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

PAYGEO, LLC, *Plaintiff*, v. SAMSUNG ELECTRONICS CO., LTD, AND SAMSUNG ELECTRONICS AMERICA, INC., *Defendants*.	Case No. 2:25-CV-00334-RWS-RSP **JURY TRIAL DEMANDED**

DEFENDANTS' INVALIDITY CONTENTIONS

Pursuant to Local Patent Rules 3-3 and 3-4 and the Court's Second Amended Docket Control Order (Dkt. 52), Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (collectively, "Samsung" or "Defendants") provide these Invalidity Contentions and accompanying document production to Plaintiff PayGeo, LLC ("PayGeo").

I. Overview

In this action, Plaintiff asserted in its P.R. 3-1 and 3-2 Disclosures of August 25, 2025 ("Infringement Contentions") that Defendants allegedly infringe claims 1-3, 22, and 24 of U.S. Patent No. 8,554,671 (the "'671 patent"), claims 1-2, 4, 6-9, 11, and 13-14 of U.S. Patent No. 10,796,296 (the "'296 patent"), claims 1-2, 4, 6-9, 11, and 13-14 of U.S. Patent No. 10,937,018 (the "'018 patent"), claims 1-2, 4, 6-9, 11, and 13-14 of U.S. Patent No. 11,087,307 (the "'307 patent"), claims 1-3, 5-8, and 10 of U.S. Patent No. 12,014,347 (the "'347 patent") (collectively, the "Patents-in-Suit" and the "Asserted Claims").

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statements and reasoning set forth by the examiner, as to why it would have been obvious to modify or combine references to arrive at the limitations of the Asserted Claims of the ’296 patent. Defendants also incorporate by reference the admissions made in the ’296 patent and/or during prosecution regarding what was already known in the art.

3. ’018 Patent

Table 6: Exemplary Anticipatory and Combinations for the Asserted Claims of the ’018 Patent

Chart	Prior Art References
C1	Lin either alone or in combination with one or more of Pharris, Taveau, McClinton, Rackley, Tumminaro, Doran, Weichert, and/or Nam
C2	Rackley either alone or in combination with one or more of Pharris, Taveau, Lin, and/or Tumminaro
C3	Tumminaro either alone or in combination with one or more of Pharris, Taveau, McClinton, Rackley, and/or Lin
C4	Taveau either alone or in combination with one or more of Pharris, Tumminaro, McClinton, Rackley, Lin, Doran, Weichert, and/or Nam
C5	Pharris either alone or in combination with one or more of Taveau, Tumminaro, McClinton, Rackley, Lin, Doran, Weichert, and/or Nam
C6	PayPal Mobile either alone or in combination with one or more of Pharris, Taveau, Rackley, Tumminaro, and/or M-PESA
C7	M-PESA either alone or in combination with one or more of Pharris, Taveau, Tumminaro, McClinton, Rackley, Lin, Doran, Weichert, and/or Nam

The prior art identified above, and in the attached ’018 charts, individually anticipate and/or can properly be combined in multiple ways to demonstrate the obviousness of the Asserted Claims of the ’018 patent. Various combinations of the references would have naturally been considered as part of the exercise of ordinary skill by one skilled in the art. The references disclosed in the attached charts and herein are also directed to the same or similar features as the purported

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invention claimed in the Asserted Claims of the ’018 patent. To the extent Plaintiff contends that any of these features solved a problem in the art, the references cited herein show that that problem was known to those of ordinary skill and had already been solved using obvious solutions.

To that end, the Asserted Claims of the ’018 patent simply combine elements already disclosed and well known in the art and yield no more than what one skilled in the art would have expected from such a combination. For example, with respect to the ’018 patent, when confronted with the alleged problems described in the ’018 patent, one of ordinary skill in the art at the time of the alleged invention would have been motivated to consider the techniques taught by the prior art cited in these Invalidity Contentions. Consideration of the teachings of this prior art, both individually and in combination, would necessarily lead to the alleged invention claimed in the ’018 patent. This is demonstrated by the cited prior art, which disclose all of the elements of the Asserted Claims of the ’018 patent, as well as motivations to modify or combine their individual teachings. One of skill in the art would have been motivated to either modify the prior art identified in the claim charts or to combine that prior art in the manner indicated by, for example, their background knowledge, design incentives, effects of demands known to the design community, or other market forces. Moreover, the cited prior art share commonalities. To the extent it is argued that any cited prior art does not expressly disclose a particular claim or element, it would have been inherent in the disclosure and/or obvious to a person of ordinary skill in the art to include the claimed element to perform the invention as claimed in the ’018 patent.

As described in the attached charts, all the elements of the Asserted Claims of the ’018 patent were commonplace before the alleged date of inventions. For each element, there exists evidence from the cited prior art that it was well known in the art prior to the date of invention. To the extent it is argued that any of the cited prior art references, systems, and/or products do not

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anticipate the Asserted Claims, it would have been obvious to a person of ordinary skill in the art that the Asserted Claims are merely combinations of well-known methods and systems resulting in expected results.

Additionally, Defendants hereby incorporate by reference the motivations to combine references set forth during the prosecution of the Asserted Claims of the '018 patent, including the statements and reasoning set forth by the examiner, as to why it would have been obvious to modify or combine references to arrive at the limitations of the Asserted Claims of the '018 patent. Defendants also incorporate by reference the admissions made in the '018 patent and/or during prosecution regarding what was already known in the art.

4. '307 Patent

Table 7: Exemplary Anticipatory and Combinations for the Asserted Claims of the '307 Patent

Chart	Prior Art References
D1	Lin either alone or in combination with one or more of Pharris, Taveau, McClinton, Rackley, Tumminaro, Doran, Weichert, and/or Nam
D2	Rackley either alone or in combination with one or more of Pharris, Taveau, Lin, and/or Tumminaro
D3	Tumminaro either alone or in combination with one or more of Pharris, Taveau, McClinton, Rackley, and/or Lin
D4	Taveau either alone or in combination with one or more of Pharris, Tumminaro, McClinton, Rackley, Lin, Doran, Weichert, and/or Nam
D5	Pharris either alone or in combination with one or more of Taveau, Tumminaro, McClinton, Rackley, Lin, Doran, Weichert, and/or Nam
D6	PayPal Mobile either alone or in combination with one or more of Pharris, Taveau, Rackley, Tumminaro, and/or M-PESA
D7	M-PESA either alone or in combination with one or more of Pharris, Taveau, Tumminaro, McClinton, Rackley, Lin, Doran, Weichert, and/or Nam

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desired security level configuration setting is set to a plurality of security levels." (claim 6).

Accordingly, these claims—and any claim(s) depending directly or indirectly therefrom—may be invalid under 35 U.S.C. § 112, ¶ 2, or 35 U.S.C. § 112(b) as indefinite.

IV. P.R. 3-4: Document Production Accompanying Invalidity Contentions

Defendants have produced documents, including SamPay_00061731 – SamPay_00068036, pursuant to P.R. 3-4(a) and P.R. 3-4(b). In addition, pursuant to P.R. 3-4(a) and under the Protective Order in this action, Defendants are making source code available in the Washington, D.C. office of their counsel.

V. Invalidity Under 53 U.S.C. § 101 and Defendants' Subject Matter Eligibility Contentions

The Asserted Claims of the Patents-in-Suit are invalid under 35 U.S.C. § 101 for failing to recite patent-eligible subject matter. Defendants incorporate by reference herein their Subject Matter Eligibility Contentions concurrently served with these Invalidity Contentions.

Dated: November 3, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 3, 2025, copies of the foregoing Defendants' Invalidity Contentions and Exhibits have been served to Plaintiff through its counsel of record via email.

/s/ Seth D. Katz
Seth D. Katz
Case Manager

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