

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

SoftView, LLC,

Plaintiff,

v.

Samsung Electronics Co., Ltd & Samsung
Electronics America, Inc.,

Defendants.

Case No. 2:25-cv-00246

JURY TRIAL DEMANDED

**PLAINTIFF SOFTVIEW LLC'S P.R. 3-1 AND 3-2 DISCLOSURE OF ASSERTED
CLAIMS AND INFRINGEMENT CONTENTIONS**

Plaintiff SoftView LLC ("SoftView") makes the following disclosure of asserted claims and infringement contentions with respect to U.S. Patent No. 9,519,729 ("the '729 patent"), U.S. Patent No. 7,844,889 ("the '889 patent"), U.S. Patent No. 10,083,154 ("the '154 patent"), U.S. Patent No. 8,533,628 ("the '628 patent"), and U.S. Patent No. 7,461,353 ("the '353 patent") (collectively, the "Asserted Patents"), to Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (together, "Samsung" or "Defendants").

SoftView's investigation is ongoing, and discovery is in its early stages. Accordingly, these disclosures are based on information available to SoftView at this time.¹ SoftView reserves the

¹ In many portions of SoftView's disclosures, SoftView has gone beyond the disclosure requirements required by the rules and provided not only its contentions but also additional disclosures and citations. These additional disclosures and citations are made for Samsung's benefit. SoftView does not confine the scope or extent of its contentions to the specific citations of evidence and explicitly reserves the right to rely on additional or different evidence as the case moves forward through fact discovery, expert discovery, and trial. Furthermore, any omission of any other specific citation to the Accused Instrumentalities or documents related thereto does not constitute a waiver of SoftView's right to raise any issues related to the Accused Instrumentalities or other documents related thereto at a later date.

right to amend or supplement these disclosures after further discovery from Defendants and others, particularly documents and other discovery regarding Defendants’ accused instrumentalities as disclosed below, as permitted by P.R. 3-6. SoftView also reserves the right to accuse different instrumentalities or find alternative literal and/or equivalent infringing elements in Defendants’ Accused Instrumentalities as disclosed below, as permitted by P.R. 3-6. Also, in accordance with P.R. 3-6, SoftView reserves the right to amend or supplement these disclosures after the Court’s Claim Construction Ruling.

I. PATENT RULE 3-1 DISCLOSURES

A. Each claim of each patent-in-suit that is allegedly infringed by each opposing party.

Pursuant to P.R. 3-1(a), SoftView asserts that Samsung has infringed at least the following claims (collectively, the “asserted claims”):

Asserted Patent	Asserted Claims
’729 patent	1-5, 7-10, 13-18, 21-22
’889 patent	1-3, 5, 13-20, 22-23, 33-40, 108-109, 114-15
’154 patent	13-23, 25
’628 patent	1-5, 7-14
’353 patent	11, 13-18, 20-21, 30-31, 35, 37-38, 50, 53, 55, 69-70, 87-88, 90, 92-93, 95, 97-98, 108, 111, 128-129, 133-134, 144-145, 150-151, 161-162, 164, 168, 170-171, 182, 185-187, 189, 193-194, 196, 204, 206-207, 209, 215-216, 226-228, 233-234, 236, 245-246, 251, 253-254, 257, 264-265, 269-270, 282, 285-287, 289, 293-294, 296, 304, 306, 307, 318-319

- B. Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality (“Accused Instrumentality”) of each opposing party of which the party is aware. This identification shall be as specific as possible. Each product, device, and apparatus must be identified by name or model number, if known. Each method or process must be identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process.**

Pursuant to P.R. 3-1(b), SoftView contends that the asserted claims are infringed under 35 U.S.C. § 271 by at least Samsung smartphones and tablets sold since 2012 upon which Chromium-based and/or WebView-based software has been installed, including the Chrome browser, the Samsung Internet browser, Gmail, and Samsung Email (the “Accused Instrumentalities”). Appendix B hereto contains a list of such Samsung tablets and smart phones currently known to SoftView.

The Accused Instrumentalities also include such smartphone and tablet products that Samsung makes or has made for or on behalf of other entities, including, for example, by way of white label or private label models.

As explained above, SoftView believes that discovery from Samsung and others will provide additional evidence of the nature and/or scope of Samsung’s infringement. SoftView reserves the right to amend, supplement, or otherwise revise the Accused Instrumentalities, as permitted by P.R. 3-6 and/or in light of the Court’s Claim Construction Ruling.

- C. A chart identifying specifically where each element of each asserted claim is found within each Accused Instrumentality, including for each element that such party contends is governed by 35 U.S.C. § 112(6), the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function.**

Pursuant to P.R. 3-1(c), claim charts for Samsung’s infringement of the asserted claims of the Asserted Patents are set forth as Exhibits 1 to 5, along with a supporting Appendix A hereto containing source code citations. These charts are representative of Samsung’s Accused

Instrumentalities. The claim element analysis provided in each chart with respect to the functionality of the Chrome browser, Samsung Internet browser, Gmail, and/or Samsung Email applies to each of the identified Samsung Accused Instrumentalities, and the analysis as to the Accused Instrumentalities is the same for purposes material to infringement. As an example, the Chrome and Samsung Internet browsers use overlapping Chromium source code and are designed to operate in substantially the same way for purposes material to infringement across the Accused Instrumentalities. The Chrome and Samsung Internet browsers behave in substantially the same way regardless of the model of accused tablet or smartphone they are installed on. The same is true of Gmail and Samsung Email. Likewise, allegations as to the Chrome browser's functionality are applicable to the Samsung Internet browser, and *vice versa*, as the two browsers use overlapping Chromium source code and are designed to operate in substantially the same way for purposes material to infringement. The same is true of Samsung Email and Gmail. Thus, for example, screenshots of the Chrome browser in the claim charts are representative of the materially similar functionality in the Samsung Internet browser, and *vice versa*. As another example, screenshots of the Gmail application in the claim charts are representative of the materially similar functionality in Samsung Email, and *vice versa*. For the same reasons, the claim charts are representative of all versions of the Samsung Internet browser, the Chrome browser, Gmail, and Samsung Email. Furthermore, the aspects of the software relevant to infringement have remained materially the same for at least the six years preceding the filing of the Complaint. For example, the software has consistently supported HTML and CSS. The software has consistently produced a DOM, performed layout resulting in bounding boxes with X/Y coordinates, and generated a vector-based display list of commands that is used to enable zooming operations. The software has

also consistently supported pinch zooming and tapping to zoom on images, paragraphs, and columns.

As explained above, SoftView believes that discovery from Samsung and others will provide additional evidence of the nature and/or scope of Samsung's infringement. SoftView reserves the right to amend, supplement, or otherwise revise the Accused Instrumentalities, as permitted by P.R. 3-6 and/or in light of the Court's Claim Construction Ruling.

D. Whether each element of each asserted claim is claimed to be literally present or present under the doctrine of equivalents in the Accused Instrumentality.

Pursuant to P.R. 3-1(d), SoftView asserts that, under the proper construction of the Asserted Claims and their claim terms, every limitation of the Asserted Claims of the Asserted Patents is literally present in Samsung's instrumentalities accused of infringing the claims. To the extent that any limitation is found to be not literally present, or to the extent that Samsung argues that any limitation is not present in the accused instrumentalities, SoftView asserts that such limitation is present under the doctrine of equivalents.

SoftView reserves the right to amend, supplement, or otherwise revise the Accused Instrumentalities, as permitted by P.R. 3-6 and/or in light of the Court's Claim Construction Ruling.

E. For any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled.

Pursuant to P.R. 3-1(e), SoftView asserts that each asserted claim of each Asserted Patent is entitled to a priority date of April 7, 2001, which is an earlier application date appearing on the face of the patents. To the extent Samsung contends, or it is found, that this date does not apply to one or more asserted claims, SoftView contends that such claims are entitled to the priority or filing date(s) of each of the later applications reflected on the face of the patents.

SoftView reserves the right to amend, supplement, or otherwise revise the Accused Instrumentalities, as permitted by P.R. 3-6 and/or in light of the Court's Claim Construction Ruling.

II. PATENT RULE 3-2 PRODUCTION OF DOCUMENTS

SoftView's concurrent production of documents responsive to P.R. 3-2 includes documents marked "Restricted – Attorney's Eyes Only." Under P.R. 2-2, such documents are restricted to outside attorneys of record pending entry of a Protective Order in this case.

A. P.R. 3-2(a)

Documents responsive to P.R. 3-2(a) may be found at the following production numbers: SV_SS00000001–SV_SS00006422; SV_SS00006506–SV_SS00006517; SV_SS00009525–SV_SS00009525; SV_SS00012235–SV_SS00012237; SV_SS00012238–SV_SS00012238; SV_SS00012534–SV_SS00012537; SV_SS00015173–SV_SS00015211; SV_SS00015312–SV_SS00015316; SV_SS00015465–SV_SS00015466; SV_SS00018616–SV_SS00018625; SV_SS00020524–SV_SS00020529; SV_SS00081542–SV_SS00081542; SV_SS00087245–SV_SS00087254; SV_SS00087280–SV_SS00087280; SV_SS00089773–SV_SS00089773; SV_SS00090708–SV_SS00090711; SV_SS00090763–SV_SS00090764; SV_SS00091161–SV_SS00091169; SV_SS00275416–SV_SS00280209; SV_SS00280731–SV_SS00280775; SV_SS00280857–SV_SS00280925; SV_SS00282478–SV_SS00284380.

SoftView's search for responsive documents remains ongoing, and accordingly, SoftView reserves the right to supplement its production of documents responsive to P.R. 3-2(a) as its search continues.

B. P.R. 3-2(b)

Documents responsive to P.R. 3-2(b) may be found at the following production numbers: SV_SS00000001–SV_SS00006422; SV_SS00006563–SV_SS00006593; SV_SS00006614–SV_SS00006626; SV_SS00006627–SV_SS00006637; SV_SS00006638–SV_SS00006639; SV_SS00006640–SV_SS00006670; SV_SS00006671–SV_SS00006701; SV_SS00006702–SV_SS00006721; SV_SS00006722–SV_SS00006728; SV_SS00006729–SV_SS00006749;

SV_SS00006750–SV_SS00006768; SV_SS00006769–SV_SS00006799; SV_SS00006800–
SV_SS00006804; SV_SS00006805–SV_SS00006814; SV_SS00006815–SV_SS00006832;
SV_SS00006833–SV_SS00006862; SV_SS00006863–SV_SS00006882; SV_SS00006883–
SV_SS00006904; SV_SS00006905–SV_SS00006921; SV_SS00006924–SV_SS00006940;
SV_SS00006941–SV_SS00006989; SV_SS00006990–SV_SS00006995; SV_SS00006996–
SV_SS00007018; SV_SS00007019–SV_SS00007034; SV_SS00007035–SV_SS00007045;
SV_SS00007046–SV_SS00007049; SV_SS00007050–SV_SS00007062; SV_SS00007063–
SV_SS00007088; SV_SS00007089–SV_SS00007096; SV_SS00007097–SV_SS00007112;
SV_SS00007113–SV_SS00007176; SV_SS00007177–SV_SS00007191; SV_SS00007192–
SV_SS00007208; SV_SS00007209–SV_SS00007215; SV_SS00007216–SV_SS00007231;
SV_SS00007232–SV_SS00007239; SV_SS00007240–SV_SS00007256; SV_SS00007257–
SV_SS00007262; SV_SS00007263–SV_SS00007266; SV_SS00007267–SV_SS00007268;
SV_SS00007269–SV_SS00007284; SV_SS00007285–SV_SS00007316; SV_SS00007317–
SV_SS00007337; SV_SS00007338–SV_SS00007340; SV_SS00007341–SV_SS00007380;
SV_SS00007381–SV_SS00007388; SV_SS00007389–SV_SS00007408; SV_SS00007409–
SV_SS00007412; SV_SS00007413–SV_SS00007420; SV_SS00007421–SV_SS00007425;
SV_SS00007426–SV_SS00007486; SV_SS00007487–SV_SS00007526; SV_SS00007527–
SV_SS00007601; SV_SS00007602–SV_SS00007628; SV_SS00007629–SV_SS00007654;
SV_SS00007655–SV_SS00007725; SV_SS00007726–SV_SS00007762; SV_SS00007763–
SV_SS00007787; SV_SS00007788–SV_SS00007828; SV_SS00007829–SV_SS00007873;
SV_SS00010677–SV_SS00010677; SV_SS00010777–SV_SS00010777; SV_SS00014035–
SV_SS00014040; SV_SS00014059–SV_SS00014059; SV_SS00015173–SV_SS00015211;
SV_SS00015312–SV_SS00015316; SV_SS00018635–SV_SS00018649; SV_SS00020504–

SV_SS00020506; SV_SS00032347–SV_SS00032442; SV_SS00073657–SV_SS00073700;
SV_SS00087263–SV_SS00087278; SV_SS00089773–SV_SS00089773; SV_SS00090719–
SV_SS00090719; SV_SS00091161–SV_SS00091169; SV_SS00092074–SV_SS00092077;
SV_SS00092091–SV_SS00092098; SV_SS00097941–SV_SS00097941; SV_SS00275416–
SV_SS00280209; SV_SS00280731–SV_SS00280775; SV_SS00280857–SV_SS00280925;
SV_SS00282478–SV_SS00284380.

Additionally, SoftView will make source code available for inspection after the entry of a protective order by the Court with adequate source code protections.

SoftView’s search for responsive documents remains ongoing, and accordingly, SoftView reserves the right to supplement its production of documents responsive to P.R. 3-2(b) as its search continues.

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

Documents responsive to P.R. 3-2(c) may be found at the following production numbers:
SV_SS00000001–SV_SS00006422.

Dated: June 11, 2025

Respectfully submitted,

/s/ Justin T. Nemunaitis

Bradley W. Caldwell

Texas Bar No. 24040630

Email: bcaldwell@caldwellcc.com

Jason D. Cassady

Texas Bar No. 24045625

Email: jcassady@caldwellcc.com

Justin T. Nemunaitis

Texas Bar No. 24065815

Email: jnemunaitis@caldwellcc.com

Andrew T. Langford

Texas Bar No. 24087886

Email: alangford@caldwellcc.com

Aisha M. Haley

Texas Bar No. 24139895

Email: ahaley@caldwellcc.com

James F. Smith

Texas Bar No. 24129800
Email: jsmith@caldwellcc.com
CALDWELL CASSADY & CURRY P.C.
2121 N Pearl Street, Suite 1200
Dallas, Texas 75201
Telephone: (214) 888-4848
Facsimile: (214) 888-4849

Andrea L. Fair
State Bar No. 24078488
MILLER FAIR HENRY, PLLC
1507 Bill Owens Parkway
Longview, TX 75604
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)
E-mail: andrea@millerfairhenry.com

Attorneys for Plaintiff SoftView, LLC

CERTIFICATE OF SERVICE

I certify that on June 11, 2025, a true and correct copy of the above and foregoing document was served on counsel of record via electronic mail.

/s/ Justin T. Nemunaitis
Justin T. Nemunaitis