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

GAEA LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD AND SAMSUNG ELECTRONICS AMERICA, INC. Defendants.	)))))))))))))	Case No. 2:26-cv-00264 **JURY TRIAL DEMANDED**

GAEA LLC'S DISCLOSURE OF
ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

Pursuant to P.R. 3-1, Plaintiff Gaea LLC's ("Gaea") submits this disclosure of asserted claims and infringement contentions to Defendant Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Samsung").

Gaea's investigation of the extent of Samsung's infringement is ongoing, and the following disclosures are based solely on the information currently available to Gaea. Gaea reserves the right to supplement or modify these disclosures as new information, including any source code and/or hardware schematics, becomes available, whether through discovery or otherwise.

Discovery is ongoing including identification by Samsung regarding additional accused products that support the identified functionality, including those released, developed, or made available by Samsung after the date on which these contentions are served.

Gaea is currently asserting U.S. Patent No. 10,776,023 ("the '023 Patent"), U.S. Patent No. 11,907,553 ("the '553 Patent"), and U.S. Patent No. 12,265,715 ("the '715 Patent") (collectively "the Asserted Patents") against Samsung.

I. P.R. 3-1(a) Disclosure of Asserted Claims

Gaea identifies the following claims of each patent in suit that is infringed by Samsung:

A. Claims 1, 9, and 14 of the '023 Patent;

B. Claims 1-4, 9-12 of the '553 Patent;

C. Claims 1, 9 of the '715 Patent.

II. P.R. 3-1(b) Identification of Accused Instrumentality

For each asserted claim identified above, Gaea identifies as the Accused Instrumentality as all Samsung Solid State Drives ("SSDs") that support Flexible Data Placement ("FDP") and/or NVMe 2.1 Base Specification, and its associated software and firmware. For example, this includes Samsung's PM9D3 and PM1763. Discovery is ongoing, including identification of all Samsung SSDs that support FDP and/or NVMe 2.1.

III. P.R. 3-1(c) Chart Identifying Infringement

Gaea identifies the following charts identifying specifically where each element of each asserted claim is found within the Accused Instrumentalities:

A. Samsung's Infringement of the '023 Patent: Exhibit A

B. Samsung's Infringement of the '553 Patent: Exhibit B

C. Samsung's Infringement of the '715 Patent: Exhibit C

IV. P.R. 3-1(d) Identification of Literal Infringement or Doctrine of Equivalents

Gaea contends that each and every limitation of each asserted claim is literally present in the Accused Instrumentalities, as set forth in the accompanying claim charts attached as Exhibits A–C. To the extent any limitation is found not to be literally present, Gaea contends that such limitation is present under the doctrine of equivalents because the Accused Instrumentalities include the same or insubstantially different structures, acts, or components that perform substantially the same function, in substantially the same way, to achieve substantially the same result as the claimed limitation. The claim charts attached as Exhibits A–C expressly identify the limitations for which Gaea currently asserts infringement literally and/or under the doctrine of equivalents.

Gaea's infringement contentions are based on information reasonably available to Gaea at this stage. Discovery has not yet begun, and Samsung has not yet produced technical documents, source code, schematics, specifications, or other information showing the design, structure, operation, and functionality of the Accused Instrumentalities. Accordingly, Gaea reserves the right to amend or supplement these contentions, including its literal infringement and doctrine-of-equivalents positions, based on information obtained through discovery. In addition, claim construction has not yet occurred, Samsung has not yet disclosed its claim construction positions, and the Court has not yet issued any claim construction order. Gaea therefore further reserves the right to amend or supplement these contentions based on Samsung's claim construction positions and any claim construction adopted by the Court.

V. P.R. 3-1(e) Priority Date

'023 Patent: Each asserted claim is entitled to a priority date of at least November 7, 2016.

’553 Patent: Each asserted claim is entitled to a priority date of at least November 7, 2016.

’715 Patent: Each asserted claim is entitled to a priority date of at least November 7, 2016.

VI. P.R. 3-1(f) Own Apparatus, Product, Device, Process, Method, Act, or Other Instrumentality

Gaea is not presently aware of any apparatus, product, device, process, method, act, or other instrumentality of Gaea that practices, incorporates, or reflects any asserted claim of the Asserted Patents.

Gaea’s investigation is ongoing. Discovery has just begun, no protective order has been entered, and Gaea has not yet completed its investigation of potentially relevant instrumentalities. Plaintiff reserves the right to amend or supplement this disclosure, including to identify any practicing instrumentality for any asserted claim, based on further investigation.

VII. P.R. 3-2(a) Document Production regarding discussion, disclosure, etc.

Gaea is not presently aware of any non-privileged documents in its possession, custody, or control responsive to this category. Gaea’s investigation is ongoing, and Gaea will supplement its production if responsive documents are later identified.

VIII. P.R. 3-2(b) Document Production regarding conception, reduction to practice, design, and development

Gaea is presently aware of the Asserted Patents and the provisional patent applications to which the Asserted Patents claim priority as documents that may evidence the conception, reduction to practice, design, and/or development of the claimed inventions. Gaea will produce or identify the Asserted Patents and the priority applications identified on the face of the Asserted Patents, to the extent not already publicly available or previously produced.

IX. P.R. 3-2(c) Copy of the File History for each patent in suit

A. ’023 Patent: GAEASAM-00000001-GAEASAM-00000325

B. ’553 Patent: GAEASAM-00000326-GAEASAM-00000752

C. ’715 Patent: GAEASAM-00000753-GAEASAM-00001328

D. Provisional Applications: GAEASAM-00001329- GAEASAM-00002080

E. Asserted Patents: GAEASAM-00002081-GAEASAM-00002239

Date: July 6, 2026

Respectfully Submitted,

/s/ Cristofer Leffler

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on July 6, 2026, a true and correct copy of the foregoing was served via email on all counsel of record for Samsung who have appeared in this case.

/s/ Cristofer Leffler
Cristofer Leffler