UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

XIFI NETWORKS R&D, INC., Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Civil Action No. 2:24-cv-01057-JRG **JURY TRIAL DEMANDED**

DEFENDANTS' ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (collectively, "Defendants" or "Samsung"), by and through their undersigned counsel, hereby submit an answer and affirmative defenses to the First Amended Complaint[1] for Patent Infringement of United States Patent Nos. 11,818,591 (the "'591 Patent"), 11,849,337 (the "'337 Patent"), 11,856,414 (the "'414 Patent"), 11,974,143 (the "'143 Patent"), 11,950,105 (the "'105 Patent"), 12,003,976 (the "'976 Patent"), 12,015,933 (the "'933 Patent"), 12,114,177 (the "'177 Patent"), 12,169,756 (the "'756 Patent), 12,190,198 (the "'198 Patent), and 12,250,564 (the

[1] Plaintiff filed the original Complaint ("Complaint") on December 17, 2024, and the Court subsequently extended the deadline for Defendants' response date to April 27, 2025. (Dkt. 8.) The Complaint was then superseded by Plaintiff's First Amended Complaint ("FAC") filed on March 11, 2025 (Dkt. 13), and the Court's April 14, 2025 First Amended Docket control order (Dkt. 28) set forth a June 9, 2025 deadline for Defendants to respond to the FAC.

"'564 Patent") (hereinafter, "FAC") (Dkt. 13) filed by Plaintiff XiFi Networks R&D, Inc. ("Plaintiff" or "XiFi") on March 11, 2025.

GENERAL DENIAL

Except to the extent admitted or qualified below, Defendants deny each and every allegation contained in Plaintiff's FAC. Defendants' reproduction of the headings set forth in Plaintiff's FAC below is solely for the purpose of organization and convenience and is not, and should not be construed as, an admission by Defendants that any allegation or other statement in the headings or paragraphs of the FAC, whether explicit or implied, is true, correct, or admitted by Defendants. All allegations in Plaintiff's FAC, including those in the headings, that Defendants do not expressly admit in this Answer are denied.

1. Paragraph 1 is an introductory statement to which no response is required. To the extent Paragraph 1 contains any factual allegations requiring a response, Defendants deny the allegations. Defendants specifically deny that "Samsung has infringed and/or continues to infringe, directly and/or indirectly, eleven XiFi patents."

2. Paragraph 2 is an introductory statement to which no response is required. To the extent Paragraph 2 contains any factual allegations requiring a response, Defendants deny the allegations. Defendants specifically deny that the "[t]he XiFi Patents cover foundational wireless communication technologies," and that "[t]he claimed inventions enable Samsung to offer superior devices that perform multi-link Wi-Fi operations, as contemplated by the IEEE 802.11be Wi-Fi 7 standards."

3. Paragraph 3 is an introductory statement to which no response is required. To the extent Paragraph 3 contains any factual allegations requiring a response, Defendants deny the

allegations. Defendants specifically deny having committed any acts of direct or indirect infringement.

4. Paragraph 4 is an introductory statement to which no response is required. To the extent Paragraph 4 contains any factual allegations requiring a response, Defendants deny the allegations. Defendants specifically deny that Plaintiff is entitled to any "damages, including past damages, and other relief," and deny having committed any acts of "infringement of the XiFi Patents."

THE PARTIES[2]

5. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 5 of the FAC, and therefore, Defendants deny the allegations set forth in Paragraph 5 of the FAC.

6. SEC admits that it is a corporation organized and existing under the laws of the Republic of Korea with its principal place of business located at 129 Samsung-ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, 16677, Republic of Korea.

7. SEA admits that it is a corporation organized and existing under the laws of the State of New York. SEA admits that it maintains offices at 6625 Excellence Way, Plano, Texas 75023, and that its registered agent is CT Corporation, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

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

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[2] As noted above, Defendants' reproduction of the headings set forth in Plaintiff's FAC should not be construed as an admission by Defendants that any allegation or other statement in the headings or paragraphs of the FAC, whether explicit or implied, is true, correct, or admitted by Defendants.

9. Defendants admit that authorized sellers and sales representatives offer and sell certain consumer electronics products named in Plaintiff's FAC throughout the State of Texas, including in this District and to consumers located in this District. Defendants deny that certain consumer electronics products manufactured by Defendants are "products pertinent to the Complaint." Except as expressly admitted, Defendants deny the remaining allegations set forth in Paragraph 9 of the FAC.

JURISDICTION AND VENUE

10. Defendants admit that XiFi's FAC purports to be a patent infringement action arising under the Patent Laws of the United States, 35 U.S.C. § 101, *et seq.*

11. Paragraph 11 alleges a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 11.

12. Paragraph 12 alleges legal conclusions to which no response is required. To the extent a response is required, Defendants, solely for the purposes of the present litigation, do not contest that the Court has specific and personal jurisdiction over Defendants. Defendants deny having committed any acts of infringement.

13. Paragraph 13 alleges legal conclusions to which no response is required. To the extent a response is required, Defendants, solely for the purposes of this litigation, do not contest that venue is proper in this District. Defendants deny that this venue is convenient for the parties and the witnesses or otherwise appropriate for this action. Defendants deny having committed any acts of infringement.

FACTUAL BACKGROUND

The [Purported] Inventor

14. Defendants lack knowledge or information sufficient to form a belief as to the truth of the characterizations and allegations set forth in Paragraph 14 of the FAC and therefore deny the allegations set forth in Paragraph 14 of the FAC.

15. Defendants lack knowledge or information sufficient to form a belief as to the truth of the characterizations and allegations set forth in Paragraph 15 of the FAC and therefore deny the allegations set forth in Paragraph 15 of the FAC.

16. Defendants lack knowledge or information sufficient to form a belief as to the truth of the characterizations and allegations set forth in Paragraph 16 of the FAC and therefore deny the allegations set forth in Paragraph 16 of the FAC.

17. Defendants lack knowledge or information sufficient to form a belief as to the truth of the characterizations and allegations set forth in Paragraph 17 of the FAC and therefore deny the allegations set forth in Paragraph 17 of the FAC.

18. Defendants lack knowledge or information sufficient to form a belief as to the truth of the characterizations and allegations set forth in Paragraph 18 of the FAC and therefore deny the allegations set forth in Paragraph 18 of the FAC.

19. Defendants lack knowledge or information sufficient to form a belief as to the truth of the characterizations and allegations set forth in Paragraph 19 of the FAC and therefore deny the allegations set forth in Paragraph 19 of the FAC.

20. Defendants lack knowledge or information sufficient to form a belief as to the truth of the characterizations and allegations set forth in Paragraph 20 of the FAC and therefore deny the allegations set forth in Paragraph 20 of the FAC.

The XiFi Patents

21. Defendants lack knowledge or information sufficient to form a belief as to the truth of the characterizations and allegations set forth in Paragraph 21 of the FAC and therefore deny the allegations set forth in Paragraph 21 of the FAC.

22. Defendants admit that the ’591 Patent is entitled “Method and Apparatus for Processing Bandwidth Intensive Data Streams Using Virtual Media Access Control and Physical Layers.” Defendants admit that, on its face, the ’591 Patent purports to have been issued on November 14, 2023 from a patent application filed on September 7, 2021, names Sai C. Manapragada as the sole inventor, and claims priority to U.S. Provisional Patent Application No. 61/897,216, filed on October 30, 2013 and U.S. Provisional Patent Application No. 61/897,219, filed on October 30, 2013. Except as expressly admitted, Defendants deny any remaining allegations set forth in Paragraph 22 of the FAC.

23. Defendants admit that the ’337 Patent is entitled “Method and Apparatus for Processing Bandwidth Intensive Data Streams Using Virtual Media Access Control and Physical Layers.” Defendants admit that, on its face, the ’337 Patent purports to have been issued on December 19, 2023 from a patent application filed on August 11, 2023, names Sai C. Manapragada as the sole inventor, and claims priority to U.S. Provisional Patent Application No. 61/897,216, filed on October 30, 2013 and U.S. Provisional Patent Application No. 61/897,219, filed on October 30, 2013. Except as expressly admitted, Defendants deny any remaining allegations set forth in Paragraph 23 of the FAC.

24. Defendants admit that the ’414 Patent is entitled “Method and Apparatus for Processing Bandwidth Intensive Data Streams Using Virtual Media Access Control and Physical Layers.” Defendants admit that, on its face, the ’414 Patent purports to have been issued on

December 26, 2023 from a patent application filed on August 10, 2023, names Sai C. Manapragada as the sole inventor, and claims priority to U.S. Provisional Patent Application No. 61/897,216, filed on October 30, 2013 and U.S. Provisional Patent Application No. 61/897,219, filed on October 30, 2013. Except as expressly admitted, Defendants deny any remaining allegations set forth in Paragraph 24 of the FAC.

25. Defendants admit that the ’143 Patent is entitled “Method and Apparatus for Processing Bandwidth Intensive Data Streams Using Virtual Media Access Control and Physical Layers.” Defendants admit that, on its face, the ’143 Patent purports to have been issued on April 30, 2024 from a patent application filed on September 20, 2023, names Sai C. Manapragada as the sole inventor, and claims priority to U.S. Provisional Patent Application No. 61/897,216, filed on October 30, 2013 and U.S. Provisional Patent Application No. 61/897,219, filed on October 30, 2013. Except as expressly admitted, Defendants deny any remaining allegations set forth in Paragraph 25 of the FAC.

26. Defendants admit that the ’105 Patent is entitled “Method and Apparatus for Processing Bandwidth Intensive Data Streams Using Virtual Media Access Control and Physical Layers.” Defendants admit that, on its face, the ’105 Patent purports to have been issued on April 2, 2024 from a patent application filed on December 7, 2023, names Sai C. Manapragada as the sole inventor, and claims priority to U.S. Provisional Patent Application No. 61/897,216, filed on October 30, 2013 and U.S. Provisional Patent Application No. 61/897,219, filed on October 30, 2013. Except as expressly admitted, Defendants deny any remaining allegations set forth in Paragraph 26 of the FAC.

27. Defendants admit that the ’976 Patent is entitled “Method and Apparatus for Processing Bandwidth Intensive Data Streams Using Virtual Media Access Control and Physical

Layers." Defendants admit that, on its face, the '976 Patent purports to have been issued on June 4, 2024 from a patent application filed on March 4, 2024, names Sai C. Manapragada as the sole inventor, and claims priority to U.S. Provisional Patent Application No. 61/897,216, filed on October 30, 2013 and U.S. Provisional Patent Application No. 61/897,219, filed on October 30, 2013. Except as expressly admitted, Defendants deny any remaining allegations set forth in Paragraph 27 of the FAC.

28. Defendants admit that the '933 Patent is entitled "Method and Apparatus for Processing Bandwidth Intensive Data Streams Using Virtual Media Access Control and Physical Layers." Defendants admit that, on its face, the '933 Patent purports to have been issued on June 18, 2024 from a patent application filed on March 4, 2024, names Sai C. Manapragada as the sole inventor, and claims priority to U.S. Provisional Patent Application No. 61/897,216, filed on October 30, 2013 and U.S. Provisional Patent Application No. 61/897,219, filed on October 30, 2013. Except as expressly admitted, Defendants deny any remaining allegations set forth in Paragraph 28 of the FAC.

29. Defendants admit that the '177 Patent is entitled "Method and Apparatus for Processing Bandwidth Intensive Data Streams Using Virtual Media Access Control and Physical Layers." Defendants admit that, on its face, the '177 Patent purports to have been issued on October 8, 2024 from a patent application filed on March 13, 2024, names Sai C. Manapragada as the sole inventor, and claims priority to U.S. Provisional Patent Application No. 61/897,216, filed on October 30, 2013 and U.S. Provisional Patent Application No. 61/897,219, filed on October 30, 2013. Except as expressly admitted, Defendants deny any remaining allegations set forth in Paragraph 29 of the FAC.

30. Defendants admit that the ’756 Patent is entitled “Method and Apparatus for Processing Bandwidth Intensive Data Streams Using Virtual Media Access Control and Physical Layers.” Defendants admit that, on its face, the ’756 Patent purports to have been issued on December 17, 2024 from a patent application filed on July 29, 2024, names Sai C. Manapragada as the sole inventor, and claims priority to U.S. Provisional Patent Application No. 61/897,216, filed on October 30, 2013 and U.S. Provisional Patent Application No. 61/897,219, filed on October 30, 2013. Except as expressly admitted, Defendants deny any remaining allegations set forth in Paragraph 30 of the FAC.

31. Defendants admit that the ’198 Patent is entitled “Method and Apparatus for Processing Bandwidth Intensive Data Streams Using Virtual Media Access Control and Physical Layers.” Defendants admit that, on its face, the ’198 Patent purports to have been issued on January 7, 2025 from a patent application filed on August 29, 2024, names Sai C. Manapragada as the sole inventor, and claims priority to U.S. Provisional Patent Application No. 61/897,216, filed on October 30, 2013 and U.S. Provisional Patent Application No. 61/897,219, filed on October 30, 2013. Except as expressly admitted, Defendants deny any remaining allegations set forth in Paragraph 31 of the FAC.

32. Defendants admit that the ’564 Patent is entitled “Method and Apparatus for Processing Bandwidth Intensive Data Streams Using Virtual Media Access Control and Physical Layers.” Defendants admit that, on its face, the ’564 Patent purports to have been issued on March 11, 2025 from a patent application filed on March 9, 2024, names Sai C. Manapragada as the sole inventor, and claims priority to U.S. Provisional Patent Application No. 61/897,216, filed on October 30, 2013 and U.S. Provisional Patent Application No. 61/897,219, filed on October 30,

2013. Except as expressly admitted, Defendants deny any remaining allegations set forth in Paragraph 32 of the FAC.

33. Defendants deny that the subject matter of the claims of the XiFi Patents constitutes one or more inventions. Defendants admit that Paragraph 33 selectively quotes language found in the '591 Patent. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 33 of the FAC.

34. Defendants deny that the subject matter of the claims of the XiFi Patents constitutes one or more inventions. Defendants deny that "[p]rior to the XiFi Patents, application data transmitted over a Wi-Fi network was confined to a single band." Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations set forth in Paragraph 34 of the FAC and therefore deny such remaining allegations set forth in Paragraph 34 of the FAC.

35. Defendants deny that the XiFi Patents recite novel "technical solutions" to "technical problems" that would result in "significant performance improvements and efficiency advantages" over prior art Wi-Fi systems. Defendants admit that Paragraph 35 selectively quotes language found in the '591 Patent. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 35 of the FAC.

36. Defendants admit that Paragraph 36 selectively quotes language found in the claims and the specification of the '591 Patent. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 36 of the FAC.

37. Defendants deny that the XiFi Patents provide for "transparency in bandwidth allocation decisions," in a way "unlike prior art systems." Defendants admit that Paragraph 37

selectively quotes language recited during prosecution of the ’143 Patent. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 37 of the FAC.

38. Defendants deny that the claims of the XiFi Patents recite features, such as a “virtual MAC layer” and “resource monitoring,” that “prior art systems did not include.” Defendants admit that Paragraph 38 selectively quotes language recited during prosecution of the ’756 Patent. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 38 of the FAC.

39. Defendants deny that the subject matter of the claims of the XiFi Patents constitutes one or more inventions. Defendants deny that “[p]rior art Wi-Fi systems did not perform band allocation decisions in a manner transparent to layers above the MAC/PHY layers,” and deny that “providing transparency in bandwidth allocation decisions was not well-known, routine, or conventional at the time of the [alleged] inventions.” Defendants deny the remaining allegations set forth in Paragraph 39 of the FAC.

40. Defendants deny that the XiFi Patents allow for “Multi-Link Operation (MLO).” Defendants admit that Paragraph 40 purports to selectively quote language recited in a 2022 White Paper, entitled “Key Advantages of Wi-Fi 7 Performance, MRU & MLO White Paper.” Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 40 of the FAC.

41. Defendants admit that the specification of U.S. Patent No. 11,452,116 (the “’116 Patent”) describes “[m]ulti-channel/multiband operation” as a “paradigm shift.” Except as expressly admitted, Defendants deny the remaining allegations set forth in Paragraph 41 of the FAC.

42. Defendants deny the allegations set forth in Paragraph 42 of the FAC.

43. Paragraph 43 alleges legal conclusions, and therefore, no response is required. To the extent a response is required, Defendants deny that any of the XiFi Patents are valid and/or enforceable.

44. Paragraph 44 alleges legal conclusions to which no response is required. To the extent a response is required, Defendants deny that they practice the XiFi Patents.

45. Defendants deny the allegations set forth in Paragraph 45 of the FAC.

Samsung

46. Defendants admit that they are a global leader in markets for mobile devices and wearable devices. Defendants further admit that SEA offers for sale and sells mobile devices and wearable devices in the United States. Defendants lack information sufficient to understand how Plaintiff defined, derived, or calculated the figures and statistics provided in Paragraph 46 of the FAC and on that basis lack sufficient information to admit or deny such figures and statistics. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 46 of the FAC.

47. Defendants admit that SEC had significant global revenues across all product lines in 2023, and that SEA had revenues in 2023 attributable to mobile devices. Defendants lack information sufficient to understand how Plaintiff defined, derived, or calculated the figures and statistics provided in Paragraph 47 of the FAC and on that basis lack sufficient information to admit or deny such figures and statistics. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 47 of the FAC.

Samsung's [Alleged] Direct Infringement and the Accused Instrumentalities[3]

48. Defendants deny the allegations set forth in Paragraph 48 of the FAC.

49. SEC admits that it or its subsidiaries manufacture and test the Accused Instrumentalities abroad. SEA admits that it conducts limited testing of the Accused Instrumentalities within the United States and offers to sell, sells, and imports the Accused Instrumentalities into the United States (with the exception of the accused TV Products, for which SEA is not the importer of record). Defendants deny all remaining allegations set forth in Paragraph 49 of the FAC, including any characterizations or statements of law that suggest Defendants infringe or have infringed any valid patents or that the knowledge or actions of any entity can or should be imputed to any one of the Defendants.

50. Defendants deny the allegations set forth in Paragraph 50 of the FAC.

51. Defendants deny the allegations set forth in Paragraph 51 of the FAC.

52. Defendants deny the allegations set forth in Paragraph 52 of the FAC.

53. Defendants deny the allegations set forth in Paragraph 53 of the FAC.

Samsung's [Alleged] Indirect Infringement

54. Defendants deny the allegations set forth in Paragraph 54 of the FAC.

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[3] For purposes of this Answer, Samsung defines "Accused Instrumentalities" as limited to the following Samsung products that Plaintiff has specifically accused of infringement: Samsung smartphones ("Accused Smartphones") and tablets ("Accused Tablets") (collectively, "Accused Mobile Devices"), including but not limited to Galaxy Note, Galaxy S, Galaxy Z, Galaxy A, and Galaxy XCover smartphones, and Galaxy Tab tablets, including the exemplary Samsung Galaxy S24 Ultra smartphone; Samsung Galaxy Book computers and Galaxy Chromebooks ("Accused Notebook Computers"); Samsung televisions ("Accused TVs"); Samsung smartwatches and wearable devices ("Accused Wearables"), including Galaxy smartwatches, Galaxy Watch Classic, Galaxy Watch, and Galaxy Watch Pro smartwatches. Any reference to "Accused Instrumentalities" in this Answer refers solely to these products as defined herein. Samsung specifically denies that any of these products infringe any valid claim of Plaintiff's asserted patents.

55. Defendants admit that SEA sells Accused Instrumentalities in the United States to third-party customers, including retailers. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 55 of the FAC.

56. Defendants deny that they "actively promote the multi-link Wi-Fi operations functionality of the Accused Instrumentalities for the U.S. market." Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is obtained before SEA sells Accused Instrumentalities in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 56 of the FAC.

57. Defendants deny the allegations set forth in Paragraph 57 of the FAC.

58. Defendants deny the allegations set forth in Paragraph 58 of the FAC.

59. Defendants deny the allegations set forth in Paragraph 59 of the FAC.

60. Defendants admit that SEA derives revenue by selling products, including Accused Instrumentalities, to third parties in the United States. Defendants deny that the Accused Instrumentalities result in infringement of the XiFi patents. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 60 of the FAC.

61. Defendants deny the allegations set forth in Paragraph 61 of the FAC.

COUNT I: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 11,818,591

62. Defendants repeat, reallege, and incorporate by reference, as fully set forth herein, their responses to the allegations set forth in Paragraphs 1 through 61. To the extent that XiFi sets forth any new allegations in Paragraph 62, Defendants deny the allegations.

63. Paragraph 63 asserts a legal conclusion, and therefore, no response is required. Defendants deny that the '591 Patent is valid.

64. Defendants deny the allegations set forth in Paragraph 64 of the FAC.

65. Defendants deny the allegations set forth in Paragraph 65 of the FAC.

66. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 66 of the FAC and therefore deny the allegations set forth in Paragraph 66 of the FAC.

67. Defendants deny the allegations set forth in Paragraph 67 of the FAC.

68. Defendants deny that they received any actual notice alleging infringement of any XiFi Patent prior to service of the original complaint. Defendants lack knowledge or information sufficient to form a belief as to the truth of whether XiFi or any authorized licensee made, offered for sale, or sold within the United States any article embodying the ’591 Patent claims following issuance of the ’591 Patent, and therefore, Defendants deny such allegation. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 68 of the FAC.

69. Defendants deny the allegations set forth in Paragraph 69 of the FAC.

70. Defendants deny the allegations set forth in Paragraph 70 of the FAC.

71. Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is obtained before SEA markets, sells, distributes, and commercializes Samsung branded consumer electronics in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 71 of the FAC.

72. Defendants deny the allegations set forth in Paragraph 72 of the FAC.

73. Defendants deny the allegations set forth in Paragraph 73 of the FAC.

74. Defendants deny the allegations set forth in Paragraph 74 of the FAC.

75. Defendants deny the allegations set forth in Paragraph 75 of the FAC.

76. Defendants deny the allegations set forth in Paragraph 76 of the FAC.

77. Defendants deny the allegations set forth in Paragraph 77 of the FAC.

COUNT II: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 11,849,337

78. Defendants repeat, reallege, and incorporate by reference, as fully set forth herein, their responses to the allegations set forth in Paragraphs 1 through 61. To the extent that XiFi sets forth any new allegations in Paragraph 78, Defendants deny the allegations.

79. Paragraph 79 asserts a legal conclusion, and therefore, no response is required. Defendants deny that the ’337 Patent is valid.

80. Defendants deny the allegations set forth in Paragraph 80 of the FAC.

81. Defendants deny the allegations set forth in Paragraph 81 of the FAC.

82. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 82 of the FAC, and therefore, Defendants deny the allegations set forth in Paragraph 82 of the FAC.

83. Defendants deny the allegations set forth in Paragraph 83 of the FAC.

84. Defendants deny that they received any actual notice alleging infringement of any XiFi Patent prior to service of the original complaint. Defendants lack knowledge or information sufficient to form a belief as to the truth of whether XiFi or any authorized licensee made, offered for sale, or sold within the United States any article embodying the ’337 patent claims following issuance of the ’337 Patent, and therefore, Defendants deny such allegation. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 84 of the FAC.

85. Defendants deny the allegations set forth in Paragraph 85 of the FAC.

86. Defendants deny the allegations set forth in Paragraph 86 of the FAC.

87. Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is obtained before SEA markets, sells, distributes, and commercializes Samsung branded consumer

electronics in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 87 of the FAC.

88. Defendants deny the allegations set forth in Paragraph 88 of the FAC.

89. Defendants deny the allegations set forth in Paragraph 89 of the FAC.

90. Defendants deny the allegations set forth in Paragraph 90 of the FAC.

91. Defendants deny the allegations set forth in Paragraph 91 of the FAC.

92. Defendants deny the allegations set forth in Paragraph 92 of the FAC.

93. Defendants deny the allegations set forth in Paragraph 93 of the FAC.

COUNT III: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 11,865,414

94. Defendants repeat, reallege, and incorporate by reference, as fully set forth herein, their responses to the allegations set forth in Paragraphs 1 through 61. To the extent that XiFi sets forth any new allegations in Paragraph 94, Defendants deny the allegations.

95. Paragraph 95 asserts a legal conclusion, and therefore, no response is required. Defendants deny that the ’414 Patent is valid.

96. Defendants deny the allegations set forth in Paragraph 96 of the FAC.

97. Defendants deny the allegations set forth in Paragraph 97 of the FAC.

98. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 98 of the FAC, and therefore, Defendants deny the allegations set forth in Paragraph 98 of the FAC.

99. Defendants deny the allegations set forth in Paragraph 99 of the FAC.

100. Defendants deny that they received any actual notice alleging infringement of any XiFi Patent prior to service of the original complaint. Defendants lack knowledge or information sufficient to form a belief as to the truth of whether XiFi or any authorized licensee made, offered

for sale, or sold within the United States any article embodying the ’414 patent claims following issuance of the ’414 Patent, and therefore, Defendants deny such allegation. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 100 of the FAC.

101. Defendants deny the allegations set forth in Paragraph 101 of the FAC.

102. Defendants deny the allegations set forth in Paragraph 102 of the FAC.

103. Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is obtained before SEA markets, sells, distributes, and commercializes Samsung branded consumer electronics in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 103 of the FAC.

104. Defendants deny the allegations set forth in Paragraph 104 of the FAC.

105. Defendants deny the allegations set forth in Paragraph 105 of the FAC.

106. Defendants deny the allegations set forth in Paragraph 106 of the FAC.

107. Defendants deny the allegations set forth in Paragraph 107 of the FAC.

108. Defendants deny the allegations set forth in Paragraph 108 of the FAC.

109. Defendants deny the allegations set forth in Paragraph 109 of the FAC.

COUNT IV: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 11,974,143

110. Defendants repeat, reallege, and incorporate by reference, as fully set forth herein, their responses to the allegations set forth in Paragraphs 1 through 61. To the extent that XiFi sets forth any new allegations in Paragraph 110, Defendants deny the allegations.

111. Paragraph 111 asserts a legal conclusion, and therefore, no response is required. Defendants deny that the ’143 Patent is valid.

112. Defendants deny the allegations set forth in Paragraph 112 of the FAC.

113. Defendants deny the allegations set forth in Paragraph 113 of the FAC.

114. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 114 of the FAC, and therefore, Defendants deny the allegations set forth in Paragraph 114 of the FAC.

115. Defendants deny the allegations set forth in Paragraph 115 of the FAC.

116. Defendants deny that they received any actual notice alleging infringement of any XiFi Patent prior to service of the original complaint. Defendants lack knowledge or information sufficient to form a belief as to the truth of whether XiFi or any authorized licensee made, offered for sale, or sold within the United States any article embodying the '143 patent claims following issuance of the '143 Patent, and therefore, Defendants deny such allegation. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 116 of the FAC.

117. Defendants deny the allegations set forth in Paragraph 117 of the FAC.

118. Defendants deny the allegations set forth in Paragraph 118 of the FAC.

119. Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is obtained before SEA markets, sells, distributes, and commercializes Samsung branded consumer electronics in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 119 of the FAC.

120. Defendants deny the allegations set forth in Paragraph 120 of the FAC.

121. Defendants deny the allegations set forth in Paragraph 121 of the FAC.

122. Defendants deny the allegations set forth in Paragraph 122 of the FAC.

123. Defendants deny the allegations set forth in Paragraph 123 of the FAC.

124. Defendants deny the allegations set forth in Paragraph 124 of the FAC.

125. Defendants deny the allegations set forth in Paragraph 125 of the FAC.

COUNT V: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 11,950,105

126. Defendants repeat, reallege, and incorporate by reference, as fully set forth herein, their responses to the allegations set forth in Paragraphs 1 through 61. To the extent that XiFi sets forth any new allegations in Paragraph 126, Defendants deny the allegations.

127. Paragraph 127 asserts a legal conclusion, and therefore, no response is required. Defendants deny that the ’105 Patent is valid.

128. Defendants deny the allegations set forth in Paragraph 128 of the FAC.

129. Defendants deny the allegations set forth in Paragraph 129 of the FAC.

130. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 130 of the FAC, and therefore, Defendants deny the allegations set forth in Paragraph 130 of the FAC.

131. Defendants deny the allegations set forth in Paragraph 131 of the FAC.

132. Defendants deny that they received any actual notice alleging infringement of any XiFi Patent prior to service of the original complaint. Defendants lack knowledge or information sufficient to form a belief as to the truth of whether XiFi or any authorized licensee made, offered for sale, or sold within the United States any article embodying the ’105 patent claims following issuance of the ’105 Patent, and therefore, Defendants deny such allegation. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 132 of the FAC.

133. Defendants deny the allegations set forth in Paragraph 133 of the FAC.

134. Defendants deny the allegations set forth in Paragraph 134 of the FAC.

135. Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is obtained before SEA markets, sells, distributes, and commercializes Samsung branded consumer

electronics in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 135 of the FAC.

136. Defendants deny the allegations set forth in Paragraph 136 of the FAC.

137. Defendants deny the allegations set forth in Paragraph 137 of the FAC.

138. Defendants deny the allegations set forth in Paragraph 138 of the FAC.

139. Defendants deny the allegations set forth in Paragraph 139 of the FAC.

140. Defendants deny the allegations set forth in Paragraph 140 of the FAC.

141. Defendants deny the allegations set forth in Paragraph 141 of the FAC.

COUNT VI: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 12,003,976

142. Defendants repeat, reallege, and incorporate by reference, as fully set forth herein, their responses to the allegations set forth in Paragraphs 1 through 61. To the extent that XiFi sets forth any new allegations in Paragraph 142, Defendants deny the allegations.

143. Paragraph 143 asserts a legal conclusion, and therefore, no response is required. Defendants deny that the ’976 Patent is valid.

144. Defendants deny the allegations set forth in Paragraph 144 of the FAC.

145. Defendants deny the allegations set forth in Paragraph 145 of the FAC.

146. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 146 of the FAC, and therefore, Defendants deny the allegations set forth in Paragraph 146 of the FAC.

147. Defendants deny the allegations set forth in Paragraph 147 of the FAC.

148. Defendants deny that they received any actual notice alleging infringement of any XiFi Patent prior to service of the original complaint. Defendants lack knowledge or information sufficient to form a belief as to the truth of whether XiFi or any authorized licensee made, offered for sale, or sold within the United States any article embodying the ’976 patent claims following

issuance of the ’976 Patent, and therefore, Defendants deny such allegation. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 148 of the FAC.

149. Defendants deny the allegations set forth in Paragraph 149 of the FAC.

150. Defendants deny the allegations set forth in Paragraph 150 of the FAC.

151. Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is obtained before SEA markets, sells, distributes, and commercializes Samsung branded consumer electronics in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 151 of the FAC.

152. Defendants deny the allegations set forth in Paragraph 152 of the FAC.

153. Defendants deny the allegations set forth in Paragraph 153 of the FAC.

154. Defendants deny the allegations set forth in Paragraph 154 of the FAC.

155. Defendants deny the allegations set forth in Paragraph 155 of the FAC.

156. Defendants deny the allegations set forth in Paragraph 156 of the FAC.

157. Defendants deny the allegations set forth in Paragraph 157 of the FAC.

COUNT VII: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 12,015,933

158. Defendants repeat, reallege, and incorporate by reference, as fully set forth herein, their responses to the allegations set forth in Paragraphs 1 through 61. To the extent that XiFi sets forth any new allegations in Paragraph 158, Defendants deny the allegations.

159. Paragraph 159 asserts a legal conclusion, and therefore, no response is required. Defendants deny that the ’933 Patent is valid.

160. Defendants deny the allegations set forth in Paragraph 160 of the FAC.

161. Defendants deny the allegations set forth in Paragraph 161 of the FAC.

162. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 162 of the FAC, and therefore, Defendants deny the allegations set forth in Paragraph 162 of the FAC.

163. Defendants deny the allegations set forth in Paragraph 163 of the FAC.

164. Defendants deny that they received any actual notice alleging infringement of any XiFi Patent prior to service of the original complaint. Defendants lack knowledge or information sufficient to form a belief as to the truth of whether XiFi or any authorized licensee made, offered for sale, or sold within the United States any article embodying the ’933 patent claims following issuance of the ’933 Patent, and therefore, Defendants deny such allegation. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 164 of the FAC.

165. Defendants deny the allegations set forth in Paragraph 165 of the FAC.

166. Defendants deny the allegations set forth in Paragraph 166 of the FAC.

167. Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is obtained before SEA markets, sells, distributes, and commercializes Samsung branded consumer electronics in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 167 of the FAC.

168. Defendants deny the allegations set forth in Paragraph 168 of the FAC.

169. Defendants deny the allegations set forth in Paragraph 169 of the FAC.

170. Defendants deny the allegations set forth in Paragraph 170 of the FAC.

171. Defendants deny the allegations set forth in Paragraph 171 of the FAC.

172. Defendants deny the allegations set forth in Paragraph 172 of the FAC.

173. Defendants deny the allegations set forth in Paragraph 173 of the FAC.

COUNT VIII: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 12,114,177

174. Defendants repeat, reallege, and incorporate by reference, as fully set forth herein, their responses to the allegations set forth in Paragraphs 1 through 61. To the extent that XiFi sets forth any new allegations in Paragraph 174, Defendants deny the allegations.

175. Paragraph 175 asserts a legal conclusion, and therefore, no response is required. Defendants deny that the '177 Patent is valid.

176. Defendants deny the allegations set forth in Paragraph 176 of the FAC.

177. Defendants deny the allegations set forth in Paragraph 177 of the FAC.

178. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 178 of the FAC, and therefore, Defendants deny the allegations set forth in Paragraph 178 of the FAC.

179. Defendants deny the allegations set forth in Paragraph 179 of the FAC.

180. Defendants deny that they received any actual notice alleging infringement of any XiFi Patent prior to service of the original complaint. Defendants lack knowledge or information sufficient to form a belief as to the truth of whether XiFi or any authorized licensee made, offered for sale, or sold within the United States any article embodying the '177 patent claims following issuance of the '177 Patent, and therefore, Defendants deny such allegation. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 180 of the FAC.

181. Defendants deny the allegations set forth in Paragraph 181 of the FAC.

182. Defendants deny the allegations set forth in Paragraph 182 of the FAC.

183. Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is obtained before SEA markets, sells, distributes, and commercializes Samsung branded consumer

electronics in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 183 of the FAC.

184. Defendants deny the allegations set forth in Paragraph 184 of the FAC.

185. Defendants deny the allegations set forth in Paragraph 185 of the FAC.

186. Defendants deny the allegations set forth in Paragraph 186 of the FAC.

187. Defendants deny the allegations set forth in Paragraph 187 of the FAC.

188. Defendants deny the allegations set forth in Paragraph 188 of the FAC.

189. Defendants deny the allegations set forth in Paragraph 189 of the FAC.

COUNT IX: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 12,169,756

190. Defendants repeat, reallege, and incorporate by reference, as fully set forth herein, their responses to the allegations set forth in Paragraphs 1 through 61. To the extent that XiFi sets forth any new allegations in Paragraph 190, Defendants deny the allegations.

191. Paragraph 191 asserts a legal conclusion, and therefore, no response is required. Defendants deny that the ’756 Patent is valid.

192. Defendants deny the allegations set forth in Paragraph 192 of the FAC.

193. Defendants deny the allegations set forth in Paragraph 193 of the FAC.

194. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 194 of the FAC, and therefore, Defendants deny the allegations set forth in Paragraph 194 of the FAC.

195. Defendants deny the allegations set forth in Paragraph 195 of the FAC.

196. Defendants deny that they received any actual notice alleging infringement of any XiFi Patent prior to service of the original complaint. Defendants lack knowledge or information sufficient to form a belief as to the truth of whether XiFi or any authorized licensee made, offered

for sale, or sold within the United States any article embodying the ’756 patent claims following issuance of the ’756 Patent, and therefore, Defendants deny such allegation. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 196 of the FAC.

197. Defendants deny the allegations set forth in Paragraph 197 of the FAC.

198. Defendants deny the allegations set forth in Paragraph 198 of the FAC.

199. Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is obtained before SEA markets, sells, distributes, and commercializes Samsung branded consumer electronics in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 199 of the FAC.

200. Defendants deny the allegations set forth in Paragraph 200 of the FAC.

201. Defendants deny the allegations set forth in Paragraph 201 of the FAC.

202. Defendants deny the allegations set forth in Paragraph 202 of the FAC.

203. Defendants deny the allegations set forth in Paragraph 203 of the FAC.

204. Defendants deny the allegations set forth in Paragraph 204 of the FAC.

205. Defendants deny the allegations set forth in Paragraph 205 of the FAC.

COUNT X: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 12,190,198

206. Defendants repeat, reallege, and incorporate by reference, as fully set forth herein, their responses to the allegations set forth in Paragraphs 1 through 61. To the extent that XiFi sets forth any new allegations in Paragraph 206, Defendants deny the allegations.

207. Paragraph 207 asserts a legal conclusion, and therefore, no response is required. Defendants deny that the ’198 Patent is valid.

208. Defendants deny the allegations set forth in Paragraph 208 of the FAC.

209. Defendants deny the allegations set forth in Paragraph 209 of the FAC.

210. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 210 of the FAC, and therefore, Defendants deny the allegations set forth in Paragraph 210 of the FAC.

211. Defendants deny the allegations set forth in Paragraph 211 of the FAC.

212. Defendants deny that they received any actual notice alleging infringement of any XiFi Patent prior to service of the original complaint. Defendants lack knowledge or information sufficient to form a belief as to the truth of whether XiFi or any authorized licensee made, offered for sale, or sold within the United States any article embodying the '198 patent claims following issuance of the '198 Patent, and therefore, Defendants deny such allegation. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 212 of the FAC.

213. Defendants deny the allegations set forth in Paragraph 213 of the FAC.

214. Defendants deny the allegations set forth in Paragraph 214 of the FAC.

215. Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is obtained before SEA markets, sells, distributes, and commercializes Samsung branded consumer electronics in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 215 of the FAC.

216. Defendants deny the allegations set forth in Paragraph 216 of the FAC.

217. Defendants deny the allegations set forth in Paragraph 217 of the FAC.

218. Defendants deny the allegations set forth in Paragraph 218 of the FAC.

219. Defendants deny the allegations set forth in Paragraph 219 of the FAC.

220. Defendants deny the allegations set forth in Paragraph 220 of the FAC.

221. Defendants deny the allegations set forth in Paragraph 220 of the FAC.

COUNT XI: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 12,250,564

222. Defendants repeat, reallege, and incorporate by reference, as fully set forth herein, their responses to the allegations set forth in Paragraphs 1 through 61. To the extent that XiFi sets forth any new allegations in Paragraph 222, Defendants deny the allegations.

223. Paragraph 223 asserts a legal conclusion, and therefore, no response is required. Defendants deny that the ’564 Patent is valid.

224. Defendants deny the allegations set forth in Paragraph 224 of the FAC.

225. Defendants deny the allegations set forth in Paragraph 225 of the FAC.

226. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 226 of the FAC, and therefore, Defendants deny the allegations set forth in Paragraph 226 of the FAC.

227. Defendants deny the allegations set forth in Paragraph 227 of the FAC.

228. Defendants deny that they received any actual notice alleging infringement of any XiFi Patent prior to service of the original complaint. Defendants lack knowledge or information sufficient to form a belief as to the truth of whether XiFi or any authorized licensee made, offered for sale, or sold within the United States any article embodying the ’564 patent claims following issuance of the ’564 Patent, and therefore, Defendants deny such allegation. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 228 of the FAC.

229. Defendants deny the allegations set forth in Paragraph 229 of the FAC.

230. Defendants deny the allegations set forth in Paragraph 230 of the FAC.

231. Defendants admit that any necessary approval required by law from United States and state regulatory agencies, such as the United States Federal Communications Commission, is

obtained before SEA markets, sells, distributes, and commercializes Samsung branded consumer electronics in the United States. Except as expressly admitted, Defendants deny the allegations set forth in Paragraph 231 of the FAC.

232. Defendants deny the allegations set forth in Paragraph 232 of the FAC.

233. Defendants deny the allegations set forth in Paragraph 233 of the FAC.

234. Defendants deny the allegations set forth in Paragraph 234 of the FAC.

235. Defendants deny the allegations set forth in Paragraph 235 of the FAC.

236. Defendants deny the allegations set forth in Paragraph 236 of the FAC.

237. Defendants deny the allegations set forth in Paragraph 237 of the FAC.

JURY TRIAL DEMANDED [BY XIFI]

Defendants are not required to provide a response to XiFi's request for a trial by jury.

[XIFI'S] PRAYER FOR RELIEF

Defendants deny that XiFi is entitled to any relief in connection with the allegations in the FAC. Defendants deny that any conduct on their part subjects Defendants to judgment for willful, direct, or indirect infringement, whether literally or under the doctrine of equivalents. Defendants deny that any conduct on their part subjects Defendants to liability for damages for infringement or willful infringement, attorneys' fees and costs under 35 U.S.C. § 285, pre-judgment or post-judgment interest, reimbursement of costs, ongoing royalties, or any other form of relief. Defendants deny that XiFi is entitled to any injunctive relief whatsoever under 35 U.S.C. § 283 or that such relief would is warranted by the equities of the case. Defendants ask that the Court dismiss Plaintiff's FAC with prejudice.

AFFIRMATIVE AND OTHER DEFENSES

Without admitting or acknowledging that Defendants bear the burden of proof as to any defenses, Defendants allege and assert 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. Defendants reserve all rights to raise additional defenses that become known through the course of discovery.

FIRST AFFIRMATIVE DEFENSE
(Failure to State a Claim)

The FAC fails to state a claim against Defendants upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE
(Invalidity)

Each and every claim of the Patents-in-Suit 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, 112 and/or 116, and the rules, regulations, and laws pertaining thereto.

By way of example, the asserted claims of the Patents-in-Suit are invalid based at least on U.S. Patent No. 5,073,899 ("Collier"), U.S. Patent No. 5,818,830 ("Danne"), and/or the other prior art references listed on the face of the patents.

THIRD AFFIRMATIVE DEFENSE
(Non-Infringement)

Defendants do not infringe and have 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 XiFi Patents, either literally or under the Doctrine of Equivalents, and have not committed any acts in violation of 35 U.S.C. § 271. If the claims at issue are interpreted so broadly as to read on any accused product, Defendants have not infringed any such claim under the Reverse Doctrine of Equivalents.

FOURTH AFFIRMATIVE DEFENSE
(Limitation of Patent Damages)

Plaintiff's claims for damages, if any, against Defendants for alleged infringement of the XiFi Patents are limited by 35 U.S.C. §§ 286, 287, and/or 288.

FIFTH AFFIRMATIVE 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, including but not limited to 35 U.S.C. § 271(a).

SIXTH AFFIRMATIVE DEFENSE
(Prosecution History Estoppel and Disclaimer)

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

SEVENTH AFFIRMATIVE DEFENSE
(Equitable Defenses)

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

EIGHTH AFFIRMATIVE DEFENSE
(Unenforceability)

Plaintiff's claims for relief are barred in whole or in part by reason of patent misuse and/or inequitable conduct.

NINTH AFFIRMATIVE DEFENSE
(Lack of Standing/Subject Matter Jurisdiction)

To the extent Plaintiff does not have substantially all the rights or all the rights to the XiFi Patents, or to the extent the purported assignments of the XiFi Patents, if any, are defective for any

reason, Plaintiff lacks standing to bring this action and/or the Court lacks subject matter jurisdiction.

TENTH AFFIRMATIVE 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.

ELEVENTH AFFIRMATIVE DEFENSE
(Patent Exhaustion, License and/or Implied License)

Plaintiff's claims for patent infringement are precluded in whole or in part: (i) to the extent any allegedly infringing products are supplied, directly or indirectly, to Defendants by an entity or entities having express or implied licenses to the XiFi Patents; and/or (ii) under the doctrine of patent exhaustion. To the extent that any entity granted Defendants a license under the XiFi Patents, Defendants have a license.

TWELFTH AFFIRMATIVE DEFENSE
(No Willful Infringement)

Plaintiff is not entitled to enhanced damages under 35 U.S.C. § 284 because Plaintiff has failed to meet, and cannot meet as a matter of law, the requirements for willful infringement. Defendants specifically reserve the right to supplement its disclosure with respect to this defense.

THIRTEENTH AFFIRMATIVE DEFENSE
(Prosecution Laches)

Plaintiff's claims are barred in whole or in part by the doctrine of prosecution laches as a result of Plaintiff's unreasonable and inexcusable delay in prosecuting the XiFi Patents as well as the prejudice such delay causes to Defendants.

FOURTEENTH AFFIRMATIVE DEFENSE
(No Injunctive Relief)

Plaintiff's claims are barred in whole or in part because Plaintiff is not entitled to injunctive relief. Any alleged injury to Plaintiff is not immediate or irreparable and Plaintiff has an adequate remedy at law.

FIFTEENTH AFFIRMATIVE DEFENSE
(Actions of Others)

On information and belief, Plaintiff's claims are barred in whole or in part because Samsung is not liable for the acts of others over whom it has no control.

RESERVATION OF RIGHT TO ASSERT OTHER DEFENSES

Defendants reserve the right to amend their Answers to add additional defenses under Rule 8(c) of the Federal Rules of Civil Procedure, the Patent Laws of the United States, and any other defenses, at law and/or equity (including, but not limited to, additional instances of inequitable conduct and/or patent misuse), as they become known throughout the course of discovery in this case. Assertion of a defense is not a concession that Defendants have the burden of proving the matter asserted.

PRAYER FOR RELIEF

WHEREFORE, Defendants respectfully pray that this Court enter judgment against Plaintiff as follows:

(a) A judgment in favor of Defendants denying XiFi all relief requested in its FAC and dismissing its FAC with prejudice;

(b) A judgment against XiFi finding that Defendants do not infringe and are not liable for any infringement of any valid and enforceable claim of the XiFi Patents;

(c) A judgment against XiFi finding that the XiFi Patents are invalid and/or unenforceable;

(d) A judgment that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding Defendants their reasonable attorneys' fees;

(e) An award of costs to Defendants; and

(f) Such other relief as the Court shall deem just and proper.

DEMAND FOR JURY TRIAL

Defendants respectfully request a trial by jury on all issues so triable.

Dated: June 9, 2025

Respectfully submitted,

/s/ Melissa R. Smith
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Attorney for Defendants
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 9, 2025, a true and correct copy of the above and foregoing document has been served on counsel of record *via* the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3).

/s/ Melissa R. Smith

Melissa R. Smith