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June 8, 2022

Via Email

Hye Jin Kim or other IP and Licensing Professional
Intellectual Property Center
Samsung Electronics Co. Ltd.
129 Samsung-ro, Maetan-3dong
Yeongtong-gu Suwon-si,
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hyejin1214.kim@samsung.com

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

Dear Intellectual Property and Licensing professional:

My name is Vishal Patel and I represent Hannibal IP LLC. I write to you today regarding Hannibal IP's patent portfolio relating to standard essential 5G wireless technologies. Hannibal IP is an affiliate of Longhorn IP that has a long history of identifying and managing valuable intellectual property assets and has entered into many mutually beneficial license agreements with several of the world's leading high-tech companies.

Hannibal's world-wide patent portfolio includes patents and applications directed to a variety of technologies in the 5G protocol stack. For example, U.S. Pat. No. 11,057,896 is directed to methods and apparatuses for determining quasi co-location (QCL) assumptions for beam operations; U.S. Pat. No. 11,240,829 is directed to methods and apparatuses for scheduling request resource prioritization for beam failure recovery; and U.S. Pat. No. 11,304,102 is directed to a method and apparatus for sidelink operation. Based on our analysis, we believe that Samsung Electronics Co. Ltd. and/or Samsung Electronics America, Inc. (collectively "Samsung") infringe at least the claims of the above-identified 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 S20, S21, and S22 smartphones, S7 and S8 tablets, and Galaxy Book Go and Galaxy Book Pro connected laptops. A non-exhaustive list of Samsung 5G compliant products is attached as Exhibit A.

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.

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Patent	Infringed Claims
U.S. Pat. No. 11,057,896	1, 2, 7, 8, 10, 11, 12, 17 and 18
U.S. Pat. No. 11,240,829	1 – 20
U.S. Pat. No. 11,304,102	1, 2, 7, 8, 12, 13, 14, 19, 20, and 24

Hannibal IP has prepared 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 is also prepared to offer Samsung a license to its world-wide patent portfolio on FRAND-or-better terms.

We look forward to your prompt response so that we may arrange a meeting to discuss Hannibal IP's intellectual property, present claim charts regarding the above-identified infringement, and discuss terms under which Samsung may obtain a license to resolve this matter amicably.

Very truly yours,



Vishal H. Patel

Encl.: U.S. Pat. Nos. 11,057,896; 11,240,829; 11,304,102

cc: ehkim@samsung.com; br1321.chung@samsung.com; Khaled Fekih-Romdhane

EXHIBIT A

Exemplary 5G Compliant Devices
Galaxy S22+
Galaxy S22
Galaxy S22 5G Enterprise Edition
Galaxy S21 FE 5G
Galaxy S22 Ultra
Galaxy A53 5G
Galaxy Z Flip3 5G Bespoke Edition
Galaxy Z Fold3 5G.
Galaxy Z Flip3 5G.
Galaxy S21 Ultra 5G
Galaxy S21+ 5G
Galaxy S21 5G.
Galaxy S21 5G Enterprise Edition
Galaxy Z Fold 5G.
Galaxy Note20 Ultra 5G
Galaxy Note20 5G.
Galaxy XCover Pro.
Galaxy Z Fold2 5G.
Galaxy S20 5G UW
Galaxy S20 5G.

Exemplary 5G Compliant Devices
Galaxy S20 FE 5G UW
Galaxy S20 FE 5G.
Galaxy S20 Ultra 5G
Galaxy A32 5G
Galaxy A42 5G
Galaxy A52 5G
Galaxy A51 5G
Galaxy A90 5G
Galaxy A71 5G
Galaxy S20+ 5G
Galaxy Note10+ 5G
Galaxy S10 5G
Galaxy Tab S7 5G
Galaxy Tab S7+ 5G
Galaxy Tab S7 FE 5G
Galaxy Tab S8+ 5G
Galaxy Book Go 5G
Galaxy Book Pro 360 5G