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

ICASHE, INC., Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Civil Action No. 2:24-cv-00429-JRG **JURY TRIAL DEMANDED**

DEFENDANTS SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.'S ANSWER AND DEFENSES TO PLAINTIFF'S COMPLAINT FOR PATENT INFRINGEMENT

Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (collectively, "Samsung" or "Defendants"), by and through their undersigned counsel, hereby answer the Complaint for Patent Infringement (hereinafter, "Complaint") of iCashe, Inc. ("iCashe" or "Plaintiff") filed June 6, 2024.

GENERAL DENIAL

Except as hereinafter expressly admitted, qualified, or otherwise admitted, Samsung specifically denies each and every allegation, statement, matter, and thing contained in Plaintiff's Complaint. Samsung's reproduction of the headings set forth in the Complaint below is solely for the purpose of convenience and is not, and should not be construed as, an admission by Samsung that any allegation or other statement in the headings or paragraphs of the Complaint, whether explicit or implied, is true, correct, or admitted by Samsung. All allegations in Plaintiff's Complaint, including those in the headings, that Samsung does not expressly admit in this Answer are specifically denied.

RESPONSE TO SPECIFIC ALLEGATIONS

Samsung hereby responds to the numbered paragraphs of the Complaint with the following correspondingly numbered responses:

INTRODUCTION

1. To the extent that the allegations of Paragraph 1 set forth legal conclusions, no response is required. Samsung admits that Plaintiff's Complaint purports to set forth a patent infringement action arising under the patent laws of the United States, Title 35 of the United States Code. Samsung denies that it has infringed any of the Asserted Patents. Except as expressly admitted, Samsung denies all remaining allegations of Paragraph 1.

2. Samsung lacks knowledge or information sufficient to form a belief as to the technologies covered by the Asserted Patents. Samsung denies that it has infringed any of the Asserted Patents. Samsung denies all remaining allegations of Paragraph 2.

3. Samsung denies that it has infringed any of the Asserted Patents. Samsung denies all remaining allegations of Paragraph 3.

4. To the extent that the allegations of Paragraph 4 set forth legal conclusions, no response is required. Samsung denies that it is liable for past damages or other relief. Samsung denies all remaining allegations of Paragraph 4.

THE PARTIES

5. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5, and on that basis, denies them.

6. Samsung admits that SEC is a corporation organized under the laws of the Republic of Korea with its principal place of business located at 129 Samsung-ro, Yeongton-gu, Suwon-si, Gyeonggi-do, Korea 16677. Except as expressly admitted, Samsung denies all remaining allegations of Paragraph 6.

7. Samsung admits that SEA is a corporation organized under the laws of the state of

New York. Samsung admits that SEA has an office at 6625 Excellence Way, Plano, Texas 75023. Samsung admits that SEA can be served through CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201. Except as expressly admitted, Samsung denies all remaining allegations of Paragraph 7.

8. Samsung admits that SEA is a wholly-owned subsidiary of SEC.

9. Samsung admits that certain retailers sell Samsung products to United States consumers. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 9, and on that basis, denies them.

JURISDICTION AND VENUE

10. To the extent that the allegations of Paragraph 10 set forth legal conclusions, no response is required. Samsung admits that Plaintiff's Complaint purports to set forth a patent infringement action arising under the patent laws of the United States, Title 35 of the United States Code. Samsung denies that it has infringed any of the Asserted Patents. Except as expressly admitted, Samsung denies all remaining allegations of Paragraph 10.

11. To the extent that the allegations of Paragraph 11 set forth legal conclusions, no response is required. Samsung admits that this Court has subject matter jurisdiction over actions arising under the patent laws of the United States pursuant to 28 U.S.C. §§ 1331 and 1338(a). Except as expressly admitted, Samsung denies all remaining allegations of Paragraph 11.

12. To the extent that the allegations of Paragraph 12 set forth legal conclusions, no response is required. Samsung admits that SEA has more than 1,000 employees at its Plano, Texas facility. Except as expressly admitted, Samsung denies all remaining allegations of Paragraph 12.

13. To the extent that the allegations of Paragraph 13 set forth legal conclusions, no response is required. Samsung admits that SEA has a place of business in this District. Except as expressly admitted, Samsung denies all remaining allegations of Paragraph 13.

FACTUAL BACKGROUND

I. Plaintiff iCashe and the Inventors

14. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14, and on that basis, denies them.

15. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15, and on that basis, denies them.

16. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16, and on that basis, denies them.

17. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17, and on that basis, denies them.

II. The iCashe Patents

18. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18, and on that basis, denies them.

19. Samsung admits that U.S. Patent No. 9,122,965 (the "'965 Patent") states, on its face, that it issued on September 1, 2015, from a patent application filed October 17, 2014, and is titled "13.56 MHz Enhancement Circuit for Smartcard Controller." Samsung further admits that the '965 Patent states, on its face, that its inventors are Siva G. Narendra, Saurav Chakraborty, and Prabhakar Tadepalli. Samsung further admits that the '965 Patent states, on its face, that it is related to U.S. Patent Application No. 12/188,346, filed on August 8, 2008, now U.S. Patent No. 7,961,101. Except as expressly admitted, Samsung denies all remaining allegations in Paragraph 19.

20. Samsung admits that U.S. Patent No. 9,483,722 (the "'722 Patent") states, on its face, that it issued on November 1, 2016, from a patent application filed October 17, 2014, and is titled "Amplifier and Transmission Solution for 13.56MHz Radio Coupled to Smartcard

Controller." Samsung further admits that the '722 Patent states, on its face, that its inventors are Siva G. Narendra, Saurav Chakraborty, and Prabhakar Tadepalli. Samsung further admits that the '722 Patent states, on its face, that it is related to U.S. Patent Application No. 12/188,346, filed on August 8, 2008, now U.S. Patent No. 7,961,101. Except as expressly admitted, Samsung denies all remaining allegations in Paragraph 20.

21. Samsung admits that U.S. Patent No. 11,694,053 (the "'053 Patent") states, on its face, that it issued on July 4, 2023, from a patent application filed February 18, 2021, and is titled "Method and Apparatus for Transmitting Data via NFC for Mobile Applications Including Mobile Payments and Ticketing." Samsung further admits that the '053 Patent states, on its face, that its inventors are Siva G. Narendra, Saurav Chakraborty, and Prabhakar Tadepalli. Samsung further admits that the '053 Patent states, on its face, that it is related to U.S. Patent Application No. 12/188,346, filed on August 8, 2008, now U.S. Patent No. 7,961,101. Except as expressly admitted, Samsung denies all remaining allegations in Paragraph 21.

22. Samsung admits that U.S. Patent No. 8,403,219 (the "'219 Patent") states, on its face, that it issued on March 26, 2013, from a patent application filed October 12, 2012, and is titled "Apparatus with Smartcard Circuitry Powered By a Mobile Device." Samsung further admits that the '219 Patent states, on its face, that its inventors are Siva G. Narendra, Thomas N. Spitzer, and Prabhakar Tadepalli. Samsung further admits that the '219 Patent states, on its face, that it is related to U.S. Patent Application No. 11/063,291, filed on February 22, 2005, now U.S. Patent No. 7,581,678. Except as expressly admitted, Samsung denies all remaining allegations in Paragraph 22.

23. Samsung admits that U.S. Patent No. 9,202,156 (the "'156 Patent") states, on its face, that it issued on December 1, 2015, from a patent application filed June 23, 2015, and is titled "Mobile Device with Time-Varying Magnetic Field." Samsung further admits that the '156 Patent

states, on its face, that its inventors are Siva G. Narendra, Thomas N. Spitzer, and Prabhakar Tadepalli. Samsung further admits that the '156 Patent states, on its face, that it is related to U.S. Patent Application No. 11/063,291, filed on February 22, 2005, now U.S. Patent No. 7,581,678. Except as expressly admitted, Samsung denies all remaining allegations in Paragraph 23.

24. Samsung admits that U.S. Patent No. 9,208,423 (the "'423 Patent") states, on its face, that it issued on December 8, 2015, from a patent application filed August 23, 2015, and is titled "Mobile Device with Time-Varying Magnetic Field and Single Transaction Account Numbers." Samsung further admits that the '423 Patent states, on its face, that its inventors are Siva G. Narendra, Thomas N. Spitzer, and Prabhakar Tadepalli. Samsung further admits that the '156 Patent states, on its face, that it is related to U.S. Patent Application No. 11/063,291, filed on February 22, 2005, now U.S. Patent No. 7,581,678. Except as expressly admitted, Samsung denies all remaining allegations in Paragraph 24.

25. Samsung admits that U.S. Patent No. 11,270,174 (the "'174 Patent") states, on its face, that it issued on March 8, 2022, from a patent application filed September 15, 2020, and is titled "Mobile Phone with Magnetic Card Emulation." Samsung further admits that the '174 Patent states, on its face, that its inventors are Siva G. Narendra, Thomas N. Spitzer, and Prabhakar Tadepalli. Samsung further admits that the '174 Patent states, on its face, that it is related to U.S. Patent Application No. 11/063,291, filed on February 22, 2005, now U.S. Patent No. 7,581,678. Except as expressly admitted, Samsung denies all remaining allegations in Paragraph 25.

26. To the extent that the allegations of Paragraph 26 set forth legal conclusions, no response is required. Samsung denies all remaining allegations in Paragraph 26.

27. To the extent that the allegations of Paragraph 27 set forth legal conclusions, no response is required. Samsung denies all remaining allegations in Paragraph 27.

28. To the extent that the allegations of Paragraph 28 set forth legal conclusions, no

response is required. Samsung denies all remaining allegations in Paragraph 28.

III. Samsung

29. Samsung admits that it is a global company generally involved in the manufacture and sale of smartphones, tablets, and smartwatches. Samsung denies the remaining allegations of Paragraph 29.

30. Samsung admits that in 2023 SEC reported its global revenue of approximately $198 billion USD. Samsung denies the remaining allegations of Paragraph 30.

IV. Samsung's [Alleged] Direct Infringement and the Accused Instrumentalities

31. To the extent that the allegations of Paragraph 31 set forth legal conclusions, no response is required. To the extent a response is required, Samsung denies that it has infringed any valid and enforceable patent claim or that iCashe is entitled to any relief. The remaining allegations of Paragraph 31 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 31, and on that basis, denies them.

32. To the extent that the allegations of Paragraph 32 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 31 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 32, and on that basis, denies them.

33. To the extent that the allegations of Paragraph 33 set forth legal conclusions, no response is required. Samsung denies all remaining allegations in Paragraph 33.

34. To the extent that the allegations of Paragraph 34 set forth legal conclusions, no response is required. Samsung denies all remaining allegations in Paragraph 34.

35. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations as to the claims of the iCashe Patents, and therefore denies them. Samsung denies the remaining allegations of Paragraph 35.

36. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36, and therefore denies them.

V. Samsung's [Alleged] Indirect Infringement

37. To the extent that the allegations of Paragraph 37 set forth legal conclusions, no response is required. Samsung denies all remaining allegations in Paragraph 37.

38. To the extent that the allegations of Paragraph 38 set forth legal conclusions, no response is required. Samsung denies all remaining allegations in Paragraph 38.

39. To the extent that the allegations of Paragraph 39 set forth legal conclusions, no response is required. Samsung admits that it has obtained approval from regulatory agencies such as the Federal Communications Commission in connection with certain Samsung products in the United States. Samsung denies all remaining allegations of Paragraph 39.

40. To the extent that the allegations of Paragraph 40 set forth legal conclusions, no response is required. Samsung denies all remaining allegations in Paragraph 40.

41. To the extent that the allegations of Paragraph 41 set forth legal conclusions, no response is required. Samsung denies all remaining allegations in Paragraph 41.

42. To the extent that the allegations of Paragraph 42 set forth legal conclusions, no response is required. Samsung denies all remaining allegations in Paragraph 42.

43. To the extent that the allegations of Paragraph 43 set forth legal conclusions, no response is required. Samsung denies all remaining allegations in Paragraph 43.

44. To the extent that the allegations of Paragraph 44 set forth legal conclusions, no

response is required. Samsung denies all remaining allegations in Paragraph 44.

COUNT I: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 9,122,965

45. Samsung incorporates by reference its responses to paragraphs 1-44 as if fully set forth herein. Samsung denies all remaining allegations of Paragraph 45.

46. To the extent that the allegations of Paragraph 46 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 46.

47. To the extent that the allegations of Paragraph 47 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 47.

48. To the extent that the allegations of Paragraph 48 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 48.

49. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49, and on that basis, denies them.

50. To the extent that the allegations of Paragraph 50 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 50 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 50, and on that basis, denies them.

51. To the extent that the allegations of Paragraph 51 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that certain Samsung Galaxy S21 5G smartphones contain a NXP SN110U. Otherwise, the remaining allegations of Paragraph 51 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 51,

and on that basis, denies them.

52. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52, and on that basis, denies them.

53. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53, and on that basis, denies them.

54. To the extent that the allegations of Paragraph 54 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 54 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 54, and on that basis, denies them.

55. To the extent that the allegations of Paragraph 55 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 55 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 55, and on that basis, denies them.

56. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56, and on that basis, denies them.

57. To the extent that the allegations of Paragraph 57 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 57 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 57, and on that basis, denies them.

58. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 58, and on that basis, denies them.

59. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 59, and on that basis, denies them.

60. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60, and on that basis, denies them.

61. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61, and on that basis, denies them.

62. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62, and on that basis, denies them.

63. To the extent that the allegations of Paragraph 63 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that the Samsung Galaxy S21 5G smartphone contains an antenna. Otherwise, the remaining allegations of Paragraph 63 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 63, and on that basis, denies them.

64. To the extent that the allegations of Paragraph 64 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 64 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 64, and on that basis, denies them.

65. To the extent that the allegations of Paragraph 65 set forth legal conclusions, no

response is required. To the extent a response is required, the remaining allegations of Paragraph 65 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 65, and on that basis, denies them.

66. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 66, and on that basis, denies them.

67. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67, and on that basis, denies them.

68. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68, and on that basis, denies them.

69. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 69, and on that basis, denies them.

70. To the extent that the allegations of Paragraph 70 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 70 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 70, and on that basis, denies them.

71. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71, and on that basis, denies them.

72. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72, and on that basis, denies them.

73. Samsung lacks knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 73, and on that basis, denies them.

74. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74, and on that basis, denies them.

75. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75, and on that basis, denies them.

76. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76, and on that basis, denies them.

77. To the extent that the allegations of Paragraph 77 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 77 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 77, and on that basis, denies them.

78. To the extent that the allegations of Paragraph 78 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 78 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 78, and on that basis, denies them.

79. To the extent that the allegations of Paragraph 79 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 79.

80. To the extent that the allegations of Paragraph 80 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 80.

81. To the extent that the allegations of Paragraph 81 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 81.

82. To the extent that the allegations of Paragraph 82 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 82.

83. To the extent that the allegations of Paragraph 83 set forth legal conclusions, no response is required. Samsung admits that it has obtained approval from regulatory agencies such as the Federal Communications Commission in connection with certain Samsung products in the United States. Samsung denies all remaining allegations of Paragraph 83.

84. To the extent that the allegations of Paragraph 84 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 84.

85. To the extent that the allegations of Paragraph 85 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 85.

86. To the extent that the allegations of Paragraph 86 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 86.

87. To the extent that the allegations of Paragraph 87 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 87.

88. To the extent that the allegations of Paragraph 88 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 88.

89. To the extent that the allegations of Paragraph 89 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 89.

COUNT II: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 9,483,722

90. Samsung incorporates by reference its responses to paragraphs 1-44 as if fully set forth herein. Samsung denies all remaining allegations of Paragraph 90.

91. To the extent that the allegations of Paragraph 91 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 91.

92. To the extent that the allegations of Paragraph 92 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 92.

93. To the extent that the allegations of Paragraph 93 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 93.

94. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94, and on that basis, denies them.

95. Samsung incorporates by reference its responses to paragraph 50 as if fully set forth herein. To the extent that the allegations of Paragraph 95 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 95 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 95, and on that basis, denies them.

96. Samsung incorporates by reference its responses to paragraphs 51-57 as if fully set forth herein. To the extent that the allegations of Paragraph 96 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that certain Samsung Galaxy S21 5G smartphones contain a NXP SN110U. Otherwise, the remaining allegations of Paragraph 96 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 96, and on that basis, denies them.

97. Samsung incorporates by reference its responses to paragraphs 58-62 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97, and on that basis, denies them.

98. Samsung incorporates by reference its responses to paragraphs 70-74 as if fully set

forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98, and on that basis, denies them.

99. Samsung incorporates by reference its responses to paragraphs 75-76 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99, and on that basis, denies them.

100. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100, and on that basis, denies them.

101. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101, and on that basis, denies them.

102. Samsung incorporates by reference its responses to paragraphs 63-64 as if fully set forth herein. To the extent that the allegations of Paragraph 102 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that the Samsung Galaxy S21 5G smartphone contains an antenna. Otherwise, the remaining allegations of Paragraph 102 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 102, and on that basis, denies them.

103. Samsung incorporates by reference its response to paragraph 65 as if fully set forth herein. To the extent that the allegations of Paragraph 103 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 103 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 103, and on that basis, denies them.

104. Samsung incorporates by reference its responses to paragraphs 66-69 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104, and on that basis, denies them.

105. To the extent that the allegations of Paragraph 105 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that the Samsung Galaxy S21 5G smartphone includes a battery. Otherwise, the remaining allegations of Paragraph 105 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 105, and on that basis, denies them.

106. Samsung incorporates by reference its responses to paragraphs 75-76 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106, and on that basis, denies them.

107. To the extent that the allegations of Paragraph 107 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 107 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 107, and on that basis, denies them.

108. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108, and on that basis, denies them.

109. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109, and on that basis, denies them.

110. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 110, and on that basis, denies them.

111. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111, and on that basis, denies them.

112. To the extent that the allegations of Paragraph 112 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 112.

113. To the extent that the allegations of Paragraph 113 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 113.

114. To the extent that the allegations of Paragraph 114 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 114.

115. To the extent that the allegations of Paragraph 115 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 115.

116. To the extent that the allegations of Paragraph 116 set forth legal conclusions, no response is required. Samsung admits that it has obtained approval from regulatory agencies such as the Federal Communications Commission in connection with certain Samsung products in the United States. Samsung denies all remaining allegations of Paragraph 116.

117. To the extent that the allegations of Paragraph 117 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 117.

118. To the extent that the allegations of Paragraph 118 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 118.

119. To the extent that the allegations of Paragraph 119 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 119.

120. To the extent that the allegations of Paragraph 120 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 120.

121. To the extent that the allegations of Paragraph 121 set forth legal conclusions, no

response is required. Samsung otherwise denies the remaining allegations of Paragraph 121.

122. To the extent that the allegations of Paragraph 122 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 122.

COUNT III: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 11,694,053

123. Samsung incorporates by reference its responses to paragraphs 1-44 as if fully set forth herein. Samsung denies all remaining allegations of Paragraph 123.

124. To the extent that the allegations of Paragraph 124 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 124.

125. To the extent that the allegations of Paragraph 125 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 125.

126. To the extent that the allegations of Paragraph 126 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 126.

127. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127, and on that basis, denies them.

128. Samsung incorporates by reference its responses to paragraph 50 as if fully set forth herein. To the extent that the allegations of Paragraph 128 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 128 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 128, and on that basis, denies them.

129. Samsung incorporates by reference its responses to paragraph 105 as if fully set forth herein. To the extent that the allegations of Paragraph 129 set forth legal conclusions, no

response is required. To the extent a response is required, Samsung admits that the Samsung Galaxy S21 5G smartphone includes a battery. Otherwise, the remaining allegations of Paragraph 129 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 129, and on that basis, denies them.

130. Samsung incorporates by reference its responses to paragraphs 51-57 as if fully set forth herein. To the extent that the allegations of Paragraph 130 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that certain Samsung Galaxy S21 5G smartphones contain a NXP SN110U. Otherwise, the remaining allegations of Paragraph 130 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 130, and on that basis, denies them.

131. Samsung incorporates by reference its responses to paragraphs 58-62 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131, and on that basis, denies them.

132. Samsung incorporates by reference its responses to paragraphs 75-76 as if fully set forth herein. To the extent that the allegations of Paragraph 132 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 132 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 132, and on that basis, denies them.

133. Samsung incorporates by reference its responses to paragraphs 63-64 as if fully set forth herein. To the extent that the allegations of Paragraph 133 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that the Galaxy S21 5G smartphone contains an antenna. Otherwise, the remaining allegations of Paragraph 133 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 133, and on that basis, denies them.

134. Samsung incorporates by reference its responses to paragraphs 70-74 as if fully set forth herein. To the extent that the allegations of Paragraph 134 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 134 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 134, and on that basis, denies them.

135. Samsung incorporates by reference its responses to paragraphs 75-76 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 135, and on that basis, denies them.

136. To the extent that the allegations of Paragraph 136 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 136 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 136, and on that basis, denies them.

137. Samsung incorporates by reference its response to paragraph 65 as if fully set forth herein. To the extent that the allegations of Paragraph 137 set forth legal conclusions, no response

is required. To the extent a response is required, the remaining allegations of Paragraph 137 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 137, and on that basis, denies them.

138. Samsung incorporates by reference its responses to paragraphs 66-69 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138, and on that basis, denies them.

139. Samsung incorporates by reference its responses to paragraphs 66-69 as if fully set forth herein. To the extent that the allegations of Paragraph 139 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 139 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 139, and on that basis, denies them.

140. To the extent that the allegations of Paragraph 140 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 140.

141. To the extent that the allegations of Paragraph 141 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 141.

142. To the extent that the allegations of Paragraph 142 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 142.

143. To the extent that the allegations of Paragraph 143 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 143.

144. To the extent that the allegations of Paragraph 144 set forth legal conclusions, no

response is required. Samsung admits that it has obtained approval from regulatory agencies such as the Federal Communications Commission in connection with certain Samsung products in the United States. Samsung denies all remaining allegations of Paragraph 144.

145. To the extent that the allegations of Paragraph 145 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 145.

146. To the extent that the allegations of Paragraph 146 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 146.

147. To the extent that the allegations of Paragraph 147 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 147.

148. To the extent that the allegations of Paragraph 148 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 148.

149. To the extent that the allegations of Paragraph 149 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 149.

150. To the extent that the allegations of Paragraph 150 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 150.

COUNT IV: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 8,403,219

151. Samsung incorporates by reference its responses to paragraphs 1-44 as if fully set forth herein. Samsung denies all remaining allegations of Paragraph 151.

152. To the extent that the allegations of Paragraph 152 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 152.

153. To the extent that the allegations of Paragraph 153 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 153.

154. To the extent that the allegations of Paragraph 154 set forth legal conclusions, no

response is required. Samsung otherwise denies the remaining allegations of Paragraph 154.

155. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155, and on that basis, denies them.

156. Samsung incorporates by reference its responses to paragraphs 50-52 as if fully set forth herein. To the extent that the allegations of Paragraph 156 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that certain Samsung Galaxy S21 5G smartphones contain a NXP SN110U. Otherwise, the remaining allegations of Paragraph 156 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 156, and on that basis, denies them.

157. Samsung incorporates by reference its responses to paragraphs 53-57 as if fully set forth herein. To the extent that the allegations of Paragraph 157 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 157 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 157, and on that basis, denies them.

158. Samsung incorporates by reference its responses to paragraphs 58-62 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158, and on that basis, denies them.

159. To the extent that the allegations of Paragraph 159 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 159 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations.

Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 159, and on that basis, denies them.

160. Samsung incorporates by reference its response to paragraphs 65 as if fully set forth herein. To the extent that the allegations of Paragraph 160 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 160 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 160, and on that basis, denies them.

161. Samsung incorporates by reference its responses to paragraphs 66-69 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161, and on that basis, denies them.

162. Samsung incorporates by reference its responses to paragraphs 70-74 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162, and on that basis, denies them.

163. Samsung incorporates by reference its responses to paragraphs 75-76 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163, and on that basis, denies them.

164. Samsung incorporates by reference its responses to paragraph 105 as if fully set forth herein. To the extent that the allegations of Paragraph 164 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that the Samsung Galaxy S21 5G smartphone includes a battery. Otherwise, the remaining allegations of Paragraph 164 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to

form a belief as to the truth of the remaining allegations in Paragraph 164, and on that basis, denies them.

165. Samsung incorporates by reference its responses to paragraphs 75-76 as if fully set forth herein. To the extent that the allegations of Paragraph 165 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 165 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 165, and on that basis, denies them.

166. Samsung incorporates by reference its responses to paragraphs 63-64 as if fully set forth herein. To the extent that the allegations of Paragraph 166 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that the Samsung Galaxy S21 5G smartphone includes an antenna. Otherwise, the remaining allegations of Paragraph 166 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 166, and on that basis, denies them.

167. Samsung incorporates by reference its responses to paragraphs 70-76 as if fully set forth herein. To the extent that the allegations of Paragraph 167 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 167 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 167, and on that basis, denies them.

168. To the extent that the allegations of Paragraph 168 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 168.

169. To the extent that the allegations of Paragraph 169 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 169.

170. To the extent that the allegations of Paragraph 170 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 170.

171. To the extent that the allegations of Paragraph 171 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 171.

172. To the extent that the allegations of Paragraph 172 set forth legal conclusions, no response is required. Samsung admits that it has obtained approval from regulatory agencies such as the Federal Communications Commission in connection with certain Samsung products in the United States. Samsung denies all remaining allegations of Paragraph 172.

173. To the extent that the allegations of Paragraph 173 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 173.

174. To the extent that the allegations of Paragraph 174 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 174.

175. To the extent that the allegations of Paragraph 175 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 175.

176. To the extent that the allegations of Paragraph 176 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 176.

177. To the extent that the allegations of Paragraph 177 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 177.

178. To the extent that the allegations of Paragraph 178 set forth legal conclusions, no

response is required. Samsung otherwise denies the remaining allegations of Paragraph 178.

COUNT V: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 9,202,156

179. Samsung incorporates by reference its responses to paragraphs 1-44 as if fully set forth herein. Samsung denies all remaining allegations of Paragraph 179.

180. To the extent that the allegations of Paragraph 180 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 180.

181. To the extent that the allegations of Paragraph 181 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 181.

182. To the extent that the allegations of Paragraph 182 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 182.

183. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183, and on that basis, denies them.

184. To the extent that the allegations of Paragraph 184 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 184 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 184, and on that basis, denies them.

185. To the extent that the allegations of Paragraph 185 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that the Samsung Galaxy S20 5G smartphone includes an antenna. Otherwise, the remaining allegations of Paragraph 185 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 185,

and on that basis, denies them.

186. To the extent that the allegations of Paragraph 186 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 186 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 186, and on that basis, denies them.

187. To the extent that the allegations of Paragraph 187 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that certain Samsung Galaxy S20 5G smartphones contain a Samsung S2MIS01A. Otherwise, the remaining allegations of Paragraph 187 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 187, and on that basis, denies them.

188. To the extent that the allegations of Paragraph 188 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 188 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 188, and on that basis, denies them.

189. To the extent that the allegations of Paragraph 189 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that the Samsung Galaxy S20 5G smartphone includes memory storage and random access memory (RAM). Otherwise, the remaining allegations of Paragraph 189 are vague, ambiguous, undefined, and/or

susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 189, and on that basis, denies them.

190. To the extent that the allegations of Paragraph 190 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 190 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 190, and on that basis, denies them.

191. To the extent that the allegations of Paragraph 191 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that certain Samsung Galaxy S20 5G smartphones contain a Qualcomm Snapdragon 865. Otherwise, the remaining allegations of Paragraph 191 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 191, and on that basis, denies them.

192. To the extent that the allegations of Paragraph 192 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 192 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 192, and on that basis, denies them.

193. To the extent that the allegations of Paragraph 193 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that certain Samsung

Galaxy S20 5G smartphones contain a Qualcomm Snapdragon 865. Otherwise, the remaining allegations of Paragraph 193 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 193, and on that basis, denies them.

194. To the extent that the allegations of Paragraph 194 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 194 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 194, and on that basis, denies them.

195. To the extent that the allegations of Paragraph 195 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 195 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 195, and on that basis, denies them.

196. To the extent that the allegations of Paragraph 196 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 196.

197. To the extent that the allegations of Paragraph 197 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 197.

198. To the extent that the allegations of Paragraph 198 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 198.

199. To the extent that the allegations of Paragraph 199 set forth legal conclusions, no

response is required. Samsung otherwise denies the remaining allegations of Paragraph 199.

200. To the extent that the allegations of Paragraph 200 set forth legal conclusions, no response is required. Samsung admits that it has obtained approval from regulatory agencies such as the Federal Communications Commission in connection with certain Samsung products in the United States. Samsung denies all remaining allegations of Paragraph 200.

201. To the extent that the allegations of Paragraph 201 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 201.

202. To the extent that the allegations of Paragraph 202 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 202.

203. To the extent that the allegations of Paragraph 203 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 203.

204. To the extent that the allegations of Paragraph 204 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 204.

205. To the extent that the allegations of Paragraph 205 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 205.

206. To the extent that the allegations of Paragraph 206 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 206.

COUNT VI: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 9,208,423

207. Samsung incorporates by reference its responses to paragraphs 1-44 as if fully set forth herein. Samsung denies all remaining allegations of Paragraph 207.

208. To the extent that the allegations of Paragraph 208 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 208.

209. To the extent that the allegations of Paragraph 209 set forth legal conclusions, no

response is required. Samsung otherwise denies the remaining allegations of Paragraph 209.

210. To the extent that the allegations of Paragraph 210 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 210.

211. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 211, and on that basis, denies them.

212. Samsung incorporates by reference its response to paragraph 184 as if fully set forth herein. To the extent that the allegations of Paragraph 212 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 212 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 212, and on that basis, denies them.

213. Samsung incorporates by reference its responses to paragraphs 185-188 as if fully set forth herein. To the extent that the allegations of Paragraph 213 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that the Galaxy S20 5G smartphone contains an antenna. Samsung admits that certain Samsung Galaxy S20 5G smartphones contain a Samsung S2MIS01A. Otherwise, the remaining allegations of Paragraph 213 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 213, and on that basis, denies them.

214. Samsung incorporates by reference its responses to paragraphs 191-194 as if fully set forth herein. To the extent that the allegations of Paragraph 214 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that certain Samsung

Galaxy S20 5G smartphones contain a Qualcomm Snapdragon 865. Otherwise, the remaining allegations of Paragraph 214 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 214, and on that basis, denies them.

215. Samsung incorporates by reference its response to paragraph 195 as if fully set forth herein. To the extent that the allegations of Paragraph 215 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 215 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 215, and on that basis, denies them.

216. Samsung incorporates by reference its responses to paragraphs 189-192 as if fully set forth herein. To the extent that the allegations of Paragraph 216 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 216 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 216, and on that basis, denies them.

217. To the extent that the allegations of Paragraph 217 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 217.

218. To the extent that the allegations of Paragraph 218 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 218.

219. To the extent that the allegations of Paragraph 219 set forth legal conclusions, no

response is required. Samsung otherwise denies the remaining allegations of Paragraph 219.

220. To the extent that the allegations of Paragraph 220 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 220.

221. To the extent that the allegations of Paragraph 221 set forth legal conclusions, no response is required. Samsung admits that it has obtained approval from regulatory agencies such as the Federal Communications Commission in connection with certain Samsung products in the United States. Samsung denies all remaining allegations of Paragraph 221.

222. To the extent that the allegations of Paragraph 222 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 222.

223. To the extent that the allegations of Paragraph 223 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 223.

224. To the extent that the allegations of Paragraph 224 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 224.

225. To the extent that the allegations of Paragraph 225 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 225.

226. To the extent that the allegations of Paragraph 226 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 226.

227. To the extent that the allegations of Paragraph 227 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 227.

COUNT VII: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 11,270,174

228. Samsung incorporates by reference its responses to paragraphs 1-44 as if fully set forth herein. Samsung denies all remaining allegations of Paragraph 228.

229. To the extent that the allegations of Paragraph 229 set forth legal conclusions, no

response is required. Samsung otherwise denies the remaining allegations of Paragraph 229.

230. To the extent that the allegations of Paragraph 230 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 230.

231. To the extent that the allegations of Paragraph 231 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 231.

232. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 232, and on that basis, denies them.

233. Samsung incorporates by reference its response to paragraph 50 as if fully set forth herein. To the extent that the allegations of Paragraph 233 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 233 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 233, and on that basis, denies them.

234. To the extent that the allegations of Paragraph 234 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 234 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 234, and on that basis, denies them.

235. To the extent that the allegations of Paragraph 235 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 235 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to

form a belief as to the truth of the remaining allegations in Paragraph 235, and on that basis, denies them.

236. To the extent that the allegations of Paragraph 236 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that certain Samsung Galaxy S21 5G smartphones contain a Qualcomm Snapdragon 888. Otherwise, the remaining allegations of Paragraph 236 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 236, and on that basis, denies them.

237. To the extent that the allegations of Paragraph 237 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that the Samsung Galaxy S21 5G smartphone includes memory storage and RAM. Otherwise, the remaining allegations of Paragraph 237 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 237, and on that basis, denies them.

238. Samsung incorporates by reference its responses to paragraphs 63-64 as if fully set forth herein. To the extent that the allegations of Paragraph 238 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that the Samsung Galaxy S21 smartphone contains an antenna. Otherwise, the remaining allegations of Paragraph 238 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 238, and on that basis, denies them.

239. Samsung incorporates by reference its responses to paragraphs 51-57 as if fully set forth herein. To the extent that the allegations of Paragraph 239 set forth legal conclusions, no response is required. To the extent a response is required, Samsung admits that certain Samsung Galaxy S21 5G smartphones contain a NXP SN110U. Otherwise, the remaining allegations of Paragraph 239 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 239, and on that basis, denies them.

240. Samsung incorporates by reference its responses to paragraphs 58-62 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 240, and on that basis, denies them.

241. Samsung incorporates by reference its responses to paragraphs 70-76 as if fully set forth herein. To the extent that the allegations of Paragraph 241 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 241 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 241, and on that basis, denies them.

242. To the extent that the allegations of Paragraph 242 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 242 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 242, and on that basis, denies them.

243. To the extent that the allegations of Paragraph 243 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 243 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 243, and on that basis, denies them.

244. To the extent that the allegations of Paragraph 244 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 244 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 244, and on that basis, denies them.

245. Samsung incorporates by reference its responses to paragraphs 70-74 as if fully set forth herein. To the extent that the allegations of Paragraph 245 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 245 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 245, and on that basis, denies them.

246. Samsung incorporates by reference its responses to paragraphs 75-76 as if fully set forth herein. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 246, and on that basis, denies them.

247. To the extent that the allegations of Paragraph 247 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph

247 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 247, and on that basis, denies them.

248. To the extent that the allegations of Paragraph 248 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 248 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 248, and on that basis, denies them.

249. To the extent that the allegations of Paragraph 249 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 249 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations, and each cited exhibit speaks for itself. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 249, and on that basis, denies them.

250. To the extent that the allegations of Paragraph 250 set forth legal conclusions, no response is required. To the extent a response is required, the remaining allegations of Paragraph 250 are vague, ambiguous, undefined, and/or susceptible to multiple different interpretations. Thus, Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 250, and on that basis, denies them.

251. To the extent that the allegations of Paragraph 251 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 251.

252. To the extent that the allegations of Paragraph 252 set forth legal conclusions, no

response is required. Samsung otherwise denies the remaining allegations of Paragraph 252.

253. To the extent that the allegations of Paragraph 253 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 253.

254. To the extent that the allegations of Paragraph 254 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 254.

255. To the extent that the allegations of Paragraph 255 set forth legal conclusions, no response is required. Samsung admits that it has obtained approval from regulatory agencies such as the Federal Communications Commission in connection with certain Samsung products in the United States. Samsung denies all remaining allegations of Paragraph 255.

256. To the extent that the allegations of Paragraph 256 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 256.

257. To the extent that the allegations of Paragraph 257 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 257.

258. To the extent that the allegations of Paragraph 258 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 258.

259. To the extent that the allegations of Paragraph 259 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 259.

260. To the extent that the allegations of Paragraph 260 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 260.

261. To the extent that the allegations of Paragraph 261 set forth legal conclusions, no response is required. Samsung otherwise denies the remaining allegations of Paragraph 261.

RESPONSE TO PRAYER FOR RELIEF

To the extent a response is required, Samsung denies the underlying allegations of

Plaintiff's Prayer for Relief against Samsung and denies that Plaintiff is entitled to any relief from this Court, whether sought in Paragraphs A-E of the Prayer for Relief or otherwise. Samsung requests that the Court deny all relief to Plaintiff, enter judgment in favor of Samsung, find that this is an exceptional case under 35 U.S.C. § 285, and award Samsung its attorneys' fees and costs as the prevailing party in this Action.

SAMSUNG'S AFFIRMATIVE AND OTHER DEFENSES

Without admitting or acknowledging that Samsung bears the burden of proof as to any defenses, Samsung specifically alleges and asserts the following defenses, undertaking the burden of proof only as to those defenses that are deemed by law to be affirmative defenses, regardless of how such defenses are denominated below. Samsung reserves all rights to raise additional defenses that become known through the course of discovery.

FIRST DEFENSE
(Failure to State a Claim)

Plaintiff's Complaint fails to state a claim against Samsung upon which relief can be granted.

SECOND DEFENSE
(Invalidity)

Each and every claim of the Asserted Patents is invalid for failure to comply with one or more requirements of United States Code, Title 35, including, without limitation, 35 U.S.C. §§ 101, 102, 103, and/or 112.

THIRD DEFENSE
(Non-Infringement)

Samsung does not infringe and has not infringed, under any theory of infringement, including directly (whether individually or jointly) or indirectly (whether contributorily or by inducement), any valid, enforceable claim of the Patents-in-Suit, either literally or under the Doctrine of Equivalents, and has not committed any acts in violation of 35 U.S.C. § 271.

FOURTH DEFENSE
(Not an Exceptional Case)

To the extent Plaintiff is entitled to any remedy, Plaintiff is not entitled to a finding that this case is exceptional warranting attorneys' fees under 35 U.S.C. § 285, or pursuant to the Court's inherent power.

FIFTH DEFENSE
(No Willful Infringement)

To the extent Plaintiff is entitled to any remedy, Plaintiff is not entitled to a finding that Samsung has engaged in any conduct that constitutes willful infringement or that would otherwise entitle Plaintiff to enhanced damages under 35 U.S.C. § 284.

SIXTH DEFENSE
(Notice, Damages, and Costs)

Plaintiff's claims for damages are statutorily limited under 35 U.S.C. §§ 286 and 287, including based on Plaintiff's failure to mark, including without limitation, to the extent Plaintiff contends there are products covered by the Asserted Patents, Plaintiff's failure to mark its own products with the numbers of the Asserted Patents and/or its failure to require and/or police the marking of Plaintiff's customers and licensees. Plaintiff is barred from recovering costs in connection with this action under 35 U.S.C. § 288. Plaintiff's claims for relief are limited by the doctrines of full compensation, exhaustion, and/or first sale, and Plaintiff is not entitled to a double recovery.

SEVENTH DEFENSE
(Territoriality)

To the extent Plaintiff's claims are directed to acts occurring outside the United States, those claims for relief are barred or limited by the doctrine of territoriality by 35 U.S.C. § 271 et seq., including but not limited to § 271(a).

EIGHTH DEFENSE
(Prosecution History Estoppel and Disclaimer)

Plaintiff's claims are barred, in whole or in part, by the doctrine of prosecution history estoppel, prosecution laches, and/or disclaimer based on statements, representations, and admissions made during prosecution of the patent applications resulting in the Asserted Patents.

NINTH DEFENSE
(Equitable Defenses)

Plaintiff's claims for relief are barred in whole or in part by reason of estoppel, unclean hands, acquiescence, patent misuse, waiver, inequitable conduct, and/or other equitable doctrines.

TENTH DEFENSE
(Lack of Standing)

To the extent Plaintiff does not have substantially all the rights or all the rights to the Asserted Patents, or to the extent the purported assignments of the Asserted Patents, if any, are defective for any reason, Plaintiff lacks standing to bring this action.

ELEVENTH DEFENSE
(Intervening Rights)

To the extent Plaintiff reissues any Asserted Patent, amends any claim thereof, or revives any expired Asserted Patent, Plaintiff's claims for infringement and monetary damages are limited by intervening rights.

TWELFTH DEFENSE
(License)

Plaintiff's claims for infringement are barred to the extent that Samsung was licensed to the Asserted Patents or otherwise authorized to use the Asserted Patents by persons or entities with rights to license.

RESERVATION OF RIGHT TO ASSERT OTHER DEFENSES

Samsung expressly reserves the right to later assert and pursue further defenses in this action.

Dated: October 1, 2024

Respectfully submitted,

/s/ Melissa R. Smith

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on October 1, 2024. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3)(A).

/s/ Melissa R. Smith
Melissa R. Smith