

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

ANONYMOUS MEDIA RESEARCH
HOLDINGS, LLC,

Plaintiff,

v.

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

Defendants.

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Case No. 2:23-CV-00439-JRG-RSP

Jury Trial Demanded

**PLAINTIFF ANONYMOUS MEDIA RESEARCH HOLDINGS, LLC’s
UNOPPOSED MOTION FOR LEAVE TO AMEND INFRINGEMENT CONTENTIONS**

Plaintiff Anonymous Media Research Holdings, LLC (“AMRH”) respectfully files this motion seeking leave to amend its Infringement Contentions to assert additional dependent claims from four patents already asserted in this case. Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) do not oppose this request.

On September 22, 2023, AMRH filed its Original Complaint against Defendants Samsung Electronics Co, Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) alleging that “Accused ACR Instrumentalities” infringe six patents held by AMRH — United States Patent Nos. 8,510,768 (the “’768 Patent”), 8,756,622 (the “’622 Patent”), 8,296,791 (the “’791 Patent”), 10,719,848 (the “’848 Patent”), 10,719,849 (the “’849 Patent”), and 10,572,896 (the “’896 Patent”). *See* Dkt. No. 1.

Pursuant to the Court’s then-effective Docket Control Order (Dkt. No. 29) and P.R. 3-1, on January 22, 2024, AMRH timely served its Infringement Contentions and asserted infringement of the six then-asserted patents listed above.

On November 7, 2024, the Court granted AMRH's unopposed motion for leave to file its First Amended Complaint. Dkt. No. 60. AMRH thereafter filed its First Amended Complaint and further asserted infringement of United States Patent Nos. 8,677,389 (the "'389 Patent") and 10,963,911 (the "'911 Patent"). AMRH served Infringement Contentions pursuant to P.R. 3-1 and 3-2 for these two newly asserted patents on October 21, 2024.

AMRH believes that Samsung's Accused ACR Instrumentalities infringe the following dependent claims of patents already asserted in this action:

'768 Patent – Claims 4-5, 12-13;

'622 Patent – Claims 3, 8, 12;

'848 Patent – Claims 4-5, 12-13; and

'849 Patent – Claims 3, 8, 12.

AMRH served claim charts for the above additional dependent claims on December 5, 2024, in connection with serving on Samsung supplemental interrogatory responses. AMRH accuses the same Samsung Accused ACR Instrumentalities already at issue of infringing these additional dependent claims.

AMRH and Samsung have conferred about AMRH's request to amend its Infringement Contentions to assert infringement of the additional dependent claims listed above. To adjust the claim construction exchange schedule to accommodate these additional asserted claims, the Parties submitted, and the Court approved, an agreed amended Docket Control Order. *See* Dkt. Nos. 70, 72. This amendment will not affect any other deadlines in the Court's schedule and will not result in delay of the case. Therefore, Samsung does not oppose AMRH's request for leave to amend its Infringement Contentions to address the additional dependent claims listed above, consistent with the claim charts for these dependent claims that AMRH served on December 5, 2024. AMRH does

not request, to amend its Infringement Contentions for any other claims. Accordingly, the Infringement Contentions for the other claims served on January 22, 2024 and October 21, 2024 remain operative.

Accordingly, for good cause shown based on the foregoing, AMRH respectfully requests that the Court grant its request for leave to amend infringement contentions.

Dated: January 2, 2025

Respectfully submitted,

/s/ Jason McManis

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COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was filed electronically on January 2, 2025. As such, this document was served on all counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Weining Bai
Weining Bai

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred via email with counsel for Defendants from December 6-16, 2024, who confirmed that Defendants do not oppose the relief sought herein.

/s/ Weining Bai
Weining Bai