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

MAXELL, LTD., *Plaintiff*, v. SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS AMERICA, INC., *Defendants*.	Civil Action No. _____ **COMPLAINT AND DEMAND FOR JURY TRIAL**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Maxell, Ltd. ("Maxell"), by and through its undersigned counsel, files this complaint under 35 U.S.C. § 271 for Patent Infringement against Defendants Samsung Electronics Co., Ltd. ("SEC"), and Samsung Electronics America, Inc. ("SEA") (together, "Samsung" or "Defendants") and further alleges as follows, upon actual knowledge with respect to itself and its own acts, and upon information and belief as to all other matters.

OVERVIEW

1. This is an action for patent infringement by Maxell. Founded in 1961 as Maxell Electric Industrial Co., Ltd., Maxell is a leading global manufacturer of information storage media products, including magnetic tapes, optical discs, and battery products such as lithium ion rechargeable micro batteries and alkaline dry batteries, and the company has over 50 years of experience producing industry-leading recordable media and energy products for both the consumer and the professional markets. Maxell has also been a leading manufacturer of projectors

and lenses and additionally sells various other devices, such as Bluetooth headsets, wireless charging solutions, etc.

2. Maxell has built up an international reputation for excellence and reliability, for pioneering the power supplies and digital recordings for today's mobile and multi-media devices, and leading the electronics industry in the fields of storage media and batteries.

3. Since being one of the first companies to develop alkaline batteries and Blu Ray camcorder discs, Maxell has always assured its customers of industry-leading product innovation and is one of the world's foremost suppliers of memory, power, audio, and video goods. Maxell's well-recognized logo and iconic "blown away" image exemplify the reputation Maxell carefully developed in these markets.

4. As more fully described below, in 2009 Hitachi, Ltd. assigned much of its consumer product-facing intellectual property to its consumer product business division, Hitachi Consumer Electronics Co., Ltd. Then, in 2013, the consumer electronics division of Hitachi Consumer Electronics Co., Ltd., was transferred to Hitachi Maxell, Ltd. This involved assigning the intellectual property, including the patents in this case, to Hitachi Maxell, Ltd. In 2017, Hitachi Maxell engaged in a reorganization and name change—to Maxell, Ltd.—in an effort to align its

intellectual property with the business development, and research and development, and licensing efforts of Maxell, including in the mobile and mobile-media device market (Hitachi, Ltd. and Hitachi Consumer Electronics Co., Ltd. are referred to herein collectively as "Hitachi"). Maxell continues to own all rights to the patents-in-suit, as well as the entire Maxell portfolio initially obtained from Hitachi.

5. Today, Maxell maintains a thriving business in the mobile device market including wireless charging solutions, wireless flash drives, multimedia players, storage devices, and headphones. Maxell also maintains intellectual property related to televisions, computer products, tablets, digital cameras, mobile phones, and other consumer electronics. As a mobile technology developer and industry leader, and due to its historical and continuous investment in research and development, including in the state of Texas, Maxell owns a portfolio of patents related to such technologies and actively enforces its patents through licensing and/or litigation. Leading smartphone manufacturers have recognized the value of Maxell's intellectual property and have obtained a license from Maxell in the recent past—including many of the smartphone companies well-known to consumers.

6. Maxell has had regular and continuous business in Texas since 2014. As a result of these business dealings and hopes to expand those and other business dealings, Maxell founded an affiliate, Maxell Research and Development America, LLC ("MRDA"), in Marshall, Texas. MRDA is part of a joint venture with another business in Marshall, and the entities work together on research and development related to IoT, mobile, media, and battery technologies. MRDA's ongoing projects include, for example, the research and development of lensless camera technology, which Maxell hopes will be utilized for sensor and camera technology in smartphones. Maxell has regularly met and continues to regularly meet with MRDA to expand its business, and

investments are being made by Maxell, MRDA, and others in this District to further the goals of these companies.

7. Maxell is forced to bring this action against Samsung as a result of Samsung's knowing and ongoing infringement of Maxell's patents as further described herein.

8. Samsung has been aware of Maxell's patents for well over a decade. In 2011, Samsung entered into a Patent Sale Agreement with Hitachi Consumer Electronics Co., Ltd. ("HCE"). Pursuant to that Agreement, HCE assigned 10 patent families to Samsung. At least one of these patents was later asserted by Samsung against Apple in litigation. The Patent Sale Agreement also provided Samsung a license to HCE's patents. This license is now expired. Though Samsung previously recognized the value the Maxell's patents, upon expiration of that prior license, Samsung has refused to take a new license. Maxell has made several attempts over the last few years to engage Samsung in negotiations for a new license. Specifically, since at least July 2021, Maxell has provided Samsung with specific notice of its patents and the parties have had numerous discussions and interrogations regarding its infringement of these patents. Samsung's representatives have been provided with detailed information regarding Maxell's patents, the developed technology, and Samsung's ongoing use of this patented technology. Through this process, Samsung's representatives requested and received detailed explanations regarding Maxell's patents and allegations. Maxell believed that a mutually beneficial agreement could be reached between the parties and continued to communicate with Samsung since informing Samsung about its infringement in July 2021. Samsung, however, elected not to enter into an agreement with Maxell or license Maxell's patents, even though many of the smartphone companies well-known to consumers have already entered into a license agreement with Maxell.

Instead, Samsung continued, and continues today, to make, use, sell, and offer for sale Maxell's patented technology without a license. Accordingly, Maxell has filed this Complaint.

PARTIES

9. Plaintiff Maxell, Ltd. is a Japanese corporation with a registered place of business at 1 Koizumi, Oyamazaki, Oyamazaki-cho, Otokuni-gun, Kyoto, Japan.

10. On information and belief, Defendant SEC is a Korea corporation with its principal place of business at 129 Samsung-Ro Yeongtong-gu, Gyeonggi-do 16677 Suwon-Shi, Republic of Korea. SEC may be served pursuant to FED. R. CIV. P. 4(f)(1).

11. Defendant SEA is a New York corporation. SEA is a wholly owned subsidiary of SEC. SEA may be served through its registered agent CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201. SEA is registered to do business in the State of Texas and has been since at least June 10, 1996.

12. SEC exercises direction and control over the performance of SEA. Alternatively, Defendants form a joint business enterprise such that the performance by one Defendant is each attributable to the other Defendant.

13. SEC and SEA, individually and collectively as a common business enterprise, conduct business operations in the Eastern District of Texas at facilities located at 6625 Excellence Way Plano, TX 75023 ("Plano Facility").

14. Upon information and belief, Samsung employs full-term personnel such as sales personnel and engineers in this District.

15. In addition, Samsung has authorized sellers and sales representatives that offer and sell products pertinent to this Complaint throughout the State of Texas, including in this District, and to consumers throughout this District, such as: Best Buy, 4210 St Michael Dr, Texarkana, TX

75503; Best Buy, 422 West TX-281 Loop, Suite 100, Longview, TX 75605; T-Mobile, 1806 East End Boulevard North, Suite 100, Marshall, TX 75670; Verizon authorized retailers, including 3902 Saint Michael Dr., Texarkana, TX 75503, Russell Cellular Texarkana Walton, 404 Walton, Texarkana, TX 75501, and Russell Cellular, 1111 East Grand Avenue, Marshall, TX 75670; Victra, 1006 East End Boulevard, Marshall, TX 75670; and Cricket Wireless authorized retailers, including 4847 Texas Blvd., Texarkana, TX 75503 and 120 East End Boulevard South, Marshall, TX 75670.

16. Samsung offers its products and services, including the products accused of infringement in this Complaint, to customers and potential customers located in the Eastern District of Texas.

NATURE OF THE ACTION, JURISDICTION, AND VENUE

17. Maxell brings this action for patent infringement under the patent laws of the United States, 35 U.S.C. § 271 *et seq*.

18. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because the action arises under the patent laws of the United States.

19. This Court has personal jurisdiction over Samsung in this action pursuant to due process and/or the Texas Long Arm Statute, by virtue of at least the substantial business each Defendant conducts in this forum, directly and/or through intermediaries, including but not limited to: (1) having committed acts within the Eastern District of Texas giving rise to this action and having established minimum contacts with this forum such that the exercise of jurisdiction over each Defendant would not offend traditional notions of fair play and substantial justice; (2) having directed its activities to customers in the State of Texas and this District, solicited business in the State of Texas and this District, transacted business within the State of Texas and this District and

attempted to derive financial benefit from residents of the State of Texas and this District, including benefits directly related to the instant patent infringement causes of action set forth herein; (3) having placed their products and services into the stream of commerce throughout the United States and having been actively engaged in transacting business in Texas and in this District; and (4) either individually, as members of a common business enterprise, and/or in conjunction with third parties, having committed acts of infringement within Texas and in this District.

20. For example, SEA maintains regular and established offices in the Eastern District of Texas, including at 6625 Excellence Way, Plano, TX 75023. Further, on information and belief, SEC directs and controls the actions of SEA, or acts in consort with SEA, such that it too maintains regular and established offices in the Eastern District of Texas, including at 6625 Excellence Way, Plano, TX 75023. Furthermore, the purposeful contacts by SEA are imputable to SEC.

21. Upon information and belief, Samsung's Plano office serves as a hub for its smartphone product line with divisions, including networks, marketing, wearables, and product management being located in the Plano facilities in this District. Samsung has described this 216,000 square foot "flagship" Plano office, with over 1,000 employees, as part of its "continued investment in our Texas roots." *See* https://news.samsung.com/us/samsung-electronics-america-open-flagship-north-texas-campus/. In Samsung's words, "Samsung's move to Plano further demonstrates the company's dedication to Texas . . . [and the Plano facility] is home to Samsung Electronics America's second biggest employee population in the U.S. across multiple divisions – Customer Care, Mobile, Mobile R&D and Engineering." *Id.* In all, "more than 1,000 regional employees" were relocated to work out of the Plano facility. *Id.*

22. Both SEC and SEA, directly or through their distribution network, have purposefully and voluntarily placed infringing products in the stream of commerce knowing and

expecting them to be purchased and used by consumers in the United States, including in the Eastern District of Texas.

23. On information and belief, Samsung has also derived substantial revenues from infringing acts in the Eastern District of Texas, including from the sale and use of infringing products (including the Accused Products, to be defined below).

24. Venue is proper in this District pursuant to 28 U.S.C. § 1391 and 28 U.S.C. § 1400.

25. Venue is proper against SEC in this District pursuant to 28 U.S.C. § 1391(c)(3) because SEC is a foreign corporation not resident in the United States, and venue is proper in any district against a foreign corporation. Venue is further proper as to SEC under 28 U.S.C. § 1391(b)(2) because SEC performs a substantial part of its infringing acts in this District by making, using, selling, offering to sell, and importing infringing products in this District. Thus SEC has committed, and continues to commit, acts of patent infringement within the District.

26. Venue is proper against SEA in this District pursuant to 28 U.S.C. § 1400(b) because SEA has a regular and established places of business in this District, including a 216,000 square foot facility at 6625 Excellence Way, Plano, TX 75023. *See In re HTC Corp.*, 889 F.3d 1349, 1354 (Fed. Cir. 2018), *In re Cray Inc.*, 871 F.3d 1355, 1362–63 (Fed. Cir. 2017).

27. Defendants are properly joined under 35 U.S.C. § 299(a)(1) because Defendants, through their own acts and/or through the acts of other entities acting as their agent, representative, or alter ego, commonly and/or jointly design and/or sell accused products such that at least one right to relief is asserted against Defendants jointly, severally, and in the alternative with respect to the same transactions, occurrences, or series of transactions or occurrences relating to the making, using, selling and/or offering to sell in, and/or importing into the United States the same accused products.

28. Defendants are properly joined under 35 U.S.C. § 299(a)(2) because Defendants, through their own acts and/or through the acts of other entities acting as their agent, representative, or alter ego, make, use, sell, and/or offer to sell in, and/or import into the United States the same or similar accused products, such that questions of fact will arise that are common to all Defendants.

29. Upon information and belief, SEC and SEA, acting in consort, have placed the accused products in the stream of commerce, knowing the likely destination of the products in the United States and this District. Upon information and belief, SEC has further purposefully availed itself of the United States and this District by directing SEA to take action in the United States and this District.

30. Upon information and belief, each Defendant serves as agent, representative, and/or alter ego of each other Defendant for the purposes of conducting business in the United States and this District in relation to making, using, selling, offering to sell, and importing into the United States the accused products.

31. Upon information and belief, each Defendant exercises direction and control over the performance of each other Defendant, or the Defendants form a joint enterprise such that the performance by one Defendant is attributable to the other Defendant.

COUNT 1 – INFRINGEMENT OF U.S. PATENT NO. 8,037,161

32. Maxell incorporates paragraphs 1-31 above by reference.

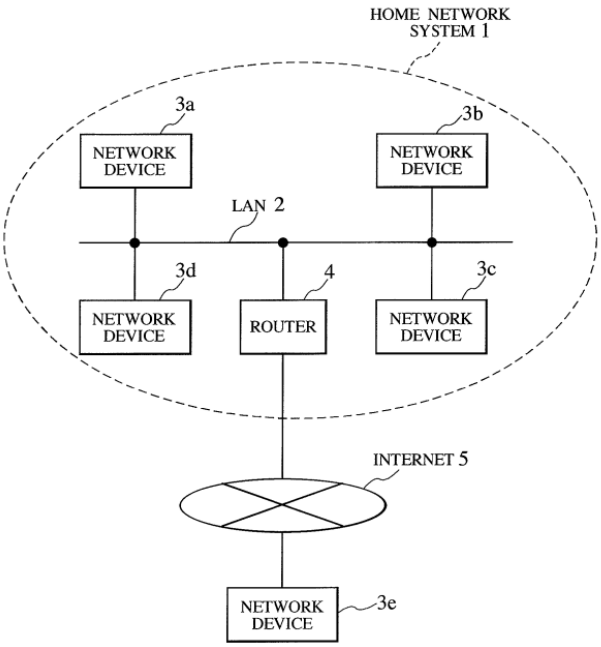
33. U.S. Patent No. 8,037,161 (the "'161 Patent," attached hereto at Exhibit 1) duly issued on October 11, 2011 and is entitled *Network System, Network Device, And Network Belonging Judgment Method*.

34. Maxell is the owner by assignment of the ’161 Patent and possesses all rights under the ’161 Patent, including the exclusive right to recover for past and future infringement.

35. The ’161 Patent is directed to establishing and managing a home network of devices. In particular, the system and methods disclosed in the ’161 Patent ensure that network devices that are not authorized to be a part of the home network system are prevented from joining and gaining access to the home network system as such a device may join the home network and “steal content, which is private information distributed within the network.” ’161 Patent, 2:17-23.

36. Specifically, the ’161 Patent discloses a specific configuration of each network device including “a peripheral device information collection unit,” “a peripheral device information storage unit,” “a peripheral device information transmission unit,” “a peripheral device information reception unit,” and “a peripheral device information collation unit,” that all work in conjunction to judge whether the network device they are communicating with belongs to the same network and then establish a home network in such a way, as shown below in Figure 1 of the ’161 Patent:

FIG.1



37. Samsung has directly infringed one or more claims of the ’161 Patent in this District and elsewhere in Texas, including at least claim 3 literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling its home networking technology, including at least Samsung products having materially similar functionality while implementing a SmartThings network using Samsung smartphones, tablets, laptops, watches, SmartThings Station, SmartThings Hubs, refrigerators, ranges, washers, dryers, air dressers, dishwashers, vacuums, air purifiers, microwaves, and wall ovens.

38. For example, Samsung has literally and/or under the doctrine of equivalents directly infringed at least claim 3 of the ’161 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling at least the following: **smartphones** including Galaxy A Quantum, Galaxy A03s, Galaxy A04s, Galaxy A10s, Galaxy A11, Galaxy A12, Galaxy A12s (aka Nacho), Galaxy A13, Galaxy A13 5G, Galaxy A14, Galaxy A14 5G, Galaxy A20, Galaxy A20e, Galaxy A20s, Galaxy A21, Galaxy A21s, Galaxy A22, Galaxy A22s 5G, Galaxy A23, Galaxy A23 5G, Galaxy A24 4G, Galaxy A30, Galaxy A30s, Galaxy A32, Galaxy A32 5G, Galaxy A33 5G, Galaxy A34, Galaxy A40, Galaxy A42 5G, Galaxy A50, Galaxy A50s, Galaxy A51, Galaxy A51 5G, Galaxy A51 5G UW, Galaxy A52, Galaxy A52 5G, Galaxy A53 5G, Galaxy A54, Galaxy A60, Galaxy A70, Galaxy A70s, Galaxy A71, Galaxy A71 5G, Galaxy A71 5G UW, Galaxy A72, Galaxy A73 5G, Galaxy A8, Galaxy 8+, Galaxy A80, Galaxy A90 5G, Galaxy Fold, Galaxy Fold 5G, Galaxy Note10, Galaxy Note10 5G, Galaxy Note10 Lite, Galaxy Note10+, Galaxy Note10+ 5G, Galaxy Note20, Galaxy Note20 5G, Galaxy Note20 Ultra, Galaxy Note20 Ultra 5G, Galaxy Note9, Galaxy S10, Galaxy S10 5G, Galaxy S10 Lite, Galaxy S10+, Galaxy S10e, Galaxy S20, Galaxy S20 5G, Galaxy S205G UW, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 Ultra, Galaxy S20 Ultra 5G, Galaxy S20+, Galaxy S20+ 5G, Galaxy S21

5G, Galaxy S21 FE 5G, Galaxy S21 Ultra 5G, Galaxy S21+ 5G, Galaxy S22 5G, Galaxy S22 Ultra 5G, Galaxy S22+ 5G, Galaxy S23, Galaxy S23 Ultra, Galaxy S23+, Galaxy S9, Galaxy S9+, Galaxy Xcover FieldPro, Galaxy Xcover Pro, Galaxy Xcover6 Pro, Galaxy Z Flip, Galaxy Z Flip 5G, Galaxy Z Flip3 5G, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Fold2 5G, Galaxy Z Fold3 5G, Galaxy Z Fold4, Galaxy Z Fold5; **tablets** including Galaxy Tab Active Pro, Galaxy Tab Active3, Galaxy Tab Active4 Pro, Galaxy Tab S5e, Galaxy Tab S6, Galaxy Tab S6 5G, Galaxy Tab S7, Galaxy Tab S7+, Galaxy Tab S8, Galaxy Tab S8 Ultra, Galaxy Tab S8+, Galaxy Tab S9, Galaxy Tab S9 Ultra, Galaxy Tab S9+; **laptops** including Galaxy Book2 360, 13", Intel Core i5, 256GB, Galaxy Book2 360, 13", Intel Core i7, 512GB, Galaxy Book2 Pro 360, 13", Intel Core i7, 256GB, Galaxy Book2 Pro 360, 13", Intel Core i7, 512GB, Galaxy Book2 Pro 360, 15", Intel Core i7, 1TB, Galaxy Book2 Pro 360, 15", Intel Core i7, 512GB, Galaxy Book2 Pro, 13", Intel Core i5, 256GB, Galaxy Book2 Pro, 13", Intel Core i7, 512GB, Galaxy Book2 Pro, 15", Intel Core i5, 512 GB, Galaxy Book2 Pro, 15", Intel Core i7, 512GB, Galaxy Book2 Pro, 15", Intel Core i7, Intel ARC Discrete Graphics, 1TB, Galaxy Book3 360, 13", Intel Core i7, 512GB, Galaxy Book3 360, 15", Intel Core i7, 512GB, Galaxy Book3 Pro 360, 16", Intel Core i7, 1TB, Galaxy Book3 Pro, 14", Intel Core i7, 512 GB, Galaxy Book3 Pro, 16" Intel Core i7, 1TB, Galaxy Book3 Ultra, 16" Intel Core i7, 1TB, Galaxy Book3 Ultra, 16" Intel Core i9, 1TB, and Galaxy Book3, 15", Intel Core i7, 512GB; **watches** including Galaxy Watch5 Pro Golf Edition, Galaxy Watch5 Pro, Galaxy Watch5, Galaxy Watch4, Galaxy Watch4 Classic; **SmartThings Station** with Travel Adapter, SmartThings Station, SmartThings Hub, SmartThings Hub Dongle; **refrigerators** including Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in Matte Black Steel, Bespoke Counter Depth 4-Door Flex™ Refrigerator (23 cu. ft.) in Matte Black Steel, 25 cu. ft. 33" 3-Door French Door Refrigerator with Dual Auto Ice Maker in Stainless Steel, 25 cu. ft. 33" 3-Door French Door Refrigerator with

Beverage Center in Stainless Steel, Bespoke Side-by-Side 28 cu. ft. Refrigerator with Beverage Center in White Glass, Bespoke Counter Depth Side-by-Side 23 cu. ft. Refrigerator with Beverage Center in Stainless Steel, Bespoke Counter Depth 4-Door Flex™ Refrigerator (23 cu. ft.) with Family Hub™ + in Charcoal Glass Top and Stainless Steel Bottom Panels, Bespoke 3-Door French Door Refrigerator (30 cu. ft.) with AutoFill Water Pitcher in White Glass, Bespoke 4-Door French Door Refrigerator (29 cu. ft.) with AutoFill Water Pitcher in Stainless Steel, Bespoke 3-Door French Door Refrigerator (24 cu. ft.) with AutoFill Water Pitcher in White Glass, Bespoke 4-Door French Door Refrigerator (29 cu. ft.) – with Top Left and Family Hub™ Panel in Charcoal Glass - and Matte Black Steel Middle and Bottom Door Panels, Bespoke 3-Door French Door Refrigerator (30 cu. ft.) with Beverage Center in Stainless Steel, Bespoke 4-Door French Door Refrigerator (23 cu. ft.) with AutoFill Water Pitcher in Stainless Steel, Bespoke 4-Door French Door Refrigerator (29 cu. ft.) with Beverage Center in Morning Blue Glass Top Panels and White Glass Middle and Bottom Panels, Bespoke 3-Door French Door Refrigerator (30 cu. ft.) – with Top Left and Family Hub™ Panel in White Glass - and Matte Grey Glass Bottom Door Panel, Bespoke 3-Door French Door Refrigerator (24 cu. ft.) with Beverage Center in White Glass, Bespoke 4-Door French Door Refrigerator (23 cu. ft.) with Beverage Center in White Glass, Bespoke 4-Door French Door Refrigerator (23 cu. ft.) – with Top Left and Family Hub™ Panel in Charcoal Glass - and Matte Black Steel Middle and Bottom Panels, Bespoke 3-Door French Door Refrigerator (24 cu. ft.) – with Top Left and Family Hub™ Panel in White Glass - and Matte Grey Glass Bottom Door Panel, 18 cu. ft. Smart Counter Depth 3-Door French Door Refrigerator in Black Stainless Steel, 17.3 cu. ft. Smart Kimchi & Specialty 4-Door French Door Refrigerator in White-Navy Glass, 22 cu. ft. Smart 3-Door French Door Refrigerator in Stainless Steel, 26.5 cu. ft. Large Capacity 3-Door French Door Refrigerator with Family Hub™ and External Water & Ice

Dispenser in Black Stainless Steel, 23 cu. ft. Smart Counter Depth Side-by-Side Refrigerator in Stainless Steel, 28 cu. ft. Smart Side-by-Side Refrigerator in Stainless Steel, 23 cu. ft. Counter Depth 4-Door French Door Refrigerator with FlexZone Drawer in Black Stainless Steel, 28 cu. ft. 4-Door French Door Refrigerator with FlexZone Drawer in Stainless Steel, 23 cu. ft. Smart Counter Depth 4-Door Flex™ Refrigerator with Beverage Center and Dual Ice Maker in Stainless Steel, 29 cu. ft. Smart 4-Door Flex™ Refrigerator with Family Hub™ and Beverage Center in Stainless Steel, 29 cu. ft. Smart 4-Door Flex™ Refrigerator with AutoFill Water Pitcher and Dual Ice Maker in Stainless Steel, 23 cu. ft. Smart Counter Depth 4-Door Flex™ refrigerator with Family Hub™ and Beverage Center in Black Stainless Steel, 29 cu. ft. Smart 4-Door Flex™ Refrigerator with Beverage Center and Dual Ice Maker in Stainless Steel, 22 cu. ft. Counter Depth Side-by-Side Refrigerator with Touch Screen Family Hub™ in Stainless Steel, 22 cu. ft. Smart 3-Door French Door Refrigerator with External Water Dispenser in Fingerprint Resistant Stainless Steel, 22 cu. ft. Counter Depth Side-by-Side Refrigerator in Stainless Steel, 26.7 cu. ft. Large Capacity Side-by-Side Refrigerator with Touch Screen Family Hub™ in Stainless Steel, 23 cu. ft. Smart Counter Depth 4-Door Flex™ refrigerator with AutoFill Water Pitcher and Dual Ice Maker in Stainless Steel, 15.6 cu. ft. Top Freezer Refrigerator with All-Around Cooling in Stainless Steel, 19.5 cu. ft. Smart 3-Door French Door Refrigerator in White, 29 cu. ft. Smart BESPOKE 4-Door Flex™ Refrigerator with Customizable Panel Colors in White Glass, Bespoke 3-Door French Door Refrigerator (30 cu. ft.) – with Family Hub™ in Charcoal Glass, Bespoke 3-Door French Door Refrigerator (24 cu. ft.) – with Family Hub™ in Charcoal Glass, Bespoke 4-Door French Door Refrigerator (23 cu. ft.) with Customizable Door Panel Colors and Beverage Center in Rose Pink Glass, Bespoke 4-Door French Door Refrigerator (23 cu. ft.) with Customizable Door Panel Colors and Beverage Center in Morning Blue Glass, Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in

Charcoal Glass, Bespoke 4-Door Flex™ Refrigerator (23 cu. ft.) in Charcoal Glass, Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in White Glass (2022), Bespoke 4-Door Flex™ Refrigerator (23 cu. ft.) in White Glass (2022), Bespoke 4-Door Flex™ Refrigerator (23 cu. ft.) in Sunrise Yellow Glass, Bespoke 4-Door Flex™ Refrigerator (23 cu. ft.) in Stainless Steel, Bespoke 4-Door Flex™ Refrigerator (23 cu. ft.) in Pink Glass (2022), Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in Emerald Green Steel, Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in Sunrise Yellow Glass, Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in Stainless Steel, Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in Clementine Glass, Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in Pink Glass (2022), Bespoke 4-Door Flex™ Refrigerator (23 cu. ft.) in Emerald Green Steel, Bespoke 4-Door Flex™ Refrigerator (23 cu. ft.) in Clementine Glass, Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in Morning Blue Glass, Bespoke 4-Door Flex™ Refrigerator (23 cu. ft.) in Morning Blue Glass, Bespoke 3-Door French Door Refrigerator (30 cu. ft.) - with Family Hub™ in White Glass, Bespoke 4-Door French Door Refrigerator (23 cu. ft.) with Customizable Door Panel Colors and Beverage Center in Emerald Green Steel, Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in White Glass Top and Grey Glass Bottom, Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in White Glass Top and Matte Black Steel Bottom, Bespoke 4-Door Flex™ Refrigerator (29 cu. ft.) in Matte Black Steel, Bespoke Counter Depth 4-Door Flex™ Refrigerator (23 cu. ft.) in White Glass Top and Grey Glass Bottom, Bespoke Counter Depth 4-Door Flex™ Refrigerator (23 cu. ft.) in White Glass Top and Matte Black Steel Bottom, 23 cu. ft. Smart Counter Depth BESPOKE 4-Door Flex™ Refrigerator with Customizable Panel Colors in White Glass, Bespoke 4-Door Flex™ Refrigerator (23 cu. ft.) in Matte Black Steel, 6.3 cu. ft.; **ranges** including Smart Freestanding Electric Range with No-Preheat Air Fry & Convection in Stainless Steel, 6.3 cu. ft. Smart Slide-in Electric Range with Convection in Stainless Steel, 6.0 cu. ft. Smart Slide-in Gas

Range with Air Fry in Stainless Steel, 6.0 cu. ft. Smart Freestanding Gas Range with 18K BTU Dual Power Burner & Self Clean in Stainless Steel, 6.0 cu. ft. Smart Freestanding Gas Range with No-Preheat Air Fry, Convection+ & Stainless Cooktop in Stainless Steel, 6.3 cu. ft. Smart Slide-in Electric Range with Air Fry in Stainless Steel, 6.3 cu ft. Smart Slide-in Electric Range with Smart Dial & Air Fry in Stainless Steel, 6.0 cu. ft. Smart Freestanding Gas Range with No-Preheat Air Fry & Convection in Stainless Steel, 6.3 cu. ft. Smart Freestanding Electric Range with No-Preheat Air Fry, Convection+ & Griddle in Black Stainless Steel, Bespoke Smart Slide-in Gas Range 6.0 cu. ft. with Smart Dial, Air Fry & Wi-Fi in Navy Steel, 6.3 cu. ft. Smart Slide-in Electric Range in Stainless Steel, 6.0 cu. ft. Smart Slide-in Gas Range in Stainless Steel, 6.3 cu. ft. Flex Duo™ Front Control Slide-in Dual Fuel Range with Smart Dial, Air Fry, and Wi-Fi in Black Stainless Steel, 6.0 cu ft. Smart Slide-in Gas Range with Smart Dial & Air Fry in Black Stainless Steel, 6.0 cu ft. Smart Slide-in Gas Range with Flex Duo™, Smart Dial & Air Fry in Stainless Steel, 6.3 cu. ft. Smart Slide-in Induction Range with Flex Duo™, Smart Dial & Air Fry in Stainless Steel, 6.3 cu. ft. Smart Slide-in Induction Range with Smart Dial & Air Fry in Stainless Steel, 6.0 cu. ft. Smart Slide-in Gas Range with Convection in Stainless Steel, 6.3 cu ft. Smart Slide-in Electric Range with Smart Dial, Air Fry, & Flex Duo™ in Stainless Steel, 6.3 cu. ft. Smart Freestanding Electric Range with Rapid Boil™ & Self Clean in Stainless Steel, 6.3 cu ft. Smart Slide-in Electric Range with Smart Dial & Air Fry in Stainless Steel, 6.3 cu. ft. Smart Freestanding Electric Range with Steam Clean in Stainless Steel, 6.0 cu. ft. Smart Freestanding Gas Range with Flex Duo™ & Air Fry in Black Stainless Steel, 6.0 cu. ft. Smart Freestanding Gas Range with Integrated Griddle in Stainless Steel, 6.3 cu. ft. Smart Freestanding Electric Range with Flex Duo™, No-Preheat Air Fry & Griddle in Black Stainless Steel, 6.3 cu. ft. Smart Rapid Heat Induction Slide-in Range with Air Fry & Convection+ in Black Stainless Steel, 6.3 cu. ft. Smart

Slide-in Electric Range with Air Fry & Convection in Stainless Steel, Bespoke 6.3 cu. ft. Smart Slide-in Electric Range with Air Fry & Convection in White Glass, 6.0 cu. ft. Smart Slide-in Gas Range with Air Fry & Convection in Fingerprint Resistant Stainless Steel, Bespoke 5.3 cu. ft.; **washing machines** including Ultra Capacity Front Load Washer with AI OptiWash™ and Auto Dispense in Brushed Navy, 4.5 cu. ft. Large Capacity Smart Front Load Washer with Super Speed Wash - Champagne, Bespoke 5.3 cu. ft. Ultra Capacity Front Load Washer with Super Speed Wash and AI Smart Dial in Silver Steel, 5.0 cu. ft. Extra Large Capacity Smart Front Load Washer with Super Speed Wash and Steam in Ivory, 4.6 cu. ft. Large Capacity AI Smart Dial Front Load Washer with Auto Dispense and Super Speed Wash in Brushed Black, 5.5 cu. ft. Extra-Large Capacity Smart Top Load Washer with Auto Dispense System in Brushed Black, 5.5 cu. ft. Extra-Large Capacity Smart Top Load Washer with Super Speed Wash in Ivory, 5.1 cu. ft. Smart Top Load Washer with ActiveWave™ Agitator and Super Speed Wash in Brushed Black, 5.0 cu. ft. Extra-Large Capacity Smart Dial Front Load Washer with MultiControl™ in Brushed Black, 5.0 cu. ft. Extra-Large Capacity Smart Dial Front Load Washer with OptiWash™ in Brushed Black, 4.5 cu. ft. Front Load Washer with Vibration Reduction Technology+ in White, 6.0 cu. ft. Total Capacity Smart Dial Washer with FlexWash™ and Super Speed Wash in Brushed Black, 5.0 cu. ft. Extra-Large Capacity Smart Front Load Washer with Super Speed Wash in Brushed Black, 2.5 cu. ft. Compact Front Load Washer with AI Smart Dial and Super Speed Wash in White, 7.5 cu. ft.; **dryers** including Smart Gas Dryer with Steam Sanitize+ in Champagne, Bespoke 7.6 cu. Ft. Ultra Capacity Gas Dryer with Super Speed Dry and AI Smart Dial in Silver Steel, Bespoke 7.6 cu. Ft. Ultra Capacity Electric Dryer with AI Optimal Dry and Super Speed Dry in Silver Steel, 7.5 cu. Ft. AI Smart Dial Electric Dryer with Super Speed Dry and MultiControl™ in Brushed Black, Bespoke 7.6 cu. Ft. Ultra Capacity Gas Dryer with AI Optimal Dry and Super Speed Dry

in Silver Steel, 7.5 cu. Ft. Smart Electric Dryer with Steam Sanitize+ and Sensor Dry in Ivory, Bespoke 7.6 cu. Ft. Ultra Capacity Electric Dryer with Super Speed Dry and AI Smart Dial in Silver Steel, 7.5 cu. Ft. Smart Gas Dryer with Steam Sanitize+ in White, 7.5 cu. Ft. AI Smart Dial Gas Dryer with Super Speed Dry and MultiControl™ in Brushed Black, 7.5 cu. Ft. Smart Gas Dryer with Steam Sanitize+ in Platinum, 7.5 cu. Ft. Smart Gas Dryer with Steam Sanitize+ and Sensor Dry in Brushed Black, 7.5 cu. Ft. Smart Electric Dryer with Steam Sanitize+ in Champagne, 7.4 cu. Ft. Smart Electric Dryer with Steam Sanitize+ in Brushed Black, 7.5 cu. Ft. Smart Dial Electric Dryer with FlexDry™ and Super Speed Dry in Brushed Black, 7.4 cu. Ft. Smart Electric Dryer with Steam Sanitize+ in Ivory, 7.4 cu. Ft. Smart Gas Dryer with Steam Sanitize+ in Brushed Black, 7.4 cu. Ft. Smart Electric Dryer with Steam Sanitize+ in White, 7.4 cu. Ft. Smart Gas Dryer with Steam Sanitize+ in Ivory, 7.5 cu. Ft. Smart Dial Gas Dryer with FlexDry™ and Super Speed Dry in Brushed Black, 7.4 cu. Ft. Smart Gas Dryer with Steam Sanitize+ in White, 7.4 cu. Ft. Smart Gas Dryer with Steam Sanitize+ in Champagne, 7.4 cu. Ft. Smart Electric Dryer with Steam Sanitize+ in Brushed Black, 7.4 cu. Ft. Smart Gas Dryer with Steam Sanitize+ in Brushed Black, 7.5 cu. Ft. Electric Dryer with Sensor Dry in Brushed Black, 7.5 cu. Ft. Smart Electric Dryer with Steam Sanitize+ in Brushed Black, 7.5 cu. Ft. Smart Dial Electric Dryer with Super Speed Dry in Ivory, 7.5 cu. Ft. Smart Dial Electric Dryer with Super Speed Dry in Brushed Black, 7.4 cu. Ft. Smart Electric Dryer with Steam Sanitize+ in Champagne, 7.5 cu. Ft. Smart Dial Electric Dryer with Super Speed Dry in Brushed Black, 4.0 cu. Ft. Electric Dryer with AI Smart Dial and Wi-Fi Connectivity in White; **AirDressers** including Bespoke AirDresser Grand Clothing Care System with Steam Refresh in Crystal Mirror Finish, Bespoke AirDresser Clothing Care System with Steam Refresh in Crystal Mirror Finish; **Dishwashers** including Smart Linear Wash 39dBA Dishwasher in Stainless Steel, Bespoke Smart 39dBA

Dishwasher with Linear Wash in Fingerprint Resistant Navy Steel, Smart 44dBA Dishwasher with StormWash+™ in Black Stainless Steel, Smart 44dBA Dishwasher with StormWash+™ in Stainless Steel, Smart 42dBA Dishwasher with StormWash+™ and Smart Dry in Black Stainless Steel, Smart 42dBA Dishwasher with StormWash+™ and Smart Dry in Black Stainless Steel, Jet Bot AI+ Robot Vacuum with Object Recognition, Jet Bot+ Robot Vacuum with Clean Station, Bluesky Compact Air Purifier, Bespoke Cube Air Purifier; **Microwaves and/or Microwave combinations** including 1.1 cu. ft. Smart SLIM Over-the-Range Microwave with 400 CFM Hood Ventilation, Wi-Fi & Voice Control in Black Stainless Steel, 1.1 cu. ft. Smart SLIM Over-the-Range Microwave with 550 CFM Hood Ventilation, Wi-Fi & Voice Control in Stainless Steel, Bespoke Smart 1.9 cu. ft. Over-the-Range Microwave with Sensor Cook in White Glass, 30" Smart Single Wall Oven in Stainless Steel, 30" Smart Microwave Combination Wall Oven in Stainless Steel, 30" Smart Double Wall Oven in Black Stainless Steel, 30" Smart Double Wall Oven with Flex Duo™ in Stainless Steel, 30" Smart Microwave Combination Wall Oven with Flex Duo™ in Black Stainless Steel, 30" Smart Single Wall Oven with Steam Cook in Black Stainless Steel, 30" Smart Microwave Combination Wall Oven with Steam Cook in Black Stainless Steel, 30" Smart Single Wall Oven with Flex Duo™ in Black Stainless Steel, and other Samsung devices with the ability to be a node in a SmartThings network (collectively, "the '161 Accused Products"). *See* https://www.smartthings.com/. Maxell reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the '161 Accused Products are identified to describe Samsung's infringement and in no way limit the discovery and infringement allegations against Samsung concerning other devices that incorporate the same or reasonably similar functionalities.

39. Each of the '161 Accused Products is one of a plurality of network devices connectable to a network based on being a node within the SmartThings ecosystems. *See* https://www.smartthings.com/. Further, each of the '161 Accused Products includes a peripheral device information collection unit such as network input interfaces (*e.g.*, Bluetooth or WiFi), which collects device information indicating which ones of the network devices are connected to the network while the connection to the network is established when joining or operating within a SmartThings network. Each of the '161 Accused Products also includes a peripheral device information storage unit, such as memory, which stores home network information including a chronological list of devices within the SmartThings network so that the devices can communicate with each other within the SmartThings network and can check on the status and/or health of the devices. Each of the '161 Accused Products further includes a peripheral device information transmission unit and a peripheral device information reception unit, such as WiFi circuity for communicating with various devices within the SmartThings network. Further, each of the '161 Accused Products includes a peripheral device information collation unit, such as processor or CPU, to collates stored information with information received from an additional device to determine whether the device is within the SmartThings network and to ensure that the network devices are communicating with Samsung devices that belong to the same SmartThings network. Each of the '161 Accused Products functions in a similar manner within the home network as related to the claimed language because they are required to communicate with each other using the Matter protocol. *See* https://www.smartthings.com/matter. Further, Samsung's SmartThings requirements dictates that each of the '161 Accused Products implement certain "Interaction Types," as noted below. *See* https://developer.smartthings.com/docs/devices/cloud-connected/interaction-types/ (excerpted below).

Interaction Types

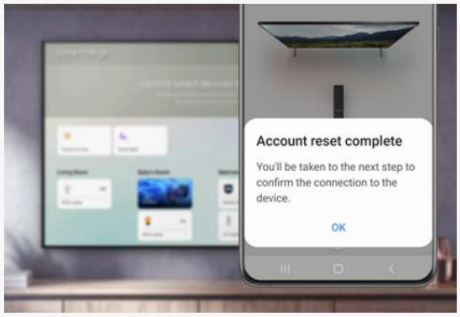
The interaction type is located in the payload `headers.interactionType`. The token context for the request is indicated in `authentication.token`.

For WWST approval, you must implement the following SmartThings interaction types:

- `discoveryRequest`: SmartThings requests a list of devices. Automatic polling occurs every ~24 hours. The Discovery request is followed by the State Refresh request.
- `stateRefreshRequest`: SmartThings requests the states of the indicated devices.
- `commandRequest`: SmartThings requests that you issue commands for the indicated devices.
- Callbacks allow your Cloud Connector to push a device's state to SmartThings:
  - Reciprocal Access Token Callbacks: Receive and refresh access tokens for use with a Callback interaction. Consists of the following interaction types:
    - `grantCallbackAccess`: Originates from SmartThings. Involved in initial token exchange.
    - `accessTokenRequest`: Originates from your Cloud Connector. Involved in initial token exchange.
    - `accessTokenResponse`: Originates from SmartThings. Involved in initial token exchange + refreshing the SmartThings token.
    - `refreshAccessTokens`: Originates from your Cloud Connector. Involved in refreshing the SmartThings token.
  - `stateCallback` is used by your Cloud Connector to update the state of a device that changed as a result of an interaction that did not originate from SmartThings.
  - `discoveryCallback` allows your Cloud Connector to perform on-demand discovery.
- `interactionResult` notifies you of where issues were found in the response on a request from SmartThings Schema.
- `integrationDeleted` notifies you when a connected service is deleted.
- Error Responses can be appended with `globalError` or `deviceError` in your interaction type response.

40. These "Interaction Types" include, for example, "discoveryRequest" that confirms that the '161 Accused Products include "a peripheral device information collection unit," "a peripheral device information storage unit," and "a peripheral device information transmission unit," because "SmartThings requests a list of devices [and a]utomatic polling occurs every ~24 hours." *Id.* Further, Samsung's SmartThings requirements also dictate that each of the '161 Accused Products also include "a peripheral device information collation unit" because "Discovery is the first SmartThings request . . . [and] this request is [handled] by retrieving a list of devices." *Id.* Further, the '161 Accused Products implement the interaction of "stateRefreshRequest" that require the devices to provide their states, which, upon information and belief, are provided after collation and confirming that the requesting device is part of the SmartThings network. Additionally each of the '161 Accused Products includes "a peripheral

device information collation unit" as evidence by SmartThings preventing from adding a device in a home network when that device is already added indicating that collation is being performed.



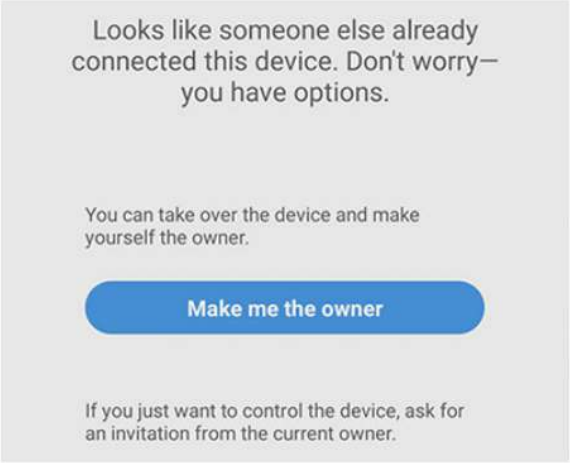
Someone already registered this device error when adding TV or projector to SmartThings

If your TV, Odyssey Ark gaming screen, or projector is still registered to an older SmartThings account or if you accidentally added it to the wrong account, you can easily reset it and transfer it. All you need to do is add the TV/projector to your new account and the SmartThings app will take care of the rest for you.

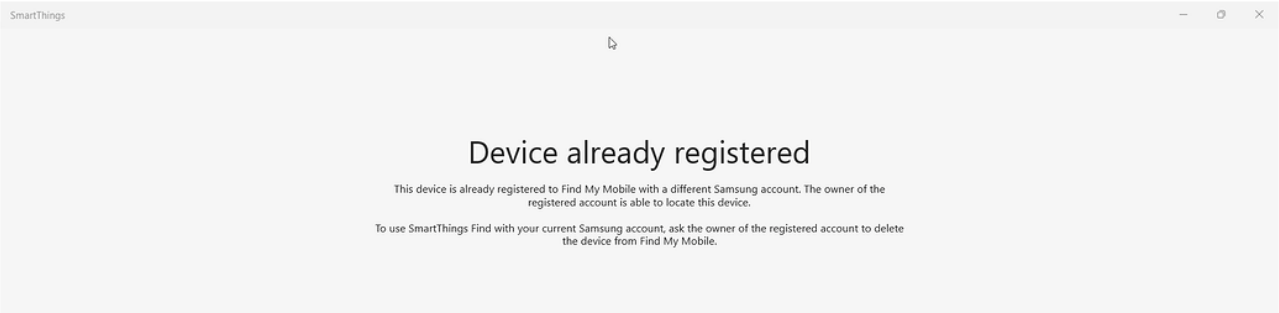
4 Make yourself the owner of the TV/projector.

Once the app detects the device, select its name. Read the information, and then tap **Make me the owner** to transfer the TV/projector to your new SmartThings account.

You may be required to allow the reset on your screen. You may also be required to enter a PIN that appears on the TV/projector. A popup message will display on your phone when the reset is complete; tap **OK**.



https://www.samsung.com/us/support/troubleshooting/TSG01201929/

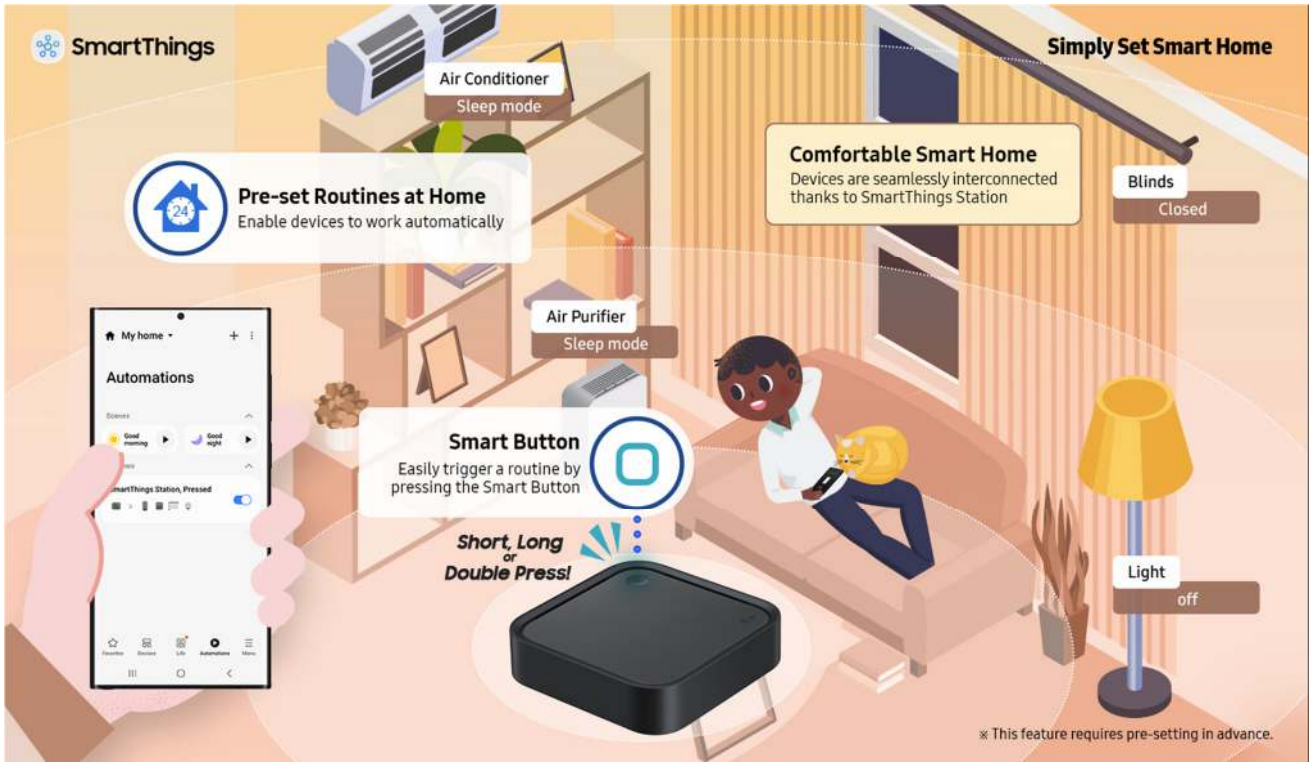


https://community.smartthings.com/t/after-factory-resetting-my-samsung-galaxy-book-flex-2a-i-cant-reactivate-find-my-device/237472

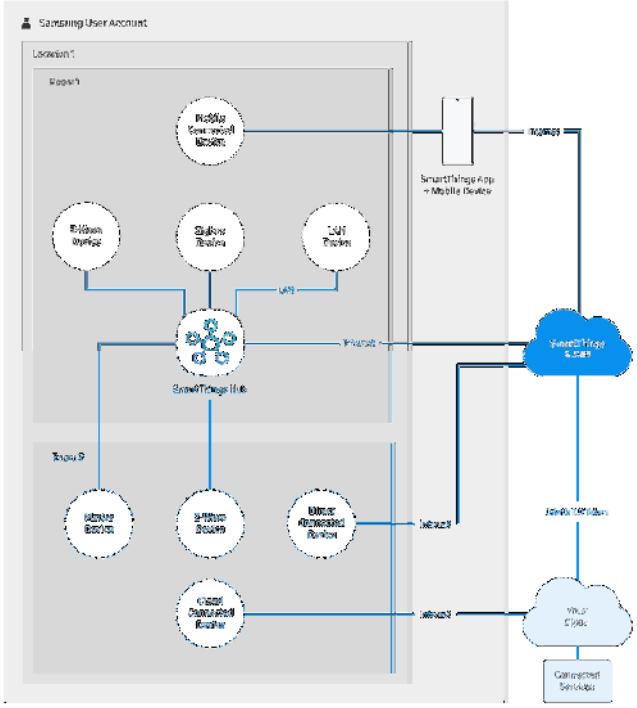
41. Similarly, the following excerpts from Samsung's websites provides non-limiting examples of the '161 Accused Products infringing at least claim 3 of the '161 Patent:

https://www.samsung.com/us/home-appliances/smartthings/

https://www.samsung.com/us/smartthings/

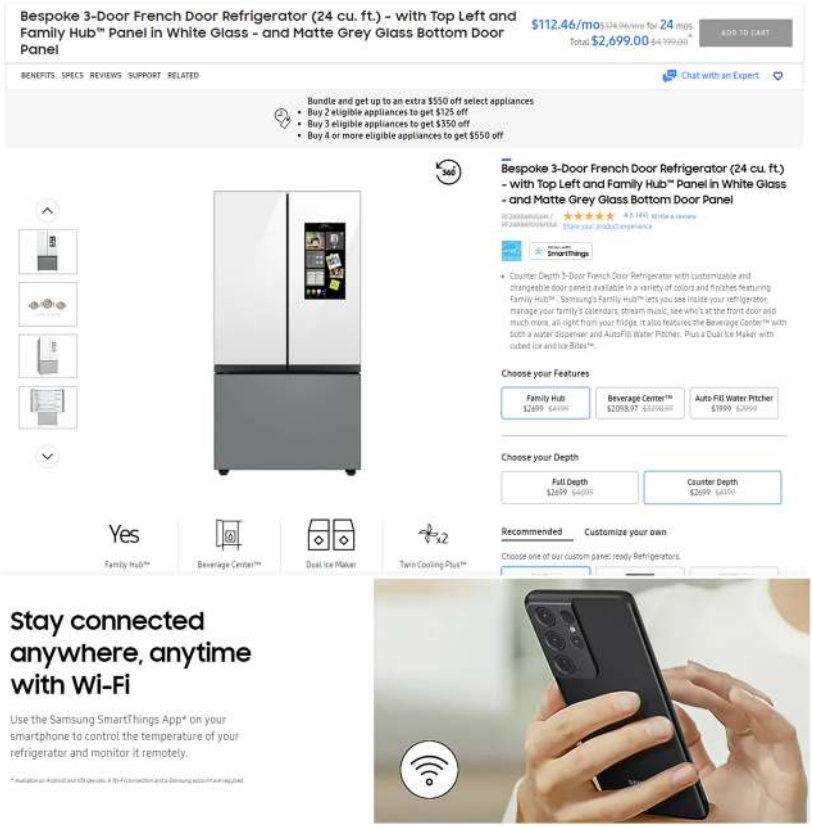


https://news.samsung.com/us/samsung-unveils-smartthings-station-making-smarter-homes-accessible-ces-2023/?utm_source=twitter&utm_medium=usnews&utm_campaign=ces



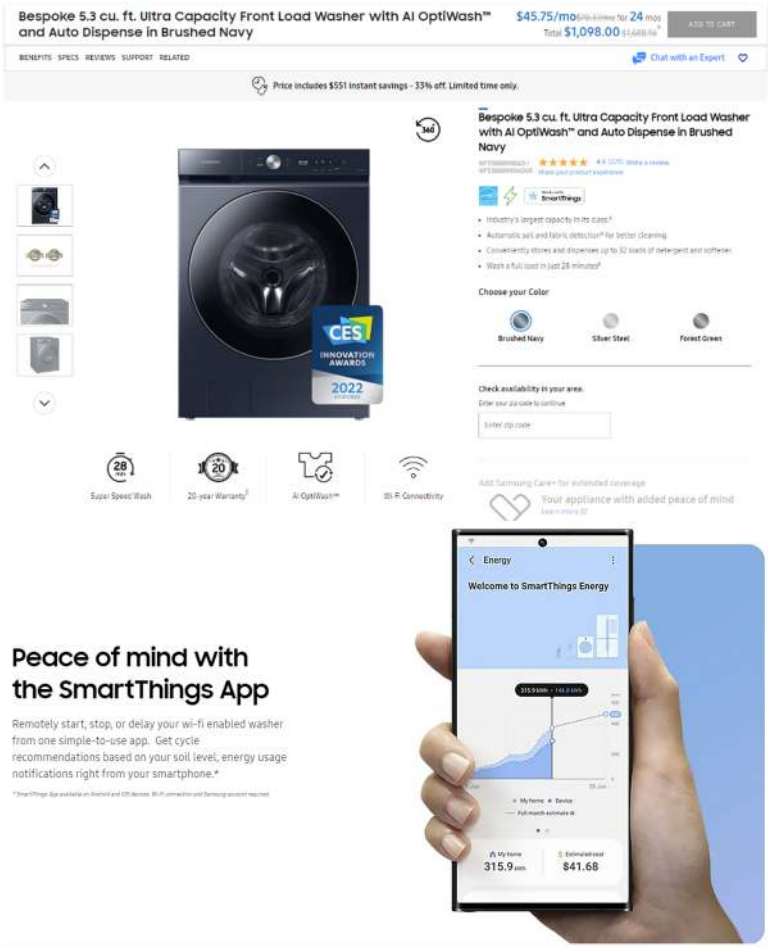
https://developer.smartthings.com/docs/getting-started/architecture-of-smartthings/

https://www.samsung.com/us/computing/monitors/smart-monitors/32-m80c-smart-monitor-4k-uhd-with-streaming-tv-usb-c-ergonomic-stand-and-slimfit-camera-ls32cm80bunxza/#benefits

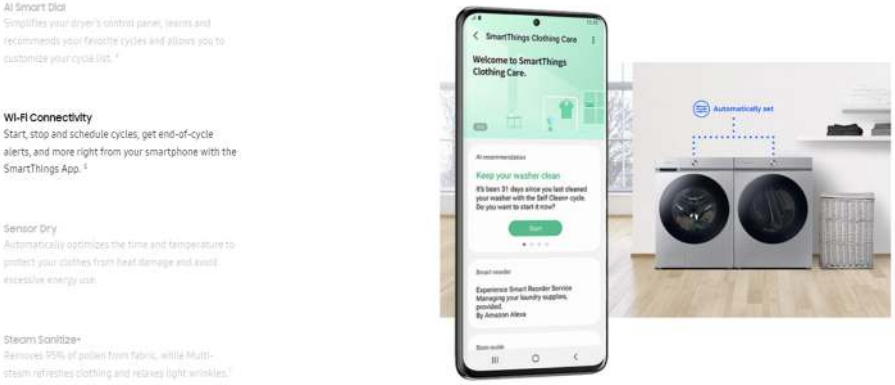


https://www.samsung.com/us/home-appliances/refrigerators/bespoke/bespoke-3-door-french-door-refrigerator-24-cu-ft-with-top-left-and-family-hub-panel-in-white-glass-and-matte-grey-glass-bottom-door-panel-rf24bb69006maa/

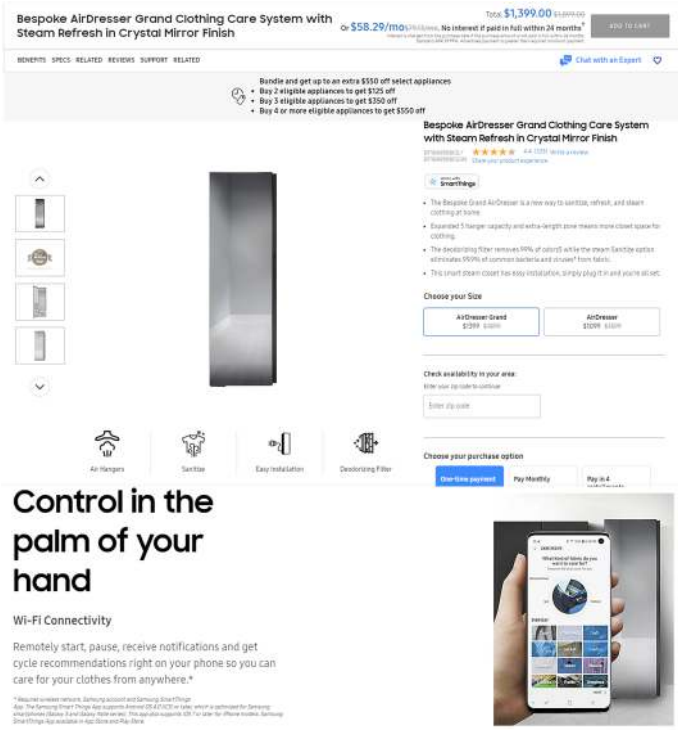
https://www.samsung.com/us/home-appliances/ranges/gas/6-0-cu-ft-front-control-slide-in-gas-range-with-smart-dial-air-fry-wi-fi-in-tuscan-stainless-steel-nx60t8711st-aa/



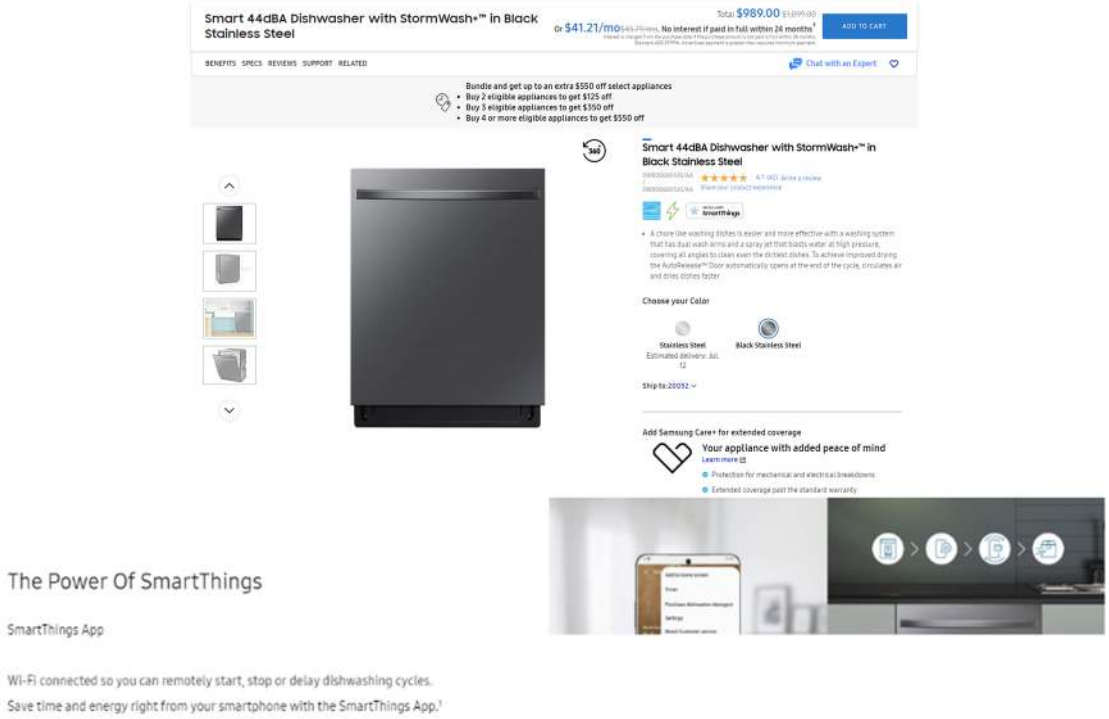
https://www.samsung.com/us/home-appliances/washers/bespoke/bespoke-5-3-cu-ft-ultra-capacity-front-load-washer-with-ai-optiwash-and-auto-dispense-in-brushed-navy-wf53bb8900adus/



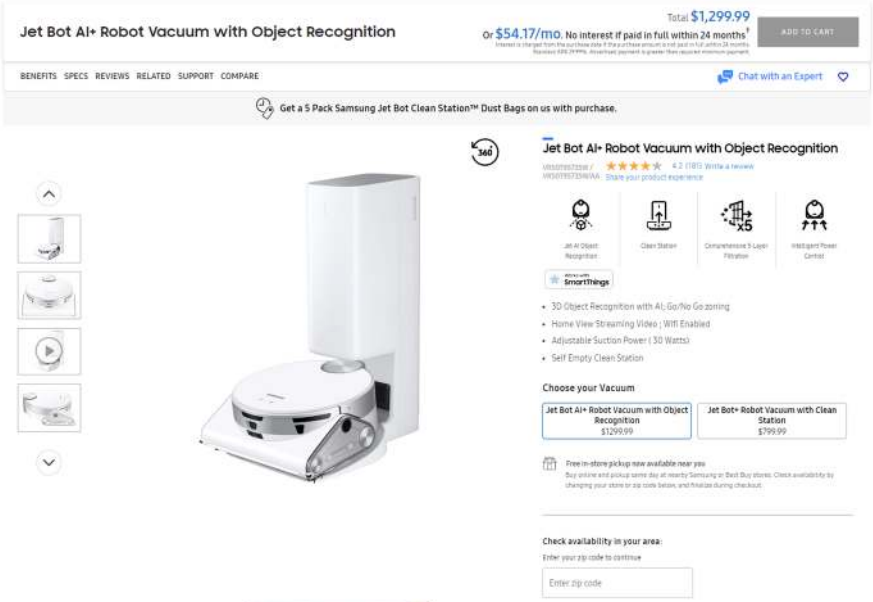
https://www.samsung.com/us/home-appliances/dryers/gas/bespoke-7-6-cu-ft-ultra-capacity-gas-dryer-with-super-speed-dry-and-ai-smart-dial-in-silver-steel-dvg53bb8700ta3/

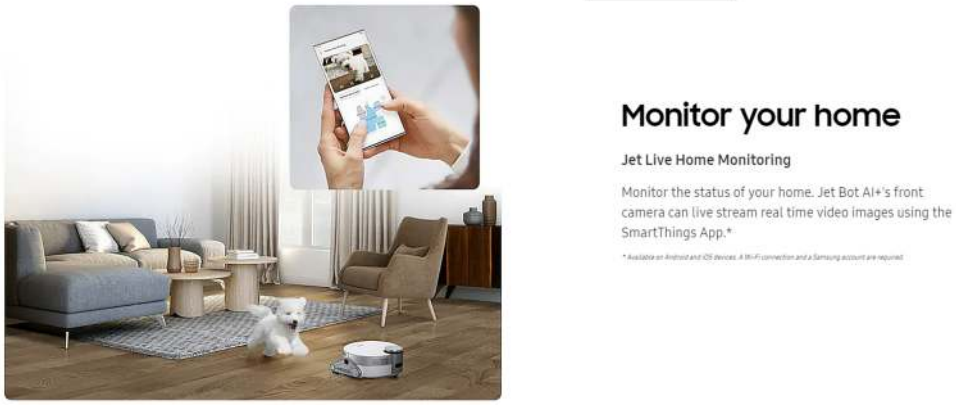


https://www.samsung.com/us/home-appliances/air-dresser/air-dresser/airdresser-grand-clothing-care-system-with-steam-refresh-and-sanitize-in-mirror-finish-df10a9500cg-a1/

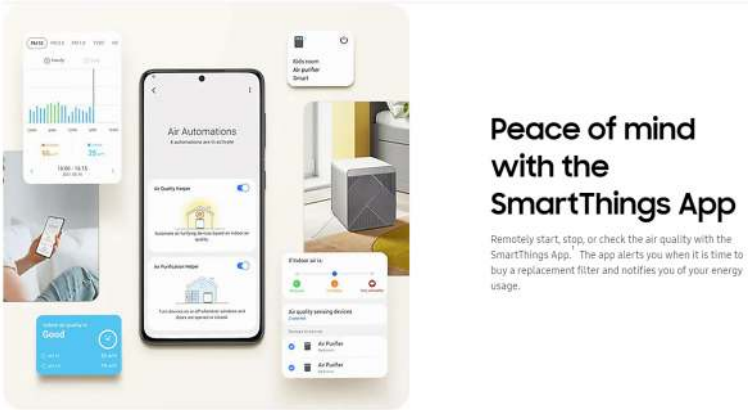


https://www.samsung.com/us/home-appliances/dishwashers/rotary/smart-44dba-dishwasher-with-stormwash-in-black-stainless-steel-dw80b6061ug-aa/

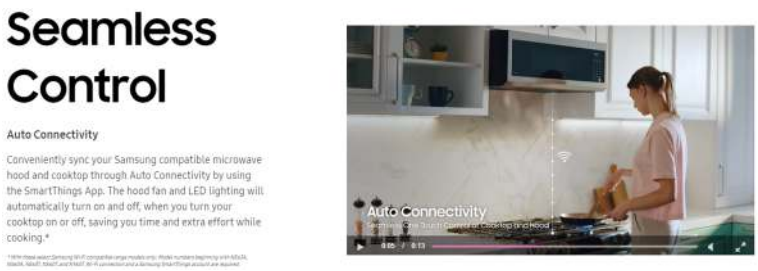




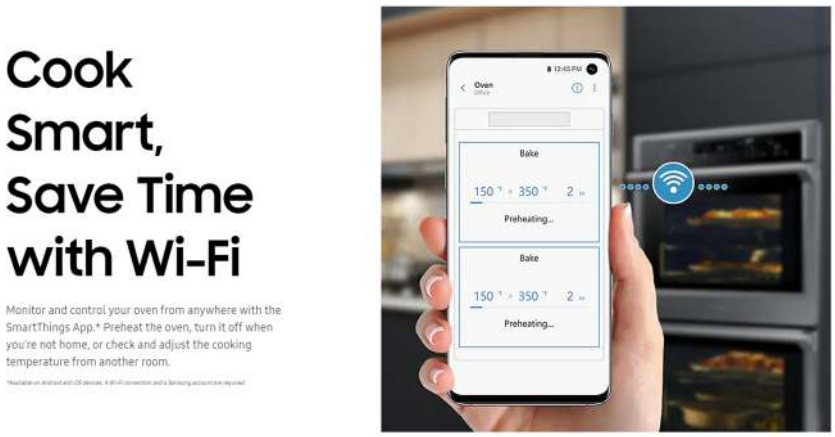
https://www.samsung.com/us/home-appliances/vacuums/jet-bot-robot/jet-bot-ai-plus-robot-vacuum-with-object-recognition-vr50t95735w-aa/



https://www.samsung.com/us/home-appliances/air-purifiers/cube-air-purifier/bespoke-air-purifier-in-grey-ax350a9350g-aa/



https://www.samsung.com/us/home-appliances/microwaves/over-the-range/1-1-cu--ft--smart-slim-over-the-range-microwave-with-550-cfm-hood-ventilation--wi-fi---voice-control-in-stainless-steel-me11a7710ds-aa/



https://www.samsung.com/us/home-appliances/wall-ovens/microwave-combination-oven/30-microwave-combination-wall-oven-in-stainless-steel-nq70t5511ds-aa/

42. The foregoing features and capabilities of the ’161 Accused Products and Samsung’s description and/or demonstration thereof, including in user manuals and advertising, reflect Samsung’s direct infringement by satisfying every element of at least claim 3 of the ’161 Patent, under 35 U.S.C. § 271(a).

43. Samsung has indirectly infringed at least claim 3 of the ’161 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use, offering for sale, selling, or importation of at least the ’161 Accused Products. Samsung’s customers who purchase devices and components thereof and operate such devices and components in accordance with Samsung’s instructions directly infringe one or more claims of the ’161 Patent in violation of 35 U.S.C. § 271. Samsung instructs its customers through at least user guides or websites, such as those located at:

https://downloadcenter.samsung.com/content/UM/202302/20230207045923682/SAM_S911_S916_S918_EN_UM_OS13_020223_FINAL.pdf, https://downloadcenter.samsung.com/content/UM/202204/20220413011651769/SAM_X700_X800_X808_X900_EN_UM_OS12_012422_FINAL_AC.pdf, and https://www.samsung.com/us/smartthings/.

44. For example, as shown above Samsung instructs its customers to ”Build a smart home to uplift your everyday,” “Be kind to the planet and your wallet by automating your energy and appliances,” “Check the front door from your fridges, sofa, wherever,” “Monitor your home, inside and out, all from your TV or tablet,” “Use the SmartThings App* on your smartphone to control the temperature of your refrigerator and monitor it remotely,” “Monitor your cooktop and adjust cook time and temperature of your oven right from your smartphone through the SmartThings™ App,” “Remotely start, stop, or delay your wi-fi enabled washer from one simple-to-use app,” “Start, stop and schedule cycles, get end-of-cycle alerts, and more right from your smartphone with the SmartThings App.” *See* https://www.samsung.com/us/smartthings/, *see also* https://www.samsung.com/us/computing/monitors/smart-monitors/32-m80c-smart-monitor-4k-uhd-with-streaming-tv-usb-c-ergonomic-stand-and-slimfit-camera-ls32cm80bunxza/#benefits, https://www.samsung.com/us/home-appliances/refrigerators/bespoke/bespoke-3-door-french-door-refrigerator-24-cu-ft-with-top-left-and-family-hub-panel-in-white-glass-and-matte-grey-glass-bottom-door-panel-rf24bb69006maa/, https://www.samsung.com/us/home-appliances/ranges/gas/6-0-cu-ft-front-control-slide-in-gas-range-with-smart-dial-air-fry-wi-fi-in-tuscan-stainless-steel-nx60t8711st-aa/, https://www.samsung.com/us/home-appliances/washers/bespoke/bespoke-5-3-cu-ft-ultra-capacity-front-load-washer-with-ai-optiwash-and-auto-dispense-in-brushed-navy-wf53bb8900adus/,

https://www.samsung.com/us/home-appliances/dryers/gas/bespoke-7-6-cu-ft-ultra-capacity-gas-dryer-with-super-speed-dry-and-ai-smart-dial-in-silver-steel-dvg53bb8700ta3/, https://www.samsung.com/us/home-appliances/air-dresser/air-dresser/airdresser-grand-clothing-care-system-with-steam-refresh-and-sanitize-in-mirror-finish-df10a9500cg-a1/, https://www.samsung.com/us/home-appliances/dishwashers/rotary/smart-44dba-dishwasher-with-stormwash-in-black-stainless-steel-dw80b6061ug-aa/, https://www.samsung.com/us/home-appliances/vacuums/jet-bot-robot/jet-bot-ai-plus-robot-vacuum-with-object-recognition-vr50t95735w-aa/, https://www.samsung.com/us/home-appliances/air-purifiers/cube-air-purifier/bespoke-air-purifier-in-grey-ax350a9350g-aa/, https://www.samsung.com/us/home-appliances/microwaves/over-the-range/1-1-cu--ft--smart-slim-over-the-range-microwave-with-550-cfm-hood-ventilation--wi-fi---voice-control-in-stainless-steel-me11a7710ds-aa/, https://www.samsung.com/us/home-appliances/wall-ovens/microwave-combination-oven/30-microwave-combination-wall-oven-in-stainless-steel-nq70t5511ds-aa/.

45. Samsung is thereby liable for infringement of the ’161 Patent pursuant to 35 U.S.C. § 271(b).

46. Samsung has indirectly infringed at least claim 3 of the ’161 Patent, by, among other things, contributing to the direct infringement of others, including customers of the ’161 Accused Products by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the ’161 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

47. For example, the ’161 Accused Products include hardware and software for implementing SmartThings home networks. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Samsung is liable for infringement of the ’161 Patent pursuant to 35 U.S.C. § 271(c).

48. Samsung has been on notice of the ’161 Patent since, at least, July 7, 2021, based on correspondence directed to Mr. Injung Lee at SEC’s Intellectual Property Center from Mr. Tatsuya Yamamoto, General Manager, IP Innovation Business Unit, Maxell, Ltd. *See* Letter from T. Yamamoto to I. Lee dated July 7, 2021 (Exhibit 2). That correspondence set forth Maxell’s belief that Samsung makes, uses, sells, offers to sell, or imports products that infringe certain of Maxell’s patents, and specifically identified the ’161 Patent as well as exemplary claims and exemplary accused products for that patent including SmartThings network. By the time of trial, Samsung will thus have known and intended (since receiving such notice), that its continued actions would actively induce and contribute to actual infringement of at least claim 3 of the ’161 Patent.

49. Samsung undertook and continued its infringing actions despite an objectively high likelihood that such activities infringed the ’161 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least July 7, 2021, Samsung has been aware of an objectively high likelihood that its actions constituted and continue to constitute infringement of the ’161 Patent, and that the ’161 Patent is valid. On information and belief, Samsung could not reasonably, subjectively believe that its actions do not constitute infringement of the ’161 Patent, nor could it reasonably, subjectively believe that the patent is invalid. Despite that knowledge and

subjective belief, and the objectively high likelihood that its actions constitute infringement, Samsung continued its infringing activities. As such, Samsung has willfully infringed and continues to willfully infringe the ’161 Patent.

50. Maxell has been and continues to be damaged by Samsung’s infringement of the ’161 Patent.

COUNT 2 - INFRINGEMENT OF U.S. PATENT NO. 8,982,086

51. Maxell incorporates paragraphs 1-50 above by reference.

52. U.S. Patent No. 8,982,086 (the “’086 Patent,” attached hereto as Exhibit 3) duly issued on March 17, 2015 and is entitled *Information Processing Apparatus*.

53. Maxell is the owner by assignment of the ’086 Patent and possesses all rights under the ’086 Patent, including the exclusive right to recover for past and future infringement.

54. The ’086 Patent was subject to an *ex parte reexamination* No. 90/014,638, filed December 23, 2020, on behalf of third-party requester Apple Inc. On September 28, 2021, the USPTO completed the reexamination and issued an *ex parte reexamination* certificate (attached hereto as Exhibit 4) confirming the patentability and validity of the ’086 Patent.

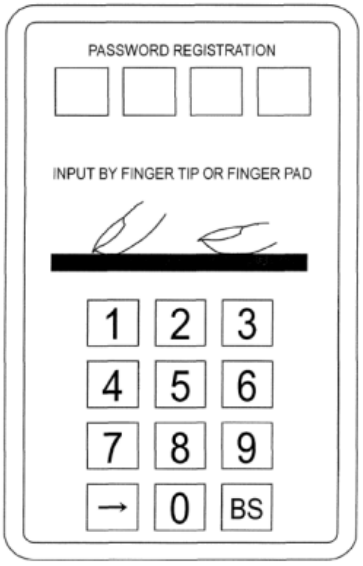
55. Altogether, four USPTO Examiners—Primary Examiner Michael Fargalla, Primary Examiner Robert L Nasser, Primary Examiner Joshua D Campbell, and Supervisory Patent Examiner Alexander J Kosowski—have confirmed the validity of the ’086 Patent’s claims.

56. The ’086 Patent discloses techniques for unlocking information processing devices, such as smartphones, with convenience. For example, prior to the ’086 Patent, one way of unlocking devices was by inputting a passcode that was preset by a user. This process would be time consuming and would require the user to memorize the passcode. Further, if the user has multiple devices he or she would need to memorize different passcodes or have the same passcode

on all of the devices but increase the risk of the security breach of all the devices if another user learnt of the passcode.

57. The ’086 Patent allowed users to conveniently execute an unlock operation on their devices by using the tip or pad of their fingers as shown below in Figure 11A of the ’086 Patent:

FIG. 11A



58. Further, the ’086 Patent also allows users to associate specific operations with their fingertip and finger pad such that when a user uses his or her fingertip the device recognizes that the user is entering an input via the fingertip and executes a corresponding operation. This is further shown in Figure 12B of the ’086 Patent:

FIG. 12B

DIGIT		1	2	3	4	OPERATION
PASSWORD		0	5	2	8	—
INPUT METHOD	1	FINGER TIP	FINGER PAD	FINGER PAD	FINGER PAD	WAITING SCREEN
	2	FINGER TIP	FINGER TIP	FINGER TIP	FINGER TIP	MAIL CREATING SCREEN
	3	FINGER PAD	FINGER TIP	FINGER PAD	FINGER TIP	APPLICATION STARTING

59. Samsung has directly infringed one or more claims of the ’086 Patent in this District and elsewhere in Texas, including at least claim 1, literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling its consumer electronic devices, including at least Samsung products having materially similar functionality while implementing fingerprint unlock using Samsung smartphones, tablets, and laptops.

60. For example, Samsung has literally and/or under the doctrine of equivalents directly infringed at least claim 1 of the ’086 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling at least the following: **smartphones** including Galaxy A Quantum, Galaxy A03s, Galaxy A04s, Galaxy A10s, Galaxy A11, Galaxy A12, Galaxy A12s (aka Nacho), Galaxy A13, Galaxy A13 5G, Galaxy A14, Galaxy A14 5G, Galaxy A20, Galaxy A20e, Galaxy A20s, Galaxy A21, Galaxy A21s, Galaxy A22, Galaxy A22s 5G, Galaxy A23, Galaxy A23 5G, Galaxy A24 4G, Galaxy A30, Galaxy A30s, Galaxy A32, Galaxy A32 5G, Galaxy A33 5G, Galaxy A34, Galaxy A40, Galaxy A42 5G, Galaxy A50, Galaxy A50s, Galaxy A51, Galaxy A51 5G, Galaxy A51 5G UW, Galaxy A52, Galaxy A52 5G, Galaxy A53 5G, Galaxy A54, Galaxy A60, Galaxy A70, Galaxy A70s, Galaxy A71, Galaxy A71 5G, Galaxy A71 5G UW, Galaxy A72, Galaxy A73 5G, Galaxy A8, Galaxy 8+, Galaxy A80, Galaxy A90 5G, Galaxy Fold, Galaxy Fold 5G, Galaxy Note10, Galaxy Note10 5G, Galaxy Note10 Lite, Galaxy Note10+, Galaxy Note10+ 5G, Galaxy Note20, Galaxy Note20 5G, Galaxy Note20 Ultra, Galaxy Note20 Ultra 5G, Galaxy Note9, Galaxy S10, Galaxy S10 5G, Galaxy S10 Lite, Galaxy S10+, Galaxy S10e, Galaxy S20, Galaxy S20 5G, Galaxy S205G UW, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 Ultra, Galaxy S20 Ultra 5G, Galaxy S20+, Galaxy S20+ 5G, Galaxy S21 5G, Galaxy S21 FE 5G, Galaxy S21 Ultra 5G, Galaxy S21+ 5G, Galaxy S22 5G, Galaxy S22 Ultra 5G, Galaxy S22+ 5G, Galaxy S23, Galaxy S23 Ultra, Galaxy S23+, Galaxy S9, Galaxy S9+,

Galaxy Xcover FieldPro, Galaxy Xcover Pro, Galaxy Xcover6 Pro, Galaxy Z Flip, Galaxy Z Flip 5G, Galaxy Z Flip3 5G, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Fold2 5G, Galaxy Z Fold3 5G, Galaxy Z Fold4, Galaxy Z Fold5; t**ablets** including Galaxy Tab Active Pro, Galaxy Tab Active3, Galaxy Tab Active4 Pro, Galaxy Tab S5e, Galaxy Tab S6, Galaxy Tab S6 5G, Galaxy Tab S7, Galaxy Tab S7+, Galaxy Tab S8, Galaxy Tab S8 Ultra, Galaxy Tab S8+, Galaxy Tab S9, Galaxy Tab S9 Ultra, Galaxy Tab S9+; **laptops** including Galaxy Book2 360, 13", Intel Core i5, 256GB, Galaxy Book2 360, 13", Intel Core i7, 512GB, Galaxy Book2 Pro 360, 13", Intel Core i7, 256GB, Galaxy Book2 Pro 360, 13", Intel Core i7, 512GB, Galaxy Book2 Pro 360, 15", Intel Core i7, 1TB, Galaxy Book2 Pro 360, 15", Intel Core i7, 512GB, Galaxy Book2 Pro, 13", Intel Core i5, 256GB, Galaxy Book2 Pro, 13", Intel Core i7, 512GB, Galaxy Book2 Pro, 15", Intel Core i5, 512 GB, Galaxy Book2 Pro, 15", Intel Core i7, 512GB, Galaxy Book2 Pro, 15", Intel Core i7, Intel ARC Discrete Graphics, 1TB, Galaxy Book3 360, 13", Intel Core i7, 512GB, Galaxy Book3 360, 15", Intel Core i7, 512GB, Galaxy Book3 Pro 360, 16", Intel Core i7, 1TB, Galaxy Book3 Pro, 14", Intel Core i7, 512 GB, Galaxy Book3 Pro, 16" Intel Core i7, 1TB, Galaxy Book3 Ultra, 16" Intel Core i7, 1TB, Galaxy Book3 Ultra, 16" Intel Core i9, 1TB, and Galaxy Book3, 15", Intel Core i7, 512GB; and other Samsung devices with the ability to perform fingerprint unlock secured by Samsung Knox or Windows Hello (collectively, "the '086 Accused Products"). *See* https://www.samsung.com/us/support/answer/ANS00082563/; *see also* https://www.samsung.com/us/support/answer/ANS00062951/. Maxell reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the '086 Accused Products are identified to describe Samsung's infringement and in no way limit the discovery and infringement allegations against Samsung concerning other devices that incorporate the same or reasonably similar functionalities.

61. The ’086 Accused Products include a processor and software confirming that they include an information processing apparatus. Further, each of the ’086 Accused Products includes a touch panel, for example, a fingerprint sensor, configured to detect a contact of a finger of a user. Each of the ’086 Accused Products also include a detector configured to detect information, such as a user’s fingerprint, to identify the user when the contact is detected between the touch panel and the finger of the user. Further, each of the ’086 Accused Products include a memory that is configured to store information relating to the identification of the user. Each of the ’086 Accused further include a first controller configured to control the information processing apparatus to operate into two operating modes (*e.g.*, CPU) and another controller (*e.g.*, Samsung Knox) configured to execute a specified process when the information of the detected user and the information stored in the memory are coincident within one of the modes. Further, each of the ’086 Accused Products implement two registering modes to provide input from different portions of the finger during registration.

62. For example, the following excerpts from Samsung’s websites provides non-limiting examples of the ’086 Accused Products infringing at least claim 1 of the ’086 Patent:

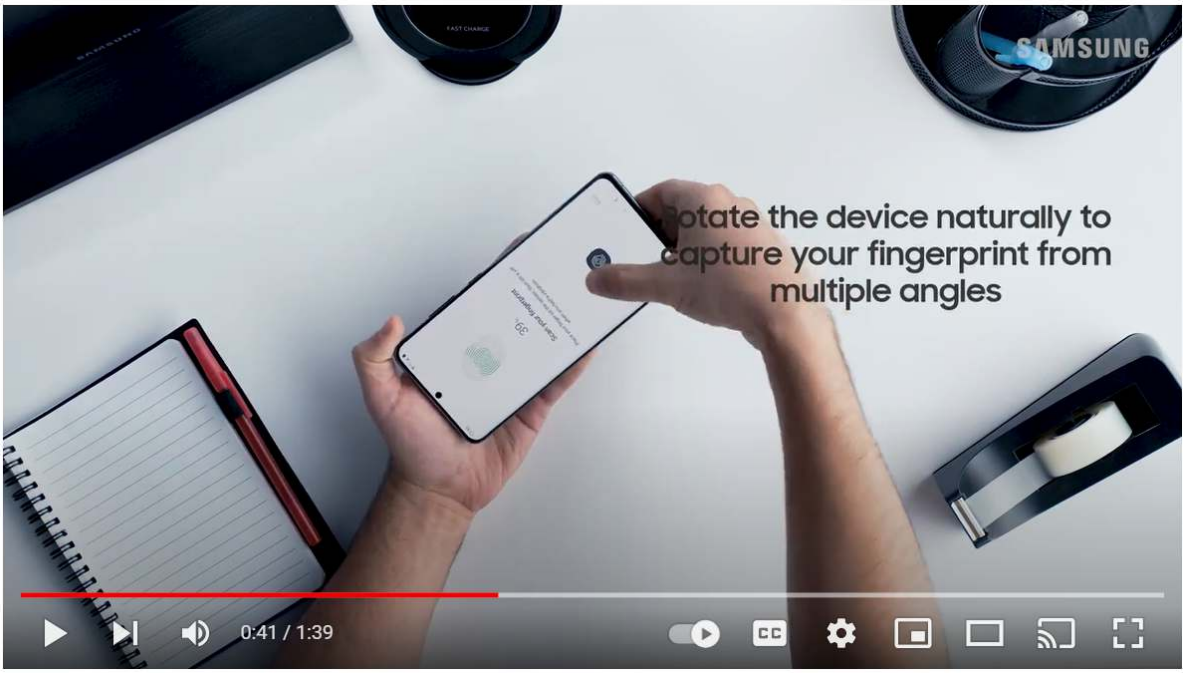
Use the fingerprint sensor on your Galaxy phone or tablet

No one in the world is quite like you, and no two fingerprints are exactly the same. That’s why fingerprint security on Galaxy phones and tablets is so dependable. However, using the fingerprint scanner may be a little different based on which type of device you have.

https://www.samsung.com/us/support/answer/ANS00082563/

1. Navigate to **Settings**, then tap **Security and privacy**, and then tap **Biometrics**. Tap **Fingerprints**.
2. Enter your lock screen credentials. If you do not have a screen lock set up, you may be prompted to create one at this point. When you're ready, read the information, and then tap **Continue**.
3. Use the on-screen prompts to register your fingerprint. When registering your fingerprint, make sure to fully cover the fingerprint sensor with your finger to prevent strong light from entering the fingerprint sensor. When you're finished, tap **Done**.
4. Next, make sure that the **switch** next to Fingerprint unlock is turned on.

https://www.samsung.com/us/support/answer/ANS00082563/



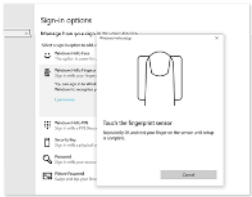
https://www.youtube.com/watch?v=gBAaLezosQE&t=17s ("Samsung Care" Channel)

Set up a lock screen on your Galaxy Book

Create a fingerprint password

Your Galaxy Book 2, Galaxy Book S, Galaxy Book Pro, or Galaxy Book Pro 360 all include a fingerprint sensor, which can be used to sign into your account. This extra layer of security will ensure that only you can access your device. On the Galaxy Book 2, the fingerprint sensor is located on the back of the PC in the upper left-hand corner. On the Galaxy Book S, Galaxy Book Pro, and Galaxy Book Pro 360, it's located on the Power button.

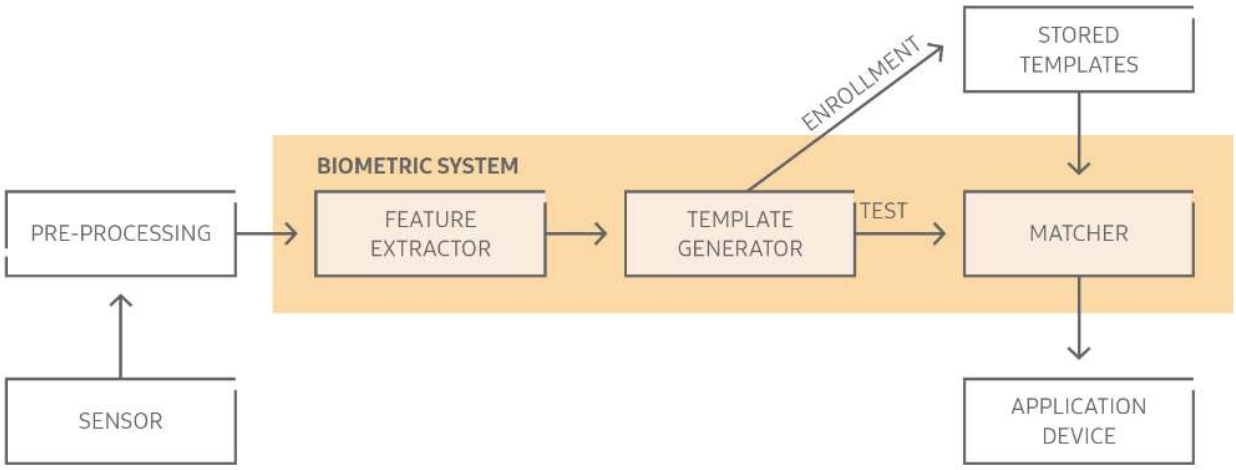
1. Select the **Start** icon, select **Settings**, and then select **Accounts**.
2. Select **Sign-in options**, select **Windows Hello Fingerprint**, and then select **Set up**.
3. Select **Get Started**, and then press your finger on the fingerprint sensor. Follow the prompts to set up your fingerprint.
4. If prompted, create or enter your login information to finish the setup. Or, you can select **Add another finger** to use more than one fingerprint when signing in.



CONTACT

https://www.samsung.com/us/support/answer/ANS00062951/

Unique advantages of Knox Biometrics



The Knox Platform provides the following in addition to standard Android capabilities:

- **Secure storage** — On Samsung devices, the authentication software doesn't share or distribute the biometric measurements of any user. The measurements are stored in a format that can't be used to reproduce the original biometric, and can only be accessed and decoded within the specific part of the TrustZone that has access to the biometric hardware. Biometrics are used only on the correct device and by the correct user. This functionality means there is a lower chance of someone spoofing biometrics credentials to access a device.

https://docs.samsungknox.com/admin/whitepaper/kpe/biometric-authentication.htm

63. The foregoing features and capabilities of the ’086 Accused Products and Samsung’s description and/or demonstration thereof, including in user manuals and advertising, reflect Samsung’s direct infringement by satisfying every element of at least claim 1 of the ’086 Patent, under 35 U.S.C. § 271(a).

64. Samsung has indirectly infringed at least claim 1 of the ’086 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use, offering for sale, selling, or importation of at least the ’086 Accused Products. Samsung’s customers who purchase devices and components thereof and operate such devices and components in accordance with Samsung’s instructions directly infringe one or more claims of the ’086 Patent in violation of

35 U.S.C. § 271. Samsung instructs its customers through at least user guides or websites, such as those located at:

https://downloadcenter.samsung.com/content/UM/202302/20230207045923682/SAM_S911_S916_S918_EN_UM_OS13_020223_FINAL.pdf, https://downloadcenter.samsung.com/content/UM/202204/20220413011651769/SAM_X700_X800_X808_X900_EN_UM_OS12_012422_FINAL_AC.pdf, and https://www.samsung.com/us/support/answer/ANS00082563/

65. For example, as shown above Samsung instructs its customers to "Use the fingerprint sensor on your Galaxy phone or tablet," "Set up and use fingerprint unlock," "Set up a lock screen on your Galaxy Book," "Record up to 4 fingerprints for faster recognition." *See* https://www.samsung.com/us/support/answer/ANS00082563/; *see also* https://www.youtube.com/watch?v=gBAaLezosQE&t=17s ("Samsung Care" Channel); https://www.samsung.com/us/support/answer/ANS00062951/;https://docs.samsungknox.com/admin/whitepaper/kpe/biometric-authentication.htm.

66. Samsung is thereby liable for infringement of the '086 Patent pursuant to 35 U.S.C. § 271(b).

67. Samsung has indirectly infringed at least claim 1 of the '086 Patent, by, among other things, contributing to the direct infringement of others, including customers of the '086 Accused Products by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the '086 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

68. For example, the ’086 Accused Products include hardware and software for implementing Fingerprint unlock as secured by Samsung Knox. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, such components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Samsung is liable for infringement of the ’086 Patent pursuant to 35 U.S.C. § 271(c).

69. Samsung has been on notice of the ’086 Patent since, at least, July 7, 2021, based on correspondence directed to Mr. I. Lee of SEC from Mr. T. Yamamoto of Maxell. *See* Letter from T. Yamamoto to I. Lee dated July 7, 2021 (Exhibit 2). Samsung was further provided notice of the successful reexamination of the ’086 Patent in follow-up correspondence directed to Mr. Daejin Jeon of SEC’s IP Center from Mr. T. Hirabayashi of Maxell, dated December 29, 2021 (Exhibit 5). This correspondence set forth Maxell’s belief that Samsung makes, uses, sells, offers to sell, or imports products that infringe certain of Maxell’s patents, and specifically identified the ’086 Patent as well as exemplary claims and exemplary accused products for that patent. By the time of trial, Samsung will thus have known and intended (since receiving such notice), that its continued actions would actively induce and contribute to actual infringement of at least claim 1 of the ’086 Patent.

70. Samsung undertook and continued its infringing actions despite an objectively high likelihood that such activities infringed the ’086 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least July 7, 2021, Samsung has been aware of an objectively high likelihood that its actions constituted and continue to constitute infringement of the ’086 Patent, and that the ’086 Patent is valid. On information and belief, Samsung could not reasonably, subjectively believe that its actions do not constitute infringement of the ’086 Patent,

nor could it reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that its actions constitute infringement, Samsung continued its infringing activities. As such, Samsung has willfully infringed and continues to willfully infringe the ’086 Patent.

71. Maxell has been and continues to be damaged by Samsung’s infringement of the ’086 Patent.

COUNT 3 - INFRINGEMENT OF U.S. PATENT NO. 10,176,848

72. Maxell incorporates paragraphs 1-71 above by reference.

73. U.S. Patent No. 10,176,848 (the “’848 Patent,” attached hereto as Exhibit 6) duly issued on January 8, 2019 and is entitled *Recording And Reproducing Apparatus And Method Thereof*.

74. Maxell is the owner by assignment of the ’848 Patent and possesses all rights under the ’848 Patent, including the exclusive right to recover for past and future infringement.

75. The ’848 Patent was subject to an *ex parte reexamination* No. 90/014,641, filed December 23, 2020, on behalf of third party requester Apple Inc. On March 18, 2022, the USPTO completed the reexamination and issued an *ex parte reexamination* certificate (attached hereto as Exhibit 7) confirming the patentability and validity of certain claims of the ’848 Patent.

76. Altogether, four USPTO Examiners—Primary Examiner Thai Q Tran, Assistant Examiner Syed Hasan, Primary Examiner B. James Peikari, and Supervisory Patent Examiner Alexander J Kosowski—have confirmed the validity of certain claims of the ’848 Patent.

77. The ’848 Patent is directed to a recording and reproducing apparatus that makes it easier for a user to navigate through a large number of recorded images and videos. For example, prior to the ’848 Patent, recording and reproducing apparatuses like smartphones and laptops were

being used to record a large number of videos and pictures. In order to make it easier for a user to find recorded content, conventional techniques generated a list of thumbnails corresponding to each recorded content, giving the user a type of "preview" of the recorded content. But as the volume of recorded content increased it became difficult to identify a specific picture or video simply by looking through thumbnails.

78. The '848 Patent discloses techniques that enable a user to identify and search through recorded content more efficiently and effectively. For example, the '848 Patent discloses executing a face recognizing process on the recorded pictures and allows a user to register pictures of a specific person in an organized manner. Further, the '848 Patent also discloses techniques whereby once a picture of a specific person is registered, future pictures of the same person will continue to be categorized and associated with the previously identified pictures of that person. Further, the '848 Patent also discloses displaying thumbnails corresponding to recorded images with an icon having predetermined shape when an importance level is set for a specific recorded image. The '848 Patent also discloses recording video information including a plurality of sections corresponding to a plurality of thumbnails and displaying the thumbnails. This manner of recording and reproducing images and video information allows users of the recording and reproducing apparatus to navigate and search through pictures and video in a more manageable and efficient manner.

79. Samsung has directly infringed one or more claims of the '848 Patent in this District and elsewhere in Texas, including at least claim 84 literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling its consumer electronic devices, including at least Samsung products having materially similar functionality

while implementing various picture and video recording and editing functions within the "Gallery" application in Samsung smartphones and tablets.

80. For example, Samsung has literally and/or under the doctrine of equivalents directly infringed at least claim 84 of the '848 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling at least the following: **smartphones** including Galaxy A04e, Galaxy A04s, Galaxy A13, Galaxy A14, Galaxy A14 5G, Galaxy A23, Galaxy A23 5G, Galaxy A23, Galaxy A23 5G, Galaxy A24 4G, Galaxy A33 5G, Galaxy A34, Galaxy A53 5G, Galaxy A54, Galaxy A73 5G, Galaxy S23, Galaxy S23 Ultra, Galaxy S23+, Galaxy XCover6 Pro, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Fold4, Galaxy Z Fold5; **tablets** including Galaxy Tab A7 10.4 (2022), Galaxy Tab Active4 Pro, Galaxy Tab S6 Lite (2022), Galaxy Tab S8, Galaxy Tab S8 Ultra, Galaxy Tab S8+, Galaxy Tab S9, Galaxy Tab S9 Ultra, Galaxy Tab S9+; and other Samsung devices with the ability to perform various picture and video recording and editing functions within Samsung's "Gallery" application (collectively, "the '848 Accused Products"). *See* https://www.samsung.com/us/support/answer/ANS00079026/; *see also* https://www.samsung.com/us/apps/one-ui/features/; https://www.samsung.com/uk/support/mobile-devices/how-to-use-samsung-video-editor/. Maxell reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the '848 Accused Products are identified to describe Samsung's infringement and in no way limit the discovery and infringement allegations against Samsung concerning other devices that incorporate the same or reasonably similar functionalities.

81. The '848 Accused Products each include a processor, a display, multiple cameras, memory, an analog/digital converter, a codec, a touch panel, and Samsung Gallery application

confirming that they include a recording and reproducing apparatus that records pictures and videos in an organized manner. Further, each of the ’848 Accused Products executes a face-recognition process and includes a Samsung Gallery application that registers albums for specific person based on the face-recognition. Each of the ’848 Accused Products further includes a Samsung Gallery application that generates thumbnails corresponding to recorded images and a display that displays the thumbnails with a predetermined shape when an importance level is set for a recorded image via a user interface (*e.g.*, via selecting Favorites in the Samsung Gallery application). Further, each of the ’848 Accused Products includes a video camera for providing video image data corresponding to a face and a display for displaying the image data with a frame surrounding at least a portion of the face when the face is detected in the video image data. Each of the ’848 Accused Products further includes a video camera that automatically sets a plurality of sections corresponding to video information, generates thumbnails corresponding to the plurality of sections, and the display displays the plurality of thumbnails. Each of the ’848 Accused Products further includes a display that displays images of faces without displaying all of the background objects including in the contents of such images.

82. For example, the following excerpts from Samsung’s websites provides non-limiting examples of the ’848 Accused Products infringing at least claim 84 of the ’848 Patent:

Use the Gallery app on your Galaxy phone or tablet

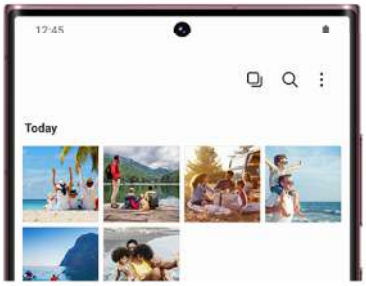
Leave that bulky photo album at home and use your **phone** or **tablet** instead to relive all those precious memories. With the Gallery app, you can view, edit, and manage your pictures, videos, and albums right on your Galaxy device.

https://www.samsung.com/us/support/answer/ANS00079026/

View and edit pictures and videos

If you spent an hour trying to take that perfect selfie or video, you can look back at your hard work by viewing it in Gallery. You can also edit your image or video using **different filters, effects, and styles**!

1. Navigate to and open **Gallery**, and then tap the **Pictures** tab. To search for a specific picture or video, tap the **Search** icon in the upper right corner. You can search by its tag, album name, or other details.

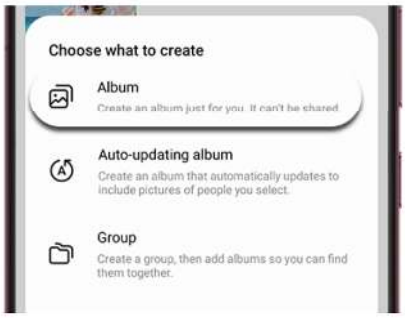


https://www.samsung.com/us/support/answer/ANS00079026/

Create albums

With so many photos and videos, your Gallery can get a little disorganized. Just create an album to get rid of the clutter.

1. From **Gallery**, tap the **Albums** tab, and then tap **Add** (the plus sign). You can select from the following album types:



- **Album:** Create a standard album.
- **Auto-updating album:** Create an album that will automatically update to include pictures of people that you select.

https://www.samsung.com/us/support/answer/ANS00079026/

How to use Samsung Video editor

Last Update date : May 19, 2023

What can I do with Samsung Video editor?

To edit your video, follow these steps.

Step 1. Open **Gallery app.**

Step 2. Tap to select a video to edit.

Step 3. Tap **Edit icon.**

https://www.samsung.com/levant/support/mobile-devices/how-to-use-samsung-video-editor/

Remove unwanted parts or shorten a video.

Step 1. Tap **Trim icon.**

Step 2. Use the white slider bars at the bottom of the screen to select when the video begins or ends.

https://www.samsung.com/levant/support/mobile-devices/how-to-use-samsung-video-editor/

How to select and view only the albums you want to see in Galaxy gallery

Last Update date : Jan 13. 2023

Photos saved on the phone are automatically added and displayed in the Gallery app. The select albums to show feature lets you view only the albums you want. This is supported in Android 13 or higher.

How to select albums to show

Step 1. Tap **Gallery**.

Step 2. Tap "Albums".

Step 3. Tap **More options icon**.

Step 4. Tap "Select albums to show".

Step 5. Tap to select any albums you wish to show in the gallery and tap "Done" when you have finished selecting.

Step 6. Now you can the view the selected albums in Gallery.

https://www.samsung.com/sg/support/mobile-devices/how-to-select-and-view-only-the-albums-you-want-to-see-in-galaxy-gallery/

83. The foregoing features and capabilities of the '848 Accused Products and Samsung's description and/or demonstration thereof, including in user manuals and advertising, reflect Samsung's direct infringement by satisfying every element of at least claim 84 of the '848 Patent, under 35 U.S.C. § 271(a).

84. Samsung has indirectly infringed at least claim 84 of the '848 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use, offering for sale, selling, or importation of at least the '848 Accused Products. Samsung's customers who purchase devices and components thereof and operate such devices and components in accordance with Samsung's instructions directly infringe one or more claims of the '848 Patent in violation of 35 U.S.C. § 271. Samsung instructs its customers through at least user guides or websites, such as those located at:

https://downloadcenter.samsung.com/content/UM/202302/20230207045923682/SAM_S911_S916_S918_EN_UM_OS13_020223_FINAL.pdf,

https://downloadcenter.samsung.com/content/UM/202204/20220413011651769/SAM_X700_X800_X808_X900_EN_UM_OS12_012422_FINAL_AC.pdf,

https://www.samsung.com/levant/support/mobile-devices/how-to-use-samsung-video-editor/,

and https://www.samsung.com/us/support/answer/ANS00079026/.

85. For example, as shown above Samsung instructs its customers to "Use the Gallery app on your Galaxy phone or tablet," "View and edit pictures and videos," "Create an album that will automatically update to include pictures of people that you select," "Tap to select a video to edit," "How to select and view only the albums you want to see in Galaxy gallery." *See* https://www.samsung.com/us/support/answer/ANS00079026/; *see also* https://www.samsung.com/levant/support/mobile-devices/how-to-use-samsung-video-editor/;

https://www.samsung.com/sg/support/mobile-devices/how-to-select-and-view-only-the-albums-you-want-to-see-in-galaxy-gallery/.

86. Samsung is thereby liable for infringement of the ’848 Patent pursuant to 35 U.S.C. § 271(b).

87. Samsung has indirectly infringed at least claim 84 of the ’848 Patent, by, among other things, contributing to the direct infringement of others, including customers of the ’848 Accused Products by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the ’848 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

88. For example, the ’848 Accused Products each includes hardware and software for implementing picture and video recording, displaying, and editing functions by Samsung Gallery. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Samsung is liable for infringement of the ’848 Patent pursuant to 35 U.S.C. § 271(c).

89. Samsung has been on notice of the ’848 Patent since, at least, July 7, 2021, based on correspondence directed to Mr. I. Lee of SEC from Mr. T. Yamamoto of Maxell. *See* Letter from T. Yamamoto to I. Lee dated July 7, 2021. *See* Exhibit 2. Samsung was further provided notice of the successful reexamination of the ’848 Patent in follow-up correspondence directed to Mr. D. Jeon from Mr. T. Hirabayashi, dated December 29, 2021. *See* Exhibit 5. This

correspondence set forth Maxell's belief that Samsung makes, uses, sells, offers to sell, or imports products that infringe certain of Maxell's patents, and specifically identified the '848 Patent as well as exemplary claims and exemplary accused products for that patent. By the time of trial, Samsung will thus have known and intended (since receiving such notice), that its continued actions would actively induce and contribute to actual infringement of at least claim 84 of the '848 Patent.

90. Samsung undertook and continued its infringing actions despite an objectively high likelihood that such activities infringed the '848 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least July 7, 2021, Samsung has been aware of an objectively high likelihood that its actions constituted and continue to constitute infringement of the '848 Patent, and that the '848 Patent is valid. On information and belief, Samsung could not reasonably, subjectively believe that its actions do not constitute infringement of the '848 Patent, nor could it reasonably, subjectively believe that the '848 Patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that its actions constitute infringement, Samsung continued its infringing activities. As such, Samsung has willfully infringed and continues to willfully infringe the '848 Patent.

91. Maxell has been and continues to be damaged by Samsung's infringement of the '848 Patent.

COUNT 4 - INFRINGEMENT OF U.S. PATENT NO. 11,223,757

92. Maxell incorporates paragraphs 1-91 above by reference.

93. U.S. Patent No. 11,223,757 (the "'757 Patent," attached hereto at Exhibit 8) duly issued on January 11, 2022 and is entitled *Video Recording Device And Camera Function Control Program*.

94. Maxell is the owner by assignment of the ’757 Patent and possesses all rights under the ’757 Patent, including the exclusive right to recover for past and future infringement.

95. Some estimates indicate that there are 92 million “selfies” being taken on a daily basis. The ’757 Patent is directed to providing an apparatus with improved techniques to capturing these images. In particular, the ’757 Patent is directed to an image recording device configured to execute a plurality of different photographing processes using multiple cameras and a touch interface. Specifically, the ’757 Patent discloses an apparatus with an “audio input interface,” “a touch display,” “a first camera arranged on a same side of the touch display,” “a second camera arranged on an opposite side of the touch display, “a recorder,” and “a controller” such that these components work in conjunction to implement a plurality of different photographing processes including taking pictures based on voice input and touch input including after elapse of a first standby time and a second standby time, to allow a user with time to compose themselves to before the camera to capture a perfect photo.

96. Samsung has directly infringed one or more claims of the ’757 Patent in this District and elsewhere in Texas, including at least claim 1 literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling its consumer electronic devices, including at least Samsung products having materially similar functionality while implementing multiple cameras, a touch screen, the “Gallery” application, the “Camera” application, and its voice assistant “Bixby” in Samsung smartphones and tablets. For example, Samsung has literally and/or under the doctrine of equivalents directly infringed at least claim 1 of the ’757 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling at least the following: **smartphones** including Galaxy A Quantum, Galaxy A03s, Galaxy A04s, Galaxy A10s, Galaxy A11, Galaxy A12, Galaxy A12s (aka Nacho),

Galaxy A13, Galaxy A13 5G, Galaxy A14, Galaxy A14 5G, Galaxy A20, Galaxy A20e, Galaxy A20s, Galaxy A21, Galaxy A21s, Galaxy A22, Galaxy A22s 5G, Galaxy A23, Galaxy A23 5G, Galaxy A24 4G, Galaxy A30, Galaxy A30s, Galaxy A32, Galaxy A32 5G, Galaxy A33 5G, Galaxy A34, Galaxy A40, Galaxy A42 5G, Galaxy A50, Galaxy A50s, Galaxy A51, Galaxy A51 5G, Galaxy A51 5G UW, Galaxy A52, Galaxy A52 5G, Galaxy A53 5G, Galaxy A54, Galaxy A60, Galaxy A70, Galaxy A70s, Galaxy A71, Galaxy A71 5G, Galaxy A71 5G UW, Galaxy A72, Galaxy A73 5G, Galaxy A8, Galaxy 8+, Galaxy A80, Galaxy A90 5G, Galaxy Fold, Galaxy Fold 5G, Galaxy Note10, Galaxy Note10 5G, Galaxy Note10 Lite, Galaxy Note10+, Galaxy Note10+ 5G, Galaxy Note20, Galaxy Note20 5G, Galaxy Note20 Ultra, Galaxy Note20 Ultra 5G, Galaxy Note9, Galaxy S10, Galaxy S10 5G, Galaxy S10 Lite, Galaxy S10+, Galaxy S10e, Galaxy S20, Galaxy S20 5G, Galaxy S205G UW, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 Ultra, Galaxy S20 Ultra 5G, Galaxy S20+, Galaxy S20+ 5G, Galaxy S21 5G, Galaxy S21 FE 5G, Galaxy S21 Ultra 5G, Galaxy S21+ 5G, Galaxy S22 5G, Galaxy S22 Ultra 5G, Galaxy S22+ 5G, Galaxy S23, Galaxy S23 Ultra, Galaxy S23+, Galaxy S9, Galaxy S9+, Galaxy Xcover FieldPro, Galaxy Xcover Pro, Galaxy Xcover6 Pro, Galaxy Z Flip, Galaxy Z Flip 5G, Galaxy Z Flip3 5G, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Fold2 5G, Galaxy Z Fold3 5G, Galaxy Z Fold4, Galaxy Z Fold5; **tablets** including Galaxy Tab Active Pro, Galaxy Tab Active3, Galaxy Tab Active4 Pro, Galaxy Tab S5e, Galaxy Tab S6, Galaxy Tab S6 5G, Galaxy Tab S7, Galaxy Tab S7+, Galaxy Tab S8, Galaxy Tab S8 Ultra, Galaxy Tab S8+, Galaxy Tab S9, Galaxy Tab S9 Ultra, Galaxy Tab S9+; and other Samsung devices with the multiple cameras and Samsung's Gallery and Bixby applications (collectively, "the '757 Accused Products"). *See* https://www.samsung.com/us/support/answer/ANS00079026/; *see also* https://www.samsung.com/us/support/answer/ANS00089063/;

https://www.samsung.com/us/apps/bixby/. Maxell reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the '757 Accused Products are identified to describe Samsung's infringement and in no way limit the discovery and infringement allegations against Samsung concerning other devices that incorporate the same or reasonably similar functionalities.

97. Each of the '757 Accused Products include an audio input interface such as a microphone to recognize commands via Bixby. Further, each of the '757 Accused Products include a touch display and multiple cameras with the Samsung Camera application such that the cameras and the Samsung Camera application can be operated based on a user providing an audio command via Bixby or a touch command via the touch display. In addition, each of the '757 Accused Products also include a recorder to record the images captured in response to the voice or touch instructions and a controller that coordinates the functions of Bixby and the Camera applications such that the pictures are recorded based on a first standby time and a second standby time.

98. For example, the following excerpts from Samsung's websites provides non-limiting examples of the '757 Accused Products infringing at least claim 1 of the '757 Patent:

Camera modes and settings on Galaxy phones and tablets

The cameras on **Galaxy phones** and **tablets** come with a variety of shooting modes and camera settings that make it easy to capture and add flair to your pictures and videos. AR Doodle, Super slow-mo, Director's view, and Portrait mode are just a few of the things the camera has to offer. You can take things a step further by adjusting the camera's available settings, such as changing the video size or adding grid lines.

Selfies

- Use wide angle for group selfies: Automatically switches to wide-angle when there are two or more people in the selfie.
- Save selfies as previewed: Save selfies as they appear in the preview without flipping them.
- Selfie color tones: Set the color tone for your selfies to Natural or Bright.

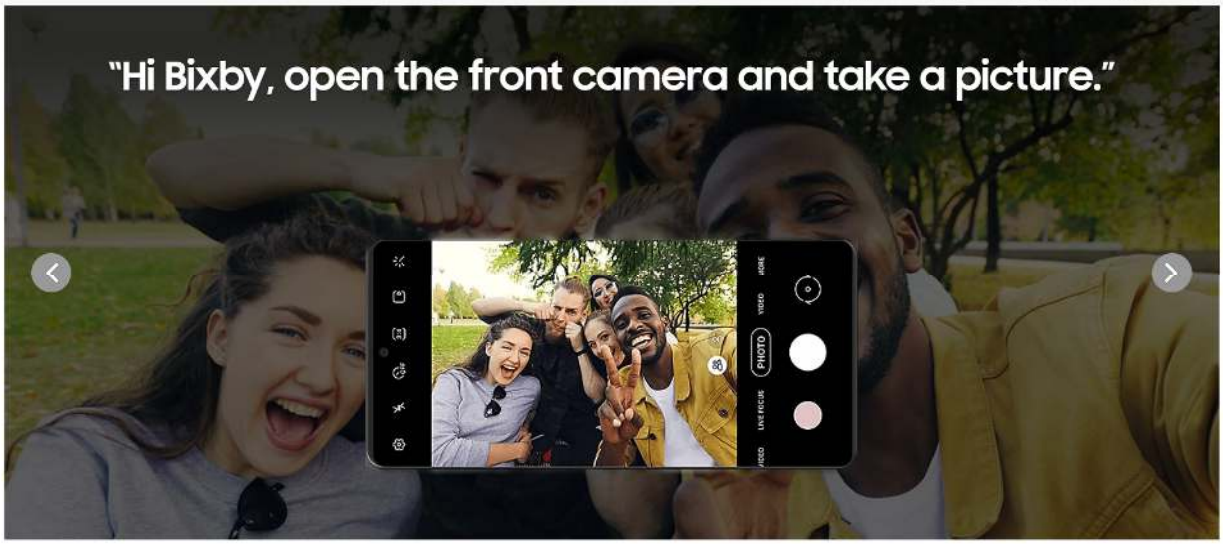
- **Voice commands:** Take pictures by saying certain key words.

https://www.samsung.com/us/support/answer/ANS00089063/

Use the Gallery app on your Galaxy phone or tablet

Leave that bulky photo album at home and use your **phone** or **tablet** instead to relive all those precious memories. With the Gallery app, you can view, edit, and manage your pictures, videos, and albums right on your Galaxy device.

https://www.samsung.com/us/support/answer/ANS00079026/



https://www.samsung.com/us/apps/bixby/

"Timer shot"

Open the camera

Set camera timer to ten seconds

Take a picture

https://www.samsung.com/us/apps/bixby/

99. The foregoing features and capabilities of the ’757 Accused Products and Samsung’s description and/or demonstration thereof, including in user manuals and advertising, reflect Samsung’s direct infringement by satisfying every element of at least claim 1 of the ’757 Patent, under 35 U.S.C. § 271(a).

100. Samsung has indirectly infringed at least claim 1 of the ’757 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use, offering for sale, selling, or importation of at least the ’757 Accused Products. Samsung’s customers who purchase devices and components thereof and operate such devices and components in accordance with Samsung’s instructions directly infringe one or more claims of the ’757 Patent in violation of 35 U.S.C. § 271. Samsung instructs its customers through at least user guides or websites, such as those located at:

https://downloadcenter.samsung.com/content/UM/202302/20230207045923682/SAM_S911_S916_S918_EN_UM_OS13_020223_FINAL.pdf, https://downloadcenter.samsung.com/content/UM/202204/20220413011651769/SAM_X700_X800_X808_X900_EN_UM_OS12_012422_FINAL_AC.pdf, https://www.samsung.com/us/support/answer/ANS00089063/, and https://www.samsung.com/us/apps/bixby/.

101. For example, as shown above, Samsung instructs its customers to "Take photos and allow the camera to determine the ideal settings for pictures," "Use wide angle for group selfies," "Take pictures by saying certain key words," "Tap to select a video to edit," "Do more with Bixby," "Hi Bixby, take a selfie," "Hi Bixby, open the front camera and take a picture," "Timer shot." *See* https://www.samsung.com/us/support/answer/ANS00089063/; *see also* https://www.samsung.com/us/apps/bixby/.

102. Samsung is thereby liable for infringement of the '757 Patent pursuant to 35 U.S.C. § 271(b).

103. Samsung has indirectly infringed at least claim 1 of the '757 Patent, by, among other things, contributing to the direct infringement of others, including customers of the '757 Accused Products by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the '757 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

104. For example, the '757 Accused Products include hardware and software for implementing picture recording, voice and touch photo capture, Bixby, and picture recording

functions by Samsung Camera application. These are components of a patented machine, manufacture, combination, or apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Samsung is liable for infringement of the ’757 Patent pursuant to 35 U.S.C. § 271(c).

105. Samsung has been on notice of the ’757 Patent since, at least, December 29, 2021, based on correspondence directed to Mr. D. Jeon from Mr. T. Hirabayashi. *See* Exhibit 5. This correspondence set forth Maxell’s belief that Samsung makes, uses, sells, offers to sell, or imports products that infringe certain of Maxell’s patents, and specifically identified the allowed patent application that issued as the ’757 Patent as well as exemplary allowed claims and exemplary accused products for that patent. By the time of trial, Samsung will thus have known and intended (since receiving such notice), that its continued actions would actively induce and contribute to actual infringement of at least claim 1 of the ’757 Patent.

106. Samsung undertook and continued its infringing actions despite an objectively high likelihood that such activities infringed the ’757 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least December 29, 2021, Samsung has been aware of an objectively high likelihood that its actions constituted and continue to constitute infringement of the ’757 Patent, and that the ’757 Patent is valid. On information and belief, Samsung could not reasonably, subjectively believe that its actions do not constitute infringement of the ’757 Patent, nor could it reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that its actions constitute infringement, Samsung continued its infringing activities. As such, Samsung has willfully infringed and continues to willfully infringe the ’757 Patent.

107. Maxell has been and continues to be damaged by Samsung's infringement of the '757 Patent.

COUNT 5 - INFRINGEMENT OF U.S. PATENT NO. 11,017,815

108. Maxell incorporates paragraphs 1-107 above by reference.

109. U.S. Patent No. 11,017,815 (the "'815 Patent," attached hereto at Exhibit 9) duly issued on May 25, 2021 and is entitled *Editing Method And Recording And Reproducing Device*.

110. Maxell is the owner by assignment of the '815 Patent and possesses all rights under the '815 Patent, including the exclusive right to recover for past and future infringement.

111. The '815 Patent is directed to an information processing apparatus, and related methods, that manages digital data and reproduce video content associated with user profiles in a specific manner that enables improved video management, storage, and the presentation of groups of video information. In conventional video information management systems at the time, attention was not paid to scenarios where a plurality of users desire to generate, select, and manage favorite play list(s) of video information. For example, techniques did not exist for a user of such systems to select some arbitrary play lists from among a plurality of play lists and manage them at the device. The claims of the '815 Patent solved this problem by providing a recording and reproducing device in which the user can select and manage arbitrary play lists in a particular manner using hierarchical levels of information management. Since the play lists are subject to unified management, it becomes possible for the user to arbitrarily alter the display sequence of play lists. This is true even in the case where a plurality of users share a single recording medium, each user can manage favorite reproduction contents. Therefore, each user can manage favorite reproduction contents, resulting in improved usage of these systems.

112. More specifically, the claimed inventions are directed to a hierarchical management interface with different areas and classifications associated with different user information, association, and/or behavior. For example, one of the claimed inventions contains "first area" and a "second area." The first area includes a "first character" associated with a "first group" of video information for a "first classification" and a "second character" that is associated with a "second group" of video information for a "second classification." The second area displays a first or second group of thumbnails configured upon user selection of the first and second characters. Both groups of video information are stored as part of the plurality of stored video information, and the first group of video information is configured to allow a user to edit. Finally, when one video information is deleted from the first group it continues to be included in the second group and a thumbnail corresponding to the video information is displayed as one of the second group of thumbnails. The inventions disclosed in the '815 Patent are directed to improving the usability and manageability of recording and reproducing video information by providing specific user interfaces with various areas and characters that allow a user to manage the recorded video content. Even in the case where a plurality of users share a single recording medium, each user can manage the storage and reproduction of their video content without effecting the recorded data of another user.

113. Samsung has directly infringed one or more claims of the '815 Patent in this District and elsewhere in Texas, including at least claims 1-8 literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling its consumer electronic devices, including at least Samsung products having materially similar functionality while implementing a Samsung Quick Share to receive video data, a recording medium to record the received video data, a display and a processor that all work in conjunction to provide specific

user interfaces in Samsung's Gallery application to manage storage of various video information in a hierarchical manner in Albums and/or "My Files," allowing a user to remove video content from one location without effecting the content from another location, and allowing a user to playback selected video content in a sequence based on manipulation of thumbnails.

114. For example, Samsung has literally and/or under the doctrine of equivalents directly infringed at least claims 1-8 of the '815 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling at least the following: **smartphones** including Galaxy A Quantum, Galaxy A03s, Galaxy A04s, Galaxy A10s, Galaxy A11, Galaxy A12, Galaxy A12s (aka Nacho), Galaxy A13, Galaxy A13 5G, Galaxy A14, Galaxy A14 5G, Galaxy A20, Galaxy A20e, Galaxy A20s, Galaxy A21, Galaxy A21s, Galaxy A22, Galaxy A22s 5G, Galaxy A23, Galaxy A23 5G, Galaxy A24 4G, Galaxy A30, Galaxy A30s, Galaxy A32, Galaxy A32 5G, Galaxy A33 5G, Galaxy A34, Galaxy A40, Galaxy A42 5G, Galaxy A50, Galaxy A50s, Galaxy A51, Galaxy A51 5G, Galaxy A51 5G UW, Galaxy A52, Galaxy A52 5G, Galaxy A53 5G, Galaxy A54, Galaxy A60, Galaxy A70, Galaxy A70s, Galaxy A71, Galaxy A71 5G, Galaxy A71 5G UW, Galaxy A72, Galaxy A73 5G, Galaxy A8, Galaxy 8+, Galaxy A80, Galaxy A90 5G, Galaxy Fold, Galaxy Fold 5G, Galaxy Note10, Galaxy Note10 5G, Galaxy Note10 Lite, Galaxy Note10+, Galaxy Note10+ 5G, Galaxy Note20, Galaxy Note20 5G, Galaxy Note20 Ultra, Galaxy Note20 Ultra 5G, Galaxy Note9, Galaxy S10, Galaxy S10 5G, Galaxy S10 Lite, Galaxy S10+, Galaxy S10e, Galaxy S20, Galaxy S20 5G, Galaxy S205G UW, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 Ultra, Galaxy S20 Ultra 5G, Galaxy S20+, Galaxy S20+ 5G, Galaxy S21 5G, Galaxy S21 FE 5G, Galaxy S21 Ultra 5G, Galaxy S21+ 5G, Galaxy S22 5G, Galaxy S22 Ultra 5G, Galaxy S22+ 5G, Galaxy S23, Galaxy S23 Ultra, Galaxy S23+, Galaxy S9, Galaxy S9+, Galaxy Xcover FieldPro, Galaxy Xcover Pro, Galaxy Xcover6 Pro, Galaxy Z Flip, Galaxy Z Flip

5G, Galaxy Z Flip3 5G, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Fold2 5G, Galaxy Z Fold3 5G, Galaxy Z Fold4, Galaxy Z Fold5; **tablets** including Galaxy Tab Active Pro, Galaxy Tab Active3, Galaxy Tab Active4 Pro, Galaxy Tab S5e, Galaxy Tab S6, Galaxy Tab S6 5G, Galaxy Tab S7, Galaxy Tab S7+, Galaxy Tab S8, Galaxy Tab S8 Ultra, Galaxy Tab S8+, Galaxy Tab S9, Galaxy Tab S9 Ultra, Galaxy Tab S9+; and other Samsung devices with Samsung Quick Share and Samsung's Gallery application (collectively, "the '815 Accused Products"). *See* https://www.samsung.com/ph/support/mobile-devices/how-to-use-quickshare-feature-on-galaxy-mobile-device/; https://www.samsung.com/us/support/answer/ANS00076845/; https://www.youtube.com/watch?v=8tSWKaAeUQg ("Samsung Care" channel); https://www.samsung.com/us/support/answer/ANS00079026/. Maxell reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the '815 Accused Products are identified to describe Samsung's infringement and in no way limit the discovery and infringement allegations against Samsung concerning other devices that incorporate the same or reasonably similar functionalities.

115. Each of the '815 Accused Products include a network interface such as a Wi-Fi chipset to receive video information via Samsung Quick Share. Further, each of the '815 Accused Products include a recording medium to record video information, a display, and a processor that work in conjunction to display specific user interfaces for the Samsung Gallery application to improve the performance and usability of Samsung's Gallery application's recording and management of video information including video information that is associated with a user profile and that is favorited by a user in Samsung's Gallery application.

116. For example, the following excerpts from Samsung's websites provides non-limiting examples of the '815 Accused Products infringing at least claims 1-8 of the '815 Patent:

How to use Quick Share feature on Galaxy device

Last Update date : Jul 15. 2022

Quick Share is a new sharing service for sending photos, videos, and files with your friends and family. is available on previous Galaxy series when upgraded to Android 10. File sharing has never been so easy on a Galaxy.

Before you try the recommendations below, be sure to check if your device's software and related apps are updated to the latest version. To update your mobile device's software, follow these steps:

Step 1. Go to **Settings > Software update.**

Step 2. Tap on **Download and install.**

Step 3. Follow the on-screen instructions.

Quick Share feature highlights

https://www.samsung.com/ph/support/mobile-devices/how-to-use-quickshare-feature-on-galaxy-mobile-device/

Use the Gallery app on your Galaxy phone or tablet

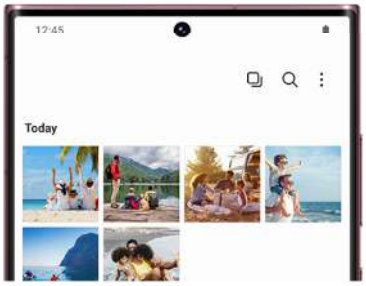
Leave that bulky photo album at home and use your **phone** or **tablet** instead to relive all those precious memories. With the Gallery app, you can view, edit, and manage your pictures, videos, and albums right on your Galaxy device.

https://www.samsung.com/us/support/answer/ANS00079026/

View and edit pictures and videos

If you spent an hour trying to take that perfect selfie or video, you can look back at your hard work by viewing it in Gallery. You can also edit your image or video using **different filters, effects, and styles**!

1. Navigate to and open **Gallery**, and then tap the **Pictures** tab. To search for a specific picture or video, tap the **Search** icon in the upper right corner. You can search by its tag, album name, or other details.

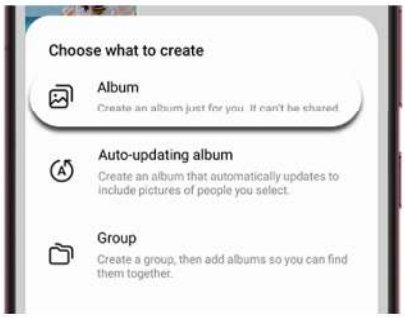


https://www.samsung.com/us/support/answer/ANS00079026/

Create albums

With so many photos and videos, your Gallery can get a little disorganized. Just create an album to get rid of the clutter.

1. From **Gallery**, tap the **Albums** tab, and then tap **Add** (the plus sign). You can select from the following album types:



- **Album:** Create a standard album.
- **Auto-updating album:** Create an album that will automatically update to include pictures of people that you select.

https://www.samsung.com/us/support/answer/ANS00079026/

How to select and view only the albums you want to see in Galaxy gallery

Last Update date : Jan 13. 2023

Photos saved on the phone are automatically added and displayed in the Gallery app. The select albums to show feature lets you view only the albums you want. This is supported in Android 13 or higher.

How to select albums to show

Step 1. Tap **Gallery**.

Step 2. Tap "Albums".

Step 3. Tap **More options icon**.

Step 4. Tap "Select albums to show".

Step 5. Tap to select any albums you wish to show in the gallery and tap "Done" when you have finished selecting.

Step 6. Now you can the view the selected albums in Gallery.

https://www.samsung.com/sg/support/mobile-devices/how-to-select-and-view-only-the-albums-you-want-to-see-in-galaxy-gallery/

117. The foregoing features and capabilities of the '815 Accused Products and Samsung's description and/or demonstration thereof, including in user manuals and advertising, reflect Samsung's direct infringement by satisfying every element of at least claims 1-8 of the '815 Patent, under 35 U.S.C. § 271(a).

118. Samsung has indirectly infringed at least claims 1-8 of the ’815 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use, offering for sale, selling, or importation of at least the ’815 Accused Products. Samsung’s customers who purchase devices and components thereof and operate such devices and components in accordance with Samsung’s instructions directly infringe one or more claims of the ’815 Patent in violation of 35 U.S.C. § 271. Samsung instructs its customers through at least user guides or websites, such as those located at: https://downloadcenter.samsung.com/content/UM/202302/20230207045923682/SAM_S911_S916_S918_EN_UM_OS13_020223_FINAL.pdf, https://downloadcenter.samsung.com/content/UM/202204/20220413011651769/SAM_X700_X800_X808_X900_EN_UM_OS12_012422_FINAL_AC.pdf, https://www.samsung.com/ph/support/mobile-devices/how-to-use-quickshare-feature-on-galaxy-mobile-device/, https://www.samsung.com/us/support/answer/ANS00079026/, https://www.samsung.com/sg/support/mobile-devices/how-to-select-and-view-only-the-albums-you-want-to-see-in-galaxy-gallery/.

119. For example, as shown above Samsung instructs its customers to “How to use Quick Share feature on Galaxy device,” “Use the Gallery app on your Galaxy phone or tablet,” “View and edit pictures and videos,” “Create albums,” “How to select and view only the albums you want to see in Galaxy gallery.” *See* https://www.samsung.com/us/support/answer/ANS00079026/; *see also* https://www.samsung.com/ph/support/mobile-devices/how-to-use-quickshare-feature-on-galaxy-mobile-device/; https://www.samsung.com/sg/support/mobile-devices/how-to-select-and-view-only-the-albums-you-want-to-see-in-galaxy-gallery/.

120. Samsung is thereby liable for infringement of the ’815 Patent pursuant to 35 U.S.C. § 271(b).

121. Samsung has indirectly infringed at least claims 1-8 of the ’815 Patent, by, among other things, contributing to the direct infringement of others, including customers of the ’815 Accused Products by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the ’815 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

122. For example, the ’815 Accused Products each include hardware and software for implementing Samsung Quick Share and Samsung’s Gallery application for receiving, recording, and managing stored videos associated with a user profile. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Samsung is liable for infringement of the ’815 Patent pursuant to 35 U.S.C. § 271(c).

123. Samsung has been on notice of the ’815 Patent since, at least, July 7, 2021, based on correspondence directed to Mr. I. Lee from Mr. T. Yamamoto of Maxell. *See* Exhibit 2. This correspondence set forth Maxell’s belief that Samsung makes, uses, sells, offers to sell, or imports products that infringe certain of Maxell’s patents, and specifically identified the allowed patent application that issued as the ’815 Patent as well as exemplary allowed claims and exemplary accused products for that patent. After issuance of the allowed claims of the ’815 Patent, Samsung was again provided similar notice on December 29, 2021, based on correspondence directed to

Mr. D. Jeon from Mr. T. Hirabayashi. *See* Exhibit 5. By the time of trial, Samsung will thus have known and intended (since receiving this notice), that its continued actions would actively induce and contribute to actual infringement of at least claims 1-8 of the ’815 Patent.

124. Samsung undertook and continued its infringing actions despite an objectively high likelihood that such activities infringed the ’815 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least July 7, 2021, Samsung has been aware of an objectively high likelihood that its actions constituted and continue to constitute infringement of the ’815 Patent, and that the ’815 Patent is valid. On information and belief, Samsung could not reasonably, subjectively believe that its actions do not constitute infringement of the ’815 Patent, nor could it reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that its actions constitute infringement, Samsung continued its infringing activities. As such, Samsung has willfully infringed and continues to willfully infringe the ’815 Patent.

125. Maxell has been and continues to be damaged by Samsung’s infringement of the ’815 Patent.

COUNT 6 - INFRINGEMENT OF U.S. PATENT NO. 10,129,590

126. Maxell incorporates paragraphs 1-125 above by reference.

127. U.S. Patent No. 10,129,590 (the “’590 Patent,” attached hereto as Exhibit 10) duly issued on November 13, 2018 and is entitled *Display Apparatus and Video Processing Apparatus*.

128. Maxell is the owner by assignment of the ’590 Patent and possesses all rights under the ’590 Patent, including the exclusive right to recover for past and future infringement.

129. The ’590 Patent was subject to an *ex parte reexamination* No. 90/014,651, filed January 12, 2021, on behalf of third party requester Apple Inc. On November 15, 2021, the USPTO

completed the reexamination and issued an *ex parte reexamination* certificate (attached hereto as Exhibit 11) confirming the patentability and validity of the ’590 Patent.

130. Altogether, four USPTO Examiners—Primary Examiner Amy Hsu, Primary Examiner My Trang Ton, Primary Examiner Kenneth Whittington, and Supervisory Patent Reexamination Specialist Andrew J. Fischer—have confirmed the validity of the ’590 Patent’s claims.

131. The ’590 Patent is directed to techniques for establishing multiple connections between a plurality of device wirelessly via three radio communication circuits in order to transmit video information over one radio communication circuit while connecting to the Internet via another radio communication circuit.

132. For example, prior to the ’590 Patent, conventional techniques connected video processing devices with each other by establishing analog connections for video and audio signals. But with the widespread use of digital videos and the ability of devices to perform multiple tasks at the same time, there arose a need to implement additional techniques of transmitting video information while also ensuring that the device could continue to be used for additional functions during video transfer.

133. The inventors of the ’590 Patent solved this problem by creating and configuring devices with a novel arrangement of hardware components, including “a first radio communication circuit,” “a second radio communication circuit,” “a third radio communication circuit,” “an imaging circuit,” “a compression circuit,” “an input device,” “an accumulation circuit,” and “a controller” that work in conjunction to allow a video processing apparatus to do things that it could not previously do: simultaneously transmit video information and connect to the internet or home network using a particular types of transmission frequencies and modulation schemes.

134. Samsung has directly infringed one or more claims of the ’590 Patent in this District and elsewhere in Texas, including at least claim 1 literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling its consumer electronic devices, including at least Samsung products having materially similar functionality while transmitting video using Samsung Quick Share, connecting to the Internet over cellular networks, and implementing Samsung Wallet using Samsung smartphones.

135. For example, Samsung has literally and/or under the doctrine of equivalents directly infringed at least claim 1 of the ’590 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling at least the following smartphones including Galaxy A03, Galaxy A04e, Galaxy A04s, Galaxy A13, Galaxy A14, Galaxy A14 5G, Galaxy A23, Galaxy A23 5G, Galaxy A24 4G, Galaxy A33 5G, Galaxy A34, Galaxy A53 5G, Galaxy A54, Galaxy A73 5G, Galaxy S21 FE 5G, Galaxy S22 5G, Galaxy S22 Ultra 5G, Galaxy S22+ 5G, Galaxy S23, Galaxy S23 Ultra, Galaxy S23+, Galaxy XCover6 Pro, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Fold4, Galaxy Z Fold5; and other Samsung devices with the ability to perform video transfer via Samsung Quick share while connecting to the Internet over cellular networks and implementing Samsung Pay (collectively, “the ’590 Accused Products”). *See* https://www.samsung.com/ph/support/mobile-devices/how-to-use-quickshare-feature-on-galaxy-mobile-device/; *see also* https://www.samsung.com/us/support/answer/ANS00087283/; https://www.samsung.com/us/support/answer/ANS00083184/; and https://www.samsung.com/us/samsung-wallet/. Maxell reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the ’590 Accused Products are identified to describe Samsung’s infringement and in no way

limit the discovery and infringement allegations against Samsung concerning other devices that incorporate the same or reasonably similar functionalities.

136. The ’590 Accused Products implement Samsung Quick Share confirming that they include a first radio communication circuit capable of transmitting information using a first transmission frequency band and a first modulation scheme. Further, each of the ’590 Accused Products connect to the Internet using a second radio communication circuit implementing a second modulation scheme and second transmission frequency band. In addition, each of the ’590 Accused Products also include Samsung Wallet that uses a third radio communication circuit to transmit information using a third transmission frequency band. Each of the ’590 Accused Products further include a camera for recording video information, a compression circuit for compressing the recorded video, a memory for accumulating the compressed recorded video, and a touch screen for providing a user indication. Further, each of the ’590 Accused Products include a controller (*e.g.*, CPU) that controls the radio communication circuits such that video can be transmitted via Samsung Quick Share while the device is connected to the Internet over cellular networks and information is transmitted via NFC while implementing Samsung Wallet.

137. For example, the following excerpts from Samsung’s websites provides non-limiting examples of the ’590 Accused Products infringing at least claim 1 of the ’590 Patent:

Share files from your Galaxy phone or tablet

When you want to share photos and files with your friends, text and email chains can get pretty long, assuming the files aren't too big to even send at all. So what if you could easily share to compatible devices with no emails or messages required? You can! With Nearby Share on Galaxy **phones** and **tablets**, you can easily send media to people around you. Quick Share is also available, which is similar and can be used with other Galaxy phone models.

https://www.samsung.com/us/support/answer/ANS00087283/

Send and receive files with Quick Share

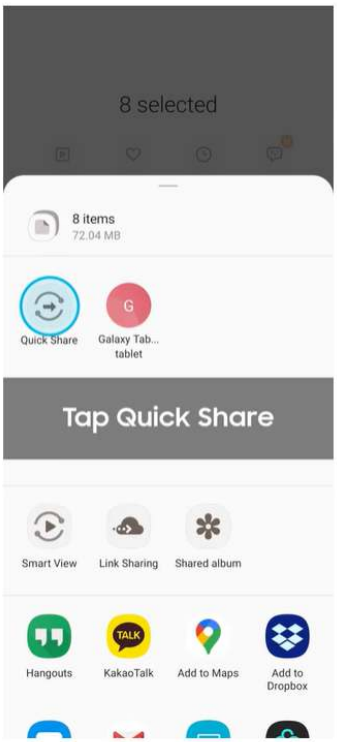
Note: The Quick Share feature does not support sharing videos with TVs or with SmartThings supported devices, however you can share photos. To share videos to your TV, you can use the **Smart View** feature.

Trying to share those awesome vacation photos with your friends? Use Quick Share to quickly and easily distribute your photography. Keep in mind that you cannot use Quick Share if you're using a mobile hotspot, Wi-Fi Direct, or Smart View.

1. First, make sure the Quick Share feature is turned on for both phones. To do this, open the Quick settings panel by swiping down from the top of the screen using two fingers, and then tap the **Quick Share** icon. It will be blue when it's activated.
   Note: If the Quick Share icon does not appear in your Quick settings panel, you may need to **add it**.
2. Navigate to a file you'd like to share. Tap the **Share** icon, and then tap **Quick Share**.

3. Your phone will begin looking for another device. If you are using a Note20 Ultra or S21 Ultra, point it at the receiving device.
4. If you're having trouble connecting to another device, swipe down from the top of your screen to open the Quick settings panel, and then touch and hold the Quick Share icon. Tap the switch next to Show my position to others to let nearby devices see your device when they are using Quick Share. This option will only show if Quick Share is enabled.
   Note: The "Show my position to others" option is only available on select models.
5. When the other device appears, tap its name to send the file. The other phone may require permission before it can receive the file. On your phone, "Sent" will appear under the other device's name when the transfer is complete.

https://www.samsung.com/us/support/answer/ANS00087283/



Share your files with Quick Share on your Galaxy phone | Samsung US

Samsung Care
199K subscribers
Subscribe
204
Share

https://www.youtube.com/watch?v=DxmuPYgP3MI ("Samsung Care" Channel)

Bring more. Carry Less.

Samsung Wallet is a mobile wallet solution that lets you carry your essentials conveniently and securely in your Galaxy phone. Add your payments cards, digital ID, boarding passes and more.

https://www.samsung.com/us/samsung-wallet/

Samsung Pay is now part of Samsung Wallet

Samsung Pay is now part of just got even better with Samsung Wallet. Upgrade your Pay app to Samsung Wallet now to experience all the great new features.

LEARN MORE

Pay where you want.

The latest Samsung devices work at all your favorite places, making Samsung Pay the most accepted mobile payment.

https://www.samsung.com/us/samsung-pay/

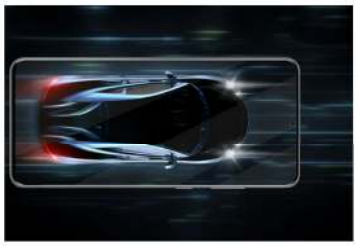
How to connect your Galaxy device to the internet

Last Update date : Apr 23. 2021

Sharing, streaming, gaming. Almost everything that we do on our smartphones is better with the internet. There are many different ways of connecting to the internet. You can either connect to a wi-fi network, mobile data, or mobile hotspot.

https://www.samsung.com/ph/support/mobile-devices/how-to-connect-your-galaxy-device-to-the-internet/

Use 5G on Galaxy phones and tablets



With 5G starting to roll out across the U.S., it won't be long before the whole country is connected to a better mobile network. If you have a 5G phone, you'll be able to enjoy faster downloads, instant streaming, and much more. But 5G is more than a mere boost in speed; it's literally the foundation of autonomous cars, augmented reality, and other new and exciting wireless technology. Compare our 5G phones and tablets on Samsung.com and **find the one that's right for you**.

https://www.samsung.com/us/support/answer/ANS00083184/

138. The foregoing features and capabilities of the ’590 Accused Products and Samsung’s description and/or demonstration thereof, including in user manuals and advertising, reflect Samsung’s direct infringement by satisfying every element of at least claim 1 of the ’590 Patent, under 35 U.S.C. § 271(a).

139. Samsung has indirectly infringed at least claim 1 of the ’590 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use, offering for sale, selling, or importation of at least the ’590 Accused Products. Samsung’s customers who purchase devices and components thereof and operate such devices and components in accordance with Samsung’s instructions directly infringe one or more claims of the ’590 Patent in violation of 35 U.S.C. § 271. Samsung instructs its customers through at least user guides or websites, such as those located at:

https://downloadcenter.samsung.com/content/UM/202302/20230207045923682/SAM_S911_S916_S918_EN_UM_OS13_020223_FINAL.pdf, https://downloadcenter.samsung.com/content/UM/202204/20220413011651769/SAM_X700_X800_X808_X900_EN_UM_OS12_012422_FINAL_AC.pdf, https://www.samsung.com/us/support/answer/ANS00087283/, https://www.youtube.com/watch?v=DxmuPYgP3MI (“Samsung Care” Channel), https://www.samsung.com/us/samsung-wallet/, https://www.samsung.com/us/samsung-pay/, and https://www.samsung.com/us/support/answer/ANS00083184/ .

140. For example, as shown above Samsung instructs its customers to “Send and receive files with Quick Share,” “Add your payments cards, digital ID, boarding passes and more [to Samsung Wallet],” “Add your favorite payment cards to your phone. Just swipe up from the bottom of your phone’s home screen to access them. Check out in-store, in-app, or online,” and “Use 5G on Galaxy phones and tablets . . . you'll be able to enjoy faster downloads, instant streaming, and much more.” *See* https://www.samsung.com/us/support/answer/ANS00087283/; *see also* https://www.youtube.com/watch?v=DxmuPYgP3MI (“Samsung Care” Channel);

https://www.samsung.com/us/samsung-wallet/; https://www.samsung.com/us/samsung-pay/; and https://www.samsung.com/us/support/answer/ANS00083184/.

141. Samsung is thereby liable for infringement of the ’590 Patent pursuant to 35 U.S.C. § 271(b).

142. Samsung has indirectly infringed at least claim 1 of the ’590 Patent, by, among other things, contributing to the direct infringement of others, including customers of the ’590 Accused Products by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, combination, or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the ’590 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

143. For example, the ’590 Accused Products include hardware and software for implementing Samsung Quick Share, cellular data services, and Samsung Wallet. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Samsung is liable for infringement of the ’590 Patent pursuant to 35 U.S.C. § 271(c).

144. Samsung has been on notice of the ’590 Patent since, at least, July 7, 2021, based on correspondence directed to Mr. I. Lee from Mr. T. Yamamoto of Maxell. *See* Exhibit 2. Samsung was further provided notice of the successful reexamination of the ’590 Patent in follow-up correspondence directed to Mr. D. Jeon of SEC from Mr. T. Hirabayashi of Maxell, dated December 29, 2021. *See* Exhibit 5. This correspondence set forth Maxell’s belief that Samsung

makes, uses, sells, offers to sell, or imports products that infringe certain of Maxell's patents, and specifically identified the '590 Patent as well as exemplary claims and exemplary accused products for that patent. By the time of trial, Samsung will thus have known and intended (since receiving this notice), that its continued actions would actively induce and contribute to actual infringement of at least claim 1 of the '590 Patent.

145. Samsung undertook and continued its infringing actions despite an objectively high likelihood that such activities infringed the '590 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least July 7, 2021, Samsung has been aware of an objectively high likelihood that its actions constituted and continue to constitute infringement of the '590 Patent, and that the '590 Patent is valid. On information and belief, Samsung could not reasonably, subjectively believe that its actions do not constitute infringement of the '590 Patent, nor could it reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that its actions constitute infringement, Samsung continued its infringing activities. As such, Samsung has willfully infringed and continues to willfully infringe the '590 Patent.

146. Maxell has been and continues to be damaged by Samsung's infringement of the '590 Patent.

COUNT 7 - INFRINGEMENT OF U.S. PATENT NO. 11,445,241

147. Maxell incorporates paragraphs 1-146 above by reference.

148. U.S. Patent No. 11,445,241 (the "'241 Patent," attached hereto at Exhibit 12) duly issued on September 13, 2022 and is entitled *Information Processing Apparatus And Information Processing Method*. The '241 Patent belongs to the same family as the '590 Patent.

149. Maxell is the owner by assignment of the ’241 Patent and possesses all rights under the ’241 Patent, including the exclusive right to recover for past and future infringement.

150. The ’241 Patent is directed to a techniques for establishing multiple connections between a plurality of device wirelessly via three radio communication circuits in order to transmit video information over one radio communication circuit while connecting to the Internet via another radio communication circuit.

151. For example, prior to the ’241 Patent, conventional techniques connected video processing devices with each other by establishing analog connections for video and audio signals. But with the widespread use of digital videos and the ability of devices to perform multiple tasks at the same time, there arose a need to implement additional techniques of transmitting video information while also ensuring that the device could continue to be used for additional functions during video transfer.

152. The inventors of the ’241 Patent solved this problem by creating and configuring devices with a novel arrangement of hardware components, including “a first radio communication circuit,” “a second radio communication circuit,” “a third radio communication circuit,” “an imaging circuit,” “a compression circuit,” “an accumulation circuit,” and “a controller” that work in conjunction to allow a video processing apparatus to do things that it could not previously do: transmit video information while connecting to the internet or home network using a particular types of transmission frequencies and modulation schemes with different circuits.

153. Samsung has directly infringed one or more claims of the ’241 Patent in this District and elsewhere in Texas, including at least claim 1 literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling its consumer electronic devices, including at least Samsung products having materially similar functionality while

transmitting video using Samsung Quick Share, connecting to the Internet over cellular networks, and implementing Samsung Wallet using Samsung smartphones.

154. For example, Samsung has literally and/or under the doctrine of equivalents directly infringed at least claim 1 of the ’241 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling at least the following smartphones including Galaxy A03s, Galaxy A04s, Galaxy A12s (aka Nacho), Galaxy A13, Galaxy A13 5G, Galaxy A14, Galaxy A14 5G, Galaxy A22, Galaxy A22s 5G, Galaxy A23, Galaxy A23 5G, Galaxy A24 4G, Galaxy A30, Galaxy A30s, Galaxy A32, Galaxy A32 5G, Galaxy A33 5G, Galaxy A34, Galaxy A52, Galaxy A52 5G, Galaxy A53 5G, Galaxy A54, Galaxy A73 5G, Galaxy Note20, Galaxy Note20 5G, Galaxy Note20 Ultra, Galaxy Note20 Ultra 5G, Galaxy S20, Galaxy S20 5G, Galaxy S205G UW, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 Ultra, Galaxy S20 Ultra 5G, Galaxy S20+, Galaxy S20+ 5G, Galaxy S21 5G, Galaxy S21 FE 5G, Galaxy S21 Ultra 5G, Galaxy S21+ 5G, Galaxy S22 5G, Galaxy S22 Ultra 5G, Galaxy S22+ 5G, Galaxy S23, Galaxy S23 Ultra, Galaxy S23+, Galaxy S9, Galaxy S9+, Galaxy Xcover FieldPro, Galaxy Xcover Pro, Galaxy Xcover6 Pro, Galaxy Z Flip3 5G, Galaxy Z Flip4, Galaxy Z Flip5, Galaxy Z Fold2 5G, Galaxy Z Fold3 5G, Galaxy Z Fold4, Galaxy Z Fold5; and other Samsung devices with the ability to perform video transfer via Samsung Quick share while connecting to the Internet over cellular networks and implementing Samsung Pay (collectively, “the ’241 Accused Products”). *See* https://www.samsung.com/ph/support/mobile-devices/how-to-use-quickshare-feature-on-galaxy-mobile-device/; *see also* https://www.samsung.com/us/support/answer/ANS00087283/; https://www.samsung.com/us/support/answer/ANS00083184/; and https://www.samsung.com/us/samsung-wallet/. Maxell reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of

doubt, the ’241 Accused Products are identified to describe Samsung’s infringement and in no way limit the discovery and infringement allegations against Samsung concerning other devices that incorporate the same or reasonably similar functionalities.

155. The ’241 Accused Products implement Samsung Quick Share confirming that they include a first radio communication circuit capable of transmitting information using a first transmission frequency band and a first modulation scheme. Further, each of the ’241 Accused Products connect to the Internet using a second radio communication circuit implementing a second modulation scheme and second transmission frequency band. In addition, each of the ’241 Accused Products also include Samsung Wallet that uses a third radio communication circuit to transmit information using a third transmission frequency band. Each of the ’241 Accused Products further include a camera for recording video information, a compression circuit for compressing the recorded video, a memory for accumulating the compressed recorded video, and a touch screen for providing a user indication. Further, each of the ’241 Accused Products include a controller (*e.g.*, CPU) that controls the radio communication circuits such that video can be transmitted via Samsung Quick Share while the device is connected to the Internet over cellular networks and information is transmitted via NFC while implementing Samsung Wallet.

156. For example, the following excerpts from Samsung’s websites provides non-limiting examples of the ’241 Accused Products infringing at least claim 1 of the ’241 Patent:

Share files from your Galaxy phone or tablet

When you want to share photos and files with your friends, text and email chains can get pretty long, assuming the files aren't too big to even send at all. So what if you could easily share to compatible devices with no emails or messages required? You can! With Nearby Share on Galaxy **phones** and **tablets**, you can easily send media to people around you. Quick Share is also available, which is similar and can be used with other Galaxy phone models.

https://www.samsung.com/us/support/answer/ANS00087283/

Send and receive files with Quick Share

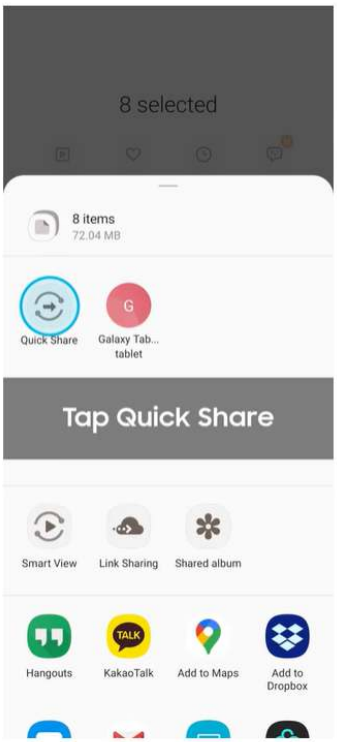
Note: The Quick Share feature does not support sharing videos with TVs or with SmartThings supported devices, however you can share photos. To share videos to your TV, you can use the **Smart View** feature.

Trying to share those awesome vacation photos with your friends? Use Quick Share to quickly and easily distribute your photography. Keep in mind that you cannot use Quick Share if you're using a mobile hotspot, Wi-Fi Direct, or Smart View.

1. First, make sure the Quick Share feature is turned on for both phones. To do this, open the Quick settings panel by swiping down from the top of the screen using two fingers, and then tap the **Quick Share** icon. It will be blue when it's activated.
   Note: If the Quick Share icon does not appear in your Quick settings panel, you may need to **add it**.
2. Navigate to a file you'd like to share. Tap the **Share** icon, and then tap **Quick Share**.

3. Your phone will begin looking for another device. If you are using a Note20 Ultra or S21 Ultra, point it at the receiving device.
4. If you're having trouble connecting to another device, swipe down from the top of your screen to open the Quick settings panel, and then touch and hold the Quick Share icon. Tap the switch next to Show my position to others to let nearby devices see your device when they are using Quick Share. This option will only show if Quick Share is enabled.
   Note: The "Show my position to others" option is only available on select models.
5. When the other device appears, tap its name to send the file. The other phone may require permission before it can receive the file. On your phone, "Sent" will appear under the other device's name when the transfer is complete.

https://www.samsung.com/us/support/answer/ANS00087283/



Share your files with Quick Share on your Galaxy phone | Samsung US

Samsung Care
199K subscribers
Subscribe
204
Share

https://www.youtube.com/watch?v=DxmuPYgP3MI ("Samsung Care" Channel)

Bring more. Carry Less.

Samsung Wallet is a mobile wallet solution that lets you carry your essentials conveniently and securely in your Galaxy phone. Add your payments cards, digital ID, boarding passes and more.

https://www.samsung.com/us/samsung-wallet/

Samsung Pay is now part of Samsung Wallet

Samsung Pay is now part of just got even better with Samsung Wallet. Upgrade your Pay app to Samsung Wallet now to experience all the great new features.

LEARN MORE

Pay where you want.

The latest Samsung devices work at all your favorite places, making Samsung Pay the most accepted mobile payment.

https://www.samsung.com/us/samsung-pay/

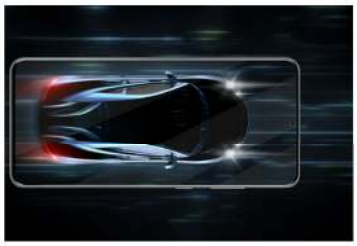
How to connect your Galaxy device to the internet

Last Update date : Apr 23. 2021

Sharing, streaming, gaming. Almost everything that we do on our smartphones is better with the internet. There are many different ways of connecting to the internet. You can either connect to a wi-fi network, mobile data, or mobile hotspot.

https://www.samsung.com/ph/support/mobile-devices/how-to-connect-your-galaxy-device-to-the-internet/

Use 5G on Galaxy phones and tablets



With 5G starting to roll out across the U.S., it won't be long before the whole country is connected to a better mobile network. If you have a 5G phone, you'll be able to enjoy faster downloads, instant streaming, and much more. But 5G is more than a mere boost in speed; it's literally the foundation of autonomous cars, augmented reality, and other new and exciting wireless technology. Compare our 5G phones and tablets on Samsung.com and **find the one that's right for you**.

https://www.samsung.com/us/support/answer/ANS00083184/

157. The foregoing features and capabilities of the ’241 Accused Products and Samsung’s description and/or demonstration thereof, including in user manuals and advertising, reflect Samsung’s direct infringement by satisfying every element of at least claim 1 of the ’241 Patent, under 35 U.S.C. § 271(a).

158. Samsung has indirectly infringed at least claim 1 of the ’241 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use, offering for sale, selling, or importation of at least the ’241 Accused Products. Samsung’s customers who purchase devices and components thereof and operate such devices and components in accordance with Samsung’s instructions directly infringe one or more claims of the ’241 Patent in violation of 35 U.S.C. § 271. Samsung instructs its customers through at least user guides or websites, such as those located at:

https://downloadcenter.samsung.com/content/UM/202302/20230207045923682/SAM_S911_S916_S918_EN_UM_OS13_020223_FINAL.pdf, https://downloadcenter.samsung.com/content/UM/202204/20220413011651769/SAM_X700_X800_X808_X900_EN_UM_OS12_012422_FINAL_AC.pdf, https://www.samsung.com/us/support/answer/ANS00087283/, https://www.youtube.com/watch?v=DxmuPYgP3MI (“Samsung Care” Channel), https://www.samsung.com/us/samsung-wallet/, https://www.samsung.com/us/samsung-pay/, and https://www.samsung.com/us/support/answer/ANS00083184/ .

159. For example, as shown above Samsung instructs its customers to “Send and receive files with Quick Share,” “Add your payments cards, digital ID, boarding passes and more [to Samsung Wallet],” “Add your favorite payment cards to your phone. Just swipe up from the bottom of your phone’s home screen to access them. Check out in-store, in-app, or online,” and “Use 5G on Galaxy phones and tablets . . . you’ll be able to enjoy faster downloads, instant streaming, and much more.” *See* https://www.samsung.com/us/support/answer/ANS00087283/; *see also* https://www.youtube.com/watch?v=DxmuPYgP3MI (“Samsung Care” Channel);

https://www.samsung.com/us/samsung-wallet/; https://www.samsung.com/us/samsung-pay/; and https://www.samsung.com/us/support/answer/ANS00083184/.

160. Samsung is thereby liable for infringement of the ’241 Patent pursuant to 35 U.S.C. § 271(b).

161. Samsung has indirectly infringed at least claim 1 of the ’241 Patent, by, among other things, contributing to the direct infringement of others, including customers of the ’241 Accused Products by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, combination, or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the ’241 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

162. For example, the ’241 Accused Products include hardware and software for implementing Samsung Quick Share, cellular data services, and Samsung Wallet. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Samsung is liable for infringement of the ’241 Patent pursuant to 35 U.S.C. § 271(c).

163. Samsung will be on notice of the ’241 Patent since at least the filing of this complaint. By the time of trial, Samsung will thus have known and intended (since receiving such notice), that its continued actions would actively induce and contribute to actual infringement of at least claim 1 of the ’241 Patent.

164. Samsung undertook and continued its infringing actions despite an objectively high likelihood that such activities infringed the ’241 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least the filing of this complaint, Samsung has been aware of an objectively high likelihood that its actions constituted and continue to constitute infringement of the ’241 Patent, and that the ’241 Patent is valid. On information and belief, Samsung could not reasonably, subjectively believe that its actions do not constitute infringement of the ’241 Patent, nor could it reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that its actions constitute infringement, Samsung continued its infringing activities. As such, Samsung has willfully infringed and continues to willfully infringe the ’241 Patent.

165. Maxell has been and continues to be damaged by Samsung’s infringement of the ’241 Patent.

PRAYER FOR RELIEF

WHEREFORE, Maxell prays for relief as follows:

166. A judgment declaring that Samsung has infringed and is infringing one or more claims of ’161, ’086, ’848, ’757, ’815, ’590, and ’241 Patents,

167. A judgment awarding Maxell compensatory damages as a result of Samsung’s infringement of one or more claims of the ’161, ’086, ’848, ’757, ’815, ’590, and ’241 Patents, together with interest and costs, consistent with lost profits and in no event less than a reasonable royalty,

168. A judgment awarding Maxell treble damages and pre-judgment interest under 35 U.S.C. § 284 as a result of Samsung’s willful and deliberate infringement of one or more claims of the ’161, ’086, ’848, ’757, ’815, ’590, and ’241 Patents,

169. A judgment declaring that this case is exceptional and awarding Maxell its expenses, costs, and attorneys' fees in accordance with 35 U.S.C. §§ 284 and 285 and Rule 54(d) of the Federal Rules of Civil Procedure,

170. A grant of preliminary and permanent injunctions enjoining Defendants from further acts of infringement of one or more claims of '161, '086, '848, '757, '815, '590, and '241 Patents.

171. Such other and further relief as the Court deems just and proper.

JURY TRIAL DEMANDED

Maxell hereby demands a trial by jury.

Dated: September 7, 2023

By: */s/ Geoffrey Culbertson*

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