

Gamba Group Holdings LLC
v.
Samsung Electronics America, Inc. et al

Case No. 2:25-cv-00438-JRG

Asserted U.S. Patent No. 9,772,193
“Vehicle beacon and method of use”

Amended Exhibit F

October 2, 2025

This claim chart is based on public information regarding Defendants' products. Plaintiff has yet to receive Defendants' internal documentation, including technical documentation such as schematics and datasheets, and source code, in discovery; and therefore Plaintiff reserves the right to amend or further supplement this claim chart.

The term "Accused Products" is defined in the pleading portion of Plaintiff's P.R. 3-1 disclosures, which are hereby served concurrently and incorporated by reference.

This claim chart specifically addresses infringement of Claims 12, 13, 15, 16, 17, and 18 ("Asserted Claims") of the '193 Patent by Defendants' Samsung Smart Phones and Samsung Tablets classes of Accused Products as detailed in the pleading portion of Plaintiff's P.R. 3-1 disclosures, which are hereby incorporated by reference.

Samsung Smart Phones and Samsung Tablets product classes, as detailed in the pleading portion of Plaintiff's P.R. 3-1 disclosures, individually infringe each of the Asserted Claims. These infringement contentions are illustrative rather than exhaustive and they are representative of, and apply to, all Accused Products based on the fact that the accused functionality is fulfilled by all Accused Products as detailed in the pleading portion of Plaintiff's P.R. 3-1 disclosures.

With respect to method claims, in *Akamai Technologies Inc. v. Limelight Networks, Inc.*, 797 F.3d 1020 (Fed. Cir. 2015), the Federal Circuit held that the acts of multiple parties can be combined for the purposes of direct infringement, and the requisite direction and control, when the first party: (1) “conditions participation in an activity or receipt of a benefit upon performance of a step,” and (2) “establishes the manner or timing of that performance.” *Akamai*, 797 F.3d at 1023. Applying these principles set forth by the Federal Circuit, Samsung is directly infringing each of the asserted claims of the Patents-in-Suit. Samsung is, *inter alia*, placing the Accused Instrumentalities into service, exercising control over the systems, and obtaining beneficial use of the infringing systems and methods, and is thus liable for direct infringement under 35 U.S.C. § 271(a) based on making, having made and using systems and methods covered by the Patents-in-Suit.

To the extent that any component or step of an asserted claim is determined to have been supplied or practiced by an end-user of the Accused Instrumentalities, Samsung is nevertheless liable as a direct infringer under *Akamai*. To the extent that end-users are determined to have independently directly infringed the claims of the Patents-in-Suit, Samsung has induced such acts of direct infringement by the end-users pursuant to 35 U.S.C. § 271(b).

Plaintiff contends that the Accused Instrumentalities literally infringe the asserted claims of each of Patents-in-Suit as more specifically explained in the attached infringement charts. Plaintiff asserts that to the extent the Court determines that any element of the asserted claims of the Patents-in-Suit are literally infringed, each such element is infringed under the doctrine of equivalents because the difference between any component of any product or system and any step of any service or method and any claim element is insubstantial.

12. A method of utilizing a Bluetooth transceiver for conveying desired information, the method comprising steps of:

Comment: Samsung mobile phone users manuals (e.g. Galaxy S21, shown at right) instruct users to connect to a vehicle's Bluetooth system with Android Auto.

Samsung support pages (below) also instruct users to connect their Galaxy phones to their car using Bluetooth to work with Android Auto.

Android Auto

Android Auto brings the most useful apps to your device screen or your compatible car display in a format that makes it easy for you to keep your main focus on driving. You can control features like navigation and maps, calls and text messages, and music.

○ From Settings, tap  **Advanced features > Android Auto** for the following features:

- **Connect a car:** Follow the prompts to connect your device using your vehicle's compatible USB port or connect using wireless Android Auto.

<https://ss7.vzw.com/is/content/VerizonWireless/samsung-galaxy-s21-userguide-01202021pdf>

Samsung Galaxy S21 User Manual

Date acquired: 1/30/2024



<https://9to5google.com/2023/12/07/android-auto-parking-location-google-maps/>

Android Auto can now save your parking location in Google Maps on arrival

Date acquired: 1/30/2024

Step 2. Check your phone.

- If your phone is running Android 10, no need to download Android Auto separately.
- If your phone is running Android 9 or lower, you need to download Android Auto from the Play Store.
- Your phone connection must allow data transfers for Android Auto to function.

Step 3. Connect and start.

- The connection between Android Auto and the vehicle is possible using a Bluetooth or USB cable, and the connection method may differ depending on the vehicle and manufacturer.
- Check if Android Auto is displayed on the display.

<https://www.samsung.com/sg/support/mobile-devices/how-to-connect-your-galaxy-smartphone-to-a-car-using-android-auto/>

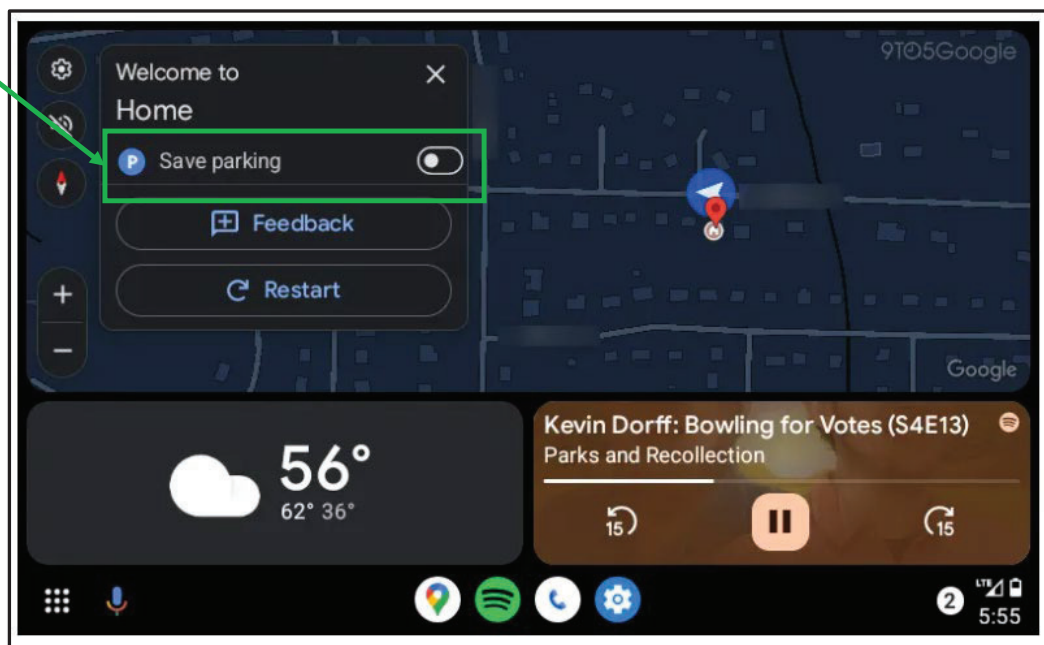
How to connect your Galaxy phone to car via Android Auto

Date acquired: 9/22/2025

[A] employing the Bluetooth transceiver integrated within a vehicle, the Bluetooth transceiver configured to transmit a Bluetooth signal detectable by a Bluetooth circuit of a mobile device located within a communication range of the respective Bluetooth transceiver;

[A]

In the latest versions of Google Maps for Android Auto, Google has quietly added a new toggle that lets you save your parking location when you arrive at a destination. This appears when you navigate to a specific destination and shows up on the arrival screen. Simply tapping the “save parking location” button will save that information to your account, and even results in a reminder (at least on Android phones) the next day.



*Comment: The vehicle necessarily has an integrated Bluetooth transceiver, which a Samsung mobile device employs when the transceiver **transmits a signal** to the user’s mobile device. The signal can include the selection of “Save parking.”*

When a user taps the “Save parking” icon, the Samsung mobile device receives the transmitted signal from the vehicle’s integrated Bluetooth transceiver.

<https://9to5google.com/2023/12/07/android-auto-parking-location-google-maps/>

Android Auto can now save your parking location in Google Maps on arrival

Date acquired: 1/30/2024

[B] registering an exact parking space location of the vehicle on the mobile device using information provided by the Bluetooth transceiver; and

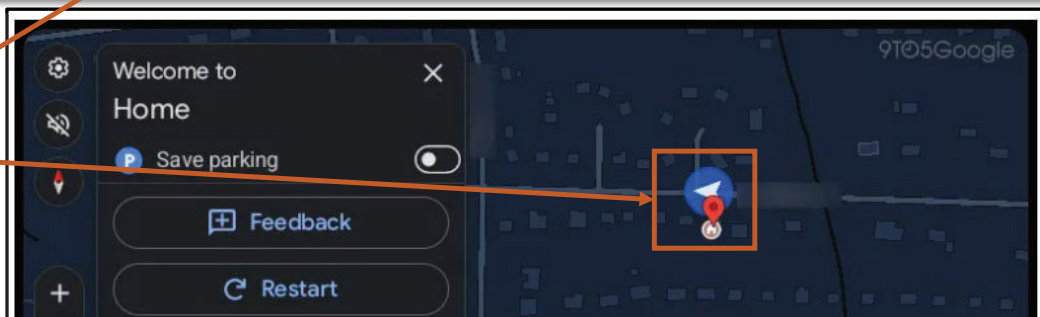
Comment: When the Samsung mobile device receives the transmitted signal from the vehicle's integrated Bluetooth transceiver, the Samsung mobile device registers the exact spot where the car is parked.

The information is thus provided from the Bluetooth transceiver to the mobile device.

The exact location is saved to the user's account, which is accessible by the user's Samsung mobile device.

*Samsung's Galaxy S22 and S23 **user forums** discuss how to use the "Save Parking" feature to register the exact spot where the car is parked.*

In the latest versions of Google Maps for Android Auto, Google has quietly added a new toggle that lets you save your parking location when you arrive at a destination. This appears when you navigate to a specific destination and shows up on the arrival screen. Simply tapping the "save parking location" button will save that information to your account, and even results in a reminder (at least on Android phones) the next day.



<https://9to5google.com/2023/12/07/android-auto-parking-location-google-maps/>
Android Auto can now save your parking location in Google Maps on arrival
Date acquired: 1/30/2024

Android Auto now remembers where you parked your car
Let's not end this on a sad note. The latest iteration of Google Maps for Android Auto prompts users to save their parking location upon reaching their destination. A simple "Save Parking Location" button appears on the navigation screen, ensuring you won't be left wandering aimlessly in search of your vehicle.

<https://r2.community.samsung.com/t5/Tech-Talk/One-UI-6-Android-14-might-break-Android-Auto-on-your-Galaxy-S22/td-p/15209047>
One UI 6/Android 14 might break Android Auto on your Galaxy S22, Galaxy S23.
Date acquired: 9/22/2025

The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

[C] subsequently using the mobile device to provide navigation to the parking space location where the vehicle is parked.

Comment: Google Maps comes pre-installed on Samsung mobile devices, as indicated in their user manuals.

The parked car is a saved location that the user wants to navigate to.

Samsung mobile device users can click on the "Directions" icon on the mobile device for detailed navigation instructions on how to get back to the car.

Google apps

The following Google apps may be preloaded on your device. Apps can be downloaded from the Google Play™ store.

Chrome | Drive | Duo | Gmail | Google | Google Pay | **Maps** | Photos | Play Movies & TV | Play Store | YouTube | YT Music



Maps

Get directions and other location-based information. You must enable location services to use Google Maps. For more information, see [Location](#).

Visit support.google.com/maps to learn more.

<https://ss7.vzw.com/is/content/VerizonWireless/samsung-galaxy-s21-userguide-01202021pdf>
Samsung Galaxy S21 User Manual
Date acquired: 1/30/2024

[C]

Find where you're parked

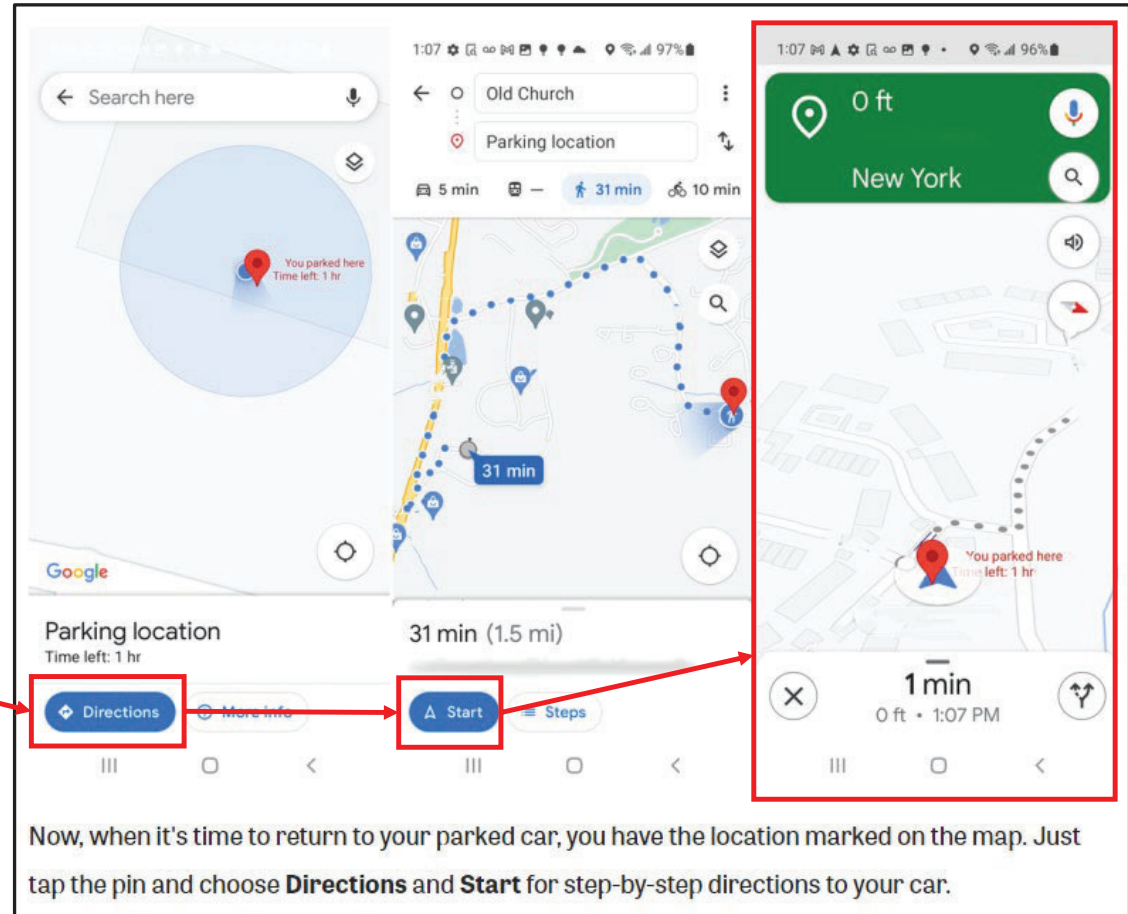
1. On your Android phone or tablet, open the Google Maps app 📍.
2. Tap the search bar > **Parking location**.
3. On the bottom, tap **Directions** ➡.

<https://support.google.com/maps/answer/7257797?co=GENIE.Platform%3DAndroid&hl=en>
Find & save parking locations
Date acquired: 9/22/2025

[C] subsequently using the mobile device to provide navigation to the parking space location where the vehicle is parked.

Comment: The Samsung mobile device user can click on the "Directions" icon on the Samsung mobile device (using the pre-installed Google Maps app) for detailed navigation instructions on how to get back to the parked car.

[C]



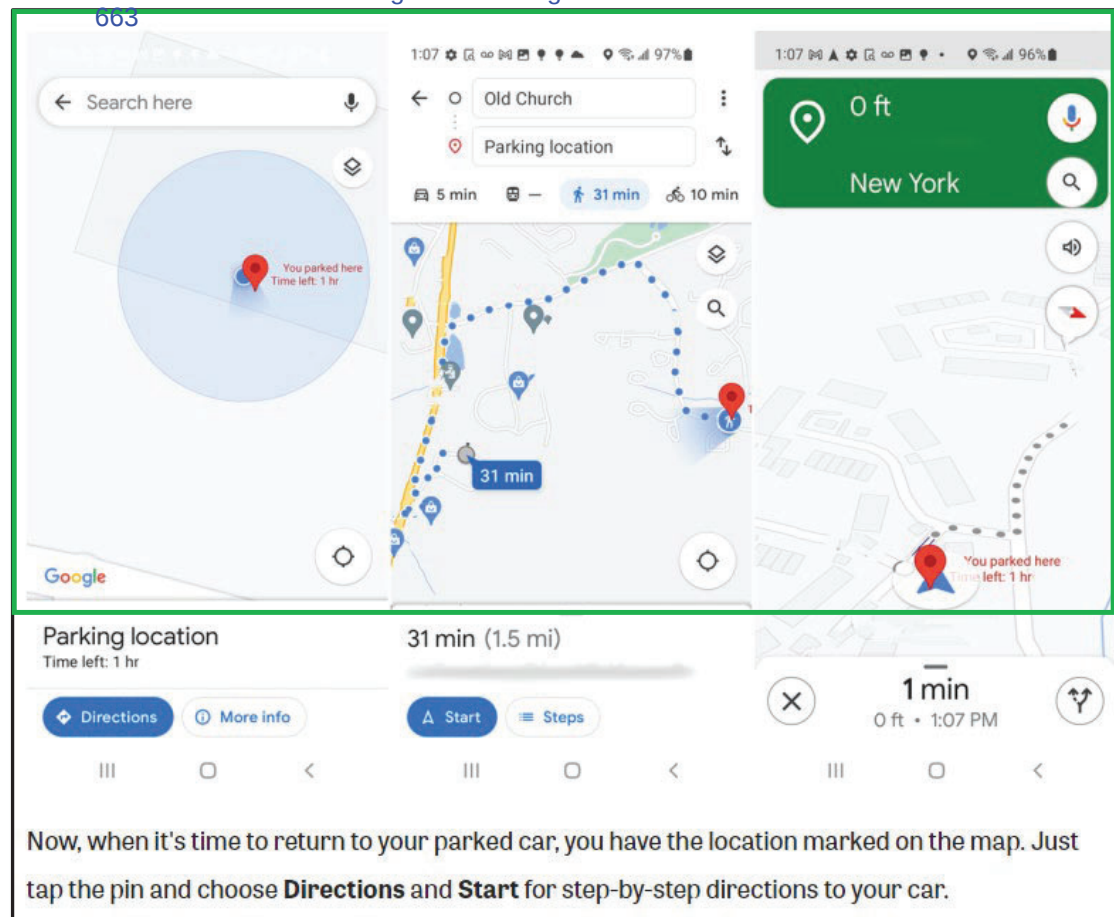
<https://www.pcmag.com/how-to/how-to-use-a-smartphone-app-to-find-your-car>

Find My Car: How to Locate Your Vehicle With a Smartphone App

Date acquired: 1/30/2024

13. The method as recited in claim 12, further comprising a step of: displaying on a display of the mobile device, **a map between a current location of the mobile device and the exact parking space location of the vehicle.**

Comment: The mobile device user can display several versions of maps that show the distance between the parking space and the mobile device.



<https://www.pcmag.com/how-to/how-to-use-a-smartphone-app-to-find-your-car>

Find My Car: How to Locate Your Vehicle With a Smartphone App

Date acquired: 1/30/2024

The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

15. The method as recited in claim 12, further comprising a step of: employing a **Global Positioning System (GPS)** to register the location of the exact parking space location of the vehicle.

Comment: The mobile device (for example the Samsung Galaxy S25 Edge) has GPS capability for determining location of the device. The mobile device can use the GPS to register the exact space where the car is parked according to the signal received from the Bluetooth transceiver when the user arrives at the destination.

Connectivity	USB Interface USB Type-C
	Location Technology GPS, GLONASS, Beidou, Galileo, QZSS

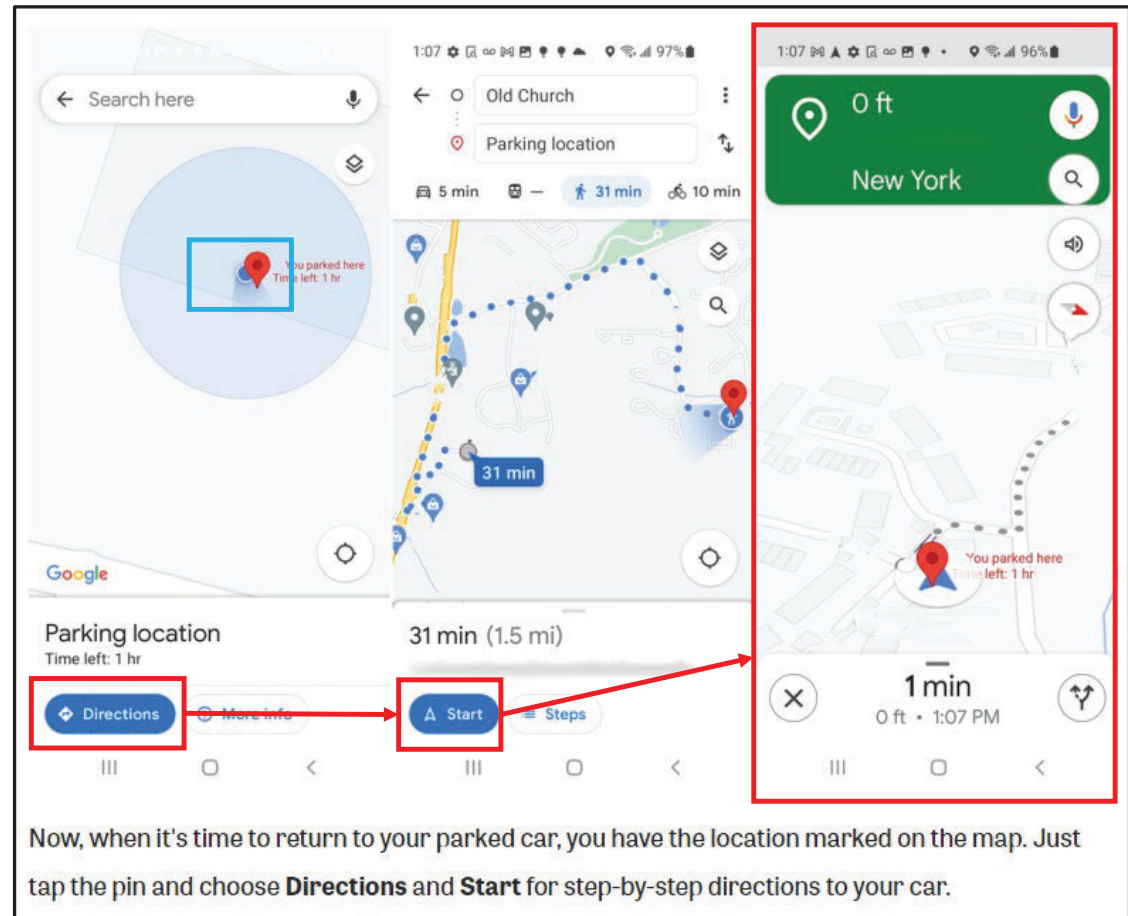
<https://www.samsung.com/smartphones/galaxy-s25-edge/specs>
Galaxy S25 Specifications
Date acquired: 6/30/2025

The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

16. The method as recited in claim 12, further comprising steps of: employing a **Global Positioning System (GPS) to register a location of the vehicle**; and subsequently using the registered location of the vehicle to **provide navigation to the parking space location where the vehicle is parked**.

Comment: As shown previously for Claim 15, the mobile device can use the GPS to register the location of the vehicle.

Also shown previously in Claim 12, the mobile device user can click on the "Directions" icon on the mobile device for detailed navigation instructions on how to get back to the car.



<https://www.pcmag.com/how-to/how-to-use-a-smartphone-app-to-find-your-car>

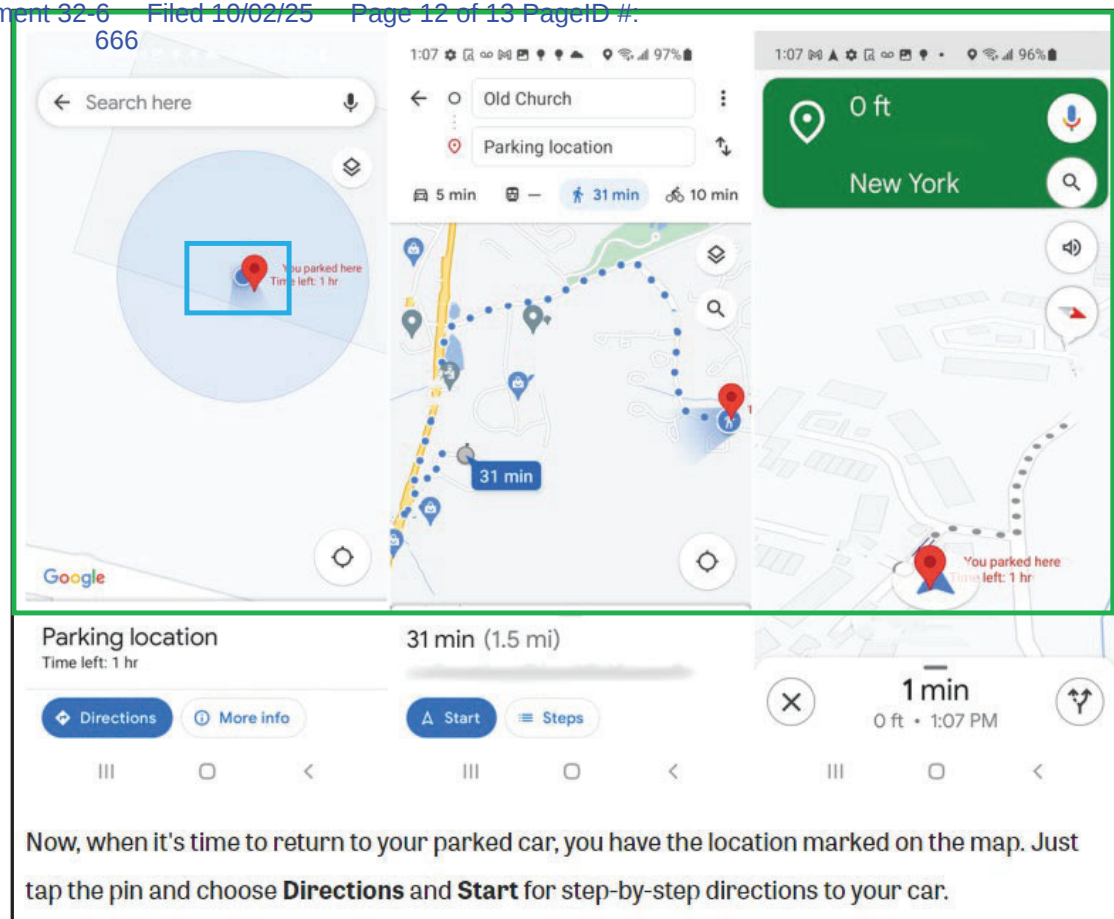
Find My Car: How to Locate Your Vehicle With a Smartphone App

Date acquired: 1/30/2024

17. The method as recited in claim 12, further comprising steps of: employing a **Global Positioning System (GPS) to register a location of the vehicle**; and **displaying on a display of the mobile device, a map between a current location of the mobile device and the registered location of the vehicle.**

Comment: As shown previously for Claim 15, the mobile device can use the GPS to register the location of the vehicle.

Also shown previously for Claim 13, the mobile device user can display several versions of maps that show the distance between the registered vehicle location and the mobile device.



<https://www.pcmag.com/how-to/how-to-use-a-smartphone-app-to-find-your-car>

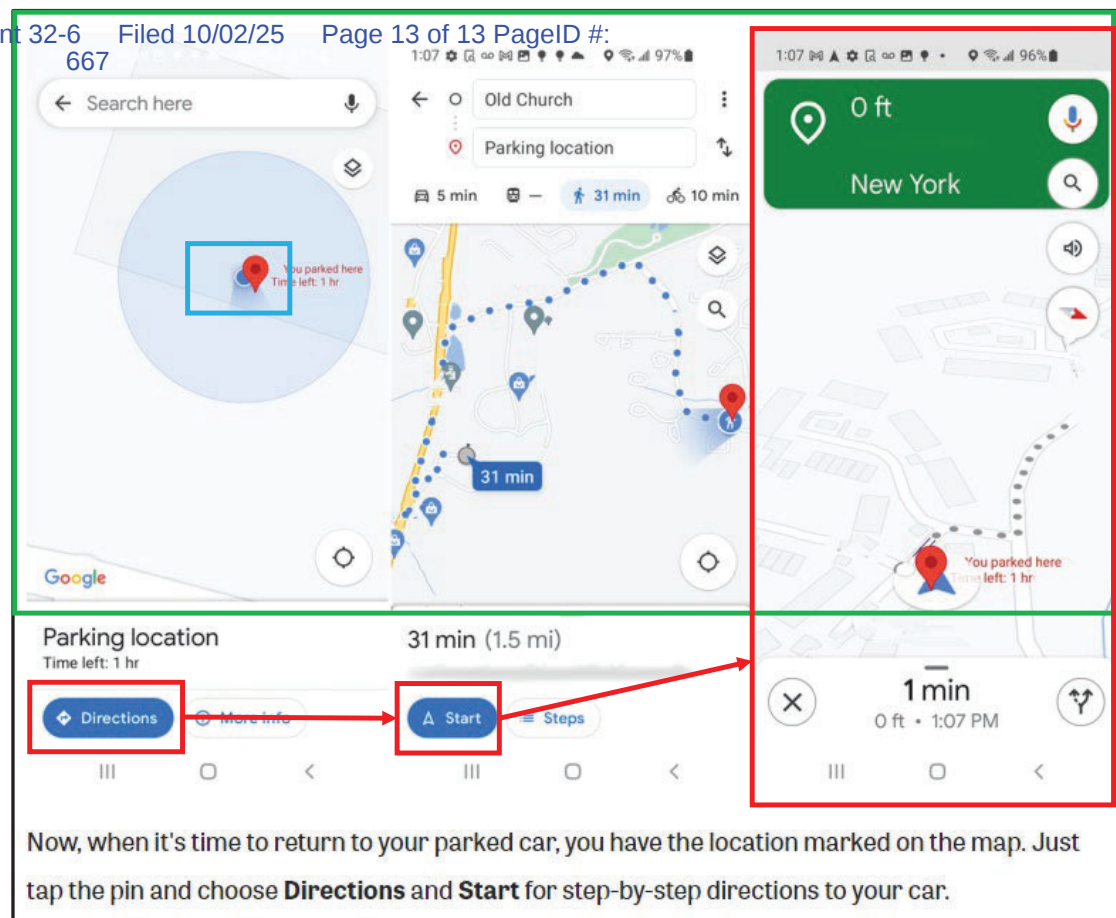
Find My Car: How to Locate Your Vehicle With a Smartphone App

Date acquired: 1/30/2024

The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

18. The method as recited in claim 12, further comprising steps of:
employing a **Global Positioning System (GPS)** to register a location of the vehicle;
displaying on a display of the mobile device, a map between a current location of the mobile device and the registered location of the vehicle; and
providing navigation from the current location of the mobile device and the registered location of the vehicle.

Comment: As shown previously for Claim 15, the mobile device can use the GPS to register the location of the vehicle. As shown previously for Claim 13, the mobile device user can display several versions of maps that show the distance between the registered vehicle location and the mobile device. As shown previously for Claim 12, the mobile device user can click on the "Directions" icon on the mobile device for detailed navigation instructions on how to get back to the car.



<https://www.pcmag.com/how-to/how-to-use-a-smartphone-app-to-find-your-car>

Find My Car: How to Locate Your Vehicle With a Smartphone App

Date acquired: 1/30/2024

The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.