

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

KIWI INTELLECTUAL ASSETS
CORPORATION,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Civil Action No.: 2:25-cv-00811-JRG

Jury Trial Demanded

**PLAINTIFF KIWI INTELLECTUAL ASSETS CORPORATION'S
DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS**

In accordance with P.R. 3-1, P.R. 3-2, and the Court's Docket Control Order (ECF No. 16), Plaintiff KIWI Intellectual Assets Corporation ("Plaintiff" or "KIWI"), by and through undersigned counsel, submits the following Disclosure of Asserted Claims and Infringement Contentions ("Infringement Contentions") with respect to U.S. Reissued Patent No. RE50,307 ("the '307 Patent" or "Asserted Patent") to Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (collectively, "Defendants").

KIWI's investigation is ongoing, and discovery is in its preliminary stages. Accordingly, the following disclosures are based solely on the information currently available to KIWI, and KIWI reserves the right to amend, supplement or otherwise revise these disclosures as new information becomes available, whether through discovery or otherwise. KIWI also reserves the right to assert additional claims of the '307 Patent, accuse different products, or identify alternative literal and/or equivalent infringing elements in Defendants' products. These Infringement

Contentions are based on KIWI's good faith present understanding of the meaning and scope of the claims of the Asserted Patents in the absence of any claim construction proceedings.

I. P.R. 3-1 DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

A. Asserted Claims (P.R. 3-1(a))

Based upon the information currently available to KIWI, including its good faith present understanding of the meaning and scope of the Asserted Patent, and the available public information regarding Defendants' products, Defendants have infringed and continue to infringe literally or under the doctrine of equivalents at least claims 34-36, 39-66, 98-109, 112-114, 116, 130-134 of the '307 Patent. KIWI asserts that Defendants have infringed and continue to infringe these claims under 35 U.S.C. § 271(a). To the extent that Defendants may contend that these claims are not directly infringed (in whole or in part), KIWI asserts that Defendants have indirectly infringed and continue to indirectly infringe these claims under 35 U.S.C. §§ 271(b) and/or (c). For example, KIWI asserts that Defendants also have infringed and continue to infringe at least claims 48, 55, 57, 99, 109, and 113 under 35 U.S.C. §§ 271(b) and/or (c) at least since the filing of the Complaint. KIWI reserves the right to assert indirect infringement of additional claims under §§ 271(b) and/or (c) after discovery has commenced.

Evidence of Defendants' infringement is further detailed in the claim chart attached hereto as Appendices A1-A8, and B. KIWI reserves the right to amend or supplement its contentions to identify additional claims and/or patents infringed by Defendants after discovery or as otherwise permitted under the Patent Rules.

B. Accused Instrumentalities (P.R. 3-1(b))

Accused Instrumentalities	Asserted Claims
Samsung T7 Portable SSD	'307 Patent Claims 34-36, 39-66, 98-109, 112-114, 116, 130-134
Samsung Galaxy Tab S9 FE Plus	'307 Patent Claims 34-36, 39-52, 55-60, 98-102, 114, 116, 130-134
Samsung S24 FE Phone	'307 Patent Claims 34-36, 39-52, 55-60, 98-102, 114, 116, 130-134
Samsung ViewFinity S80UD	'307 Patent Claims 34-36, 39-52, 55-60, 98-102, 114, 116, 130-134
Samsung EP-T1510 Power Adapter	'307 Patent Claims 34-36, 39-42, 44, 48-52, 55-60, 98-102, 114, 116, 130-134
Samsung EP-T4511 Power Adapter	'307 Patent Claims 34-36, 39-52, 55-60, 98-102, 114, 116, 130-134
Samsung EP-T5020 Power Adapter	'307 Patent Claims 34-36, 39-42, 44, 48-52, 55-60, 98-102, 114, 116, 130-134
Samsung EP-TA865 Power Adapter	'307 Patent Claims 34-36, 39-52, 55-60, 98-102, 114, 116, 130-134
All Samsung phones, tablets, power adapters, computers (including laptops), monitors, televisions, and other devices including a USB-C port or receptacle, including, but not limited to, the products identified in the Appendices A-1 through A-8 and B of these Infringement Contentions, the Complaint (ECF No. 1, which is incorporated by reference herein, including Paragraph 43 thereof), and/or the following products: The Galaxy S25 Edge, the Galaxy S24FE and 25FE, the Galaxy S25 Ultra, the Galaxy S25, the Galaxy S25+, the Galaxy A16, the Galaxy A15, the Galaxy S24 Ultra, the Galaxy S24, the Galaxy Z Fold6, the Galaxy Z Flip6, the Galaxy Z Fold5, the Galaxy A35, the Galaxy A26 5G, the Galaxy A36 5G, the Galaxy S23 FE, the Galaxy Z Flip7, the Galaxy Z Fold7, the Galaxy Z Flip7 FE, the Galaxy Tab S11, the S11 Ultra, the Galaxy Tab S10 Ultra, the Galaxy Tab S10+, the Galaxy Tab S10 FE, the Galaxy Tab S10 FE+, the Galaxy Tab S9+, the Galaxy Tab S9, the Galaxy Tab S9 FE, the Galaxy Tab A9, the Galaxy Tab A9+ , the 45W Power Adapter (e.g., EP-T4511 and EP-TA845), the 50W Power Adapter (e.g., EP-T5020), the 25W Power Adapter (e.g., EP-T2510), the 15W Power Adapter (e.g., EP-T1510 and EP-P5400), the Galaxy	'307 Patent Claims 34-36, 39-52, 55-60, 98-102, 114, 116, 130-134

Accused Instrumentalities	Asserted Claims
Book4, the Galaxy Chromebook Plus, the Galaxy Book4 Edge, the Galaxy Book4 Ultra, the Galaxy Book5 Pro, the Galaxy Book5 360, the Galaxy Book5 Pro 360, the Smart Monitor M9 (including the M90SF), the Smart Monitor M8 (including the M80D and M80F), the ViewFinity S8, the Odyssey QD-OLED G9, the ViewFinity S9, the Smart Monitor M7 (including M70F and M70D), the ViewFinity TU874, the ViewFinity S80PB, the ViewFinity S65VC, the ViewFinity S65UC, the M70C Smart Monitor (M7 Series), the M80C Smart Monitor, the ViewFinity S65UA, the ViewFinity the S60UA, the OLED S95F (QN83S95F, the QN77S95F, the QN65S95F, QN55S95F), the OLED S95D, the Frame (2025) (LS03FW, the LS03FA), the Neo QLED 8K (QN990F, QN800D, SN900D, and QN800F), and hard drives such as the SSD T9; USB-C Chargers; Cameras with a USB-C port for connection to a display; Remote controls with a USB-C port used for charging, which are sold with at least the M8, S85F, the QN1EF, and the Q8F.	

The Accused Instrumentalities are described in more detail in Appendices A1-A8, and B. KIWI reserves the right to amend or supplement its contentions to identify and accuse additional products released, developed, or made available by Defendants after the date on which these contentions are served, or of which KIWI was not aware at the time of these contentions and/or additional products identified through discovery.

C. Claim Charts (P.R. 3-1(c))

Claim charts identifying specifically where each element of each Asserted Claim is found within each Accused Instrumentality are attached hereto as Appendices A1-A8, and B.¹ The claim charts are based on publicly available information that is currently accessible to KIWI. KIWI

¹ KIWI does not concede that any identified preamble of the Asserted Claims should be interpreted to be limiting in any manner.

reserves the right to amend or supplement these claim charts, as well as other information contained in this document, to incorporate information learned during the course of discovery, including, but not limited to, information that is not publicly available or readily discernible without discovery.

D. Literal Infringement and/or Doctrine of Equivalents (P.R. 3-1(d))

The claim charts attached hereto as Appendices A1-A8, and B, demonstrate literal infringement of each element of each Asserted Claim as well as those elements present under the doctrine of equivalents in the Accused Instrumentalities. To the extent any limitation is determined not to be present in the Accused Instrumentalities, that limitation is present under the doctrine of equivalents, because the differences between the claim limitations and the elements of the Accused Instrumentalities are insubstantial. In other words, the corresponding feature(s) of the Accused Instrumentalities performs the same or substantially the same function, in the same or substantially the same way, to achieve the same or substantially the same result, as the claimed element.

KIWI reserves the right to amend and/or supplement its contentions as new information is learned during the course of discovery and following the entry of the Court's Claim Construction Order.

E. Priority Claim to Earlier Applications (P.R. 3-1(e))

The claimed priority date for all asserted claims in the Asserted Patent is at least as early as April 15, 2009. To the extent the dates of KIWI's conception and reduction to practice become a relevant disputed issue, KIWI reserves the right to amend or supplement its contentions at any time in view of the Court's construction, any new information learned during discovery, or for any other reason permissible under the Federal and Local Rules.

F. Reliance on the Claimed Invention (P.R. 3-1(f))

KIWI does not presently rely on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed inventions of the Asserted Claims.

II. P.R. 3-2 DOCUMENT PRODUCTION ACCOMPANYING DISCLOSURE

A. Documents Regarding Disclosure to a Third Party, Sale of or Offer to Sell (P.R. 3-2(a))

Following a reasonably diligent search, KIWI has not located any documents evidencing discussions with, disclosures to, or other manners of providing to a third party, or sales of or offers to sell, the claimed invention prior to the date of application for the Asserted Patent.

B. Documents Evidencing Conception and Reduction to Practice (P.R. 3-2(b))

Following a reasonably diligent search, KIWI herewith produces the following documents evidencing the conception, reduction to practice, design, and development of the claimed invention of the Asserted Patent that were created on or before the priority date identified pursuant to P.R. 3-1(e) as KIWI-Sam_004501 to KIWI-Sam_004530.

C. File History (P.R. 3-2(c))

Copies of the file and assignment histories for the Asserted Patent have been produced herewith as KIWI-Sam_000470 to KIWI-Sam_003698.

Dated: January 8, 2026

Respectfully submitted,

By: /s/ Scott R. Bialecki

Claire A. Henry
Texas Bar No. 24053063
claire@millerfairhenry.com
MILLER FAIR HENRY PLLC
1507 Bill Owens Parkway
Longview, Texas 75604
(903) 757-6400

Robert R. Brunelli
CO State Bar No. 20070
rbrunelli@sheridanross.com
Scott R. Bialecki
CO State Bar No. 23103
sbialecki@sheridanross.com
Matthew C. Holohan
CO State Bar No. 40996
mholohan@sheridanross.com
Brian Boerman
CO State Bar No. 50834
bboerman@sheridanross.com
Tristan D. Lewis
CO State Bar No. 60968
tlewis@sheridanross.com
SHERIDAN ROSS P.C.
1560 Broadway, Suite 1200
Denver, CO 80202
Telephone: 303-863-9700
Facsimile: 303-863-0223
litigation@sheridanross.com

Patrick A. Fitch
Massachusetts Bar No. 672797
pfitch@princelobel.com
Prince Lobel Tye LLP
One International Place, Suite 3700
Boston, MA 02110
Telephone: 617-456-8000

Attorneys for Plaintiff
KIWI Intellectual Assets Corporation

CERTIFICATE OF SERVICE

I hereby certify that, on January 8, 2026, true and correct copies of Plaintiff KIWI Intellectual Assets Corporation's Disclosure of Asserted Claims and Infringement Contentions were served via email on counsel for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.

/s/ Scott R. Bialecki
Scott R. Bialecki
CO State Bar No. 23103
sbialecki@sheridanross.com
SHERIDAN ROSS P.C.
1560 Broadway, Suite 1200
Denver, CO 80202
Telephone: 303-863-9700
Facsimile: 303-863-0223
litigation@sheridanross.com

Attorney for Plaintiff
KIWI Intellectual Assets Corporation