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

ZOPHONOS INC., Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD, AND SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Case No. 2:25-cv-00752-JRG **JURY TRIAL DEMANDED**

PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO LOCAL PATENT RULES 3-1 AND 3-2

Pursuant to Local Patent Rules 3-1 and 3-2, Plaintiff Zophonos Inc. ("Zophonos") hereby serves its Disclosure of Assert Claims and Infringement Contentions and accompanying documents on Defendants Samsung Electronics Co., Ltd. ("Samsung Limited") and Samsung Electronics America, Inc. ("Samsung America") ("Samsung Limited" and "Samsung America" may be collectively referred to as "Samsung" or "Defendants").

Zophonos makes these contentions based on the information reasonably available to it at this time and reserves its right to supplement and/or amend these contentions.

I. Patent Rule 3-1(a) Disclosures

Based upon information presently available, Zophonos asserts that Defendants directly and indirectly infringe the claims identified in the claim charts that accompany these disclosures. For convenience, the Asserted Claims are Claims 1–3, 6, 8–12, 13, 15, and 17–20 of U.S. Patent No. 10,656,906 B2, Claims 1, 3, 8, 9, 13, 17-19, 21, 23, 27, and 28 of U.S. Patent No. 11,204,736 B2, and Claims 39, 40, and 43 of U.S. Patent No. 11,900,016 B2.

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Exhibit 1030

Zophonos makes this disclosure based on information reasonably available to it at this time and reserves its right to supplement and/or amend its disclosure of Asserted Claims.

II. Patent Rule 3-1(b) Disclosures

Zophonos's detailed infringement assertions are contained in the claim charts that accompany these disclosures and identify for each asserted claim each apparatus, product, device, process, method, act, or other instrumentality accused of infringing.

Zophonos makes this disclosure based on information reasonably available to it at this time and reserves its right to supplement and/or amend its disclosure of the Accused Instrumentalities, including to identify additional Accused Instrumentalities.

III. Patent Rule 3-1(c) Disclosures

Zophonos's detailed infringement assertions are contained in the claim charts that accompany these disclosures. *See* Exhibits A-C.

Zophonos makes this disclosure based on information reasonably available to it at this time and reserves its right to supplement and/or amend its disclosure.

IV. Patent Rule 3-1(d) Disclosures

Zophonos asserts that Defendants literally infringe each asserted claim. To the extent that any particular element is shown not to be met literally, Plaintiff contends that Defendants infringe under the Doctrine of Equivalents as there would be no substantial difference between the elements of the asserted claims and the corresponding functionality in the accused instrumentality, i.e., the corresponding functionality in the Accused Instrumentalities does substantially the same thing, in substantially the same way, to achieve substantially the same result(s) as the claimed elements.

Zophonos makes this disclosure based on information reasonably available to it at this time and reserves its right to supplement and/or amend its disclosure.

V. Patent Rule 3-1(e) Disclosures

U.S. Patent No. 10,656,906 B2 ("the '906 Patent"): The Asserted Claims are entitled to a priority date of no later than July 15, 2013, as demonstrated by the non-privileged documents evidencing the conception, reduction to practice, design, and development of each claimed invention being concurrently produced bearing Bates numbers ZOPH-SAM_00000082 through ZOPH-SAM_00000349. In the alternative, the Asserted Claims are entitled to a priority date of no later than September 23, 2014, including through the filing of U.S. Provisional Application No. 62/054,286. In the alternative, the Asserted Claims are entitled to a priority date of no later than September 23, 2015, including through the filing of U.S. Application No. 14/862,304. In the alternative, the Asserted Claims are entitled to a priority date of no later than October 10, 2018, including through the filing of U.S. Application No. 16/155,919. In the alternative, the Asserted Claims are entitled to a priority date of no later than May 23, 2019, including through the filing of U.S. Application No. 16/421,141.

U.S. Patent No. 11,204,736 B2 ("the '736 Patent"): The Asserted Claims are entitled to a priority date of no later than July 15, 2013, as demonstrated by the non-privileged documents evidencing the conception, reduction to practice, design, and development of each claimed invention being concurrently produced bearing Bates numbers ZOPH-SAM_00000082 through ZOPH-SAM_00000349. In the alternative, the Asserted Claims are entitled to a priority date of no later than September 23, 2014, including through the filing of U.S. Provisional Application No. 62/054,286. In the alternative, the Asserted Claims are entitled to a priority date of no later than September 23, 2015, including through the filing of U.S. Application No. 14/862,304. In the alternative, the Asserted Claims are entitled to a priority date of no later than October 10, 2018, including through the filing of U.S. Application No. 16/155,919. In the alternative, the Asserted

Claims are entitled to a priority date of no later than May 23, 2019, including through the filing of U.S. Application No. 16/421,141.

U.S. Patent No. 11,900,016 B2 ("the '016 Patent"): The Asserted Claims are entitled to a priority date of no later than July 15, 2013, as demonstrated by the non-privileged documents evidencing the conception, reduction to practice, design, and development of each claimed invention being concurrently produced bearing Bates numbers ZOPH-SAM_00000082 through ZOPH-SAM_00000349. In the alternative, the Asserted Claims are entitled to a priority date of no later than September 23, 2014, including through the filing of U.S. Provisional Application No. 62/054,286. In the alternative, the Asserted Claims are entitled to a priority date of no later than September 23, 2015, including through the filing of U.S. Application No. 14/862,304. In the alternative, the Asserted Claims are entitled to a priority date of no later than October 10, 2018, including through the filing of U.S. Application No. 16/155,919. In the alternative, the Asserted Claims are entitled to a priority date of no later than May 23, 2019, including through the filing of U.S. Application No. 16/421,141. In the alternative, the Asserted Claims are entitled to a priority date of no later than October 17, 2019, including through the filing of U.S. Application No. 16/656,259.

VI. Patent Rule 3-1(f) Disclosures

Zophonos presently is not relying on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention.

Zophonos makes this disclosure based on information reasonably available to it at this time and reserves its right to supplement and/or amend its disclosure.

VII. Patent Rule 3-2(a) Documents

Zophonos presently is not aware of any non-privileged documents evidencing any discussion with, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, the claimed invention prior to the dates of application for the Asserted Patents. In an abundance of caution, Zophonos nevertheless identifies the documents being concurrently produced bearing Bates numbers ZOPH-SAM_00000001through ZOPH-SAM_00000081 and ZOPH-SAM_00001414 through ZOPH-SAM_00001472.

Zophonos makes this disclosure based on information reasonably available to it at this time and reserves its right to supplement and/or amend its disclosure.

VIII. Patent Rule 3-2(b) Documents

Non-privileged documents evidencing the conception, reduction to practice, design, and development of each claimed invention, which were created on or before the dates of application for the Asserted Patents or the priority date identified pursuant to Patent Rule 3-1(e) are being concurrently produced bearing Bates numbers ZOPH-SAM_00000082 through ZOPH-SAM_00000349.

Zophonos makes this disclosure based on information reasonably available to it at this time and reserves its right to supplement and/or amend its disclosure.

IX. Patent Rule 3-2(c) Documents

Copies of the file histories for the Asserted Patents are being concurrently produced bearing Bates numbers ZOPH-SAM_00000350 through ZOPH-SAM_00001413.

Date: November 10, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all counsel of record by email on November 10, 2025.

/s/W. Walker Hobby
W. Walker Hobby