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November 6, 2023

Via Email

Youngho Kim
Licensing, Principal Engineer
Licensing Group 1
Samsung Electronics
Yh1025.kim@samsung.com

Re: Hannibal IP LLC's Standard Essential 5G Patent Portfolio Licensing Program

Dear Youngho:

Further to my correspondence from June 8, 2022, and in accordance with paragraph 8 of the Non-Disclosure Agreement between Samsung and Hannibal IP, we provide this supplemental notice letter regarding patents within Hannibal's portfolio that are infringed by certain Samsung products.

As you are aware, Hannibal's world-wide patent portfolio includes patents and applications directed to a variety of technologies in the 5G protocol stack. Based on our continued analysis, we believe that Samsung infringes at least the claims of the patents identified in the table below by making, using, selling, offering for sale, and importing into the United States Samsung's 5G compliant devices. Such devices include at least Samsung's Galaxy S23 and S23+, Galaxy Z Flip5 and Fold5 smartphones along with Galaxy Tab S9 family of tablets and other Samsung 5G compliant products supporting Release 16 identified in my prior correspondence.

We also believe that Samsung induces at least the end users of its 5G compliant devices to infringe the claims identified in the table below by actively promoting and instructing users on how to operate the 5G compliant devices.

Patent	Infringed Claims
U.S. Pat. No. 10,911,201	1, 6, 7, 11, 16, and 17
U.S. Pat. No. 11,272,535	1, 2, 3, 4, 7, 8, 10, 11, 12, 13, 16, and 17

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Patent	Infringed Claims
U.S. Pat. No. 11,297,642	1, 2, 5, 6, 7, 8, 11, and 12
U.S. Pat. No. 11,329,791	1, 2, 4, 5, 6, 7, 9, and 10
U.S. Pat. No. 11,368,911	1, 2, 10, and 11
U.S. Pat. No. 11,405,932	1, 3, 4, 8, 10, and 11
U.S. Pat. No. 11,476,981	1, 2, 4, 7, 8, 10, 11, 14, 17, and 18
U.S. Pat. No. 11,477,674	1, 2, 3, 4, 7, 8, 9, and 10
U.S. Pat. No. 11,483,782	1, 9, 12, 13, 14, 22, 25, and 26

Hannibal IP has prepared and shared claim charts for exemplary 5G compliant products that map the infringed claims of the above-identified patents to the appropriate part of the 5G standard. Further, Hannibal IP has also provided Samsung an offer to license its world-wide patent portfolio on FRAND-or-better terms.

We look forward to your response to our licensing offer and further discussions so that Samsung may obtain a license to resolve this matter amicably.

Very truly yours,



Vishal H. Patel