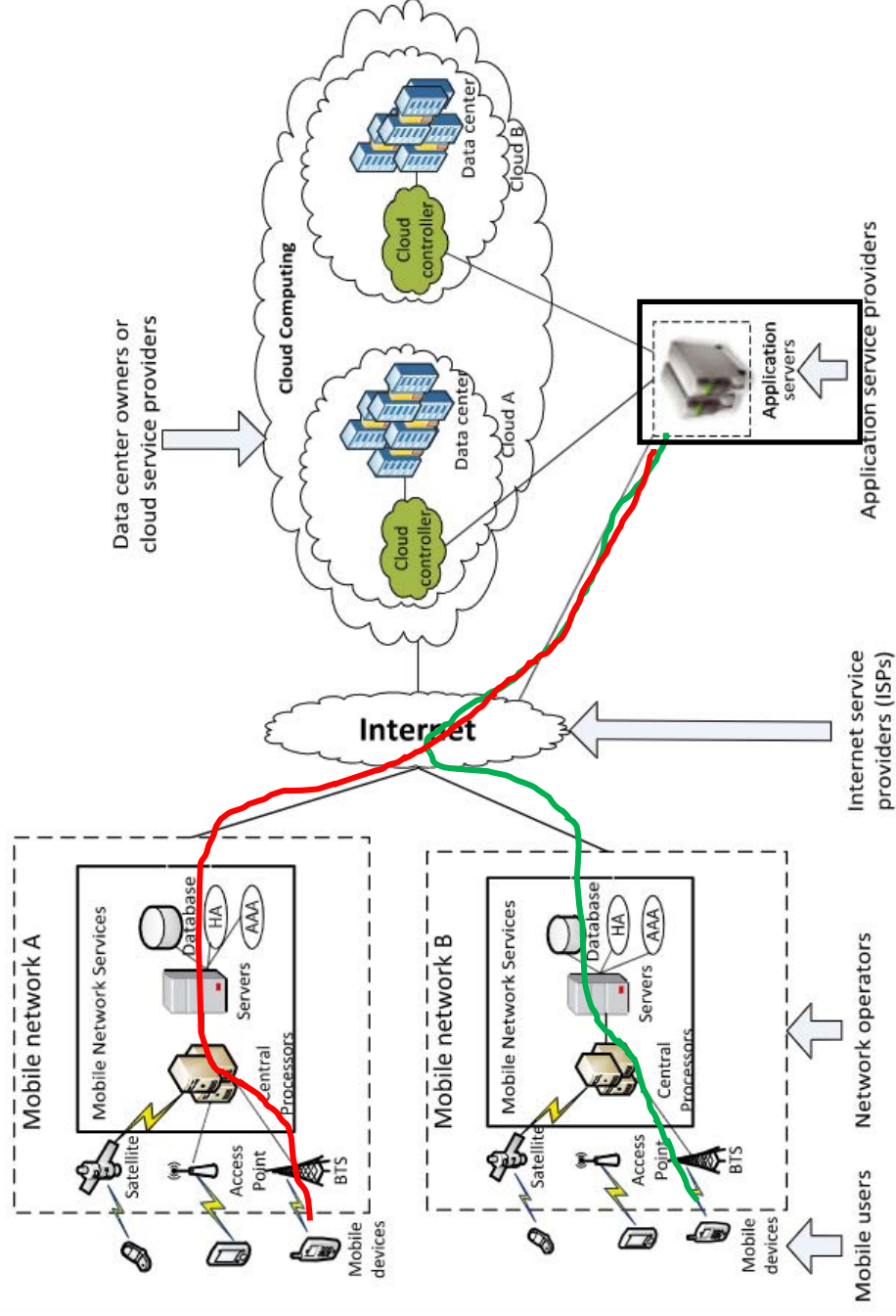
Date acquired: 2/12/2024

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 (C2)

to receive second device-captured data from a second one of the mobile devices via the network interface; and

In this example, the Samsung application servers can receive device-captured data from the first mobile device (red line) as well as the second mobile device (green line).



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

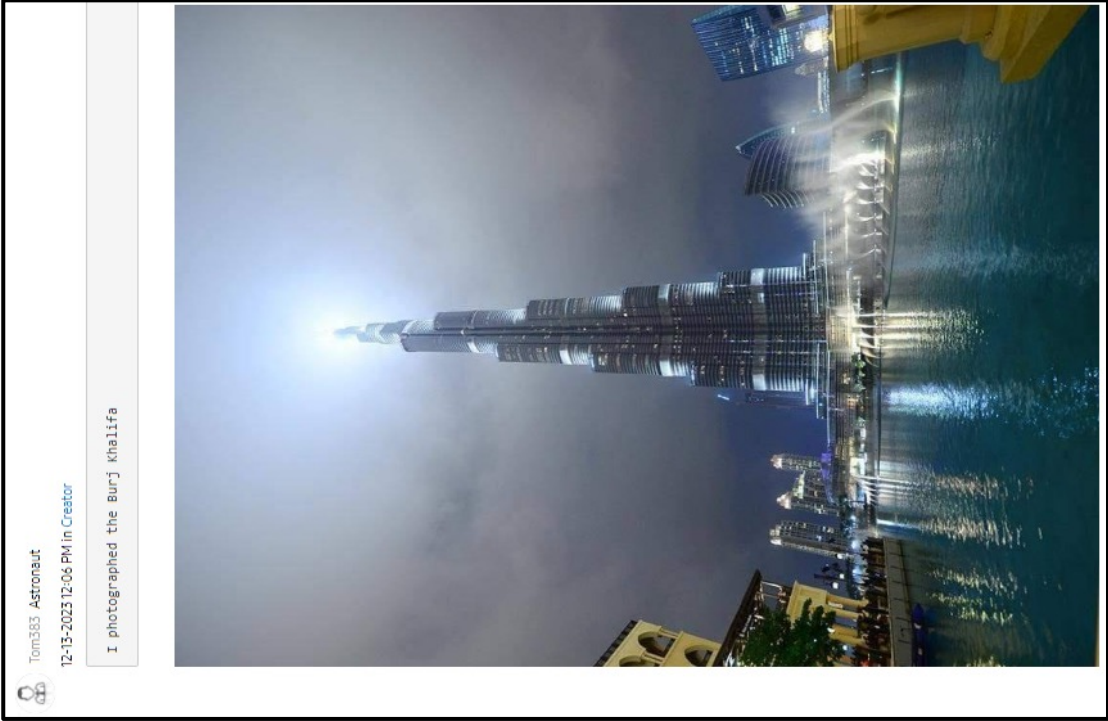
Claim 1, Element (C2) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are 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: 1 – Element (D)

to integrate the first and second device- and second data into a web-based shared information channel controllably accessible to first and second users of the respective first and second mobile devices

- The processing element at the “**Samsung Members**” server is configured to integrate the first and second images into a single web-based shared information channel (Burj Khalifa thread at the URL shown at right).

- The thread is controllably accessible to the first and second mobile devices (mobile device of users tom383 and jvudcoo).



<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.

Claim: 1 – Element (E)

via respective personalized content applications of the first and second mobile devices.

- “**Samsung Members**” is a personalized content application.
- Each “**Samsung Members**” user must be registered on the server.
- Each user’s account is personalized by the user. The account can be personalized in a variety of ways, including the way the pages are displayed to the user, as well as selection of avatars, signatures, and many other settings.



<https://www.youtube.com/watch?v=K0ySaHwhJzs>

Samsung Members: Service Features

Date acquired: 2/13/2024

SAMSUNG

Community HomeWelcome to the CommunityGet HelpGroups

Samsung Community / My settings : Preferences

PERSONAL

PREFERENCES

AVATARS

TAGGING

MACROS

SUBSCRIPTIONS & NOTIFICATIONS

Preference Options

Display

General

Linear Layout

Threaded Layout

Home Page

Privacy

Private Messenger

Preference Options

Time zone

Use default (GMT -08:00 U.S. Pacific Time)

Language

Use default (English (US))

Ignore HTML

☐

View signatures in posts

☒

<https://us.community.samsung.com/t5/user/myprofilepage/tab/user-preferences>

My Settings: Preferences

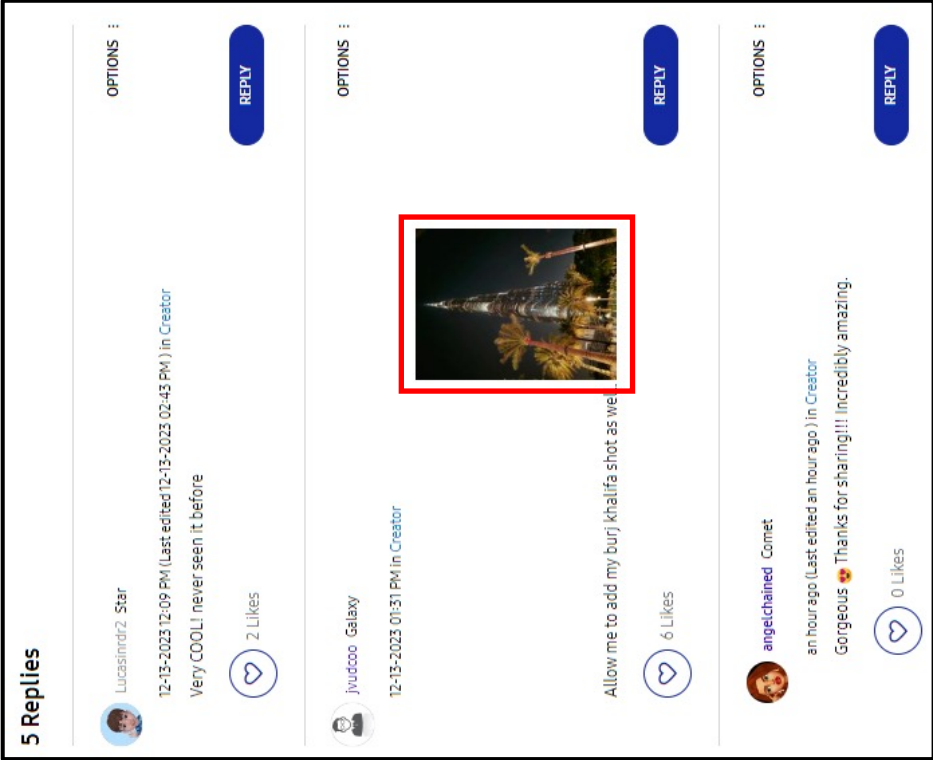
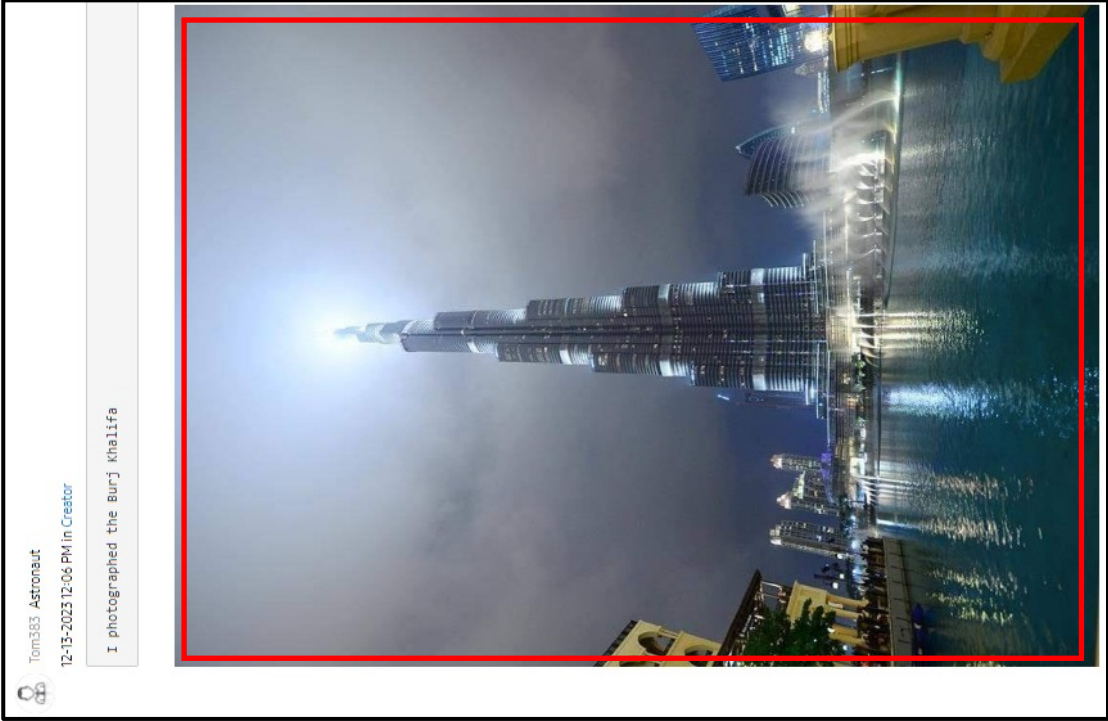
Date acquired: 2/12/2024

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: 2 – Element (A)

The apparatus of claim 1 wherein at least one of the first device-captured data and the second device-captured data comprises image data.

- The first and second device-captured data includes image data as shown.



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

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

Claim 2, 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: 6 – Element (A)

The apparatus of claim 1 wherein a given one of the first and second mobile devices comprises one of a **mobile telephone**, a tablet computer, a GPS-based navigational device, a watch and a portable game player.

- The mobile device can include at least a mobile telephone.

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



BBIM410 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

<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 6, 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.

16

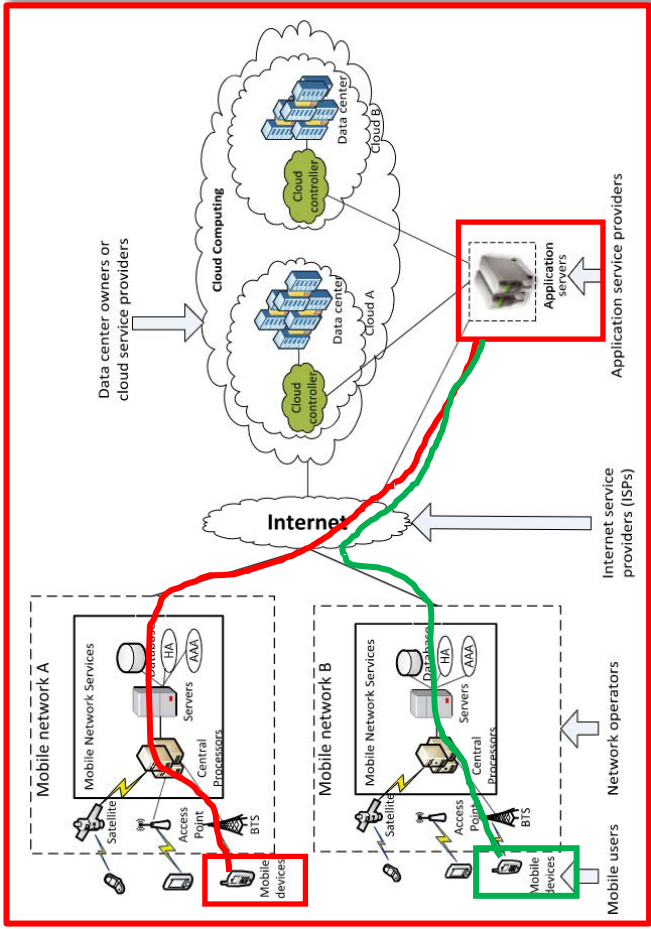
Claim: 7 – Element (A)

The apparatus of claim 1 further comprising a web server that includes the network interface and the processing element and wherein the web server is accessible to the first and second mobile devices over the Internet via the network interface.

- The Accused Product includes a network-based communication system comprised of servers that include a web server.
- Samsung's Network servers are necessarily equipped with at least one or more network interfaces and processing elements that are accessible to the first and second mobile devices over the Internet via the network interface.

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/>



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

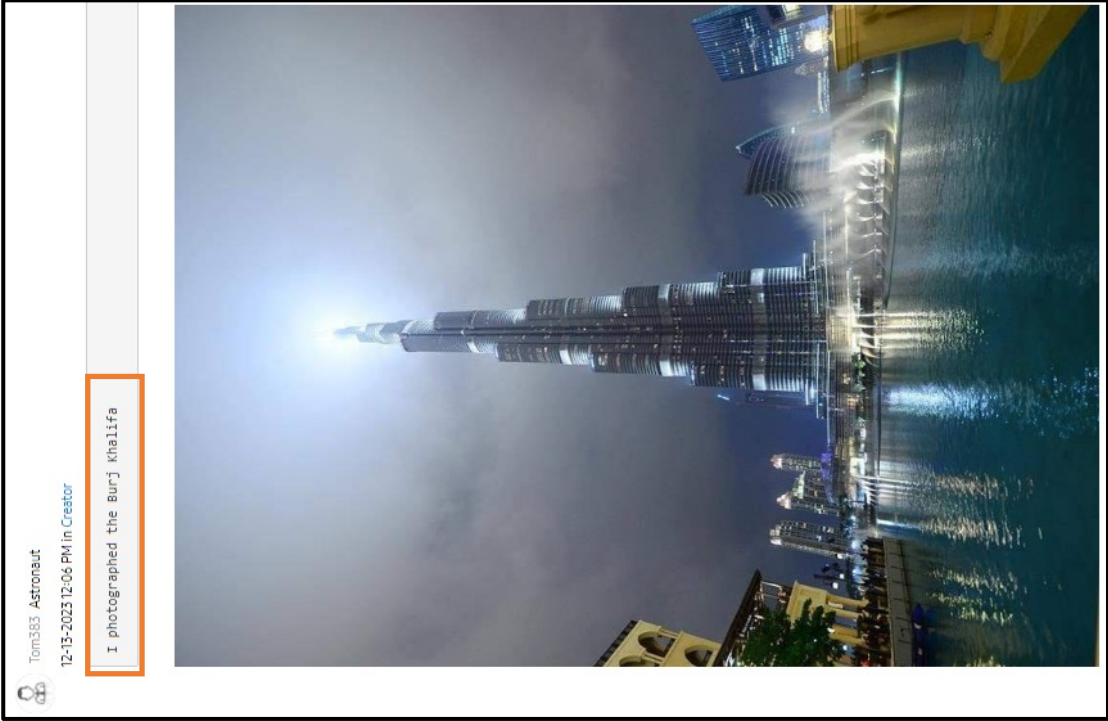
Claim 7, Element (A) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are 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: 8 – Element (A)

The apparatus of claim 1 wherein the web-based shared information channel is configured to allow a given one of the first and second users to enter a message via the personalized content application of its corresponding mobile device and

In this example, the first device-captured data is photos from the first user (in orange), and the second device-captured data is a comment from the second user.

Either user can then enter a message via the Samsung Members app (each user’s personalized content application). Here, the second user enters a message in response (in blue) along with the image.



5 Replies



12-13-2023 12:09 PM (Last edited 12-13-2023 02:43 PM) in Creator

Very COOL! never seen it before



2 Likes

REPLY



12-13-2023 01:31 PM in Creator



Allow me to add my burj khalifa shot as well.



6 Likes

REPLY



an hour ago (Last edited an hour ago) in Creator
Gorgeous 🥰 Thanks for sharing!!! Incredibly amazing.

OPTIONS :



0 Likes

REPLY

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

Original topic: Burj Khalifa

Date acquired: 2/12/2024

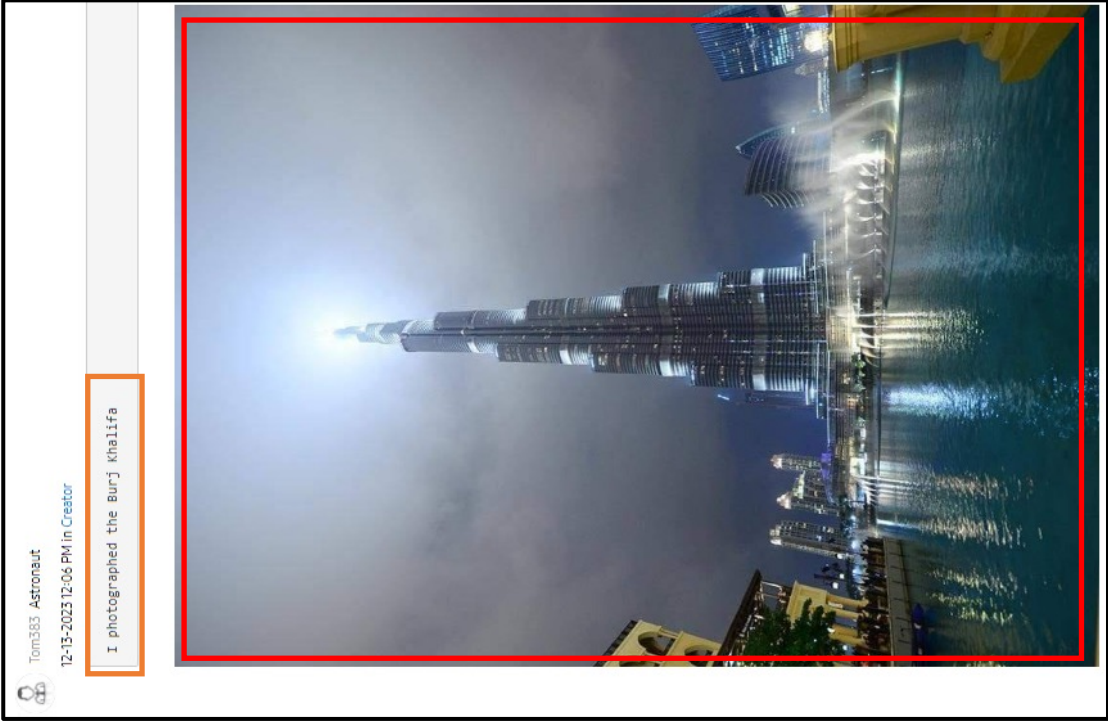
Claim 8, Element (A) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are 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: 8 – Element (B)

wherein the message is integrated with the first and second device-captured data into a persistent version of a given set of shared information content of the web-based shared information channel so as to be accessible with the first and second device-captured data to the first and second users of the respective first and second mobile devices via the respective personalized content applications of the first and second mobile devices.

Each message is then integrated with the first and second-captured data into a persistent version of shared information content.

The integrated message is accessible from the personalized content app (Samsung Members) on each mobile device.

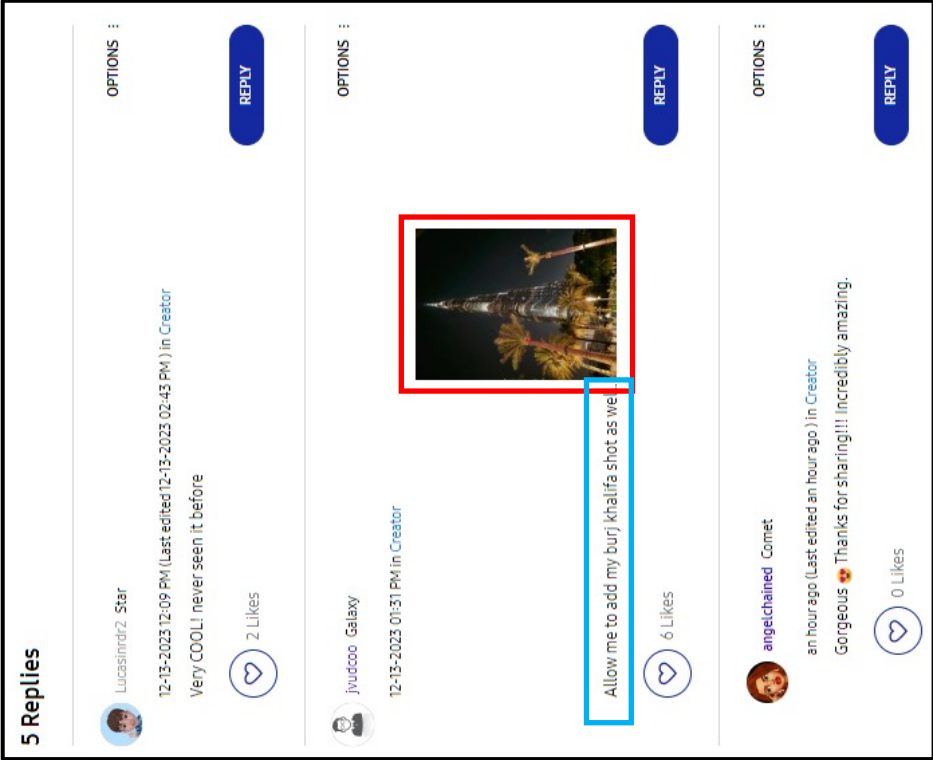


<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

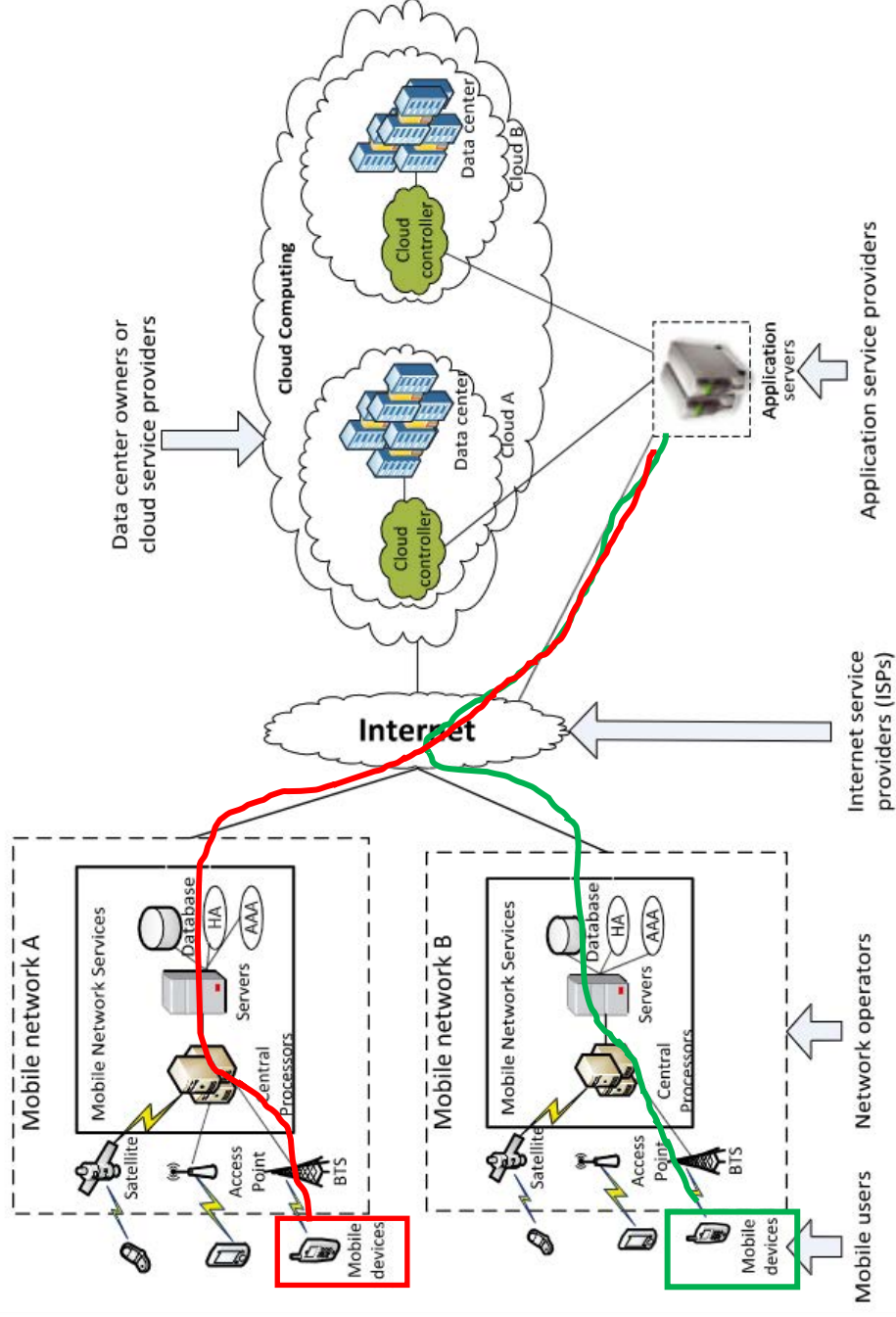
Claim 8, Element (B) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are 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: 9 – Element (A)

The apparatus of claim 8 wherein the message is delivered to one or more of the mobile devices over a wireless network.

- The message will be delivered to the mobile devices over the wireless network.



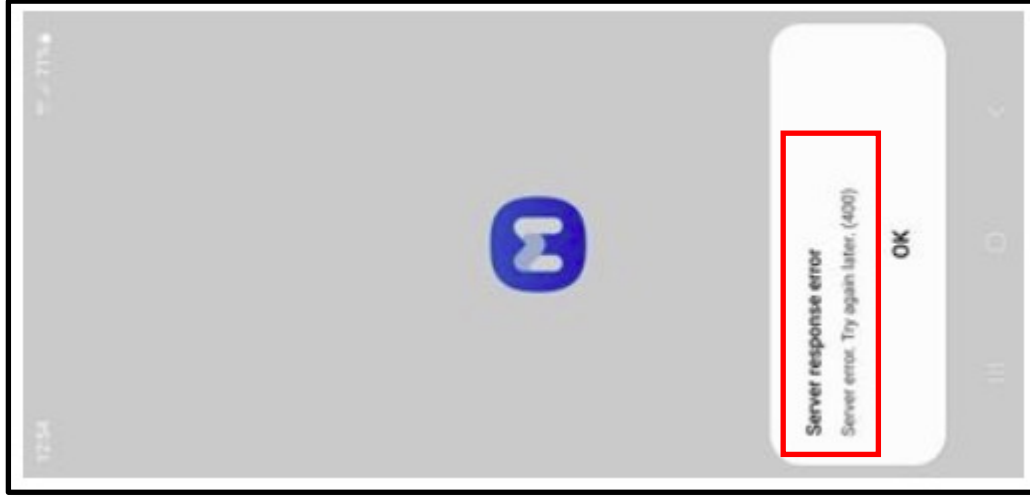
Source: <https://onlinelibrary.wiley.com/doi/epdf/10.1002/wcm.1203>

Claim 9, 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: 12 – Element (A)

A network-based communication system comprising a plurality of servers configured to communicate over said at least one network, a given one of the servers comprising the apparatus of claim 1.

As explained in the graphics at right, Samsung has developed a highly sophisticated Network communication system consisting of data centers that use a plurality of servers, including using the servers for Samsung Members.



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

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.

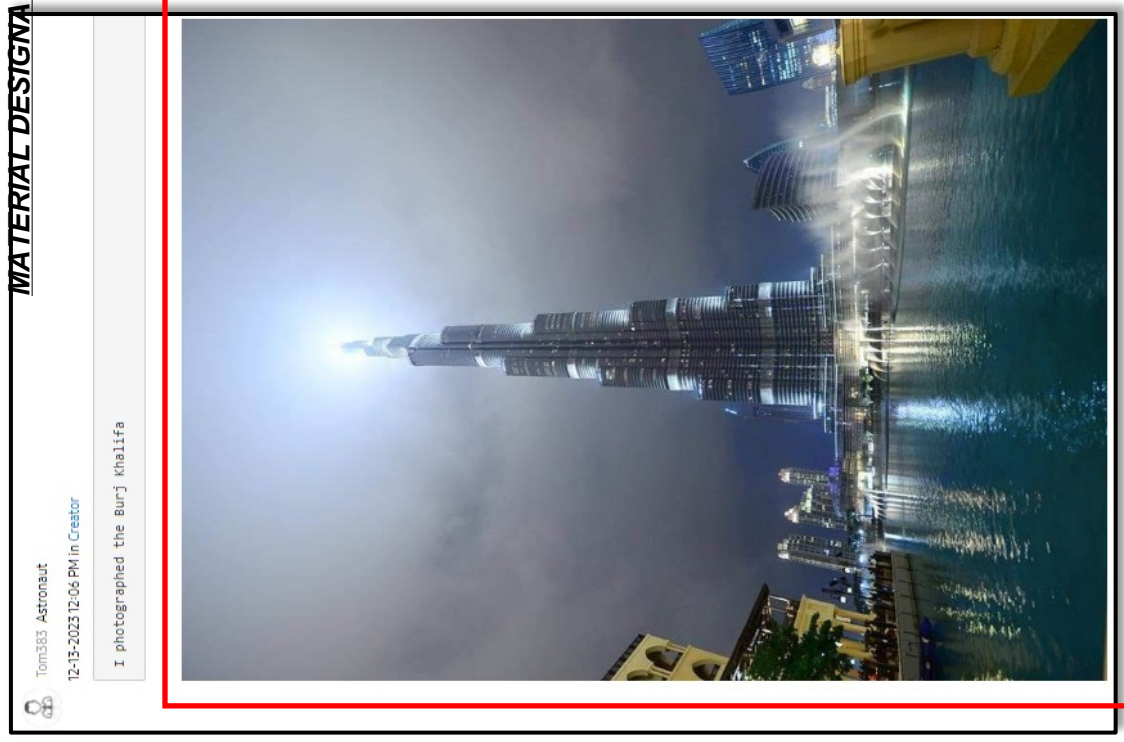
Source: <https://www.samsung.com/global/business/networks/insights/blog/north-america/>

Claim 12, 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: 13 – Element (A)

13. A method comprising:
receiving first device-captured data from a first mobile device over at least one network;

- The “**Samsung Members**” server receives first device-captured data from a first mobile device.
- The image at right shows device-captured image data from a 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 13, 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: 13 – Element (B)

receiving second device-captured data from a second mobile device over said at least one network; and

- The “**Samsung Members**” server receives second device-captured data from a second mobile device.
- The image at right shows device-captured image data from a second user user “jvudcoo.”



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

Original topic: Burj Khalifa

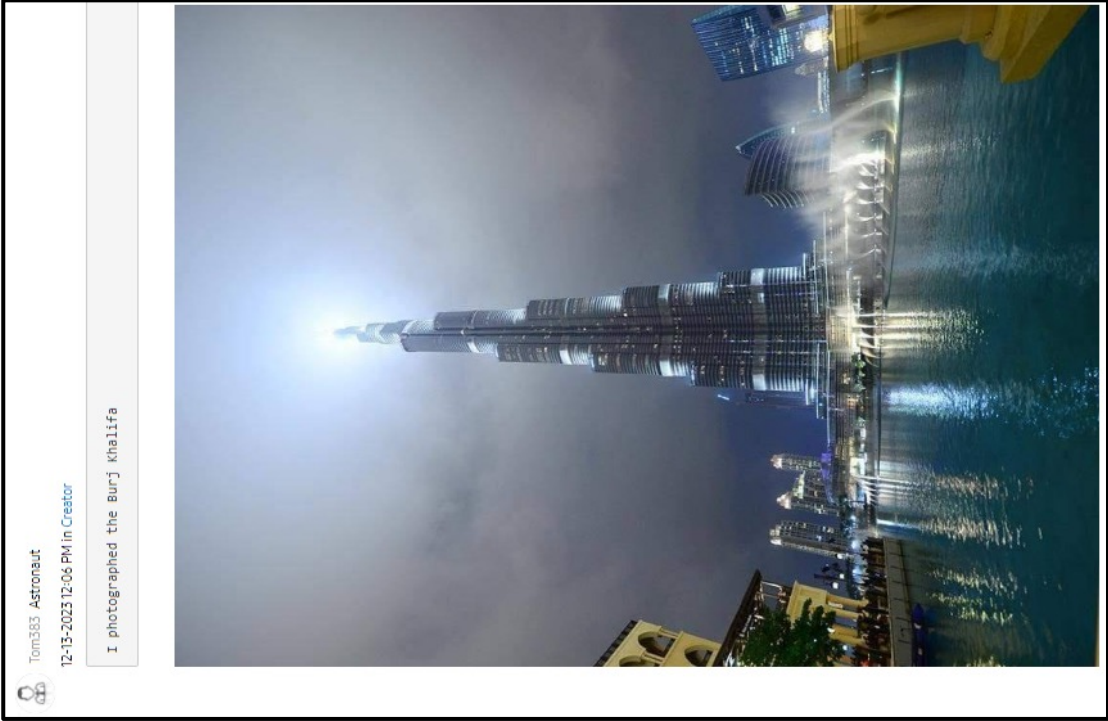
Date acquired: 2/12/2024

Claim 13, 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: 13 – Element (C)

integrating the first and second device-captured data into a web-based shared information channel controllably accessible to first and second users of the respective first and second mobile devices via respective personalized content applications of the first and second mobile devices.

- The “**Samsung Members**” server integrates the first and second images into a single web-based shared information channel (Burj Khalifa thread at the URL shown at right).
- The thread is controllably accessible to the first and second mobile devices (mobile device of users tom383 and jvudcoo) via their Samsung Members apps.



5 Replies

Lucasindri2 Star

12-13-2023 12:09 PM (Last edited 12-13-2023 02:43 PM) in Creator

Very COOL! never seen it before

2 Likes

REPLY

jvudcoo Galaxy

12-13-2023 01:31 PM in Creator

6 Likes

REPLY

angeichained Comet

an hour ago (Last edited an hour ago) in Creator

Gorgeous 🌟 Thanks for sharing!!! Incredibly amazing.

0 Likes

REPLY

Allow me to add my burj khalifa shot as well.

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

Claim 13, 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.

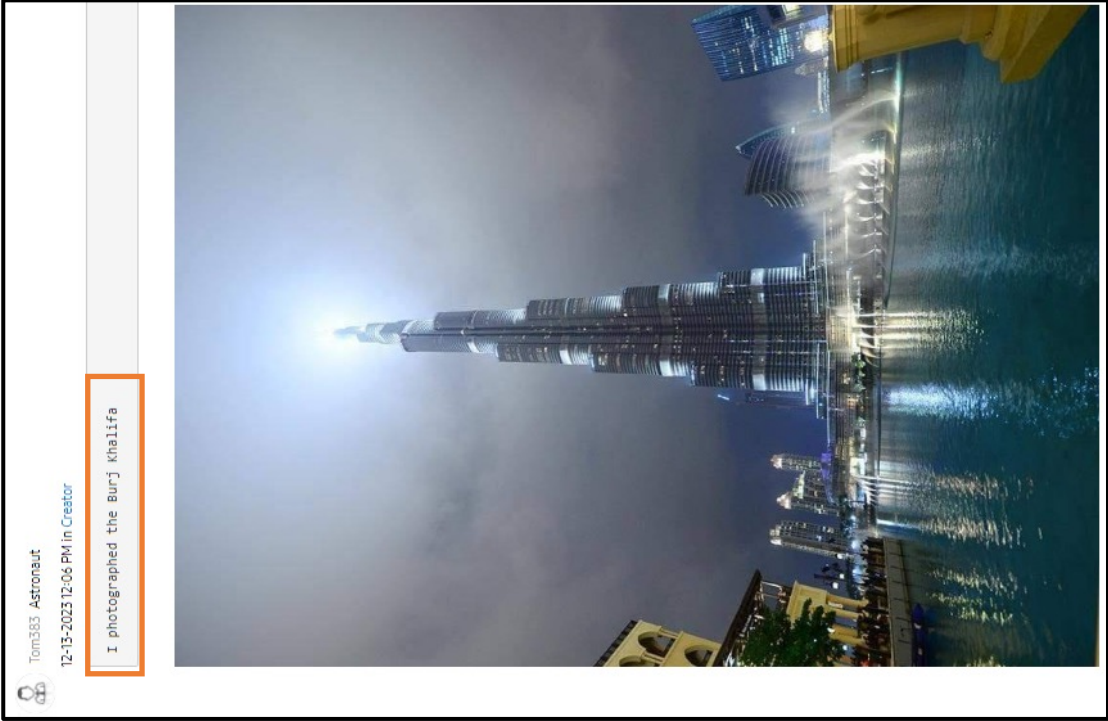
24

Claim: 14 – Element (A)

The method of claim 13 further comprising: receiving in the web-based shared information channel a message from one of the first and second users via the personalized content application of its corresponding mobile device; and

The Samsung Members app can receive a message from either user via the app. Here, Facebook receives a message from the first user (in blue).

In this example, the first message is from the first user (in orange), and the second device-captured data is a message from the second user (in blue).



5 Replies

-  **Lucasindr2 Star**
12-13-2023 12:09 PM (Last edited 12-13-2023 02:43 PM) in Creator
Very COOL! never seen it before

 2 Likes

REPLY
-  **jvudcoo Galaxy**
12-13-2023 01:31 PM in Creator

 6 Likes

REPLY
-  **angeichained Comet**
an hour ago (Last edited an hour ago) in Creator
Gorgeous 🥰 Thanks for sharing!!! Incredibly amazing.

 0 Likes

REPLY

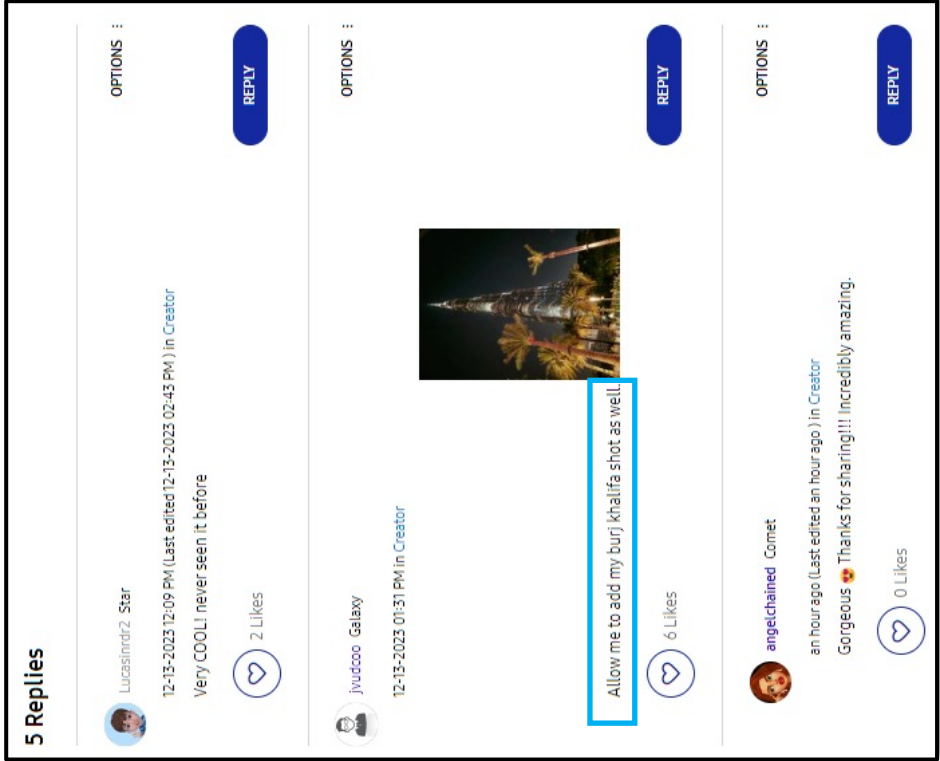
<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>
Original topic: Burj Khalifa
Date acquired: 2/12/2024

Claim 14, 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: 14 – Element (B)

delivering the message over said at least one network to another one of the first and second users via the personalized content application of its corresponding mobile device;

The message is then delivered over a network from the second user to the first user.



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

Original topic: Burj Khalifa

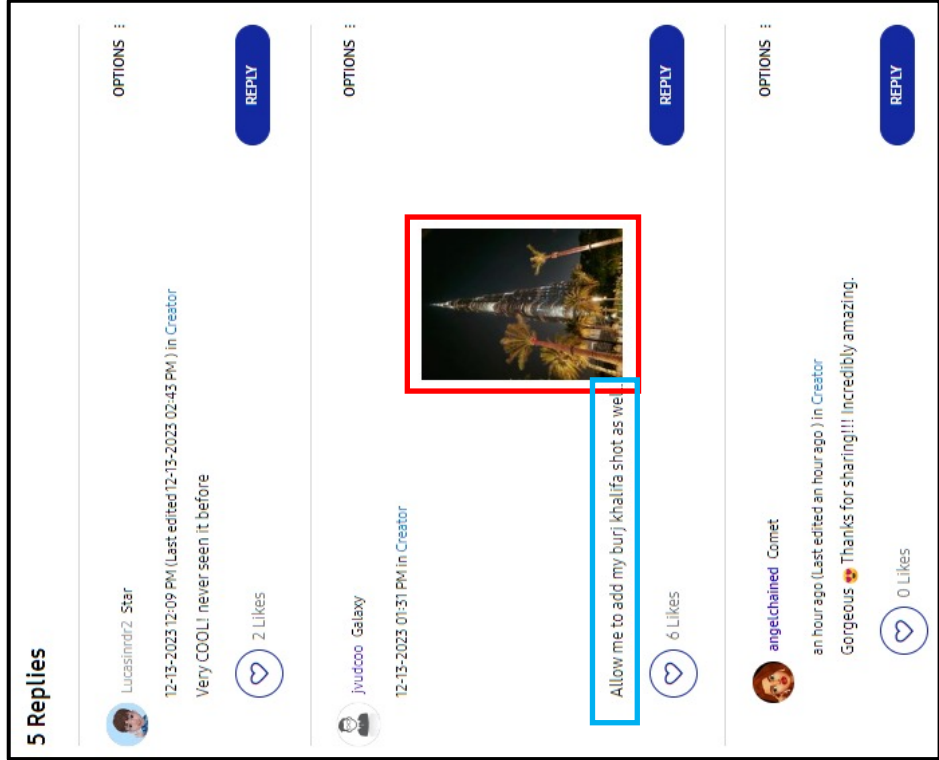
Date acquired: 2/12/2024

Claim 14, 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: 14 – Element (C)

wherein the message is integrated with the first and second device-captured data into a persistent version of a given set of shared information content of the web-based shared information channel so as to be accessible with the first and second device-captured data to the first and second users of the respective first and second mobile devices via the respective personalized content applications of the first and second mobile devices.

The message is then integrated with the first and second captured data into a persistent version, and can be accessed by either the first or second mobile device.



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

Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 14, 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: 17 – preamble

A non-transitory computer-readable storage medium having embodied therein executable code of one or more software programs, wherein said executable program code when executed by a processing element causes said processing element:

- The Accused Product also includes software programs stored on non-transitory computer-readable storage mediums in servers.
- For example, the software that runs websites supporting the mobile app “Samsung Members” is necessarily installed on non-transitory storage mediums on Samsung servers.
- The servers at these locations necessarily have a processing element that is coupled to a memory.



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

Claim 17, preamble - By charting the preamble, Plaintiff does 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: 17 – Element (A)

to receive first device-captured data from a first mobile device over at least one network;

- The processing element at the “**Samsung Members**” server is configured to receive first device-captured data from a first mobile device.
- The image at right shows device-captured image data from a first user “Tom383.”



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

Claim 17, 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.

to receive second device-captured data from a second mobile device over said at least one network; and

- The processing element at the “**Samsung Members**” server is configured to receive second device-captured data from a second mobile device.
- The image at right shows device-captured image data from a second user “jvudcoo.”



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

Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 17, 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: 17 – Element (C)

to integrate the first and second device-captured data into a web-based shared information channel controllably accessible to first and second users of the respective first and second mobile devices via respective personalized content applications of the first and second mobile devices.

- The Accused Product integrates the data from the different users into a web-based shared information channel. This channel can have access controlled by the users of the mobile devices via personalized content applications on the mobile devices.
- The first device-captured data from a first user (poster of photos) and second device-captured data from a second user (comment from other user) are integrated and presented on the web-based shared information channel. The respective personalized content applications controllably accessible to both the first and second users of the respective mobile devices.



5 Replies

Lucasinrd2 Star

12-13-2023 12:09 PM (Last edited 12-13-2023 02:43 PM) in Creator

Very COOL! never seen it before

2 Likes

REPLY

jvudcoo Galaxy

12-13-2023 01:31 PM in Creator

Allow me to add my burj khalifa shot as well

6 Likes

REPLY

angeichained Comet

an hour ago (Last edited an hour ago) in Creator

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0 Likes

REPLY

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

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

Claim 17, 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: 18 – preamble

The non-transitory computer-readable storage medium of claim 17 wherein said executable program code when executed by said processing element further causes said processing element:

- The Accused Product also includes software programs stored on non-transitory computer-readable storage mediums in servers.
- For example, the software that runs websites supporting the mobile app “Samsung Members” is necessarily installed on non-transitory storage mediums on Samsung servers.
- The servers at these locations necessarily have a processing element that is coupled to a memory.



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

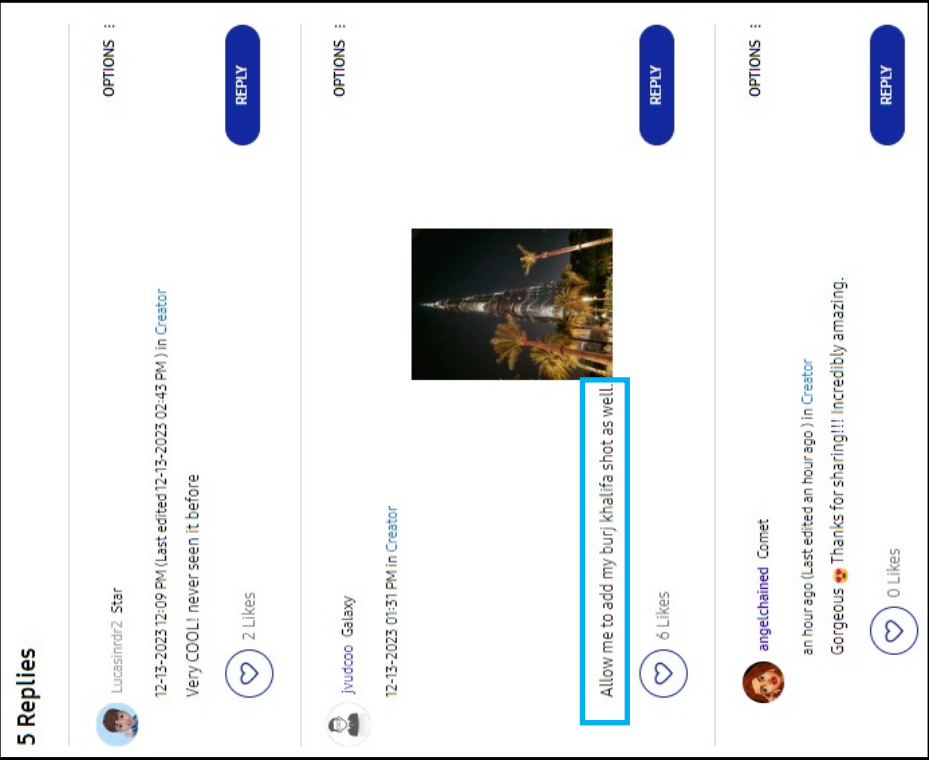
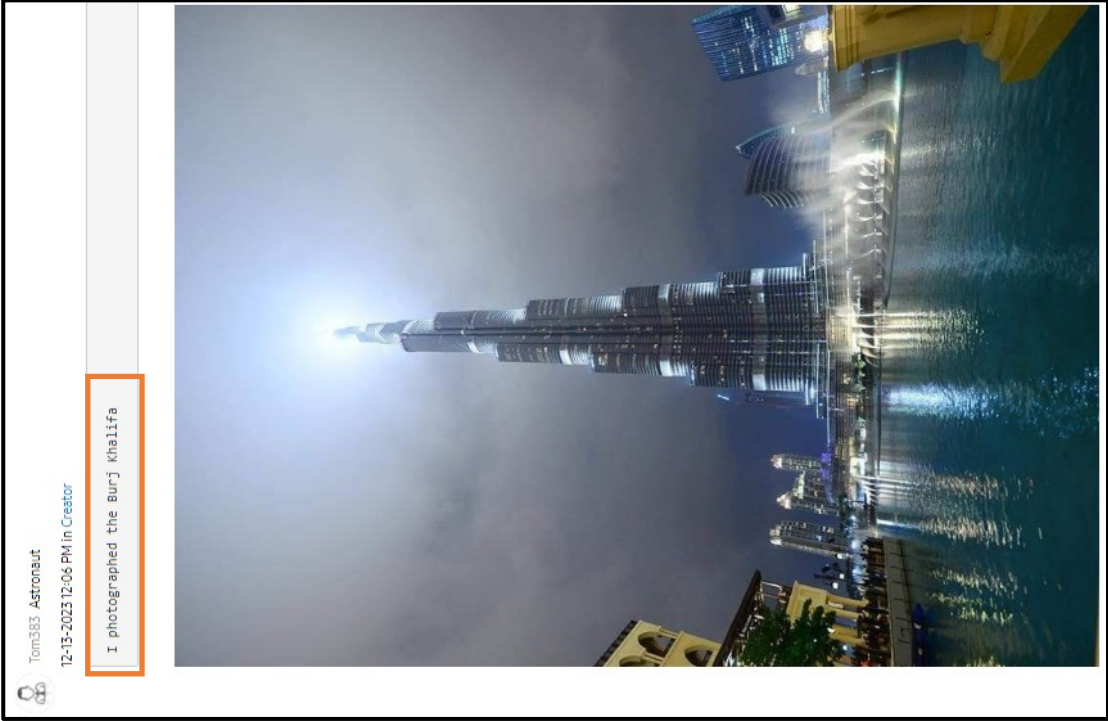
Claim 18, preamble - By charting the preamble, Plaintiff does not concede that the preamble is a limitation and reserve the right to contend that the preamble is not a limitation of the claim.

Claim: 18 – Element (A)

to receive in the web-based shared information channel a message from one of the first and second users via the personalized content application of its corresponding mobile device; and

The Samsung Members app can receive a message from either user via the app. Here, Facebook receives a message from the first user (in blue).

In this example, the first message is from the first user (in orange), and the second device-captured data is a message from the second user (in blue).



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

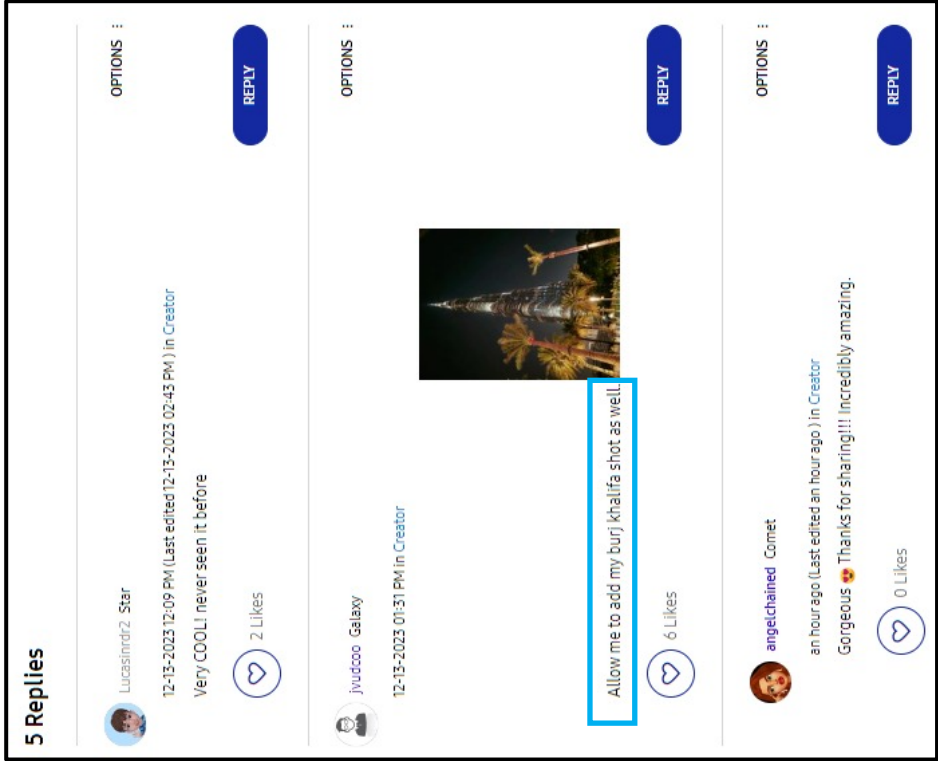
Original topic: Burj Khalifa
Date acquired: 2/12/2024

Claim 18, 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: 18 – Element (B)

to deliver the message over said at least one network to another one of the first and second users via the personalized content application of its corresponding mobile device;

The message is then delivered over a network from the second user to the first user.



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

Original topic: Burj Khalifa

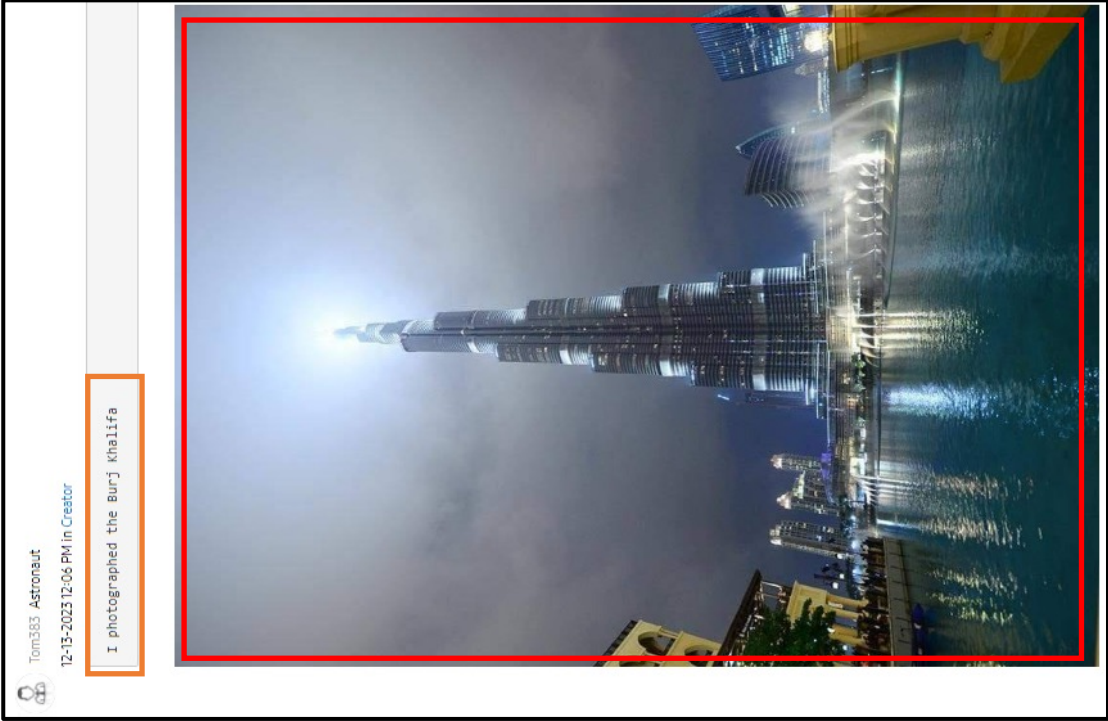
Date acquired: 2/12/2024

Claim 18, 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: 18 – Element (C)

wherein the message is integrated with the first and second device-captured data into a persistent version of a given set of shared information content of the web-based shared information channel so as to be accessible with the first and second device-captured data to the first and second users of the respective first and second mobile devices via the respective personalized Each message is then integrated with the first and second-captured data into a persistent version of shared information content.

The integrated message is accessible from the personalized content app (Samsung Members) on each mobile device.



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

Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 18, 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.