

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

In the Matter of:

**CERTAIN VIDEO-CAPABLE
ELECTRONIC DEVICES**

Investigation No. 337-TA-_____

**VERIFIED COMPLAINT OF INTERDIGITAL, INC. AND INTERDIGITAL VC
HOLDINGS, INC. UNDER SECTION 337 OF THE TARIFF ACT OF 1930**

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1 ¹	Certified Copy of U.S. Patent No. 10,741,211
2	Certified Copy of U.S. Patent No. 9,747,674
3	Certified Copy of U.S. Patent No. 8,363,724
4	Certified Copy of U.S. Patent No. 8,681,855
5	Certified Copy of U.S. Patent No. 11,917,146
6	Certified Assignment Record of U.S. Patent No. 10,741,211
7	Certified Assignment Record of U.S. Patent No. 9,747,674
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14	Innovation Momentum 2023: The Global Top 100, LexisNexis (Jan. 2023), available at https://www.lexisnexisip.com/wp-content/uploads/2024/02/LexisNexis-Innovation-Momentum-Report-2023.pdf
15	Innovation Momentum 2024: The Global Top 100, LexisNexis (Jan. 2024), available at https://go.lexisnexisip.com/hubfs/LexisNexis-Innovation-Momentum-Report-2024.pdf?hsCtaTracking=b73d2358-7d13-4732-afc6-e8a25be14c30%7C0b8f3fb0-888a-43b3-b2f6-70a6a3d96d87

¹ InterDigital has ordered but not yet received copies of the certified copies of the Asserted Patents (Exs. 1-5) and the certified assignment records for the Asserted Patents (Exs. 6-10). InterDigital will submit these certified copies upon receipt from the U.S. Patent and Trademark Office.

Public Exhibits	
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16	Fire Stick 4K Plus Amazon.com Listing, available at https://www.amazon.com/dp/B0F7Z4QZTT?tag=googhydr-20&hvadid=743821782711&hvpos=&hvnetw=g&hvrnd=10056816651732423106&hvpone=&hvptwo=&hvgmt=p&hvdev=c&hvdvcmdl=&hvlocint=&hvlocphy=9026903&hvtargid=kwd-308611635598&ref=pd_sl_25n983zrxq_p&gad_campaignid=23174761811&gbr aid=0AAAAADl_c3KyrCx7qQsq8uCJABrqU6xGs&gclid=CjwKCAiA2svIBhB-EiwARWDPjgGDQcaQLbY-3GHRxVFfRNglQr76LkQj9j-uvLiPovyMS2J7bfo-WhoCGrcQAvD_BwE&th=1
17	Fire TV Omni QLED Series Amazon.com Listing, available at https://www.amazon.com/dp/B0DD24KM9Y?ref_=MARS_NAVSTRIPE_deskto p_firetv_tvs_omniqled&th=1
18	Fire HD 10 Amazon.com Listing, available at https://www.amazon.com/dp/B0BHZT5S12?ref_=amzdv_b_ucw_unknown_tabc at_d_pc_clk_B0BHZT5S12&th=1
19	Echo Show 15 Amazon.com Listing, available at https://www.amazon.com/Echo-Show-15-Smart-Display/dp/B0C5DPSW5Y?th=1
20	Fire Stick 4K Plus Amazon.com Purchase Order
21	Fire TV Omni QLED Series Amazon.com Purchase Order
22	Fire HD 10 Amazon.com Purchase Order
23	Echo Show 15 Amazon.com Purchase Order
24	Amazon Stipulation and Exhibit A, <i>Certain Video Processing Devices and Components Thereof</i> , Inv. No. 337-TA-1343, Doc. ID 801044 (July 28, 2023)
25	Amazon Stipulation, <i>Certain Video Capable Electronic Devices, Including Computers, Streaming Devices, Televisions, Cameras, and Components and Modules Thereof</i> , Inv. No. 337-TA-1379, Doc. ID 819248 (April 22, 2024)
26	Fire TV Omni QLED Series Ebay Listing, available at https://www.ebay.com/itm/336281890143?chn=ps&mkcid=28&google_free_listi ng_action=view_item&com_cvv=8fb3d522dc163aeadb66e08cd7450cbbdddc64c6cf2e8891f6d48747c6d56d2c
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28	Fire HD 10 Target.com Listing, available at https://www.target.com/p/amazon-fire-hd-10-34-32gb-tablet-2023-release-black/-/A-89741724#lnk=sametab
29	Fire HD 10 BestBuy.com Listing, available at https://www.bestbuy.com/product/amazon-fire-hd-10-10-1-tablet-2023-release-32gb-with-wi-fi-black/J39HW697FX/sku/6562284
30	Echo Show 15 bjs.com Listing, available at https://www.bjs.com/product/amazon-echo-show-15-2024-release/3000000000005710747/
31	Echo Show 15 BestBuy.com Listing, available at https://www.bestbuy.com/product/amazon-echo-show-15-full-hd-15-6-smart-display-for-home-organization-with-built-in-fire-tv-and-alexa-black/J39HW6R2VX
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46	Dolby Vision or High Dynamic Range Not Working on Fire TV Devices, Amazon.com Help & Customer Service, available at https://www.amazon.com/gp/help/customer/display.html?nodeId=G8GNX2B27JG726AH
47	Reviews of Fire Stick 4K Plus, available at https://www.amazon.com/product-reviews/B0F7Z4QZTT/ref=cm_cr_dp_d_show_all_btm?ie=UTF8&reviewerType=all_reviews
48	Complaint, <i>InterDigital, Inc. et al v. Amazon.com Services LLC</i> , Case No. 1:25-cv-1365-GBW, D.I. 1 (D. Del. Nov. 7, 2025)
49	Fire HD 10 Tablet Specifications, Amazon Developer, available at https://developer.amazon.com/docs/device-specs/ft-device-specifications-firehd-models.html?v=firehd10_2023
50	Reviews of Fire TV Omni QLED Series, available at https://www.amazon.com/product-reviews/B0CJDJWMDV/ref=cm_cr_ar_p_d_viewopt_srt?ie=UTF8&reviewerType=all_reviews&sortBy=recent&pageNumber=1
51	Reviews of Fire HD 10 Tablet, available at https://www.amazon.com/product-reviews/B0BHZT5S12/ref=cm_cr_dp_d_show_all_btm?ie=UTF8&reviewerType=all_reviews
52	Echo Show 15 Specifications, Amazon Developer, available at https://developer.amazon.com/docs/device-specs/device-specifications-echo-show.html
53	Reviews of Echo Show 15, available at https://www.amazon.com/product-reviews/B0C5DPSW5Y/ref=cm_cr_ar_p_d_viewopt_rvw?ie=UTF8&reviewerType=avp_only_reviews&pageNumber=1
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81	<i>Certain Cellular Base Station Communication Equipment, Components Thereof, And Products Containing Same</i> , Inv. No. 337-TA-1302, Order No. 17 Granting Summary Determination on Apple Economic Domestic Industry (Nov. 2, 2022)
82	<i>Certain Video Capable Electronic Devices, Including Computers, Streaming Devices, Televisions, Cameras, and Components and Modules Thereof</i> , Inv. No. 337-TA-1379, Initial Determination on Violation of Section 337 and Recommended Determination on Remedy and Bond (Jan. 29, 2025)
83	Apple 17, https://www.apple.com/shop/buy-iphone/iphone-17/6.3-inch-display-256gb-mist-blue-unlocked
84	iPad Pro, https://www.apple.com/shop/buy-ipad/ipad-pro
85	Apple 15-inch MacBook Air, https://www.apple.com/shop/buy-mac/macbook-air/15-inch-sky-blue-m4-chip-with-10-core-cpu-10-core-gpu-16gb-memory-256gb
86	Apple Studio Display, https://www.apple.com/shop/buy-mac/apple-studio-display
87	Apple TV 4K, https://www.apple.com/shop/buy-tv/apple-tv-4k
88	Apple 2025 10-K
89	Apple, Contact - How to Contact Us, https://www.apple.com/contact/
90	Restated Articles of Incorporation of Apple Inc.
91	Apple Worldwide Campuses and Global Jobs, https://www.apple.com/careers/us/work-at-apple/locations.html
92	Apple Retail Stores, United States, https://www.apple.com/retail/storelist/
93	iPhone Repair and Service, https://support.apple.com/iphone/repair
94	Apple commits \$430 billion in US investments over five years (Apr. 26, 2021), https://www.apple.com/newsroom/2021/04/apple-commits-430-billion-in-us-investments-over-five-years/
95	Apple Increases US Commitment to \$600 billion, Announces American Manufacturing Program (Aug. 6, 2025), https://www.apple.com/newsroom/2025/08/apple-increases-us-commitment-to-600-billion-usd-announces-ambitious-program/
96	Apple plans \$19.3 M renovation of temporary offices in North Carolina (Apr. 26, 2022), https://appleinsider.com/articles/22/04/26/apple-plans-193m-renovation-of-temporary-offices-in-north-carolina

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97	Apple's northwest Austin campus reportedly adding \$279M in new structures (Aug. 17, 2022), https://www.kvue.com/article/money/economy/boomtown-2040/apple-northwest-austin-campus-new-structures/269-2963b2a6-0030-431c-96d3-dbd299ff747
98	Apple, Job Creation, https://www.apple.com/job-creation/
99	Apple Research and Development Expenses 2011-2025, https://www.macrotrends.net/stocks/charts/AAPL/apple/research-development-expenses
100	Apple and Corning partner to manufacture 100 percent of iPhone and Apple Watch cover glass in Kentucky (Aug. 6, 2025), https://www.apple.com/newsroom/2025/08/apple-corning-to-manufacture-all-iphone-apple-watch-cover-glass-in-kentucky/
101	Inside Apple's top secret testing facilities where iPhone defences are forged in temperatures of -40C (May 30, 2019), https://www.the-independent.com/tech/apple-iphone-privacy-security-park-interview-federighi-a8925291.html
102	Apple job listings for Pro XDR Display
103	Apple job listings for iPhone
104	Apple Statistics (2025), https://www.businessofapps.com/data/apple-statistics/
105	Every iPhone Generation: A Full History of Release Dates, https://www.ign.com/articles/all-iphone-release-dates-in-order
106	Samsung 2025 Q3 Interim Business Report
107	SEC 2024 Consolidated Financial Statements
108	Samsung in North America, https://www.samsung.com/global/business/networks/insights/blog/north-america/
109	Samsung Research America: About, https://sra.samsung.com/about-sra/
110	Samsung Galaxy S25 Ultra, https://www.samsung.com/us/smartphones/galaxy-s25-ultra/buy/galaxy-s25-ultra-512gb-unlocked-sku-sm-s938uztexasa/
111	Samsung Galaxy S25, https://www.samsung.com/us/smartphones/galaxy-s25/buy/galaxy-s25-128gb-unlocked-sku-sm-s931ulbaxaa/
112	Samsung 65 Class NEO QLED 4K TV, https://www.samsung.com/us/tvs/neo-qled/65-class-neo-qled-4k-tv-qn90f-sku-qn65qn90fafxza/

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113	Samsung Electronics America LinkedIn "About" Page, https://www.linkedin.com/company/samsung-electronics-america/about/
114	Samsung: Careers, https://www.samsung.com/us/careers/
115	Samsung Electronics Marks 19 Consecutive Years as the Global TV Market Leader (Feb. 18, 2025), https://news.samsung.com/global/samsung-electronics-marks-19-consecutive-years-as-the-global-tv-market-leader
116	SEC 2023 Consolidated Financial Statements
117	Life at Samsung, https://www.samsung.com/us/careers/life-at-samsung/
118	Samsung job listings in numerous cities
119	SRA: Locations
120	Samsung Experience Stores, https://www.samsung.com/us/samsung-experience-store/locations/
121	New Samsung Experience Stores Open the World of Galaxy (Oct. 24, 2025), https://news.samsung.com/us/new-samsung-experience-stores-open-the-world-of-galaxy/
122	Tech Radar: Samsung Launches First Ever US Retail Stores, https://www.techradar.com/news/samsung-launches-first-ever-us-retail-stores
123	Samsung Newsroom: Celebrating 10 Years of Galaxy at Samsung's New Experiential Retail Locations, https://news.samsung.com/us/samsung-experience-store-retail-10-years-of-galaxy/?nrtv_cid=496jv7y3hg5my&u1=trdpro-us-6772418898066000066
124	Amended Complaint, <i>Certain Active Matrix Organic Light-Emitting Diode Display Panels and Modules For Mobile Devices, and Components Thereof</i> , Inv. No. 337-TA-1351, EDIS Doc. ID 794839 (Apr. 24, 2023)
125	Samsung Fast Facts, https://news.samsung.com/global/fast-facts
126	LinkedIn Profiles for SEA Personnel Working on Domestic Industry Products
127	LinkedIn Profiles for SRA Personnel Working on Samsung Video Products
128	Samsung Job Posting: Director of Product Management, Samsung TV Plus
129	SRA LinkedIn "About" Page
130	SRA: Digital Media, https://sra.samsung.com/research-area/digital-media/

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131	SRA: Next Generation Communication
132	Samsung uBreakiFix FAQ
133	Samsung Job Postings Related to Sales and Marketing
134	The History of Samsung Galaxy Smartphones: 15 Years of Innovation & Evolution, https://www.t-mobile.com/dialed-in/devices/history-evolution-of-samsung-galaxy-smartphones
135	Photo of Apple iPhone 17 packaging

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77C	InterDigital-Samsung Patent License Agreement (2023)
78C	InterDigital-Samsung Patent License Agreement (2024)

Appendices	
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A ²	Certified Copy of U.S. Patent No. 10,741,211 Prosecution History
B	Certified Copy of U.S. Patent No. 9,747,674 Prosecution History
C	Certified Copy of U.S. Patent No. 8,363,724 Prosecution History
D	Certified Copy of U.S. Patent No. 8,681,855 Prosecution History
E	Certified Copy of U.S. Patent No. 11,917,146 Prosecution History
F	Prosecution histories of patents related to U.S. Patent No. 10,741,211
G	Prosecution histories of patents related to U.S. Patent No. 9,747,674

² InterDigital has ordered but not yet received certified copies of the prosecution histories for the Asserted Patents (Apps. A-E). InterDigital will submit these certified copies upon receipt from the U.S. Patent and Trademark Office.

Appendices	
Appx. No.	Description
H	Prosecution histories of patents related to U.S. Patent No. 8,363,724
I	Prosecution histories of patents related to U.S. Patent No. 8,681,855
J	Prosecution histories of patents related to U.S. Patent No. 11,917,146

I. INTRODUCTION

1. Complainants InterDigital, Inc. and InterDigital VC Holdings, Inc. (together, “InterDigital” or “Complainants”) request that the United States International Trade Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, based on the unlawful importation into the United States, the sale for importation, and the sale within the United States after importation, of certain video-capable electronic devices, specifically including streaming devices, televisions, tablet computers, and smart displays (collectively, “the Accused Products”)³ that directly or indirectly infringe, either literally and/or under the doctrine of equivalents, one or more claims of U.S. Patent No. 10,741,211 (“the ’211 Patent”); U.S. Patent No. 9,747,674 (“the ’674 Patent”); U.S. Patent No. 8,363,724 (“the ’724 Patent”); U.S. Patent No. 8,681,855 (“the ’855 Patent”); and U.S. Patent No. 11,917,146 (“the ’146 Patent”) (collectively, the “Asserted Patents”).

2. The Proposed Respondents are Amazon.com, Inc. and Amazon.com Services, LLC (collectively, “Respondents” or “Amazon”). The Accused Products are streaming devices, televisions, tablet computers, and smart displays manufactured, imported, and sold by or on behalf of one or more Respondent. On information and belief, the Accused Products infringe one or more Asserted Claim. The Accused Products include at least those listed in Exhibit 11.

3. Complainants assert that Respondents directly or indirectly infringe, either literally and/or under the doctrine of equivalents, at least the following claims of the Asserted Patents:

³ It is not practicable for InterDigital to submit exemplary imported articles that are the subject of the Complaint, pursuant to 19 C.F.R. § 210.12(b). In lieu of submitting physical samples, Complainants provide photos of exemplary imported articles that are the subject of the Complaint. *See infra* Section V; Exs. 58-65. Should the Commission request their submission, InterDigital will submit exemplary imported articles accordingly.

Asserted Patent	Asserted Claims (Independent Claims Bolded)
U.S. Patent No. 10,741,211	1 , 2, 12 , 14
U.S. Patent No. 9,747,674	1 , 4, 10 , 15
U.S. Patent No. 8,363,724	39 , 41, 43, 47, 48, 50, 53, 54, 56, 57 , 59, 61, 65, 66, 68, 71, 72, 74
U.S. Patent No. 8,681,855	13 , 16, 19 , 22
U.S. Patent No. 11,917,146	1 , 2, 3, 7 , 8, 9, 13 , 14, 17 , 18

4. Certified copies of each of the Asserted Patents are attached as Exhibits 1-5, respectively. Complainants own all right, title, and interest in each of the Asserted Patents. Certified copies of the recorded assignments for each of the Asserted Patents are attached as Exhibits 6-10, respectively. Certified copies of the prosecution histories for each of the Asserted Patents are attached as Appendices A-E, respectively.

5. In accordance with 19 C.F.R. § 210.12(a)(12), the plain English categories of the Accused Products are video-capable streaming devices, televisions, tablet computers, and smart displays. *See* Ex. 11 (full Accused Products List). Non-limiting examples of the Accused Products include a Fire TV Stick 4K Plus, Echo Show 15, Fire HD 10 tablet, and Fire TV 50" Omni QLED Series.

6. On information and belief, the Accused Products are manufactured and assembled outside of the United States by or on behalf of Amazon. The Accused Products are then sold for importation into the United States, imported into the United States, and/or sold within the United States after importation, by or on behalf of Amazon.

7. As required by 19 U.S.C. § 1337(a)(2) and (3), an industry in the United States relating to articles protected by the Asserted Patents exists or is in the process of being established.

Apple and Samsung are licensed to use the Asserted Patents in their consumer electronics products,⁴ such as Apple iPhones, Apple iPads, Apple Macs, Apple TVs, Apple Displays, Samsung Galaxy Mobile Phones, and Samsung Smart TVs (collectively, the “Domestic Industry Products”). *See* Ex. 12 (Domestic Industry Products); Ex. 76C (License with Apple); Exs. 37C and 77C-78C (Licenses with Samsung).⁵ On information and belief, the Domestic Industry Products practice at least one claim of each Asserted Patent, and Apple and Samsung have each made in the United States, with respect to their respective Domestic Industry Products, significant investments into plant and equipment, significant employment of labor and capital, and substantial investments in the exploitation of the Asserted Patents, including engineering, research, and development.

8. Pursuant to 19 U.S.C. § 1337(d)(2), InterDigital seeks a permanent limited exclusion order against Amazon and its subsidiaries, predecessors, affiliates, agents, successors, and assigns, barring from entry into the United States all of Amazon’s products that infringe, directly or indirectly, one or more claims of the Asserted Patents.

9. InterDigital also seeks permanent cease and desist orders pursuant to 19 U.S.C. § 1337(f), prohibiting Amazon from importing, selling (including sale for importation and after importation), offering for sale, marketing, advertising, distributing, transferring, soliciting United States agents or distributors, and aiding or abetting other entities in the importation, sale,

⁴ It is not practicable for InterDigital to submit the domestic industry articles that are the subject of the Complaint, pursuant to 19 C.F.R. § 210.12(b). In lieu of submitting physical samples, Complainants provide photos of exemplary domestic articles that are the subject of the Complaint from Apple’s website. *See infra* Section IX.B. Should the Commission request their submission, InterDigital will submit the domestic industry articles accordingly.

⁵ Pursuant to 19 C.F.R. § 210.12(a)(9)(iv), InterDigital is seeking the required consent of and/or is providing the required notice to Apple and Samsung to provide confidential copies of the license agreements in full, which will be provided as supplemental exhibits to this Complaint. Public redacted versions of the license agreements with Apple and Samsung are provided as Exhibits 37 and 76-78 to this Complaint.

marketing, advertisement, distribution, or transfer of Accused Products that infringe, either directly or indirectly, one or more claims of the Asserted Patents in violation of 19 U.S.C. § 1337.

10. Further, InterDigital requests that the Commission impose a bond upon Amazon's importation of infringing Accused Products during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j) to prevent further injury to InterDigital and its licensees' domestic industry relating to each of the Asserted Patents.

II. THE PARTIES

A. Complainants

1. Complainant InterDigital, Inc.

11. InterDigital, Inc. (along with its subsidiaries and affiliates) is one of the most successful and innovative research and development companies of the last half century, both domestically and globally. As a dynamic and groundbreaking engineering company, for more than fifty years InterDigital has been at the forefront of developing foundational video, wireless communication, and other digital technologies.

12. Every year, InterDigital commits a massive amount of money into its world-class research and IP portfolio development engine. For example, in the most recently reported fiscal year alone, InterDigital reinvested well over nine figures—a sum representing nearly 50% of its recurring revenues—back into this cycle of innovation. At its facilities throughout the United States, and its bespoke video research laboratories in Rennes, France, InterDigital researches, develops, engineers, and licenses advanced video-related innovations as well as other cutting-edge technology. As discussed in further detail below, InterDigital has designed and developed a range of key technologies instrumental to video coding and related implementation techniques, including high dynamic range (“HDR”) functionality.

13. InterDigital and its employees' technical contributions have been recognized all over the world. Its employees have held or currently hold more than 100 significant leadership positions on global industry-leading technology development organizations, including multiple standard setting bodies. InterDigital has also won many awards for its technical discoveries. As just one example, InterDigital has been named as one of the world's 100 most innovative businesses by LexisNexis for the past three years.⁶ As one of the world's largest pure research and innovation companies, InterDigital relies heavily on the cycle of invention, and licensing others to use and benefit from its technical breakthroughs, to enable its future research and development efforts. InterDigital relies on obtaining fair compensation for its novel contributions to technological advancement in multiple industry segments, including in video coding, to fund its ongoing work breaking new ground for implementers and consumers alike.

14. Protecting its innovations is a key component to InterDigital's business and, to this end, it has a massive patent portfolio of over 33,000 patent assets, with a strong emphasis on video and wireless technologies. More specifically, InterDigital has approximately 6,800 patents in its video portfolio, with over 3,500 patents and applications relating to current and developing codec technologies such as AVC, HEVC, VP9, AV1, and VVC. InterDigital also has a portfolio of video-related patents including those related to improved dynamic range and many other improvements to the user video experience.

⁶ See Ex. 13 (*Innovation Momentum 2022: The Global Top 100*, LEXISNEXIS (Jan. 18, 2022), <https://go.lexisnexisip.com/hubfs/~IP%20-%20Intellectual%20Property%20Files/IP%20-%20PatentSight/2022%20Innovation%20Momentum%20Report/LexisNexis%20Innovation%20Momentum%20Report%202022.pdf>); Ex. 14 (*Innovation Momentum 2023: The Global Top 100*, LEXISNEXIS (Jan. 2023), <https://www.lexisnexisip.com/wp-content/uploads/2024/02/LexisNexis-Innovation-Momentum-Report-2023.pdf>); Ex. 15 (*Innovation Momentum 2024: The Global Top 100*, LEXISNEXIS (Jan. 2024), <https://go.lexisnexisip.com/hubfs/LexisNexis-Innovation-Momentum-Report-2024.pdf?hsCtaTracking=b73d2358-7d13-4732-afc6-e8a25be14c30%7C0b8f3fb0-888a-43b3-b2f6-70a6a3d96d87>).

15. Plaintiff InterDigital, Inc. is a Pennsylvania corporation with its principal place of business at 200 Bellevue Parkway, Suite 300, Wilmington, DE 19809. Approximately half of its employees are based in the United States, including at research and development facilities in Conshohocken, Pennsylvania; New York, New York; Los Altos, California; Melville, New York; and Indianapolis, Indiana.

2. Complainant InterDigital VC Holdings, Inc.

16. InterDigital VC Holdings, Inc., a wholly owned subsidiary of InterDigital, Inc., is the owner of the Asserted Patents. *See* Exs. 6-10 (certified assignment records).

17. InterDigital VC Holdings, Inc. is a Delaware corporation with its principal place of business at 200 Bellevue Parkway, Suite 300, Wilmington, DE 19809.

B. Proposed Respondents

18. **Amazon.com, Inc.** is a Delaware corporation with a principal place of business at 410 Terry Avenue North, Seattle, WA 98109.

19. **Amazon Services, LLC** (“Amazon Services”) is a Delaware limited liability company with a principal place of business at 410 Terry Avenue North, Seattle, WA 98109.

20. Amazon.com Services is a wholly owned subsidiary of Amazon.com, Inc.

21. Amazon.com, Inc. and Amazon Services, LLC are collectively referred to as “Amazon” herein.

22. The Amazon Accused Products include the products listed at Ex. 11.

23. On information and belief, Amazon makes and sells products and services that are capable of playing back HDR10, HDR10+, or Dolby Vision content and/or capable of decoding AV1 or VP9 content, including, without limitation, the Accused Products such as Amazon Fire TV Stick and Echo Show products. Ex. 32-36.

24. On information and belief, Amazon operates the e-commerce website “Amazon.com,” through which Amazon sells for importation, imports, by or on its behalf, and/or sells within the United States after importation Accused Products that are manufactured outside of the United States. Importation records list Amazon.com, Inc. as the consignee for imported Accused Products shipped by or on behalf of Amazon.com, Inc. from Vietnam, South Korea, the People’s Republic of China, Singapore, and the Republic of China to ports in the United States. Exs. 54-57 (exemplary importation records).

25. On information and belief, Amazon is engaged in the design, manufacturing, research, development, testing, marketing, distribution, shipping, importation, sale for importation, and/or sale within the United States after importation of Accused Products that infringe the Asserted Patents. Amazon sells Accused Products within the United States through distributors, retailers, such as Best Buy, Walmart, Target, and BJ’s, as well as through its own website, Amazon.com. Exs. 26-30 (Retail websites showing exemplary Accused Products offered for sale); Exs. 16-19 (Amazon website showing exemplary Accused Products offered for sale). For example, a Fire TV Stick 4K Plus, Echo Show 15, Fire HD 10 tablet, and Fire TV 50" Omni QLED Series were purchased from Amazon.com on November 20, 2025. Exs. 20-23 (receipts for online purchases of exemplary Accused Products from Amazon.com); Exs. 16-19 (Amazon website showing exemplary Accused Products offered for sale). Photos of a Fire TV Stick 4K Plus and its packaging, showing “Assembled in Vietnam” labels, are attached as Exhibits 58 and 59, respectively. *See also* Exs. 60-61 (photos of a Fire TV 50" Omni QLED Series and its packaging, respectively, showing “Assembled in China” labels); Exs. 62-63 (photos of a Fire HD 10 tablet and its packaging, respectively, showing “Assembled in Vietnam” labels); Exs. 64-65 (photos of an Echo Show 15 and its packaging, respectively, showing “Assembled in Vietnam” labels). Thus,

on information and belief, the aforementioned exemplary Accused Products were assembled abroad and imported into the United States.

26. Furthermore, in past investigations, for example, Amazon has stipulated that the importation requirements of 19 U.S.C. § 1337(a)(1)(B) have been met as to many of the same products and categories of articles as the Accused Products identified in this Complaint. *See, e.g.*, Ex. 24 (Stipulation and Exhibit A, *Certain Video Processing Devices and Components Thereof*, Inv. No. 337-TA-1343, Doc. ID 801044 (July 28, 2023)) (Amazon admission to importation, sale for importation, and sale after importation of various generations and screen sizes of Amazon Fire tablets, Amazon Fire TV/Cube devices, Amazon Echo Show devices, and Amazon Fire TV sets, including the Accused Products); Ex. 25 (Stipulation, *Certain Video Capable Electronic Devices, Including Computers, Streaming Devices, Televisions, Cameras, and Components and Modules Thereof*, Inv. No. 337-TA-1379, Doc. ID 819248 (April 22, 2024)) (Amazon admission to importation and sale after importation of certain Amazon-branded products, including the Accused Products).

27. On information and belief, Amazon is also engaged in contributing to, or instructing others regarding, the use, manufacture, sale, and/or importation of such products. *See, e.g.*, Exs. 26-31 (retail websites showing exemplary Accused Products offered for sale); *see also* Exs. 24-25 (Amazon Stipulations in prior Section 337 investigations).

28. Amazon also provides substantial support services to cause, aid, or abet the importation, sale for importation, or sale after importation of the Accused Products into the United States. This includes the advertisement, marketing, and distribution support of the Accused Products. This also includes, upon information and belief, the development, provision, configuration, technical support of, and/or distribution of software on the Accused Products.

29. Therefore, on information and belief, Amazon, itself and/or through its subsidiaries and corporate relatives, imports into the United States, sells for importation in the United States, and/or sells in the United States after importation the Amazon Accused Products.

III. THE ASSERTED PATENTS

A. U.S. Patent No. 10,741,211

1. Identification of Patent and Ownership

30. InterDigital owns by assignment the entire right, title, and interest in and to the '211 Patent, entitled "Information processing device, information recording medium, and information processing method," issued on August 8, 2020, to inventors Ryohei Takahashi and Kouichi Uchimura. The '211 Patent issued from U.S. Application No. 15/533,592, which is a national stage application of PCT/JP2015/082032, filed on November 13, 2015, which entered the U.S. under § 371 on June 6, 2017, which claims priority to Japanese Application No. 2014-258349, filed on December 22, 2014. The '211 Patent expires on July 25, 2036.

31. A certified copy of the '211 Patent is attached as Ex. 1.

32. A certified copy of the assignment record for the '211 Patent is attached as Ex. 6.

33. Pursuant to 19 C.F.R. § 210.12(c), a certified copy of the prosecution history of the '211 Patent is included in Appendix A. Copies of the prosecution histories of patents related to the '211 Patent are included in Appendix F.

34. The '211 Patent has 15 claims, 7 of which are independent claims. InterDigital is asserting Claims 1, 2, 12, 14.

2. Foreign and Domestic Counterparts to the '211 Patent

35. Exhibit 38 lists each foreign patent and each pending foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned or withdrawn, corresponding to the '211 Patent, with an indication of

the prosecution status of each such patent application. InterDigital is aware of no other foreign or domestic patents or patent applications corresponding to the '211 Patent that have been filed, abandoned, withdrawn, or rejected.

3. Non-Technical Description of the Patented Inventions

36. Per 19 C.F.R. § 210.12(c), the following is a non-technical description of the '211 Patent.

37. The '211 Patent is directed to systems and methods for recording and reproducing HDR image data in a standardized MP4 file format, ensuring that HDR content and associated metadata can be stored and played back optimally across various display devices. Ex. 1 ('211 Patent) at 1:20-27. The invention addresses the absence of any established definition or mechanism in existing MP4 standards for recording HDR-specific metadata within MP4 files. *Id.* at 2:46-67.

38. Prior to the invention, MP4 was used as a recording and playback format for images, audio, and subtitles, including by portable devices such as smartphones and tablets. *Id.* at 5:20-36. However, while conventional MP4 structures supported storage of multiple media tracks through “trak,” “moof,” “traf,” and “mdat” boxes, they lacked containers for HDR-specific metadata, such as luminance, color primaries, or mastering display information. *Id.* at 1:60-67, 6:1-10.

39. To overcome this deficiency, the '211 Patent modifies the traditional MP4 hierarchy to allow the storage of HDR metadata. *Id.* at 10:8-11, Figs. 5-8. This metadata includes, among other fields, a metadata identifier, the electro-optical transfer function (EOTF), color primaries (mastering display color volume), white point coordinates, and key luminance parameters such as Maximum Content Light Level (MaxCLL) and Maximum Frame-Average Light Level (MaxFALL). *Id.* at 10:16-53, Figs. 5-8.

40. The HDR image metadata enables playback devices to “determine whether executing a conversion process of the HDR image read from the MP4 file according to the acquired metadata and display function information of the display unit,” and then “execute an output image generation process according to a determination result.” *Id.* at 3:30-37, Abstract, 2:56-60, 4:15-20.

41. Through this architecture, the '211 Patent enables unified recording and playback of HDR image data in MP4 files, ensuring that metadata is embedded directly within the file hierarchy and accessible to playback devices for adaptive processing. *Id.* at 4:35-8. The invention thereby allows an HDR image and its metadata to be stored together such that “the reproduction device can reproduce an optimum HDR image based on metadata.” *Id.* at 4:21-24.

42. These technical advancements are reflected in the claims, which recite, for example, “acquire high dynamic range (HDR) image metadata from an MP4 file,” “acquiring display function information of the display unit,” and “execute a conversion process of the read HDR image data based on the acquired HDR image metadata and the acquired display function information of the display unit.” *Id.* at Claims 1-3. The claimed methods and structures improve the functioning of video systems by enabling compatibility between HDR-encoded media and displays of varying capabilities through standardized, metadata-driven playback control. The ordered combination of elements—metadata acquisition, comparison to display capabilities, and adaptive image conversion—constitutes a specific, technical solution to an identified problem in digital video systems. The specification demonstrates that the inventors possessed the claimed subject matter and enables one of ordinary skill to implement the invention without undue experimentation.

B. U.S. Patent No. 9,747,674

1. Identification of Patent and Ownership

43. InterDigital owns by assignment the entire right, title, and interest in and to the '674 Patent, entitled "Method and device for converting an image sequence whose luminance values belong to a high dynamic range," issued on August 29, 2017, to inventors Ronan Boitard, Dominique Thoreaus, and Yannick Olivier. The '674 Patent issued from U.S. Application No. 14/415,600, filed on January 29, 2013, which entered the U.S. under § 371 on January 18, 2015, and claims priority to European Patent Office Application No. WO2014/012680, published on January 23, 2014. The '674 Patent expires on August 22, 2033.

44. A certified copy of the '674 Patent is attached as Ex. 2.

45. A certified copy of the assignment record for the '674 Patent is attached as Ex. 7.

46. Pursuant to 19 C.F.R. § 210.12(c), a certified copy of the prosecution history of the '674 Patent is included in Appendix B. Copies of the prosecution histories of patents related to the '674 Patent are included in Appendix G.

47. The '674 Patent has 18 claims, 2 of which are independent claims. InterDigital is asserting Claims 1, 4, 10, 15.

2. Foreign and Domestic Counterparts to the '674 Patent

48. Exhibit 39 lists each foreign or domestic patent and each pending foreign or domestic patent application (not already issued as a patent), and each foreign patent application that has been denied, abandoned or withdrawn, corresponding to the '674 Patent, with an indication of the prosecution status of each such patent application. InterDigital is aware of no other foreign or domestic patents or patent applications corresponding to the '674 Patent that have been filed, abandoned, withdrawn, or rejected.

3. Non-Technical Description of the Patented Inventions

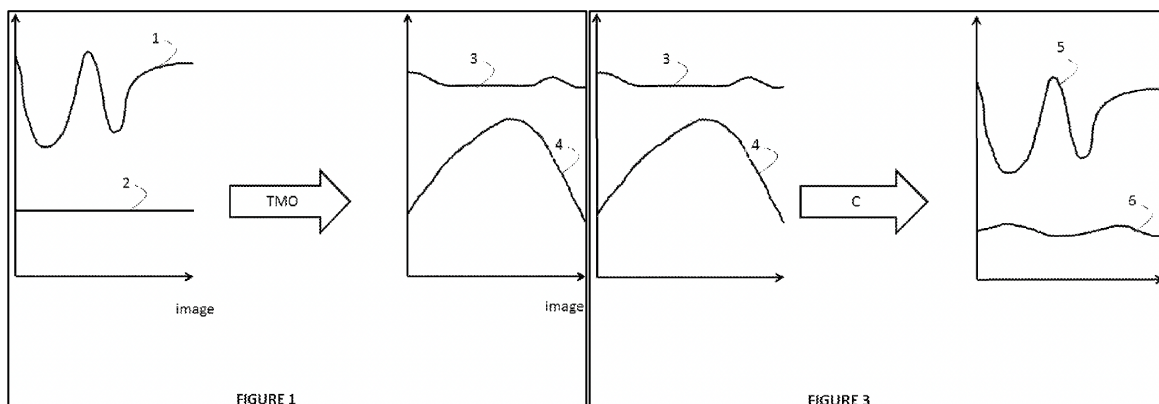
49. Per 19 C.F.R. § 210.12(c), the following is a non-technical description of the '674 Patent.

50. The '674 Patent is directed to methods and devices for converting an image sequence whose luminance values belong to an HDR into an image sequence whose luminance values belong to a lower dynamic range (LDR). Ex. 2 ('674 Patent) at 1:16-21. The invention addresses limitations in prior tone-mapping operators (TMOs), such as the commonly used Reinhard “Photographic Tone Reproduction” (PTR) operator, which operate on each image independently and therefore introduce visible temporal artifacts—particularly a “flickering effect [that is] visible in modified images.” *Id.* at 1:40-2:40. The '674 Patent explains that this is because, “if the key *k* changes from one image to another, the conversion curve (of sigmoid form) also changes, which results in different conversions for luminance values nevertheless similar in the original images. A flickering effect is thus visible in the modified images.” *Id.* at 2:21-25.

51. Prior attempts to mitigate these problems—such as applying low-pass filters to tone curves—failed to preserve visual consistency. *Id.* at 2:35-45, 3:1-8. As the patent notes, such temporal filtering the conversion curve “deforms” the perceptual optimization, “causing a sub-optimal perception of the images of the image sequence thus modified.” *Id.* at 3:3-8.

52. The invention introduces a new HDR-to-LDR conversion system that performs image-by-image dynamic-range conversion using any known TMO but adds a **correction step** to maintain perceptual and temporal coherence. Specifically, “the method is characterized in that it also comprises a step of correction of the dynamic range during which the dynamic range of the values of the luminance component thus modified is reduced by a value calculated from a global characteristic of the original image sequence.” *Id.* at Abstract, 3:60-66.

53. Figure 3 (reproduced below) of the '674 Patent illustrates the improvement achieved by the claimed invention over the prior art (Figure 1). As shown in Figure 1 (reproduced below), prior tone-mapping approaches convert HDR image sequences into LDR values in a way that causes brightness instability across frames. The upper curve (3) shows that a constant-brightness object appears to fluctuate in luminance from frame to frame, while the lower curve (2) remains steady—demonstrating that prior methods introduce visible flicker. In contrast, Figure 3 shows that after applying the claimed correction step, the upper curve (3) becomes stable, indicating consistent luminance for the object throughout the sequence, while curve (4) reflects a controlled compression of luminance values that preserves overall brightness and perceptual balance. As a result, the sequence exhibits coherent illumination from frame to frame, eliminating the flicker characteristic of prior systems.



54. These advances are reflected in the claims. Claim 1 recites applying a dynamic-range conversion operator to each image’s luminance component and then “correcting the dynamic range of the values of the luminance component thus modified by reducing it by a value calculated from a global characteristic of the original image sequence.” *Id.* at Claim 1.

55. In sum, the '674 Patent discloses concrete, computer-implemented improvements to dynamic-range conversion in video processing. By integrating global and local luminance statistics into the tone-mapping operation, the invention ensures perceptual stability, reduces

flicker, and preserves brightness coherence across frames. A person of ordinary skill in the art would understand that the claimed invention's ordered combination of elements is inventive and that the specification demonstrates full possession of the claimed subject matter without undue experimentation.

C. U.S. Patent No. 8,363,724

1. Identification of Patent and Ownership

56. InterDigital owns by assignment the entire right, title, and interest in and to the '724 Patent, entitled "Methods and apparatus using virtual reference pictures," issued on January 29, 2013, to inventors Yeping Su, Peng Yin, Purvin Bibhas Pandit, and Cristina Gomilaas. The '724 Patent is a national stage application of PCT/US2007/015719, filed on July 10, 2007, which entered the U.S. under § 371 on January 5, 2009, which claims priority to U.S. Provisional Application No. 60/830,195, filed on July 11, 2006. The '724 Patent expires on July 7, 2029.

57. A certified copy of the '724 Patent is attached as Ex. 3.

58. A certified copy of the assignment record for the '724 Patent is attached as Ex. 8.

59. Pursuant to 19 C.F.R. § 210.12(c), a certified copy of the prosecution history of the '724 Patent is included in Appendix C. Copies of the prosecution histories of patents related to the '724 Patent are included in Appendix H.

60. The '724 Patent has 87 claims, 5 of which are independent claims. InterDigital is asserting Claims 39, 41, 43, 47, 48, 50, 53, 54, 56, 57, 59, 61, 65, 66, 68, 71, 72, 74.

2. Foreign and Domestic Counterparts to the '724 Patent

61. Exhibit 40 lists each foreign or domestic patent and each pending foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned or withdrawn, corresponding to the '724 Patent, with an indication of the prosecution status of each such patent application. InterDigital is aware of no

other foreign or domestic patents or patent applications corresponding to the '724 Patent that have been filed, abandoned, withdrawn, or rejected.

3. Non-Technical Description of the Patented Inventions

62. Per 19 C.F.R. § 210.12(c), the following is a non-technical description of the '724 Patent.

63. The '724 Patent improves upon limitations in prior art video compression systems, such as AVC, which rely on previously reconstructed or decoded pictures as reference frames for motion estimation and compensation. Ex. 3 ('724 Patent) at 1:22-35. In multi-view video coding (MVC), reconstructed pictures from neighboring camera views may also be used as reference sources to exploit redundancy between perspectives through disparity estimation and compensation. *Id.* However, as the specification explains, prior systems depend exclusively on decoded pictures that have already been reconstructed for display, limiting the flexibility and potential accuracy of prediction. *See, e.g., id.* at Abstract, 1:54-59.

64. To address these shortcomings, the patent introduces methods and apparatus that use and manage Virtual Reference Pictures ("VRPs"). These virtual pictures are created from decoded frames but are not required for display. *Id.* at 1:54-64. As the specification explains, the invention provides for "management of virtual reference pictures (VRP) in a video encoder and/or decoder," with each VRP being "not required for display purposes" and usable for prediction purposes. *Id.* at 4:61-5:5.

65. Through these innovations, the patent extends traditional prediction models beyond the limits of prior compression systems. By enabling the creation, signaling, storage, and controlled use of virtual reference pictures that are not tied to displayed frames, the invention provides a structured framework for leveraging synthetic or processed reference data. *See, e.g.,*

Figs. 1-4. This results in improved compression efficiency and prediction quality relative to prior art methods that lacked any mechanism for managing such virtual references.

66. These technical advancements are reflected in the claims, which recite, for example, “wherein the at least one virtual reference picture is different than a previously decoded picture, and the at least one virtual reference picture is stored in a decoded picture buffer that also stores non-virtual reference pictures.” *Id.* at Claims 39. The ordered combination of elements—metadata acquisition, comparison to display capabilities, and adaptive image conversion—constitutes a specific, technical solution to an identified problem in digital video systems. The specification demonstrates that the inventors possessed the claimed subject matter and enables one of ordinary skill to implement the invention without undue experimentation.

D. U.S. Patent No. 8,681,855

1. Identification of Patent and Ownership

67. InterDigital owns by assignment the entire right, title, and interest in and to the ’855 Patent, entitled “Method and apparatus for video encoding and decoding geometrically partitioned bi-predictive mode partitions,” issued on March 25, 2014, to inventors Peng Yin and Oscar Divorra Escoda. The ’855 Patent is a national stage application of PCT/US2008/011661, filed on October 10, 2008, which entered the U.S. under § 371 on April 9, 2010, which claims priority to U.S. Provisional Application No. 60/979,586, filed on October 12, 2007. The ’855 Patent expires on May 3, 2030.

68. A certified copy of the ’855 Patent is attached as Ex. 4.

69. A certified copy of the assignment record for the ’855 Patent is attached as Ex. 9.

70. Pursuant to 19 C.F.R. § 210.12(c), a certified copy of the prosecution history of the ’855 Patent is included in Appendix D. Copies of the prosecution histories of patents related to the ’855 Patent are included in Appendix I.

71. The '855 Patent has 25 claims, 5 of which are independent claims. InterDigital is asserting Claims 13, 16, 19, 22.

2. Foreign and domestic Counterparts to the '855 Patent

72. Exhibit 41 lists each foreign or domestic patent and each pending foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned or withdrawn, corresponding to the '855 Patent, with an indication of the prosecution status of each such patent application. InterDigital is aware of no other foreign or domestic patents or patent applications corresponding to the '855 Patent that have been filed, abandoned, withdrawn, or rejected.

3. Non-Technical Description of the Patented Inventions

73. Per 19 C.F.R. § 210.12(c), the following is a non-technical description of the '855 Patent.

74. Conventional video coding standards, such as ITU-T H.261, MPEG-1, MPEG-2, and MPEG-4 AVC (H.264), rely primarily on tree-structured macroblock partitioning. In these approaches, a 16×16 macroblock may be divided into rectangular sub-partitions such as 16×8, 8×16, 8×8, and further down to 4×4. *See* Ex. 4 ('855 Patent) at 1:25-2:20. Each partition is predicted using forward or backward motion compensation from reference pictures, depending on whether the frame type is predictive (P-frame) or bi-predictive (B-frame). *Id.*

75. While this tree-based approach improves efficiency compared with earlier uniform block partitioning, it is limited because rectangular partitions cannot capture the geometric structure of two-dimensional video data. *Id.* at 2:42-35. Prior approaches introduced *geometric block partitioning*, where a block is divided by an arbitrary line or curve (a “wedge” partition). *Id.* at 2:35-3:10. However, those implementations were confined to predictive (P-frame) modes and were not extended to bi-predictive (B-frame) coding. *Id.* at 3:57-67.

76. The invention claimed in the '855 Patent overcomes these deficiencies by introducing adaptive geometric partitioning into the bi-predictive framework. *Id.* at 4:1-49. The disclosed encoder and decoder enable the use of geometric partitions in B-frames, allowing each region of a partitioned block to be predicted from forward, backward, or bi-directional reference lists. *Id.* at 10:1-24.

77. These technical advancements are reflected in the claims, which recite, for example, “decoding bi-predictable picture data for at least a portion of a picture using adaptive geometric partitioning.” *Id.* at Claims 13. The claimed methods and structures improve the functioning of decoders. The ordered combination of elements constitutes a specific, technical solution to an identified problem in digital video systems. The specification demonstrates that the inventors possessed the claimed subject matter and enables one of ordinary skill to implement the invention without undue experimentation.

E. U.S. Patent No. 11,917,146

1. Identification of Patent and Ownership

78. InterDigital owns by assignment the entire right, title, and interest in and to the '146 Patent, entitled “Information processing device, information recording medium, and information processing method,” issued on February 27, 2024, to inventors Tangi Poirier, Franck Galpin, and Fabrice Leleannec. The '146 Patent is a national stage application of PCT/EP2018/056254, filed on March 13, 2018, which entered the U.S. under § 371 on September 27, 2019, which claims priority to European Patent Office Application No. WO2018/177741, published on October 4, 2018. The '146 Patent expires on March 13, 2038.

79. A certified copy of the '146 Patent is attached as Ex. 5.

80. A certified copy of the assignment record for the '146 Patent is attached as Ex. 10.

81. Pursuant to 19 C.F.R. § 210.12(c), a certified copy of the prosecution history of the '146 Patent is included in Appendix E. Copies of the prosecution histories of patents related to the '146 Patent are included in Appendix J.

82. The '146 Patent has 20 claims, 8 of which are independent claims. InterDigital is asserting Claims 1, 2, 3, 7, 8, 9, 13, 14, 17, 18.

2. Foreign and Domestic Counterparts to the '146 Patent

83. Exhibit 42 lists each foreign or domestic patent and each pending foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned or withdrawn, corresponding to the '146 Patent, with an indication of the prosecution status of each such patent application. InterDigital is aware of no other foreign or domestic patents or patent applications corresponding to the '146 Patent that have been filed, abandoned, withdrawn, or rejected.

3. Non-Technical Description of the Patented Inventions

84. Per 19 C.F.R. § 210.12(c), the following is a non-technical description of the '146 Patent.

85. Prior video coding standards, such as HEVC and the Joint Exploration Model ("JEM"), employed rigid hierarchical structures that divided pictures into coding tree units ("CTUs") and further into coding units ("CUs"), prediction units ("PUs"), and transform units ("TUs"). Ex. 5 ('146 Patent) at 1:20-2:55. While these schemes provided some compression efficiency, they were constrained by symmetric splitting patterns and required block sizes to conform to specific multiples of minimum coding block sizes. *Id.*

86. These limitations particularly affected blocks located along the boundaries of a picture, which could not be partitioned flexibly and thus were not coded efficiently. In HEVC and JEM, when a block extended beyond a picture's edge, only a single fixed split mode—a quad-tree

split—was allowed. This restriction caused degradation in reconstructed image quality and inefficiencies when encoding irregular frame dimensions, tiled picture structures, or 360-degree video layouts. *Id.* at 7:20-49. Because of these rigid restrictions, prior art encoders and decoders were unable to adapt to non-standard picture sizes or complex boundary conditions, leading to wasted bits and visible artifacts near picture borders. *Id.*

87. The invention claimed in the '146 Patent overcomes these deficiencies by introducing a flexible and adaptive decision framework for determining allowable split modes when a picture block extends beyond a boundary. *Id.* at Abstract. Instead of defaulting to a fixed quad-tree split, the disclosed methods evaluate whether split lines are co-located with picture borders or whether the remaining block portion within the picture has dimensions that are a multiple of a minimum block size. *Id.* at Abstract, 7:20-49.

88. Based on this assessment, the encoder or decoder dynamically permits or restricts various split modes—including asymmetric and triple-split modes—while maintaining efficient signaling and consistent picture quality. *Id.* at 16:42-17:29. By allowing selective use of multiple split strategies, the invention provides enhanced rate-distortion performance and improved quality for boundary blocks.

89. These technical advancements are reflected in the claims, which recite, for example, “determine a current split mode to be applied to the current block in a set of split modes,” “responsive to the current block extending beyond a single boundary of the picture, determining the current split mode comprises: decoding information to identify the current split mode in a plurality of split modes for which a split direction is parallel to a direction of the single boundary of the picture, wherein the information comprises a flag indicating a number of second blocks resulting from a decomposition of the current block according to the current split mode.” *Id.* at

Claims 7. The claimed methods and structures improve the functioning of AV1 encoding and decoding systems. The ordered combination of elements constitutes a specific, technical solution to an identified problem in digital video systems. The specification demonstrates that the inventors possessed the claimed subject matter and enables one of ordinary skill to implement the invention without undue experimentation.

IV. LICENSES

90. As required under Commission Rule 210.12(a)(9)(iii), a list of the currently licensed entities is attached to this Complaint as Confidential Exhibit 43C. In addition, contemporaneous with the filing of this Complaint, InterDigital has sought or will seek consent to identify additional license(s), the existence of which may be subject to nondisclosure requirements and will supplement Confidential Exhibit 43C to the extent necessary.

V. AMAZON'S UNLAWFUL AND UNFAIR ACTS

91. Importation into the United States, sale for importation, and sale after importation of the Accused Products infringe the Asserted Patents, based on at least the Accused Products' practice of the Asserted Claims, as shown in the attached claim charts. *See* Exs. 32-36 (infringement claim charts); *see also* Ex. 11 (Accused Product List).

92. Respondents, either themselves or through subsidiaries or third parties acting on behalf of Respondents, import into the United States, sell for importation, sell within the United States after importation the Accused Products, which infringe the Asserted Patents. *See, e.g.*, Exs. 32-36 (infringement claim charts). Amazon imports, offers to sell, sells after importation the Accused Products to consumers. *See, e.g., id.*

A. Infringement of the '211 Patent

93. On information and belief, the Accused Products that are sold for importation, imported, and/or sold within the United States after importation by Amazon infringe at least Claims 1 and 12 of the '211 Patent, either literally or under the doctrine of equivalents.

94. On information and belief, Amazon directly infringes one or more claims of the '211 Patent through its manufacture, sale for importation, importation, use, and sale after importation of one or more Accused Product.

95. As one example of Amazon's infringement, Amazon manufactures, imports, and sells televisions that infringe the '211 Patent. One example of an infringing TV Accused Product is the Fire TV Omni QLED Series.

More than smart. Brilliant.

Amazon Fire TV 55" Omni QLED Series (newest model), 4K Ultra HD smart TV, HDR10+, Dolby Vision, Dolby Audio, quad-core processor, hands-free with Alexa

Visit the Amazon Fire TV Store

4.4 ★★★★★ 28 ratings

1 sustainability feature

100+ bought in past month

Black Friday Deal

-17% \$489⁹⁹

List Price: \$589.99

FREE Returns

Delivery & Support

Select to learn more

Professional TV wall-mounting available

Ships from Amazon.com

FREE refund/replacement until Jan 31, 2026

Customer Support

Get \$60 off instantly: Pay \$429.99 upon approval for the Amazon Store Card.

You're viewing the newest model of this product

Size: **55-inch**

Size	Price
50-inch	\$479.99
55-inch	\$489.99
65-inch	\$849.99
75-inch	\$1,199.99

Click to see full view

\$489⁹⁹

FREE scheduled delivery as soon as Friday, November 28, 8 AM - 8 PM

Delivering to Philadelphia 19103 - Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon.com

Sold by Amazon.com

Returns FREE refund/replacement until Jan 31, 2026

Packaging Ships in product packaging

See more

☐ This is a gift

☒ Link device to your Amazon account to simplify setup. Why is this important?

Add Additional Items

☐ Amazon Fire TV Alexa Voice Remote Pro (newest model) with Remote only \$24.99

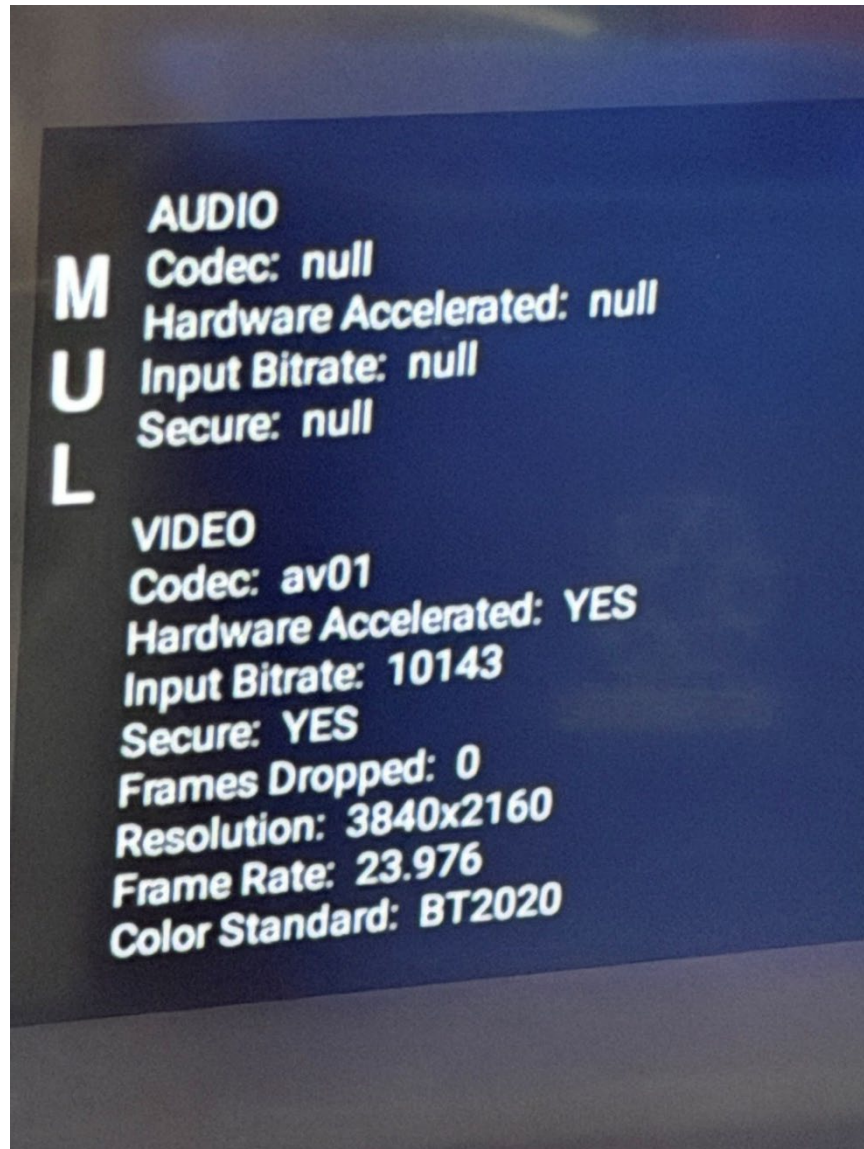
List Price: \$34.99

Add to List

Ex. 17 (Fire TV Omni QLED Series Amazon.com listing,

https://www.amazon.com/dp/B0DD2F6VXT?ref=MARS_NAVSTRIPE_desktop_firetv_tvs_o_mniqled&th=1) (last accessed Nov. 23, 2025).

96. Additionally, Amazon instructs and encourages users to use the TV Accused Products in a manner that infringes the Asserted Claims of the '211 Patent by advertising the products' ability to stream and display video and, for example, by instructing users how to “troubleshoot” the TV Accused Products to ensure use of the infringing high dynamic range functionality:



Ex. 44 (photo of Fire TV Omni in developer mode playing back an AV1 video); *see also* Ex. 17 at 2-4, 8-9 (Fire TV Omni QLED Series Amazon.com listing).

Dolby Vision or High Dynamic Range Not Working on Fire TV Smart TV

Check your cable connections and verify which video formats the content supports.



1. Check if the content supports Dolby Vision, 4K, or HDR.
2. If the content comes from a connected device:
 - a. Connect the device with an HDMI cable.
 - b. Restart the connected device.
 - c. Set the source device to output Dolby Vision, 4K, or HDR.
 - d. Go to **Settings** on your Fire TV Smart TV.
 - e. Select **Display & Sounds**, and then select **Picture Settings**.
 - f. Select the HDMI input that your device connects to, and then select **HDMI Input Mode**.
 - g. Change the input mode to **Auto** or **Mode 2 (2.0)**.
3. Try to restart your Fire TV Smart TV:
 - a. Go to **Settings** on your Fire TV Smart TV.
 - b. Select **My Fire TV** or **Device & Software**.
 - c. Select **Restart**.
4. Make sure that the app is up to date:
 - a. Go to the **Appstore** and then search for the app.
 - b. An option to update shows if there's an available update for the app.
5. Reset your Fire TV Smart TV:
 - a. Go to **Settings** on your Fire TV Smart TV.
 - b. Select **My Fire TV** or **Device & Software**.
 - c. Select **Reset to Factory Defaults**.

Dolby Vision or High Dynamic Range Not Working on Fire TV Devices

To troubleshoot issues with Dolby Vision or High Dynamic Range (HDR), use the Audio and Video Diagnostics tool on your Fire TV device.

The Audio and Video Diagnostics tool checks the capabilities of connected HDMI devices like your TV, soundbar, or AV receiver. The tool tests your TV's maximum resolution and refresh rate, HDR, and Dolby Vision support. It also detects support for various surround sound standards.

Note: The Audio and Video Diagnostics tool isn't available on all Fire TV devices.

1. Check that your equipment supports Dolby Vision or High Dynamic Range (HDR). To check supported audio settings, use the Audio and Video Diagnostics tool:
 - a. Go to **Settings** on your Fire TV device.
 - b. Select **Display & Sounds**.
 - c. Select **Audio/Video Diagnostics**.
2. If your TV supports HDR, but the content you're streaming is in a different format:
 - a. Confirm that your TV supports Dolby Vision or HDR formats by using the test video at the bottom of the page.
 - b. Check that the content supports HDR.
 - c. Go to your TV's picture or input settings and check that the resolution is 4K, HDR, or FHD. Follow the manufacturer's instructions if needed.
3. If the Audio/Video Diagnostics tool doesn't detect the format that you want to use, check your current equipment setup:
 - a. Make sure that your TV supports Dolby Vision or HDR. If you're connecting your Fire TV device to an AV Receiver or soundbar, make sure it's able to pass-through Dolby Vision or HDR formats.
 - b. Sometimes your Fire TV device streams at 1080p 60 Hz for smoother playback if you have a 4K 30 Hz Dolby Vision TV. To set your resolution to 4K 60 Hz, go to **Settings** on your Fire TV device and then **Display & Sounds**.

For more help, go to:

[Dolby Vision or High Dynamic Range Not Working on Fire TV Smart TV](#)

Ex. 45 (Dolby Vision or High Dynamic Range Not Working on Fire TV Smart TV, Amazon.com Help & Customer Service,

<https://www.amazon.com/gp/help/customer/display.html?nodeId=TyJkIVATkXXwoG2FB5>)

(last accessed Nov. 23, 2025); Ex. 46 (Dolby Vision or High Dynamic Range Not Working on Fire TV Devices, Amazon.com Help & Customer Service,

<https://www.amazon.com/gp/help/customer/display.html?nodeId=G8GNX2B27JG726AH>) (last accessed Nov. 23, 2025).

97. Additionally, on information and belief, Amazon publishes customer reviews of the TV Accused Products that show its customers in fact use the TV Accused Products to stream and watch video:

Top reviews from the United States



OneFineDay

★★★★★ Excellent 50 inch TV and a great monitor

Reviewed in the United States on November 12, 2025

Size: 50-inch | [Amazon Vine Customer Review of Free Product](#) (What's this?)

The Amazon Fire smart TV comes in several sizes. This review is for the 50 inch model. The TV is very light weight and easy to handle. A quick installation of the steel legs and the TV is ready to go. The legs that function like a built in stand are heavy duty one piece steel so the TV sits firmly. The initial set up can not be easier but updates did take a few minutes. After the initial set up and updates, each time the TV starting up takes no time. There is no bloatware and no lags. Linking to Amazon account can be done via a cell phone or by the remote. Downloading popular apps such as YouTube is also fast. Using voice or Alexa is also easy and straight forward. The remote is simple, easy to use, and also takes voice. Sharp Omni 4K image, HDRIO+, Dolby vision and sound, a simple easy to use remote, and the friendly Alexa eco system makes this TV a great value. I only use Alexa when I want to be hands free. But the TV works just as well without using Alexa. Not only with super sharp image and contrast, the sound of this TV is so great I do streaming without external speakers with this.

Other than being a great TV, I am also using this as a monitor. There are four HDMI ports on this TV, one 2.1 and three 2.0. A live HDMI connection is automatically detected on the INPUT setting. So setting INPUT is a no brainer. The settings such as display and sound are also easily controlled with the remote. This works very well with my laptop which is a Lenovo. Having a 50 inch as a monitor allows me to open more windows without using dual monitors. And the high resolution and sharp image on the TV enables using this as a monitor. I will mention that the legs placement is on the outer most corners of the TV. So in order to accommodate the TV as a free standing unit, the desk or TV stand need to be at least 11 inch wide and 44 inch long for a solid placement. As a TV, the quad core processor is plenty fast for all the apps I use. When used as a 50 inch monitor for my laptop, there is no lags in syncing and really zero complaint at this price. Again, great value all around and an excellent choice to meet all my needs.

[^ Read less](#)



2 people found this helpful

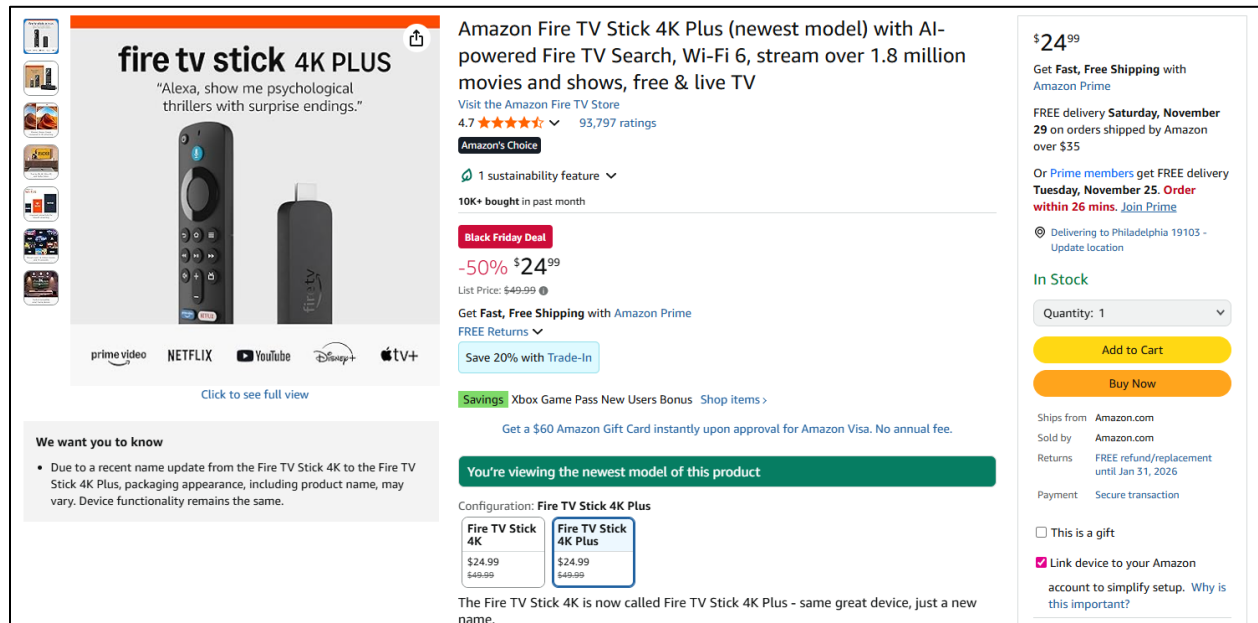
[Helpful](#)

[Report](#)

Ex. 17 at 11-13 (Review of Fire TV Omni QLED Series,

https://www.amazon.com/dp/B0DD24KM9Y?ref_=MARS_NAVSTRIPE_desktop_firetv_tvs_o_mniqled&th=1) (last accessed Nov. 23, 2025); *see also* Ex. 50 (Reviews of Fire TV Omni QLED Series).

98. As another example of Amazon’s infringement, Amazon manufactures, imports, and sells streaming devices that infringe the ’211 Patent. One example of an infringing Streaming Device Accused Product is the Fire Stick 4K Plus.



Ex. 16 (Fire Stick 4K Plus Amazon.com Listing, <https://a.co/d/9BWwIuQ>) (last accessed Nov. 23, 2025).

99. Additionally, Amazon instructs and encourages users to use the Streaming Device Accused Products in a manner that infringes the Asserted Claims of the ’211 Patent by advertising the products’ ability to stream and display video and, for example, by instructing users how to “troubleshoot” the TV Accused Products to ensure use of the infringing high dynamic range functionality:

[See all bundles](#)

- Advanced 4K streaming - Elevate your entertainment with the next generation of our best-selling 4K stick, with improved streaming performance optimized for 4K TVs.
- Play Xbox games with no console required - Stream Forza Motorsport, Starfield, Palworld, and discover hundreds of other high-quality games directly on your Fire TV Stick 4K Plus with Xbox Game Pass via cloud gaming.
- Smarter searching starts here - Find movies by actor, plot, and even iconic quotes with AI-powered Fire TV Search. Try saying, "Alexa show me action movies with car chases."
- Wi-Fi 6 support - Enjoy smooth 4K streaming, even when other devices are connected to your router.
- Cinematic experience - Watch in vibrant 4K Ultra HD with support for Dolby Vision, HDR10+, and immersive Dolby Atmos audio.
- Endless entertainment - Stream more than 1.8 million movies and TV episodes. Watch favorites from Netflix, Prime Video, Disney+, Max, and more. Subscription fees may apply.
- Stream for free - Access over 400,000 free movies and TV episodes from popular ad-supported streaming apps like Fire TV Channels, Prime Video, Tubi, and Pluto TV.
- Alexa Voice Remote - Quickly find, launch, and control content with your voice. Get to your favorite apps with preset buttons, and control TV power and volume with one remote.
- Do more with your smart home - Control compatible devices like cameras, lights, and more with your remote. Press and ask Alexa to check the weather or dim the lights.

[^ Show less](#)

Ex. 16 at 1 (Fire Stick 4K Plus Amazon.com Listing); *see also id.* at 2, 6-7

Dolby Vision or High Dynamic Range Not Working on Fire TV Smart TV

Check your cable connections and verify which video formats the content supports.

Dolby Vision or High Dynamic Range Not Working on Fire TV Smart TV

- Check if the content supports Dolby Vision, 4K, or HDR.
- If the content comes from a connected device:
 - Connect the device with an HDMI cable.
 - Restart the connected device.
 - Set the source device to output Dolby Vision, 4K, or HDR.
 - Go to **Settings** on your Fire TV Smart TV.
 - Select **Display & Sounds**, and then select **Picture Settings**.
 - Select the HDMI input that your device connects to, and then select **HDMI Input Mode**.
 - Change the input mode to **Auto** or **Mode 2 (2.0)**.
- Try to restart your Fire TV Smart TV:
 - Go to **Settings** on your Fire TV Smart TV.
 - Select **My Fire TV** or **Device & Software**.
 - Select **Restart**.
- Make sure that the app is up to date:
 - Go to the **Appstore** and then search for the app.
 - An option to update shows if there's an available update for the app.
- Reset your Fire TV Smart TV:
 - Go to **Settings** on your Fire TV Smart TV.
 - Select **My Fire TV** or **Device & Software**.
 - Select **Reset to Factory Defaults**.

Dolby Vision or High Dynamic Range Not Working on Fire TV Devices

To troubleshoot issues with Dolby Vision or High Dynamic Range (HDR), use the Audio and Video Diagnostics tool on your Fire TV device.

The Audio and Video Diagnostics tool checks the capabilities of connected HDMI devices like your TV, soundbar, or AV receiver. The tool tests your TV's maximum resolution and refresh rate, HDR, and Dolby Vision support. It also detects support for various surround sound standards.

Note: The Audio and Video Diagnostics tool isn't available on all Fire TV devices.

- Check that your equipment supports Dolby Vision or High Dynamic Range (HDR). To check supported audio settings, use the Audio and Video Diagnostics tool:
 - Go to **Settings** on your Fire TV device.
 - Select **Display & Sounds**.
 - Select **Audio/Video Diagnostics**.
- If your TV supports HDR, but the content you're streaming is in a different format:
 - Confirm that your TV supports Dolby Vision or HDR formats by using the test video at the bottom of the page.
 - Check that the content supports HDR.
 - Go to your TV's picture or input settings and check that the resolution is 4K, HDR, or FHD. Follow the manufacturer's instructions if needed.
- If the Audio/Video Diagnostics tool doesn't detect the format that you want to use, check your current equipment setup:
 - Make sure that your TV supports Dolby Vision or HDR. If you're connecting your Fire TV device to an AV Receiver or soundbar, make sure it's able to pass-through Dolby Vision or HDR formats.
 - Sometimes your Fire TV device streams at 1080p 60 Hz for smoother playback if you have a 4K 30 Hz Dolby Vision TV. To set your resolution to 4K 60 Hz, go to **Settings** on your Fire TV device and then **Display & Sounds**.

For more help, go to:

[Dolby Vision or High Dynamic Range Not Working on Fire TV Smart TV](#)

Exs. 45-46.

100. Additionally, on information and belief, Amazon publishes customer reviews of the Streaming Device Accused Products that show its customers in fact use the Streaming Device Accused Products to stream and watch video:

Chris

★★★★★ **Great Firestick**

Reviewed in the United States on November 2, 2025

Configuration: Fire TV Stick 4K Plus | **Verified Purchase**

As with all Firesticks, it works great. Very easy to set up with many options. Amazon allows you to have it shipped already registered to your Amazon account to make setup that much easier. Great picture quality and streams great. The remote is easy to use with buttons for the most frequently used streaming services. The remote was easy to set up to control my TV volume, as well as my soundbar. If you have multiple fire sticks like I do then you may want to rename them in the Alexa app so you know which is which.

3 people found this helpful

Helpful

Report

Ex. 47 at 4 (Reviews of Fire Stick 4K Plus); *see also generally id.*, Ex. 16 at 8.

101. Amazon knowingly and intentionally induces users of one or more Accused Product to directly infringe one or more claim of the '211 Patent by encouraging, instructing, and aiding one or more persons in the United States, including Amazon employees who test and operate Accused Products at the direction of Amazon, to make, use (including testing those devices and methods), sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '211 Patent. *See* Ex. 11 (Accused Product List).

102. For example, as seen in the Amazon publications above, Amazon advertises the Accused Products on its website so that customers may purchase and use the products, thus inducing its customers to also infringe the '211 Patent. On information and belief, Amazon also advertises other Amazon products that infringe the '211 Patent on its website for consumer purchase.

103. Upon information and belief, Amazon has been aware of the '211 Patent and its infringement thereof since at least November 7, 2025. Ex. 48 (Complaint, *InterDigital, Inc. et al v. Amazon.com Services LLC*, Case No. 1:25-cv-1365-GBW, D.I. 1 (D. Del. Nov. 7, 2025)).

104. On information and belief, Amazon continues to infringe one or more Asserted Claim of the '211 Patent by offering for sale or selling and/or importing a patented component or material and/or apparatus used to practice a patented process, constituting a material part of the inventions, knowing the same to be especially made or especially adapted for use in an infringement and not a staple article or commodity of commerce suitable for substantial non-infringing use.

105. A claim chart mapping each of the asserted independent claims of the '211 Patent to the Accused Products is attached as Exhibit 32.

B. Infringement of the '674 Patent

106. On information and belief, the Accused Products that are sold for importation, imported, and/or sold within the United States after importation by Amazon infringe at least Claims 1 and 10 of the '674 Patent, either literally or under the doctrine of equivalents.

107. On information and belief, Amazon directly infringes one or more claims of the '674 Patent through its manufacture, sale for importation, importation, use, and sale after importation of one or more Accused Product.

108. As one example of Amazon's infringement, Amazon manufactures, imports, and sells televisions that infringe the '674 Patent. One example of an infringing TV Accused Product is the Fire TV Omni QLED Series.

Amazon Fire TV 55" Omni QLED Series (newest model), 4K Ultra HD smart TV, HDR10+, Dolby Vision, Dolby Audio, quad-core processor, hands-free with Alexa

Visit the Amazon Fire TV Store

4.4 ★★★★★ 28 ratings

1 sustainability feature

100+ bought in past month

Black Friday Deal

-17% **\$489⁹⁹**

List Price: \$589.99

FREE Returns

Delivery & Support

Select to learn more

- Professional TV wall-mounting available
- Ships from Amazon.com
- FREE refund/replacement until Jan 31, 2026
- Customer Support

Get \$60 off instantly: Pay \$429.99 upon approval for the Amazon Store Card.

You're viewing the newest model of this product

Size: **55-inch**

Size	Price
50-inch	\$479.99
55-inch	\$489.99
65-inch	\$849.99
75-inch	\$1,199.99

\$489⁹⁹

FREE scheduled delivery as soon as **Friday, November 28, 8 AM - 8 PM**

Delivering to Philadelphia 19103 - Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon.com

Sold by Amazon.com

Returns FREE refund/replacement until Jan 31, 2026

Packaging Ships in product packaging

See more

☐ This is a gift

☒ Link device to your Amazon account to simplify setup. Why is this important?

Add Additional Items

☐ Amazon Fire TV Alexa Voice Remote Pro (newest model) with Remote only **\$24.99**

List Price: \$34.99

Add to List

Ex. 17.

109. Additionally, Amazon instructs and encourages users to use the TV Accused Products in a manner that infringes the Asserted Claims of the '674 Patent by advertising the products' ability to stream and display video and, for example, by instructing users how to

“troubleshoot” the TV Accused Products to ensure use of the infringing high dynamic range functionality:

- Brilliant in every way – A 4K QLED display combines stunning visuals, smart features, and fast performance so you can get the most out of your TV.
- Picture perfect views – Scenes leap off the screen and look beautiful in any light with Dolby Vision and HDR10+ Adaptive.
- Speed, redefined – Jump right into what you love with Wi-Fi 6 support and a new quad-core processor. Apps open and load fast and the picture stays smooth.
- Instantly On - Introducing our custom Omnisense technology. Built-in sensors wake the display when you enter to show your favorite artwork or let you start watching in a snap.
- The new Alexa on Fire TV – Getting to what you love has never been easier. Talk naturally to find what to watch fast, manage your smart home, or dive into virtually any topic.
- No remote needed – Ask Alexa to play shows, set timers, and more hands-free, even when the screen is off.
- Find it fast. Watch it now. – Easily find what to watch from over 1.8 million movies and TV episodes (subscriptions fees may apply), including over 400,000 episodes of free content.
- Game away – Download free games from the Appstore or stream games from the cloud with Amazon Luna.
- Designed to protect your privacy – Built with privacy protections and controls, including a switch that electronically disconnects the microphones.
- Quick connections – Connect your soundbar, gaming consoles, and more with four HDMI inputs. Use AirPlay to share content from compatible devices to your TV.

Ex. 17 at 2 (Fire TV Omni QLED Series Amazon.com listing); *see also id.* at 2-4, 8-9.

Dolby Vision or High Dynamic Range Not Working on Fire TV Smart TV

Check your cable connections and verify which video formats the content supports.



1. Check if the content supports Dolby Vision, 4K, or HDR.
2. If the content comes from a connected device:
 - a. Connect the device with an HDMI cable.
 - b. Restart the connected device.
 - c. Set the source device to output Dolby Vision, 4K, or HDR.
 - d. Go to **Settings** on your Fire TV Smart TV.
 - e. Select **Display & Sounds**, and then select **Picture Settings**.
 - f. Select the HDMI input that your device connects to, and then select **HDMI Input Mode**.
 - g. Change the Input mode to **Auto** or **Mode 2 (2.0)**.
3. Try to restart your Fire TV Smart TV:
 - a. Go to **Settings** on your Fire TV Smart TV.
 - b. Select **My Fire TV** or **Device & Software**.
 - c. Select **Restart**.
4. Make sure that the app is up to date:
 - a. Go to the **Appstore** and then search for the app.
 - b. An option to update shows if there's an available update for the app.
5. Reset your Fire TV Smart TV:
 - a. Go to **Settings** on your Fire TV Smart TV.
 - b. Select **My Fire TV** or **Device & Software**.
 - c. Select **Reset to Factory Defaults**.

Dolby Vision or High Dynamic Range Not Working on Fire TV Devices

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Note: The Audio and Video Diagnostics tool isn't available on all Fire TV devices.

1. Check that your equipment supports Dolby Vision or High Dynamic Range (HDR). To check supported audio settings, use the Audio and Video Diagnostics tool:
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 - b. Select **Display & Sounds**.
 - c. Select **Audio/Video Diagnostics**.
2. If your TV supports HDR, but the content you're streaming is in a different format:
 - a. Confirm that your TV supports Dolby Vision or HDR formats by using the test video at the bottom of the page.
 - b. Check that the content supports HDR.
 - c. Go to your TV's picture or input settings and check that the resolution is 4K, HDR, or FHD. Follow the manufacturer's instructions if needed.
3. If the Audio/Video Diagnostics tool doesn't detect the format that you want to use, check your current equipment setup:
 - a. Make sure that your TV supports Dolby Vision or HDR. If you're connecting your Fire TV device to an AV Receiver or soundbar, make sure it's able to pass-through Dolby Vision or HDR formats.
 - b. Sometimes your Fire TV device streams at 1080p 60 Hz for smoother playback if you have a 4K 30 Hz Dolby Vision TV. To set your resolution to 4K 60 Hz, go to **Settings** on your Fire TV device and then **Display & Sounds**.

For more help, go to:

[Dolby Vision or High Dynamic Range Not Working on Fire TV Smart TV](#)

Exs. 45-46.

110. Additionally, on information and belief, Amazon publishes customer reviews of the TV Accused Products that show its customers in fact use the TV Accused Products to stream and watch video:

Top reviews from the United States



OneFineDay

★★★★★ Excellent 50 inch TV and a great monitor

Reviewed in the United States on November 12, 2025

Size: 50-inch | [Amazon Vine Customer Review of Free Product](#) (What's this?)

The Amazon Fire smart TV comes in several sizes. This review is for the 50 inch model. The TV is very light weight and easy to handle. A quick installation of the steel legs and the TV is ready to go. The legs that function like a built in stand are heavy duty one piece steel so the TV sits firmly. The initial set up can not be easier but updates did take a few minutes. After the initial set up and updates, each time the TV starting up takes no time. There is no bloatware and no lags. Linking to Amazon account can be done via a cell phone or by the remote. Downloading popular apps such as YouTube is also fast. Using voice or Alexa is also easy and straight forward. The remote is simple, easy to use, and also takes voice. Sharp Omni 4K image, HDRIO+, Dolby vision and sound, a simple easy to use remote, and the friendly Alexa eco system makes this TV a great value. I only use Alexa when I want to be hands free. But the TV works just as well without using Alexa. Not only with super sharp image and contrast, the sound of this TV is so great I do streaming without external speakers with this.

Other than being a great TV, I am also using this as a monitor. There are four HDMI ports on this TV, one 2.1 and three 2.0. A live HDMI connection is automatically detected on the INPUT setting. So setting INPUT is a no brainer. The settings such as display and sound are also easily controlled with the remote. This works very well with my laptop which is a Lenovo. Having a 50 inch as a monitor allows me to open more windows without using dual monitors. And the high resolution and sharp image on the TV enables using this as a monitor. I will mention that the legs placement is on the outer most corners of the TV. So in order to accommodate the TV as a free standing unit, the desk or TV stand need to be at least 11 inch wide and 44 inch long for a solid placement. As a TV, the quad core processor is plenty fast for all the apps I use. When used as a 50 inch monitor for my laptop, there is no lags in syncing and really zero complaint at this price. Again, great value all around and an excellent choice to meet all my needs.

[^ Read less](#)



2 people found this helpful

[Helpful](#)

[Report](#)

Ex. 17 at 11-12 (Fire TV Omni QLED Series Amazon.com listing); *see also* Ex. 50 (Reviews of Fire TV Omni QLED Series).

111. As yet another example of Amazon's infringement, Amazon manufactures and sells streaming devices that infringe the '674 Patent. One example of an infringing Streaming Device Accused Product is the Fire Stick 4K Plus.

fire tv stick 4K PLUS
 "Alexa, show me psychological thrillers with surprise endings."

Amazon Fire TV Stick 4K Plus (newest model) with AI-powered Fire TV Search, Wi-Fi 6, stream over 1.8 million movies and shows, free & live TV

Visit the Amazon Fire TV Store
 4.7 ★★★★★ 93,797 ratings
 Amazon's Choice

1 sustainability feature
 10K+ bought in past month

Black Friday Deal
 -50% \$24⁹⁹
 List Price: \$49.99

Get Fast, Free Shipping with Amazon Prime
 FREE Returns
 Save 20% with Trade-In

Savings Xbox Game Pass New Users Bonus Shop items >

Get a \$60 Amazon Gift Card instantly upon approval for Amazon Visa. No annual fee.

You're viewing the newest model of this product

Configuration: **Fire TV Stick 4K Plus**

Fire TV Stick 4K	Fire TV Stick 4K Plus
\$24.99 \$49.99	\$24.99 \$49.99

The Fire TV Stick 4K is now called Fire TV Stick 4K Plus - same great device, just a new name.

\$24⁹⁹
 Get Fast, Free Shipping with Amazon Prime
 FREE delivery **Saturday, November 29** on orders shipped by Amazon over \$35
 Or Prime members get FREE delivery **Tuesday, November 25. Order within 26 mins.** Join Prime
 Delivering to Philadelphia 19103 - Update location

In Stock
 Quantity: 1
 Add to Cart
 Buy Now

Ships from Amazon.com
 Sold by Amazon.com
 Returns FREE refund/replacement until Jan 31, 2026
 Payment Secure transaction

☐ This is a gift
☒ Link device to your Amazon account to simplify setup. Why is this important?

Ex. 16.

112. Amazon instructs and encourages users to use the Streaming Device Accused Products in a manner that infringes the Asserted Claims of the '674 Patent by advertising the products' ability to stream and display video and, for example, by instructing users how to "troubleshoot" the TV Accused Products to ensure use of the infringing high dynamic range functionality:

[See all bundles](#)

- Advanced 4K streaming - Elevate your entertainment with the next generation of our best-selling 4K stick, with improved streaming performance optimized for 4K TVs.
- Play Xbox games with no console required - Stream Forza Motorsport, Starfield, Palworld, and discover hundreds of other high-quality games directly on your Fire TV Stick 4K Plus with Xbox Game Pass via cloud gaming.
- Smarter searching starts here - Find movies by actor, plot, and even iconic quotes with AI-powered Fire TV Search. Try saying, "Alexa show me action movies with car chases."
- Wi-Fi 6 support - Enjoy smooth 4K streaming, even when other devices are connected to your router.
- Cinematic experience - Watch in vibrant 4K Ultra HD with support for Dolby Vision, HDR10+, and immersive Dolby Atmos audio.
- Endless entertainment - Stream more than 1.8 million movies and TV episodes. Watch favorites from Netflix, Prime Video, Disney+, Max, and more. Subscription fees may apply.
- Stream for free - Access over 400,000 free movies and TV episodes from popular ad-supported streaming apps like Fire TV Channels, Prime Video, Tubi, and Pluto TV.
- Alexa Voice Remote - Quickly find, launch, and control content with your voice. Get to your favorite apps with preset buttons, and control TV power and volume with one remote.
- Do more with your smart home - Control compatible devices like cameras, lights, and more with your remote. Press and ask Alexa to check the weather or dim the lights.

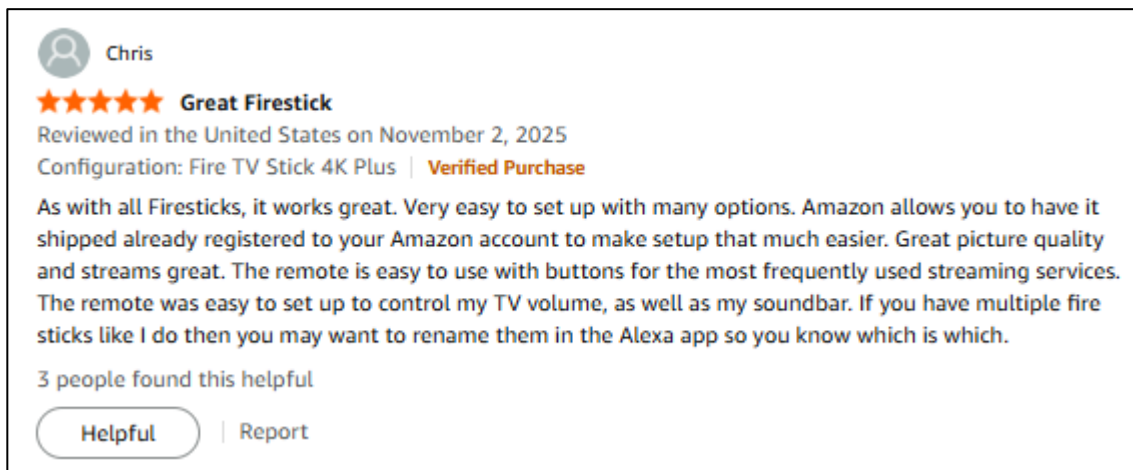
[^ Show less](#)

Ex. 16 at 1 (Fire Stick 4K Plus Amazon.com Listing); *see also id.* at 2, 6-7.

Dolby Vision or High Dynamic Range Not Working on Fire TV Smart TV Check your cable connections and verify which video formats the content supports.  - Check if the content supports Dolby Vision, 4K, or HDR. - If the content comes from a connected device: - Connect the device with an HDMI cable. - Restart the connected device. - Set the source device to output Dolby Vision, 4K, or HDR. - Go to Settings on your Fire TV Smart TV. - Select Display & Sounds, and then select Picture Settings. - Select the HDMI input that your device connects to, and then select HDMI Input Mode. - Change the input mode to Auto or Mode 2 (2.0). - Try to restart your Fire TV Smart TV: - Go to Settings on your Fire TV Smart TV. - Select My Fire TV or Device & Software. - Select Restart. - Make sure that the app is up to date: - Go to the Appstore and then search for the app. - An option to update shows if there's an available update for the app. - Reset your Fire TV Smart TV: - Go to Settings on your Fire TV Smart TV. - Select My Fire TV or Device & Software. - Select Reset to Factory Defaults.	Dolby Vision or High Dynamic Range Not Working on Fire TV Devices To troubleshoot issues with Dolby Vision or High Dynamic Range (HDR), use the Audio and Video Diagnostics tool on your Fire TV device. The Audio and Video Diagnostics tool checks the capabilities of connected HDMI devices like your TV, soundbar, or AV receiver. The tool tests your TV's maximum resolution and refresh rate, HDR, and Dolby Vision support. It also detects support for various surround sound standards. Note: The Audio and Video Diagnostics tool isn't available on all Fire TV devices. - Check that your equipment supports Dolby Vision or High Dynamic Range (HDR). To check supported audio settings, use the Audio and Video Diagnostics tool: - Go to Settings on your Fire TV device. - Select Display & Sounds. - Select Audio/Video Diagnostics. - If your TV supports HDR, but the content you're streaming is in a different format: - Confirm that your TV supports Dolby Vision or HDR formats by using the test video at the bottom of the page. - Check that the content supports HDR. - Go to your TV's picture or input settings and check that the resolution is 4K, HDR, or FHD. Follow the manufacturer's instructions if needed. - If the Audio/Video Diagnostics tool doesn't detect the format that you want to use, check your current equipment setup: - Make sure that your TV supports Dolby Vision or HDR. If you're connecting your Fire TV device to an AV Receiver or soundbar, make sure it's able to pass-through Dolby Vision or HDR formats. - Sometimes your Fire TV device streams at 1080p 60 Hz for smoother playback if you have a 4K 30 Hz Dolby Vision TV. To set your resolution to 4K 60 Hz, go to Settings on your Fire TV device and then Display & Sounds. For more help, go to: Dolby Vision or High Dynamic Range Not Working on Fire TV Smart TV
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Exs. 45-46.

113. Additionally, on information and belief, Amazon publishes customer reviews of the Streaming Device Accused Products that show its customers in fact use the Streaming Device Accused Products to stream and watch video:



Ex. 47 at 4 (Reviews of Fire Stick 4K Plus); *see generally id.*; Ex. 16 at 8.

114. Amazon knowingly and intentionally induces users of one or more Accused Product to directly infringe one or more claim of the '674 Patent by encouraging, instructing, and aiding one or more persons in the United States, including Amazon employees who test and operate Accused Products at the direction of Amazon, to make, use (including testing those devices and methods), sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '674 Patent. *See* Ex. 11 (Accused Product List).

115. For example, as seen in the Amazon publications above, Amazon advertises the Accused Products on its website so that customers may purchase and use the products, thus inducing its customers to also infringe the '674 Patent. On information and belief, Amazon also advertises other Amazon products that infringe the '674 Patent on its website for consumer purchase.

116. Upon information and belief, Amazon has been aware of the '674 Patent and its infringement thereof since at least November 7, 2025. Ex. 48 (Complaint, *InterDigital, Inc. et al v. Amazon.com Services LLC*, Case No. 1:25-cv-1365-GBW, D.I. 1 (D. Del. Nov. 7, 2025)).

117. On information and belief, Amazon continues to infringe one or more Asserted Claim of the '674 Patent by offering for sale or selling and/or importing a patented component or material and/or apparatus used to practice a patented process, constituting a material part of the inventions, knowing the same to be especially made or especially adapted for use in an infringement and not a staple article or commodity of commerce suitable for substantial non-infringing use.

118. A claim chart mapping each of the asserted independent claims of the '674 Patent to the Accused Products is attached as Exhibit 33.

C. Infringement of the '724 Patent

119. On information and belief, the Accused Products that are sold for importation, imported, and/or sold within the United States after importation by Amazon infringe at least Claims 39 and 57 of the '724 Patent, either literally or under the doctrine of equivalents.

120. On information and belief, Amazon directly infringes one or more claims of the '724 Patent through its manufacture, sale for importation, importation, use, and sale after importation of one or more Accused Product.

121. As just one example of Amazon's infringement, Amazon manufactures, imports, and sells streaming devices that infringe the '724 Patent. One example of an infringing Streaming Device Accused Product is the Fire Stick 4K Plus.

The screenshot displays the Amazon product page for the Fire TV Stick 4K Plus. The main product image shows the device and its remote. The title is "Amazon Fire TV Stick 4K Plus (newest model) with AI-powered Fire TV Search, Wi-Fi 6, stream over 1.8 million movies and shows, free & live TV". The price is \$24.99, marked down from \$49.99. A "Black Friday Deal" banner indicates a 50% discount. The page also features a "We want you to know" section explaining the name change from Fire TV Stick 4K to Fire TV Stick 4K Plus. A configuration table at the bottom shows the "Fire TV Stick 4K Plus" selected. A red box highlights the "Fire TV Stick 4K Plus" in the configuration table.

Configuration	Fire TV Stick 4K	Fire TV Stick 4K Plus
Price	\$24.99	\$24.99
Original Price	\$49.99	\$49.99

Ex. 16.

Content formats supported	Video: Dolby Vision, HDR 10, HDR10+, HLG, H.265, H.264, VP9, AV1; Audio: xHE-AAC, AAC-LC, AAC+, eAAC+, AAC-ELD, MP3, AMR-NB, FLAC, PCM/WAV, Vorbis, Dolby AC3, eAC3 (Dolby Digital Plus), Dolby Atmos (EC3_JOC), Dolby AC4, Dolby MAT, Dolby TrueHD pass-through, MPEG-H pass-through, DTS passthrough, DTS-HD passthrough (basic profile); Photo: JPEG, PNG, GIF, BMP
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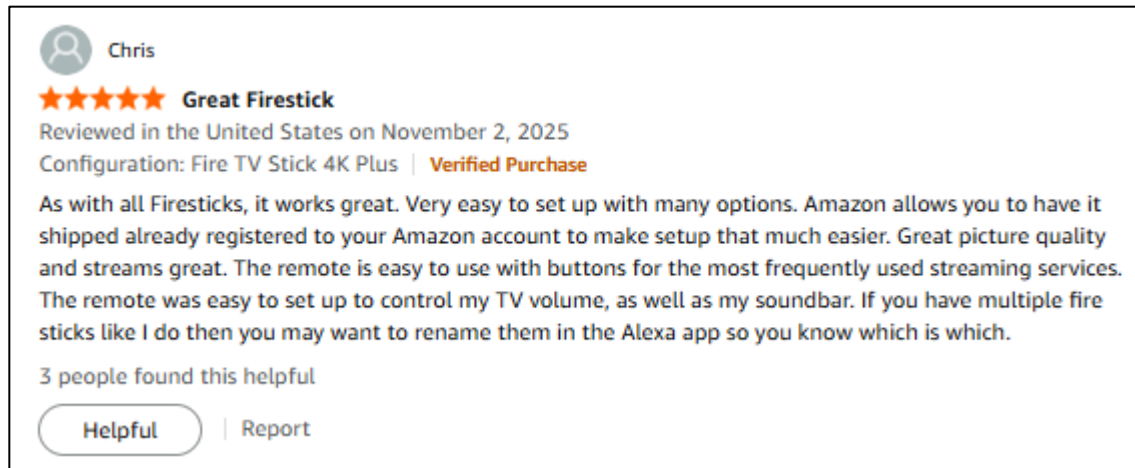
Ex. 16 (Fire Stick 4K Plus Amazon.com Listing).

122. Additionally, Amazon instructs and encourages users to use the Streaming Device Accused Products in a manner that infringes the Asserted Claims of the '724 Patent by advertising the products' ability to stream and display video:

Size	99 mm x 30 mm x 14 mm (only housing) 108 mm x 30 mm x 14 mm (including the connector)
Weight	43.5 g
Processor	Quad-core 1.7GHz
GPU	650MHz
Storage	8GB
Wifi	Wi-Fi 6 dual-band: 802.11 a/b/g/n/ac/ax (2.4GHz and 5GHz)
Bluetooth	Bluetooth 5.2 + BLE
Voice Support	Yes, with the Alexa Voice Remote (included) or free Fire TV app (available for download on Fire OS, Android, and iOS)
IR device control with included Alexa Voice Remote	The included Alexa Voice Remote can control Fire TV Stick 4K Plus and certain functions (such as power and volume) on a wide range of compatible IR-enabled devices, including TVs, soundbars and A/V receivers. Note: Certain functions may not be available on some IR-enabled devices.
Cloud Storage	Free cloud storage for digital content purchased from Amazon
Ports	HDMI 2.1 output with ARC input support, micro USB
Audio Support	Dolby Atmos, 7.1 surround sound, 2-channel stereo, and HDMI audio pass through up to 5.1.
4K Support	To watch movies and TV shows in 4K Ultra HD, you need a compatible Ultra HD TV. All services may not be available in 4K/HDR. Certain services are subject to change at any time, may not be available in all areas, or in 4K/HDR, and may require separate subscriptions. Learn more about services.
Content formats supported	Video: Dolby Vision, HDR 10, HDR10+, HLG, H.265, H.264, VP9, AV1; Audio: xHE-AAC, AAC-LC, AAC+, eAAC+, AAC-ELD, MP3, AMR-NB, FLAC, PCM/WAV, Vorbis, Dolby AC3, eAC3 (Dolby Digital Plus), Dolby Atmos (EC3_JOC), Dolby AC4, Dolby MAT, Dolby TrueHD pass-through, MPEG-H pass-through, DTS passthrough, DTS-HD passthrough (basic profile); Photo: JPEG, PNG, GIF, BMP

Ex. 16 at 7 (Fire Stick 4K Plus Amazon.com Listing); *see also id.* at 1-2, 6.

123. Additionally, on information and belief, Amazon publishes customer reviews of the Streaming Device Accused Products that show its customers in fact use the Streaming Device Accused Products to stream and watch video:

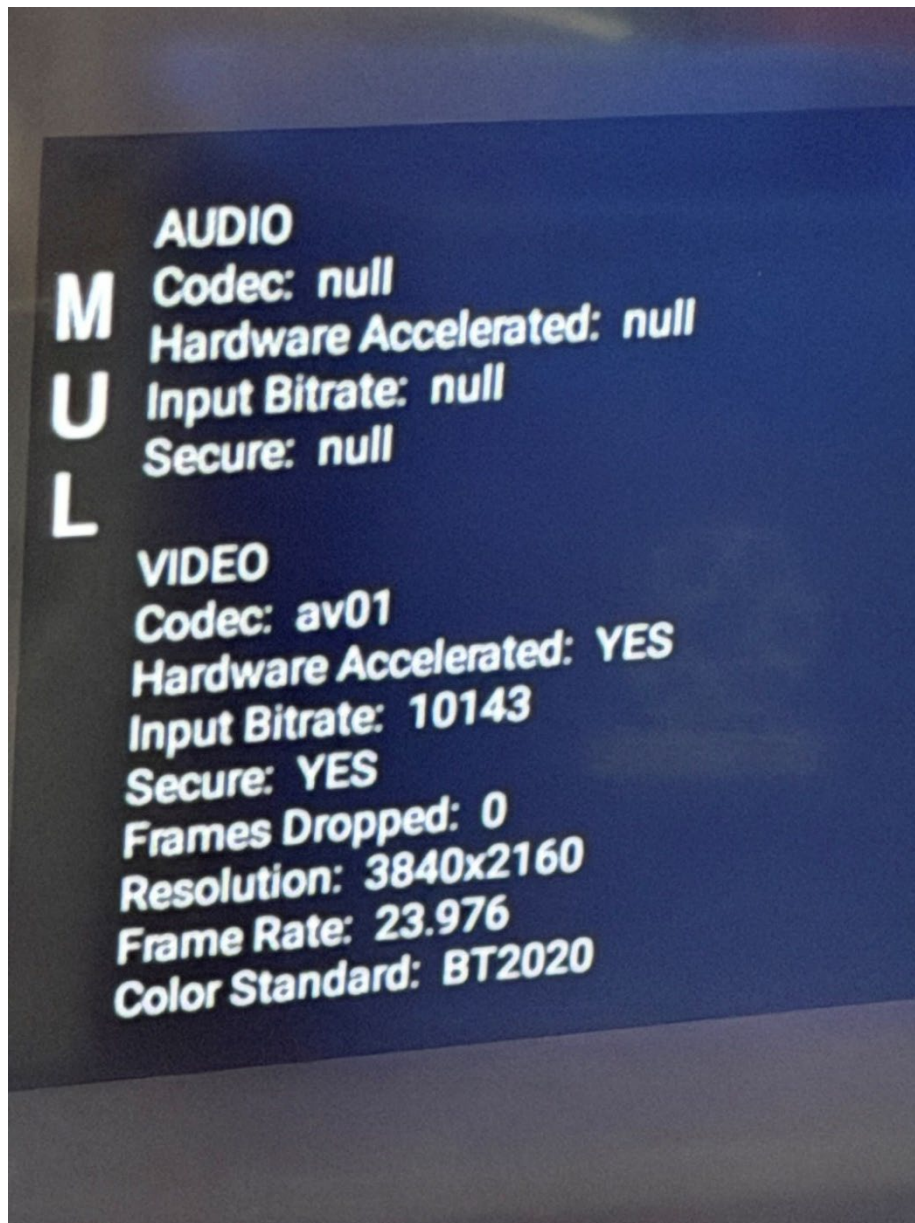


Ex. 47 at 4 (Reviews of Fire Stick 4K Plus); *see generally id.*; Ex. 16 at 8.

124. As another example of Amazon’s infringement, Amazon manufactures and sells televisions that infringe the ’724 Patent. One example of an infringing TV Accused Product is the Fire TV Omni QLED Series.

Size: 55-inch	50-inch	55-inch	65-inch	75-inch
	\$479.99	\$489.99	\$849.99	\$1,199.99

Ex. 17.



Ex. 44 (photo of FireTV Omni in developer mode playing back an AV1 video); *see also* Ex. 17 at 2-4, 8-9 (Fire TV Omni QLED Series Amazon.com listing).

125. Additionally, Amazon instructs and encourages users to use the TV Accused Products in a manner that infringes the Asserted Claims of the '724 Patent by advertising the products' ability to stream and display video:

- Brilliant in every way – A 4K QLED display combines stunning visuals, smart features, and fast performance so you can get the most out of your TV.
- Picture perfect views – Scenes leap off the screen and look beautiful in any light with Dolby Vision and HDR10+ Adaptive.
- Speed, redefined – Jump right into what you love with Wi-Fi 6 support and a new quad-core processor. Apps open and load fast and the picture stays smooth.
- Instantly On – Introducing our custom Omnisense technology. Built-in sensors wake the display when you enter to show your favorite artwork or let you start watching in a snap.
- The new Alexa on Fire TV – Getting to what you love has never been easier. Talk naturally to find what to watch fast, manage your smart home, or dive into virtually any topic.
- No remote needed – Ask Alexa to play shows, set timers, and more hands-free, even when the screen is off.
- Find it fast. Watch it now. – Easily find what to watch from over 1.8 million movies and TV episodes (subscriptions fees may apply), including over 400,000 episodes of free content.
- Game away – Download free games from the Appstore or stream games from the cloud with Amazon Luna.
- Designed to protect your privacy – Built with privacy protections and controls, including a switch that electronically disconnects the microphones.
- Quick connections – Connect your soundbar, gaming consoles, and more with four HDMI inputs. Use AirPlay to share content from compatible devices to your TV.

Ex. 17 at 2 (Fire TV Omni QLED Series Amazon.com listing); *see also id.* at 2-4, 8-9.

126. Additionally, on information and belief, Amazon publishes customer reviews of the TV Accused Products that show its customers in fact use the TV Accused Products to stream and watch video:

Top reviews from the United States



OneFineDay

★★★★★ Excellent 50 inch TV and a great monitor

Reviewed in the United States on November 12, 2025

Size: 50-inch | [Amazon Vine Customer Review of Free Product](#) (What's this?)

The Amazon Fire smart TV comes in several sizes. This review is for the 50 inch model. The TV is very light weight and easy to handle. A quick installation of the steel legs and the TV is ready to go. The legs that function like a built in stand are heavy duty one piece steel so the TV sits firmly. The initial set up can not be easier but updates did take a few minutes. After the initial set up and updates, each time the TV starting up takes no time. There is no bloatware and no lags. Linking to Amazon account can be done via a cell phone or by the remote. Downloading popular apps such as YouTube is also fast. Using voice or Alexa is also easy and straight forward. The remote is simple, easy to use, and also takes voice. Sharp Omni 4K image, HDRIO+, Dolby vision and sound, a simple easy to use remote, and the friendly Alexa eco system makes this TV a great value. I only use Alexa when I want to be hands free. But the TV works just as well without using Alexa. Not only with super sharp image and contrast, the sound of this TV is so great I do streaming without external speakers with this.

Other than being a great TV, I am also using this as a monitor. There are four HDMI ports on this TV, one 2.1 and three 2.0. A live HDMI connection is automatically detected on the INPUT setting. So setting INPUT is a no brainer. The settings such as display and sound are also easily controlled with the remote. This works very well with my laptop which is a Lenovo. Having a 50 inch as a monitor allows me to open more windows without using dual monitors. And the high resolution and sharp image on the TV enables using this as a monitor. I will mention that the legs placement is on the outer most corners of the TV. So in order to accommodate the TV as a free standing unit, the desk or TV stand need to be at least 11 inch wide and 44 inch long for a solid placement. As a TV, the quad core processor is plenty fast for all the apps I use. When used as a 50 inch monitor for my laptop, there is no lags in syncing and really zero complaint at this price. Again, great value all around and an excellent choice to meet all my needs.

[^ Read less](#)



2 people found this helpful

[Helpful](#)

[Report](#)

Ex. 17 at 11-12 (Fire TV Omni QLED Series Amazon.com listing); *see also* Ex. 50 (Reviews of Fire TV Omni QLED Series).

127. As another example of Amazon's infringement, Amazon manufactures and sells tablets that infringe the '724 Patent. One example of an infringing Tablet Accused Product is the Fire HD 10.

Amazon Fire HD 10 tablet, built for relaxation, 10.1" vibrant Full HD screen, octa-core processor, 3 GB RAM, 32 GB, Black

Visit the Amazon Fire Tablets Store

4.5 ★★★★★ (37,107) | Search this page

1 sustainability feature

10K+ bought in past month

\$139⁹⁹

Price history

Or **\$23⁵³** /mo (6 mo). Select from 3 plans

FREE Returns

Save 20% with Trade-In

With Amazon Business, you would have saved **\$398.31** in the last year. Create a free account and save up to 3% today.

You're viewing the newest model of this product — see what's new

Fire HD 10 tablets

Amazon Fire HD 10
Best for: Movies and casual gaming on a budget-friendly 10" tablet.
★★★★★ 37,107
From: \$139.99

Digital Storage Capacity: **32 GB**

32 GB
\$139.99

64 GB
See available options

Offer Type: **With Lockscreen Ads**

With Lockscreen Ads **Without Lockscreen Ads**

\$139⁹⁹

FREE delivery **Monday, December 29** for Prime members

Arrives after Christmas. Need a gift sooner? Send an Amazon Gift Card today by email or text message.

Deliver to George - Austin 78701

Quantity: 1

Add to Cart

Buy Now

Shipper / Seller Amazon.com

Returns **FREE** refund/replacement until Jan 31, 2026

Support Product support included

See more

☐ This is a gift

☒ Link device to your Amazon account to simplify setup. Why is this important?

Enhance your purchase

☐ Fire HD 10 Amazon Standing Cover: Black **\$35.99** List Price: \$59.99

☐ Fire HD 10 Screen Protector (2-Pack) **\$15.99** List Price: \$17.99

☐ Fire HD 10: Protect Your Investment: 2 year **\$24.99**

☐ Fire HD 10 Bluetooth Keyboard Case **\$54.99**

Relax all day with 13-hour battery and expandable storage

Click to see full view

Ask Rufus

Can this tablet be used for video calls? Does this tablet have a headphone jack?

What is the battery life like? Ask something else

alexa+ Buy this device, try Alexa+ for free during Early Access. Try our smartest AI assistant yet. After Early Access ends, Alexa+ will stay free with Prime. Learn more about Alexa+.

Ex. 18 (Amazon Fire HD 10 tablet Amazon.com Listing, <https://a.co/d/1GPYOB5>).

VIDEO CODECS		
H.263		D (HW) baseline, 1080P@60FPS
H.264 AVC		D (HW) High profile, L4.2 1080p@60FPS, E (HW)
H.265 HEVC		D (HW) Main Profile L4.2 1080p@60FPS
MPEG2		D (HW) 1080P@60FPS
MPEG4		D (HW) Advanced Simple Profile@L5 1080P@60FPS
VP8		D (HW)
VP9		D (HW) 1080P@60FPS
AV1 with film grain		Not supported
VC-1		Not supported

Ex. 49 (Amazon Fire HD 10 Tablet Specifications, https://developer.amazon.com/docs/device-specs/ft-device-specifications-firehd-models.html?v=firehd10_2023).

128. Additionally, Amazon instructs and encourages users to use the Tablet Accused Products in a manner that infringes the Asserted Claims of the '724 Patent by advertising the products' ability to stream and display video:



Watch videos and more on the 10.1" 1080p Full HD display

[Click to see full view](#)

Amazon Fire HD 10 tablet, built for relaxation, 10.1" vibrant Full HD screen, octa-core processor, 3 GB RAM, 32 GB, Black

Visit the Amazon Fire Tablets Store

4.5 ★★★★★ (35,702) | [Ask questions and search reviews](#)

Amazon's Choice

1 sustainability feature

10K+ bought in past month

Black Friday Deal

-50% \$69⁹⁹

\$69⁹⁹

prime Today

FREE delivery **Today 2 PM - 6 PM.**
Order within **12 hrs 2 mins**

📍 Deliver to Jamie - Washington 20037

In Stock

Quantity: 1

Add to Cart

Buy Now

Shipper / Seller Amazon.com

Returns **FREE** refund/replacement until Jan 31, 2026

Support [Product support](#)

Ex. 18.



Stream

Take a front row seat to all the popular shows with Prime Video, Netflix, and Hulu. (Subscriptions for some apps required.)



Read

Use apps like Kindle as your personal library with thousands of titles to choose from. Let the book club commence.



Listen

Stay in the know with podcasts from Audible, or chill out to your favorite music with apps like Amazon Music.



Play

Beat your highest score or start a new record with games like Candy Crush and Roblox.

Ex. 18.

129. Additionally, on information and belief, Amazon publishes customer reviews of the Tablet Accused Products that show its customers in fact use the Tablet Accused Products to stream and watch video:



Kelly Ferguson

★★★★★ **Value for money! Love it!**

Reviewed in the United States on November 13, 2025

Digital Storage Capacity: 32 GB | Offer Type: Without Lockscreen Ads | Color: Ocean | Style: Amazon Fire HD 10 | **Verified Purchase**

Battery is great, and lasts long. Good quality. Feels expensive. Beautiful HD screen with lots of features compared to my regular Kindle. I actually downgraded from 2025 Compact Kindle to this model so I could use plenty of apps and services on it. It's hard to read books for long periods on it compared to a ink Kindle but that isn't a reason to hate this as I can use both Kindles for different reasons. Has lot of settings to make reading better. And reading in color is nice for once. I enjoy this model and use it for YouTube and streaming **video** apps. Games. The works. I'd get one while you can. It's a big screen compared to the 8, even though the 8 HD is newer, this has a better performance in my opinion.

76 people found this helpful

Helpful

| Report

Ex. 51 (Amazon Fire HD 10 Customer Reviews, https://www.amazon.com/product-reviews/B0BHZT5S12/ref=cm_cr_dp_d_show_all_btm?ie=UTF8&reviewerType=all_reviews).

130. As another example of Amazon's infringement, Amazon manufactures and sells smart displays that infringe the '724 Patent. One example of an infringing Smart Display Accused Product is the Echo Show 15.

echo show 15
Smart kitchen TV for home organization

Organization Fire TV Smart Home Personalization

Click to see full view

6 VIDEOS

Amazon Echo Show 15 (newest model), Full HD 15.6" kitchen hub for home organization, with built-in Fire TV and Alexa+ Early Access

Visit the Amazon Echo & Alexa Store

4.4 ★★★★★ 3,443 ratings

Amazon's Choice

1 sustainability feature

10K+ bought in past month

Black Friday Deal

-15% \$254⁹⁹

List Price: \$299.99

FREE Returns

Get a \$60 Amazon Gift Card instantly upon approval for Amazon Visa. No annual fee.

You're viewing the newest model of this product — see what's new

Size: 15-inch

15-inch	21-inch
\$254.99 ~~\$299.99~~	\$349.99 ~~\$399.99~~

\$254⁹⁹

FREE delivery **Saturday, November 29**

Or **Prime members** get FREE delivery **Tomorrow, November 25**. Order within 23 hrs 16 mins. [Join Prime](#)

Delivering to Philadelphia 19103 - [Update location](#)

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon.com

Sold by Amazon.com

Returns **FREE** refund/replacement until Jan 31, 2026

Packaging Ships in product packaging

[See more](#)

☐ This is a gift

☒ **Link device to your Amazon account to simplify setup. Why is this important?**

alex+ Buy this device, try Alexa+ for free during Early Access

Try our smartest AI assistant yet. After Early Access ends, Alexa+ will stay free with Prime. [Learn more about Alexa+](#).

Ex. 19.

Video codecs	• AV1: Hardware accelerated up to 1080p @ 60fps, 20 Mbps, Main Profile Level 4.1 • H.265 (HEVC) (High Efficiency Video Coding): Hardware accelerated up to 1080p @ 60fps, 20 Mbps, Main Profile Level 4.1 • H.264: Hardware accelerated up to 1080p @ 60fps, or 720p @ 60fps, 20 Mbps, High Profile up to Level 4 • H.263: Supported up to 1080p @ 30fps, 6 Mbps, Profile 0 Level 70 • VP9: Hardware accelerated up to 1080p @ 60fps, Profile 2 up to 20 Mbps • VP8: Supported up to 1080p 30fps. Baseline profile, non-secure • MPEG-4: Hardware accelerated up to 1080p @ 60fps • MPEG-2: Hardware accelerated up to 1080p @ 60fps
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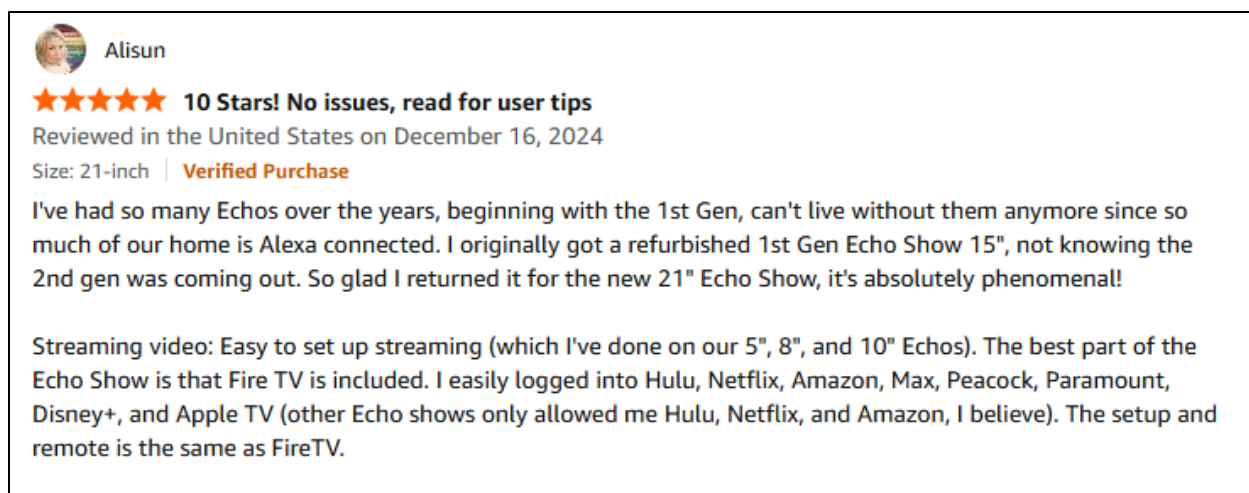
Ex. 52 (Echo Show 15 Specifications, <https://developer.amazon.com/docs/device-specs/device-specifications-echo-show.html>).

131. Additionally, Amazon instructs and encourages users to use the Smart Display Accused Products in a manner that infringes the Asserted Claims of the '724 Patent by advertising the products' ability to stream and display video:

- **MEET THE ALL-NEW ECHO SHOW 15** - A stunning 15.6" Full-HD (1080p) smart display that's perfect for your kitchen and ready to show you more. Use customizable widgets to keep your day on track, watch your favorite shows with Fire TV and powerful vibrant sound, and enjoy natural video calling, with 3.3x zoom and wide field of view.
- **FAMILY ORGANIZATION HUB** - See your top widgets at a glance, like your family's calendars and to-do lists, local weather, smart home, and more.
- **ALL YOUR FAVORITES, ALL RIGHT HERE** - Built-in Fire TV unlocks endless entertainment, so you can enjoy your favorite content from thousands of apps like Prime Video, Netflix, YouTube, Apple TV, and more (subscription may be required). Fire TV remote included. Plus, now you can quickly add a device to play music with Active Media - start playing a song in the kitchen, then add the living room and bedroom on the fly.
- **SMART HOME CENTRAL** - Control smart devices with your voice or a few taps using the smart home dashboard. Easily turn on all your living room lights at once or check live camera feeds to see what's happening around your home.
- **FRAME YOUR FAVORITE MEMORIES** - Brighten your space (and your day) by turning your home screen into a stylish digital photo frame that displays your favorite memories. Auto curate your images and show off your favorite family memories.
- **CONNECT LIKE NEVER BEFORE** - Video calling with family and friends will feel even more natural with a centered, auto-framing camera, wide field of vision, 3.3x zoom, and noise reduction technology.

Ex. 19 (Echo Show 15 Amazon.com Listing).

132. Additionally, on information and belief, Amazon publishes customer reviews of the Smart Display Accused Products that show its customers in fact use the Smart Display Accused Products to stream and watch video:



Ex. 53 (Echo Show 15 Customer Reviews).

133. Amazon knowingly and intentionally induces users of one or more Accused Product to directly infringe one or more claim of the '724 Patent by encouraging, instructing, and aiding one or more persons in the United States, including Amazon employees who test and operate Accused Products at the direction of Amazon, to make, use (including testing those devices and methods), sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '724 Patent. *See* Ex. 11 (Accused Product List).

134. For example, as seen in the Amazon publications above, Amazon advertises the Accused Products on its website so that customers may purchase and use the products, thus inducing its customers to also infringe the '724 Patent. On information and belief, Amazon also advertises other Amazon products that infringe the '724 Patent on its website for consumer purchase.

135. Upon information and belief, Amazon has been aware of the '724 Patent and its infringement thereof since at least November 7, 2025. Ex. 48 (Complaint, *InterDigital, Inc. et al v. Amazon.com Services LLC*, Case No. 1:25-cv-1365-GBW, D.I. 1 (D. Del. Nov. 7, 2025)).

136. On information and belief, Amazon continues to infringe one or more Asserted Claim of the '724 Patent by offering for sale or selling and/or importing a patented component or material and/or apparatus used to practice a patented process, constituting a material part of the inventions, knowing the same to be especially made or especially adapted for use in an infringement and not a staple article or commodity of commerce suitable for substantial non-infringing use.

137. A claim chart mapping each of the asserted independent claims of the '724 Patent to the Accused Products is attached as Exhibit 34.

D. Infringement of the '855 Patent

138. On information and belief, the Accused Products that are sold for importation, imported, and/or sold within the United States after importation by Amazon infringe at least Claims 13 and 19 of the '855 Patent, either literally or under the doctrine of equivalents.

139. On information and belief, Amazon directly infringes one or more claims of the '855 Patent through its manufacture, sale for importation, importation, use, and sale after importation of one or more Accused Product.

140. As just one example of Amazon's infringement, Amazon manufactures, imports, and sells streaming devices that infringe the '855 Patent. One example of an infringing Streaming Device Accused Product is the Fire Stick 4K Plus.

fire tv stick 4K PLUS

"Alexa, show me psychological thrillers with surprise endings."

prime video NETFLIX YouTube Disney+ Apple TV+

[Click to see full view](#)

Amazon Fire TV Stick 4K Plus (newest model) with AI-powered Fire TV Search, Wi-Fi 6, stream over 1.8 million movies and shows, free & live TV

Visit the Amazon Fire TV Store

4.7 ★★★★★ 93,797 ratings

Amazon's Choice

1 sustainability feature

10K+ bought in past month

Black Friday Deal

-50% \$24⁹⁹

List Price: \$49.99

Get Fast, Free Shipping with Amazon Prime

FREE Returns

Save 20% with Trade-In

Savings Xbox Game Pass New Users Bonus Shop items

Get a \$60 Amazon Gift Card instantly upon approval for Amazon Visa. No annual fee.

You're viewing the newest model of this product

Configuration: **Fire TV Stick 4K Plus**

Fire TV Stick 4K	Fire TV Stick 4K Plus
\$24.99	\$24.99
\$49.99	\$49.99

The Fire TV Stick 4K is now called Fire TV Stick 4K Plus - same great device, just a new name.

\$24⁹⁹

Get Fast, Free Shipping with Amazon Prime

FREE delivery **Saturday, November 29** on orders shipped by Amazon over \$35

Or Prime members get FREE delivery **Tuesday, November 25. Order within 26 mins.** [Join Prime](#)

Delivering to Philadelphia 19103 - [Update location](#)

In Stock

Quantity: 1

[Add to Cart](#)

[Buy Now](#)

Ships from Amazon.com

Sold by Amazon.com

Returns FREE refund/replacement until Jan 31, 2026

Payment Secure transaction

☐ This is a gift

☒ Link device to your Amazon account to simplify setup. [Why is this important?](#)

Ex. 16.

Content formats supported	Video: Dolby Vision, HDR 10, HDR10+, HLG, H.265, H.264, VP9, AV1; Audio: xHE-AAC, AAC-LC, AAC+, eAAC+, AAC-ELD, MP3, AMR-NB, FLAC, PCM/WAV, Vorbis, Dolby AC3, eAC3 (Dolby Digital Plus), Dolby Atmos (EC3_JOC), Dolby AC4, Dolby MAT, Dolby TrueHD pass-through, MPEG-H pass-through, DTS passthrough, DTS-HD passthrough (basic profile); Photo: JPEG, PNG, GIF, BMP
----------------------------------	---

Ex. 16.

141. Additionally, Amazon instructs and encourages users to use the Streaming Device Accused Products in a manner that infringes the Asserted Claims of the '855 Patent by advertising the products' ability to stream and display video:

[See all bundles](#)

- **Advanced 4K streaming** - Elevate your entertainment with the next generation of our best-selling 4K stick, with improved streaming performance optimized for 4K TVs.
- **Play Xbox games with no console required** - Stream Forza Motorsport, Starfield, Palworld, and discover hundreds of other high-quality games directly on your Fire TV Stick 4K Plus with Xbox Game Pass via cloud gaming.
- **Smarter searching starts here** - Find movies by actor, plot, and even iconic quotes with AI-powered Fire TV Search. Try saying, "Alexa show me action movies with car chases."
- **Wi-Fi 6 support** - Enjoy smooth 4K streaming, even when other devices are connected to your router.
- **Cinematic experience** - Watch in vibrant 4K Ultra HD with support for Dolby Vision, HDR10+, and immersive Dolby Atmos audio.
- **Endless entertainment** - Stream more than 1.8 million movies and TV episodes. Watch favorites from Netflix, Prime Video, Disney+, Max, and more. Subscription fees may apply.
- **Stream for free** - Access over 400,000 free movies and TV episodes from popular ad-supported streaming apps like Fire TV Channels, Prime Video, Tubi, and Pluto TV.
- **Alexa Voice Remote** - Quickly find, launch, and control content with your voice. Get to your favorite apps with preset buttons, and control TV power and volume with one remote.
- **Do more with your smart home** - Control compatible devices like cameras, lights, and more with your remote. Press and ask Alexa to check the weather or dim the lights.

[^ Show less](#)

Ex. 16 at 1; *see also id.* at 2, 6-7.

142. Additionally, on information and belief, Amazon publishes customer reviews of the Streaming Device Accused Products that show its customers in fact use the Streaming Device Accused Products to stream and watch video:


Chris


Great Firestick

Reviewed in the United States on November 2, 2025

Configuration: Fire TV Stick 4K Plus | **Verified Purchase**

As with all Firesticks, it works great. Very easy to set up with many options. Amazon allows you to have it shipped already registered to your Amazon account to make setup that much easier. Great picture quality and streams great. The remote is easy to use with buttons for the most frequently used streaming services. The remote was easy to set up to control my TV volume, as well as my soundbar. If you have multiple fire sticks like I do then you may want to rename them in the Alexa app so you know which is which.

3 people found this helpful

Helpful
Report

Ex. 47 at 4 (Reviews of Fire Stick 4K Plus); *see generally id.*, Ex. 16 at 8.

143. As another example of Amazon's infringement, Amazon manufactures and sells televisions that infringe the '855 Patent. One example of an infringing TV Accused Product is the Fire TV Omni QLED Series.

More than smart. Brilliant.

Amazon Fire TV 55" Omni QLED Series (newest model), 4K Ultra HD smart TV, HDR10+, Dolby Vision, Dolby Audio, quad-core processor, hands-free with Alexa

Visit the Amazon Fire TV Store

4.4 ★★★★★ 28 ratings

1 sustainability feature

100+ bought in past month

Black Friday Deal

-17% **\$489⁹⁹**

List Price: \$589.99

FREE Returns

Delivery & Support

Select to learn more

- Professional TV wall-mounting available
- Ships from Amazon.com
- FREE refund/replacement until Jan 31, 2026
- Customer Support

Get \$60 off instantly: Pay \$429.99 upon approval for the Amazon Store Card.

You're viewing the newest model of this product

Size: 55-inch	50-inch	55-inch	65-inch	75-inch
	\$479.99	\$489.99	\$849.99	\$1,199.99

\$489⁹⁹

FREE scheduled delivery as soon as **Friday, November 28, 8 AM - 8 PM**

Delivering to Philadelphia 19103 - Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon.com

Sold by Amazon.com

Returns FREE refund/replacement until Jan 31, 2026

Packaging Ships in product packaging

See more

☐ This is a gift

☒ Link device to your Amazon account to simplify setup. Why is this important?

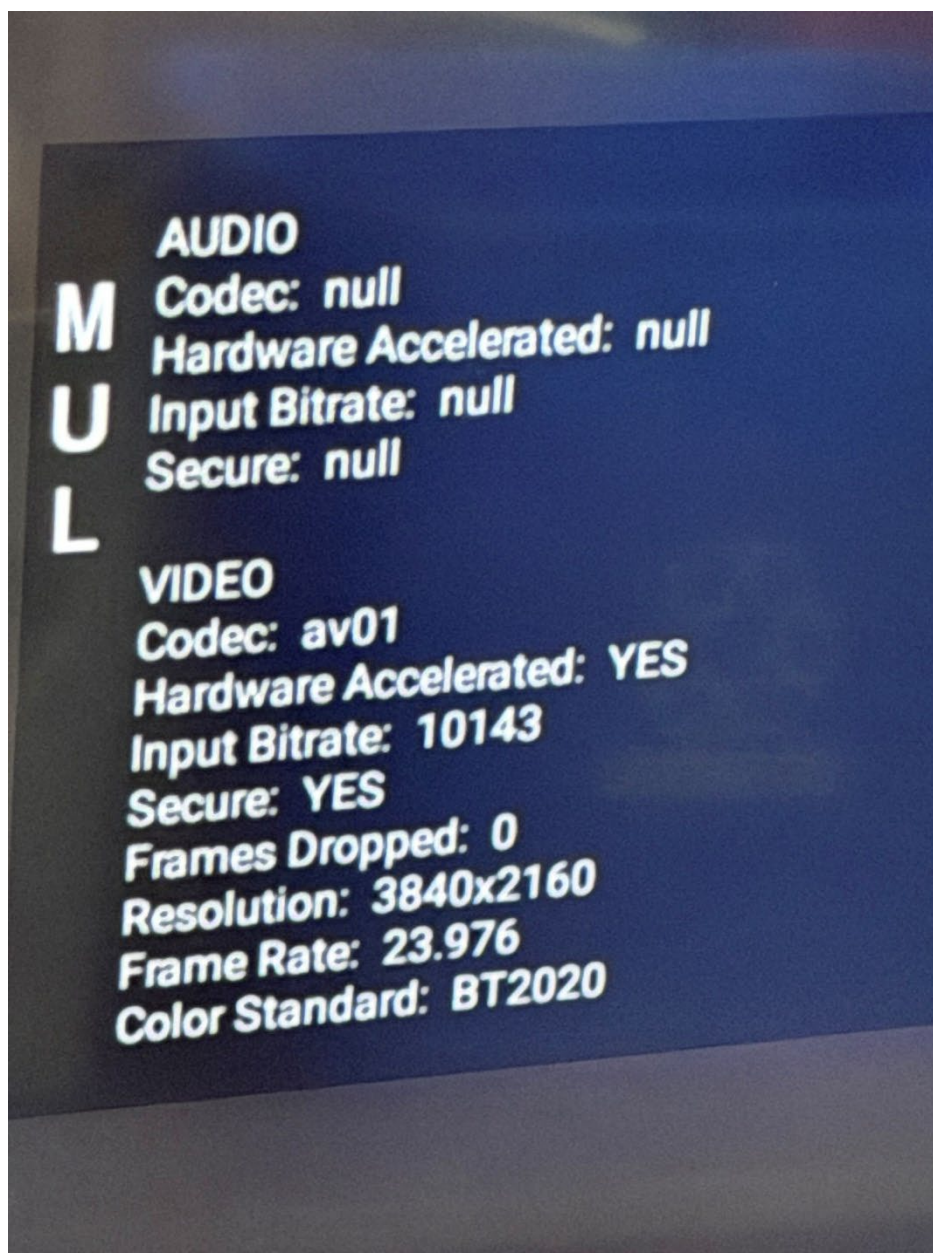
Add Additional Items

☐ Amazon Fire TV Alexa Voice Remote Pro (newest model) with Remote only **\$24.99**

List Price: \$34.99

Add to List

Ex. 17.



Ex. 44 (photo of FireTV Omni in developer mode playing back an AV1 video); *see also* Ex. 17 at 2-4, 8-9.

144. Additionally, Amazon instructs and encourages users to use the TV Accused Products in a manner that infringes the Asserted Claims of the '855 Patent by advertising the products' ability to stream and display video:

- Brilliant in every way – A 4K QLED display combines stunning visuals, smart features, and fast performance so you can get the most out of your TV.
- Picture perfect views – Scenes leap off the screen and look beautiful in any light with Dolby Vision and HDR10+ Adaptive.
- Speed, redefined – Jump right into what you love with Wi-Fi 6 support and a new quad-core processor. Apps open and load fast and the picture stays smooth.
- Instantly On – Introducing our custom Omnisense technology. Built-in sensors wake the display when you enter to show your favorite artwork or let you start watching in a snap.
- The new Alexa on Fire TV – Getting to what you love has never been easier. Talk naturally to find what to watch fast, manage your smart home, or dive into virtually any topic.
- No remote needed – Ask Alexa to play shows, set timers, and more hands-free, even when the screen is off.
- Find it fast. Watch it now. – Easily find what to watch from over 1.8 million movies and TV episodes (subscriptions fees may apply), including over 400,000 episodes of free content.
- Game away – Download free games from the Appstore or stream games from the cloud with Amazon Luna.
- Designed to protect your privacy – Built with privacy protections and controls, including a switch that electronically disconnects the microphones.
- Quick connections – Connect your soundbar, gaming consoles, and more with four HDMI inputs. Use AirPlay to share content from compatible devices to your TV.

Ex. 17 at 2; *see also id.* at 2-4, 8-9.

145. Additionally, on information and belief, Amazon publishes customer reviews of the TV Accused Products that show its customers in fact use the TV Accused Products to stream and watch video:

Top reviews from the United States



OneFineDay

★★★★★ Excellent 50 inch TV and a great monitor

Reviewed in the United States on November 12, 2025

Size: 50-inch | [Amazon Vine Customer Review of Free Product](#) (What's this?)

The Amazon Fire smart TV comes in several sizes. This review is for the 50 inch model. The TV is very light weight and easy to handle. A quick installation of the steel legs and the TV is ready to go. The legs that function like a built in stand are heavy duty one piece steel so the TV sits firmly. The initial set up can not be easier but updates did take a few minutes. After the initial set up and updates, each time the TV starting up takes no time. There is no bloatware and no lags. Linking to Amazon account can be done via a cell phone or by the remote. Downloading popular apps such as YouTube is also fast. Using voice or Alexa is also easy and straight forward. The remote is simple, easy to use, and also takes voice. Sharp Omni 4K image, HDRIO+, Dolby vision and sound, a simple easy to use remote, and the friendly Alexa eco system makes this TV a great value. I only use Alexa when I want to be hands free. But the TV works just as well without using Alexa. Not only with super sharp image and contrast, the sound of this TV is so great I do streaming without external speakers with this.

Other than being a great TV, I am also using this as a monitor. There are four HDMI ports on this TV, one 2.1 and three 2.0. A live HDMI connection is automatically detected on the INPUT setting. So setting INPUT is a no brainer. The settings such as display and sound are also easily controlled with the remote. This works very well with my laptop which is a Lenovo. Having a 50 inch as a monitor allows me to open more windows without using dual monitors. And the high resolution and sharp image on the TV enables using this as a monitor. I will mention that the legs placement is on the outer most corners of the TV. So in order to accommodate the TV as a free standing unit, the desk or TV stand need to be at least 11 inch wide and 44 inch long for a solid placement. As a TV, the quad core processor is plenty fast for all the apps I use. When used as a 50 inch monitor for my laptop, there is no lags in syncing and really zero complaint at this price. Again, great value all around and an excellent choice to meet all my needs.

[^ Read less](#)



2 people found this helpful

[Helpful](#)

[Report](#)

Ex. 17 at 11-12 (Review of Fire TV Omni QLED Series); *see also* Ex. 50 (Customer Reviews of Fire TV Omni QLED Series).

146. As another example of Amazon's infringement, Amazon manufactures and sells tablets that infringe the '855 Patent. One example of an infringing Tablet Accused Product is the Fire HD 10.



Accessory sold separately

Relax all day with 13-hour battery and expandable storage

[Click to see full view](#)

Amazon Fire HD 10 tablet, built for relaxation, 10.1" vibrant Full HD screen, octa-core processor, 3 GB RAM, 32 GB, Black

Visit the Amazon Fire Tablets Store

4.5 (37,107) | [Search this page](#)

1 sustainability feature

10K+ bought in past month

\$139⁹⁹

Price history

Or **\$23⁵³** /mo (6 mo). Select from 3 plans

FREE Returns

Save 20% with Trade-In

With Amazon Business, you would have saved **\$398.31** in the last year. Create a free account and save up to 3% today.

You're viewing the newest model of this product — see what's new

Fire HD 10 tablets

Amazon Fire HD 10

Best for: Movies and casual gaming on a budget-friendly 10" tablet.

★★★★★ (37,107)

From: \$139.99

Fire HD 10 Kids

Best for: Kids play on a 10" tablet.

★★★★★ (6,687)

From: \$104.99

+5 other colors

Digital Storage Capacity: **32 GB**

32 GB

\$139.99

64 GB

See available options

Offer Type: **With Lockscreen Ads**

With Lockscreen Ads

Without Lockscreen Ads

\$139⁹⁹

FREE delivery **Monday, December 29** for Prime members

Arrives after Christmas. Need a gift sooner? Send an Amazon Gift Card today by email or text message.

Deliver to George - Austin 78701

Quantity: 1

Add to Cart

Buy Now

Shipper / Seller Amazon.com

Returns **FREE** refund/replacement until Jan 31, 2026

Support Product support included

See more

☐ This is a gift

☒ Link device to your Amazon account to simplify setup. Why is this important?

Enhance your purchase

☐ Fire HD 10 Amazon Standing Cover: Black **\$35.99** List Price: \$59.99

☐ Fire HD 10 Screen Protector (2-Pack) **\$15.99** List Price: \$17.99

☐ Fire HD 10: Protect Your Investment: 2 year **\$24.99**

☐ Fire HD 10 Bluetooth Keyboard Case **\$54.99**

Ask Rufus

Can this tablet be used for video calls? Does this tablet have a headphone jack?

What is the battery life like? **Ask something else**

alexa+ Buy this device, try Alexa+ for free during Early Access. Try our smartest AI assistant yet. After Early Access ends, Alexa+ will stay free with Prime. Learn more about Alexa+.

Ex. 18 (Amazon Fire HD 10 Tablet).

VIDEO CODECS		
	H.263	D (HW) baseline, 1080P@60FPS
	H.264 AVC	D (HW) High profile, L4.2 1080p@60FPS, E (HW)
	H.265 HEVC	D (HW) Main Profile L4.2 1080p@60FPS
	MPEG2	D (HW) 1080P@60FPS
	MPEG4	D (HW) Advanced Simple Profile@L5 1080P@60FPS
	VP8	D (HW)
	VP9	D (HW) 1080P@60FPS
	AV1 with film grain	Not supported
	VC-1	Not supported

Ex. 49 (Amazon Fire HD 10 Tablet Specifications).

147. Additionally, Amazon instructs and encourages users to use the Tablet Accused Products in a manner that infringes the Asserted Claims of the '855 Patent by advertising the products' ability to stream and display video:



Amazon Fire HD 10 tablet, built for relaxation, 10.1" vibrant Full HD screen, octa-core processor, 3 GB RAM, 32 GB, Black

Visit the Amazon Fire Tablets Store

4.5 ★★★★★ (35,702) | [Ask questions and search reviews](#)

Amazon's Choice

1 sustainability feature

10K+ bought in past month

Black Friday Deal

-50% \$69⁹⁹

\$69⁹⁹

prime Today

FREE delivery **Today 2 PM - 6 PM.**
Order within **12 hrs 2 mins**

📍 Deliver to Jamie - Washington 20037

In Stock

Quantity: 1

Add to Cart

Buy Now

Shipper / Seller Amazon.com

Returns **FREE** refund/replacement until Jan 31, 2026

Support [Product support](#)

Watch videos and more on the 10.1" 1080p Full HD display

[Click to see full view](#)

Ex 18.



Stream

Take a front row seat to all the popular shows with Prime Video, Netflix, and Hulu. (Subscriptions for some apps required.)



Read

Use apps like Kindle as your personal library with thousands of titles to choose from. Let the book club commence.



Listen

Stay in the know with podcasts from Audible, or chill out to your favorite music with apps like Amazon Music.



Play

Beat your highest score or start a new record with games like Candy Crush and Roblox.

Ex. 18.

148. Additionally, on information and belief, Amazon publishes customer reviews of the Tablet Accused Products that show its customers in fact use the Tablet Accused Products to stream and watch video:

 Kelly Ferguson

★★★★★ **Value for money! Love it!**

Reviewed in the United States on November 13, 2025

Digital Storage Capacity: 32 GB | Offer Type: Without Lockscreen Ads | Color: Ocean | Style: Amazon Fire HD 10 | **Verified Purchase**

Battery is great, and lasts long. Good quality. Feels expensive. Beautiful HD screen with lots of features compared to my regular Kindle. I actually downgraded from 2025 Compact Kindle to this model so I could use plenty of apps and services on it. It's hard to read books for long periods on it compared to a ink Kindle but that isn't a reason to hate this as I can use both Kindles for different reasons. Has lot of settings to make reading better. And reading in color is nice for once. I enjoy this model and use it for YouTube and streaming **video** apps. Games. The works. I'd get one while you can. It's a big screen compared to the 8, even though the 8 HD is newer, this has a better performance in my opinion.

76 people found this helpful

Helpful

| Report

Ex. 51 (Customer Reviews of Fire HD 10).

149. As another example of Amazon’s infringement, Amazon manufactures and sells smart displays that infringe the ’855 Patent. One example of an infringing Smart Display Accused Product is the Echo Show 15.

echo show 15
Smart kitchen TV for home organization

Organization Fire TV Smart Home Personalization

Click to see full view

6 VIDEOS

Amazon Echo Show 15 (newest model), Full HD 15.6" kitchen hub for home organization, with built-in Fire TV and Alexa+ Early Access

Visit the Amazon Echo & Alexa Store

4.4 ★★★★★ 3,443 ratings

Amazon's Choice

1 sustainability feature

10K+ bought in past month

Black Friday Deal

-15% \$254⁹⁹

List Price: \$299.99

FREE Returns

Get a \$60 Amazon Gift Card instantly upon approval for Amazon Visa. No annual fee.

You're viewing the newest model of this product — see what's new

Size: 15-inch

15-inch	21-inch
\$254.99 ~~\$299.99~~	\$349.99 ~~\$399.99~~

\$254⁹⁹

FREE delivery **Saturday, November 29**

Or **Prime members** get FREE delivery **Tomorrow, November 25**. Order within 23 hrs 16 mins. [Join Prime](#)

Delivering to Philadelphia 19103 - [Update location](#)

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon.com

Sold by Amazon.com

Returns **FREE** refund/replacement until Jan 31, 2026

Packaging Ships in product packaging

See more

☐ This is a gift

☒ **Link device to your Amazon account to simplify setup. Why is this important?**

alex+ Buy this device, try Alexa+ for free during Early Access

Try our smartest AI assistant yet. After Early Access ends, Alexa+ will stay free with Prime. [Learn more about Alexa+](#).

Ex. 19 (Echo Show 15 Amazon.com listing).

Video codecs	• AV1: Hardware accelerated up to 1080p @ 60fps, 20 Mbps, Main Profile Level 4.1 • H.265 (HEVC) (High Efficiency Video Coding): Hardware accelerated up to 1080p @ 60fps, 20 Mbps, Main Profile Level 4.1 • H.264: Hardware accelerated up to 1080p @ 60fps, or 720p @ 60fps, 20 Mbps, High Profile up to Level 4 • H.263: Supported up to 1080p @ 30fps, 6 Mbps, Profile 0 Level 70 • VP9: Hardware accelerated up to 1080p @ 60fps, Profile 2 up to 20 Mbps • VP8: Supported up to 1080p 30fps. Baseline profile, non-secure • MPEG-4: Hardware accelerated up to 1080p @ 60fps • MPEG-2: Hardware accelerated up to 1080p @ 60fps
---------------------	---

Ex. 52 (Echo Show 15 Specifications).

150. Additionally, Amazon instructs and encourages users to use the Smart Display Accused Products in a manner that infringes the Asserted Claims of the '855 Patent by advertising the products' ability to stream and display video:

- **MEET THE ALL-NEW ECHO SHOW 15** - A stunning 15.6" Full-HD (1080p) smart display that's perfect for your kitchen and ready to show you more. Use customizable widgets to keep your day on track, watch your favorite shows with Fire TV and powerful vibrant sound, and enjoy natural video calling, with 3.3x zoom and wide field of view.
- **FAMILY ORGANIZATION HUB** - See your top widgets at a glance, like your family's calendars and to-do lists, local weather, smart home, and more.
- **ALL YOUR FAVORITES, ALL RIGHT HERE** - Built-in Fire TV unlocks endless entertainment, so you can enjoy your favorite content from thousands of apps like Prime Video, Netflix, YouTube, Apple TV, and more (subscription may be required). Fire TV remote included. Plus, now you can quickly add a device to play music with Active Media - start playing a song in the kitchen, then add the living room and bedroom on the fly.
- **SMART HOME CENTRAL** - Control smart devices with your voice or a few taps using the smart home dashboard. Easily turn on all your living room lights at once or check live camera feeds to see what's happening around your home.
- **FRAME YOUR FAVORITE MEMORIES** - Brighten your space (and your day) by turning your home screen into a stylish digital photo frame that displays your favorite memories. Auto curate your images and show off your favorite family memories.
- **CONNECT LIKE NEVER BEFORE** - Video calling with family and friends will feel even more natural with a centered, auto-framing camera, wide field of vision, 3.3x zoom, and noise reduction technology.

Ex. 19 (Echo Show 15 Amazon.com listing).

151. Additionally, on information and belief, Amazon publishes customer reviews of the Smart Display Accused Products that show its customers in fact use the Smart Display Accused Products to stream and watch video:


Alisun


10 Stars! No issues, read for user tips

Reviewed in the United States on December 16, 2024

Size: 21-inch | **Verified Purchase**

I've had so many Echos over the years, beginning with the 1st Gen, can't live without them anymore since so much of our home is Alexa connected. I originally got a refurbished 1st Gen Echo Show 15", not knowing the 2nd gen was coming out. So glad I returned it for the new 21" Echo Show, it's absolutely phenomenal!

Streaming video: Easy to set up streaming (which I've done on our 5", 8", and 10" Echos). The best part of the Echo Show is that Fire TV is included. I easily logged into Hulu, Netflix, Amazon, Max, Peacock, Paramount, Disney+, and Apple TV (other Echo shows only allowed me Hulu, Netflix, and Amazon, I believe). The setup and remote is the same as FireTV.

Ex. 53 (Consumer Reviews of Echo Show 15).

152. Amazon knowingly and intentionally induces users of one or more Accused Product to directly infringe one or more claim of the '855 Patent by encouraging, instructing, and aiding one or more persons in the United States, including Amazon employees who test and operate Accused Products at the direction of Amazon, to make, use (including testing those devices and methods), sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '855 Patent. *See* Ex. 11 (Accused Product List).

153. For example, as seen in the Amazon publications above, Amazon advertises the Accused Products on its website so that customers may purchase and use the products, thus inducing its customers to also infringe the '855 Patent. On information and belief, Amazon also advertises other Amazon products that infringe the '855 Patent on its website for consumer purchase.

154. Upon information and belief, Amazon has been aware of the '855 Patent and its infringement thereof since at least November 7, 2025. Ex. 48 (Complaint, *InterDigital, Inc. et al v. Amazon.com Services LLC*, Case No. 1:25-cv-1365-GBW, D.I. 1 (D. Del. Nov. 7, 2025)).

155. On information and belief, Amazon continues to infringe one or more Asserted Claim of the '855 Patent by offering for sale or selling and/or importing a patented component or material and/or apparatus used to practice a patented process, constituting a material part of the inventions, knowing the same to be especially made or especially adapted for use in an infringement and not a staple article or commodity of commerce suitable for substantial non-infringing use.

156. A claim chart mapping each of the asserted independent claims of the '855 Patent to the Accused Products is attached as Exhibit 35.

E. Infringement of the '146 Patent

157. On information and belief, the Accused Products that are sold for importation, imported, and/or sold within the United States after importation by Amazon infringe at least Claims 1, 7, 13, and 17 of the '146 Patent, either literally or under the doctrine of equivalents.

158. On information and belief, Amazon directly infringes one or more claims of the '146 Patent through its manufacture, sale for importation, importation, use, and sale after importation of one or more Accused Product.

159. As just one example of Amazon's infringement, Amazon manufactures, imports, and sells streaming devices that infringe the '146 Patent. One example of an infringing Streaming Device Accused Product is the Fire Stick 4K Plus.

fire tv stick 4K PLUS
"Alexa, show me psychological thrillers with surprise endings."

Amazon Fire TV Stick 4K Plus (newest model) with AI-powered Fire TV Search, Wi-Fi 6, stream over 1.8 million movies and shows, free & live TV

Visit the Amazon Fire TV Store
4.7 ★★★★★ 93,797 ratings
Amazon's Choice

1 sustainability feature
10K+ bought in past month

Black Friday Deal
-50% \$24⁹⁹
List Price: \$49.99

Get Fast, Free Shipping with Amazon Prime
FREE Returns
Save 20% with Trade-In

Savings Xbox Game Pass New Users Bonus Shop items >
Get a \$60 Amazon Gift Card instantly upon approval for Amazon Visa. No annual fee.

You're viewing the newest model of this product

Configuration: **Fire TV Stick 4K Plus**

Fire TV Stick 4K	Fire TV Stick 4K Plus
\$24.99	\$24.99
\$49.99	\$49.99

The Fire TV Stick 4K is now called Fire TV Stick 4K Plus - same great device, just a new name.

\$24⁹⁹
Get Fast, Free Shipping with Amazon Prime
FREE delivery **Saturday, November 29** on orders shipped by Amazon over \$35
Or Prime members get FREE delivery **Tuesday, November 25. Order within 26 mins.** Join Prime
Delivering to Philadelphia 19103 - Update location

In Stock
Quantity: 1
Add to Cart
Buy Now

Ships from Amazon.com
Sold by Amazon.com
Returns FREE refund/replacement until Jan 31, 2026
Payment Secure transaction

☐ This is a gift
☒ Link device to your Amazon account to simplify setup. Why is this important?

We want you to know

- Due to a recent name update from the Fire TV Stick 4K to the Fire TV Stick 4K Plus, packaging appearance, including product name, may vary. Device functionality remains the same.

Ex. 16.

Content formats supported	Video: Dolby Vision, HDR 10, HDR10+, HLG, H.265, H.264, VP9, AV1; Audio: xHE-AAC, AAC-LC, AAC+, eAAC+, AAC-ELD, MP3, AMR-NB, FLAC, PCM/WAV, Vorbis, Dolby AC3, eAC3 (Dolby Digital Plus), Dolby Atmos (EC3_JOC), Dolby AC4, Dolby MAT, Dolby TrueHD pass-through, MPEG-H pass-through, DTS passthrough, DTS-HD passthrough (basic profile); Photo: JPEG, PNG, GIF, BMP
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Ex. 16.

160. Additionally, Amazon instructs and encourages users to use the Streaming Device Accused Products in a manner that infringes the Asserted Claims of the '146 Patent by advertising the products' ability to stream and display video:

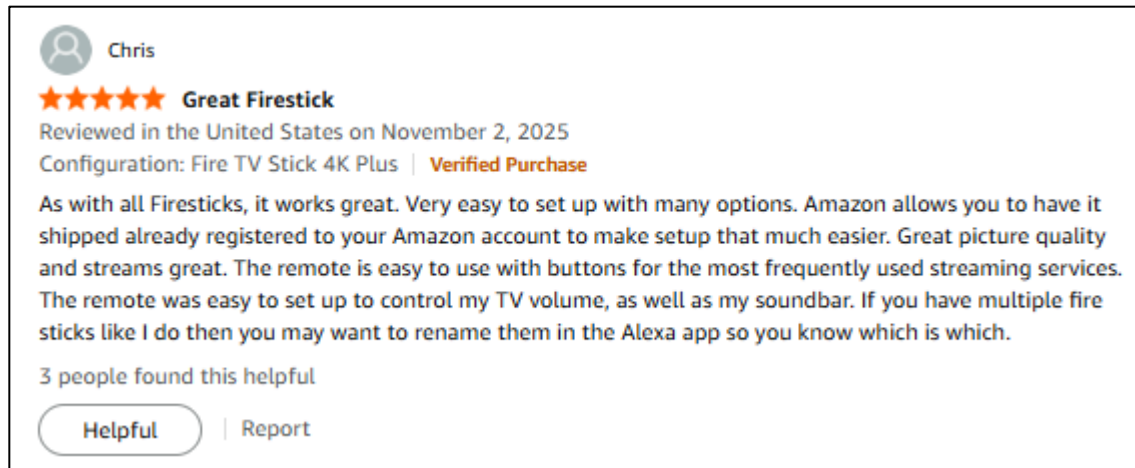
[See all bundles](#)

- **Advanced 4K streaming** - Elevate your entertainment with the next generation of our best-selling 4K stick, with improved streaming performance optimized for 4K TVs.
- **Play Xbox games with no console required** - Stream Forza Motorsport, Starfield, Palworld, and discover hundreds of other high-quality games directly on your Fire TV Stick 4K Plus with Xbox Game Pass via cloud gaming.
- **Smarter searching starts here** – Find movies by actor, plot, and even iconic quotes with AI-powered Fire TV Search. Try saying, "Alexa show me action movies with car chases."
- **Wi-Fi 6 support** - Enjoy smooth 4K streaming, even when other devices are connected to your router.
- **Cinematic experience** - Watch in vibrant 4K Ultra HD with support for Dolby Vision, HDR10+, and immersive Dolby Atmos audio.
- **Endless entertainment** - Stream more than 1.8 million movies and TV episodes. Watch favorites from Netflix, Prime Video, Disney+, Max, and more. Subscription fees may apply.
- **Stream for free** - Access over 400,000 free movies and TV episodes from popular ad-supported streaming apps like Fire TV Channels, Prime Video, Tubi, and Pluto TV.
- **Alexa Voice Remote** - Quickly find, launch, and control content with your voice. Get to your favorite apps with preset buttons, and control TV power and volume with one remote.
- **Do more with your smart home** - Control compatible devices like cameras, lights, and more with your remote. Press and ask Alexa to check the weather or dim the lights.

[^ Show less](#)

Ex. 16 at 1; *see also id.* at 2, 6-7.

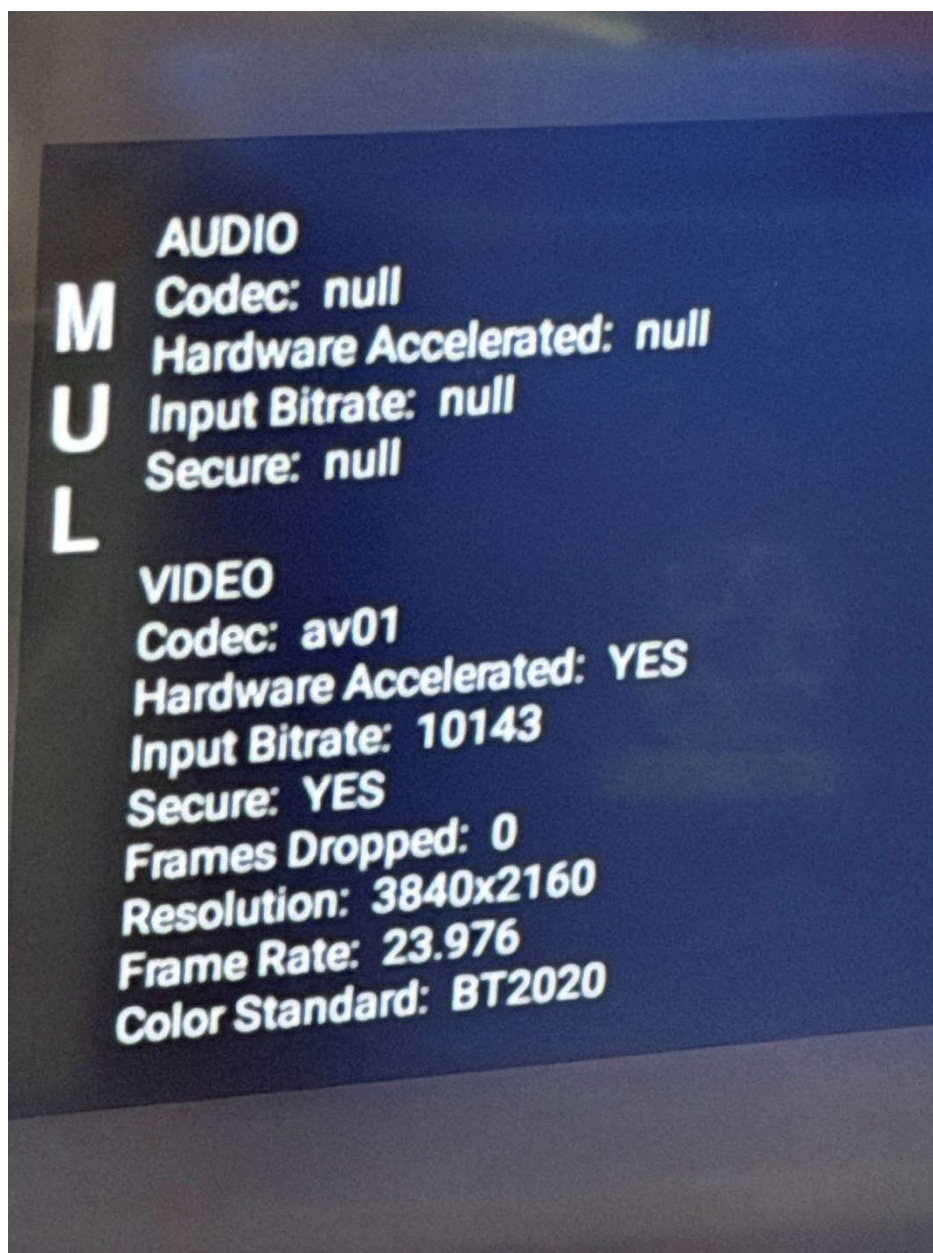
161. Additionally, on information and belief, Amazon publishes customer reviews of the Streaming Device Accused Products that show its customers in fact use the Streaming Device Accused Products to stream and watch video:



Ex. 47 at 4 (Reviews of Fire Stick 4K Plus); *see generally id.*; Ex. 16 at 8.

162. As another example of Amazon’s infringement, Amazon manufactures and sells televisions that infringe the ’146 Patent. One example of an infringing TV Accused Product is the Fire TV Omni QLED Series.

Ex. 17.



Ex. 44 (photo of Fire TV Omni in developer mode playing back an AV1 video); *see also* Ex. 17 at 2-4, 8-9.

163. Additionally, Amazon instructs and encourages users to use the TV Accused Products in a manner that infringes the Asserted Claims of the '146 Patent by advertising the products' ability to stream and display video:

- Brilliant in every way – A 4K QLED display combines stunning visuals, smart features, and fast performance so you can get the most out of your TV.
- Picture perfect views – Scenes leap off the screen and look beautiful in any light with Dolby Vision and HDR10+ Adaptive.
- Speed, redefined – Jump right into what you love with Wi-Fi 6 support and a new quad-core processor. Apps open and load fast and the picture stays smooth.
- Instantly On – Introducing our custom Omnisense technology. Built-in sensors wake the display when you enter to show your favorite artwork or let you start watching in a snap.
- The new Alexa on Fire TV – Getting to what you love has never been easier. Talk naturally to find what to watch fast, manage your smart home, or dive into virtually any topic.
- No remote needed – Ask Alexa to play shows, set timers, and more hands-free, even when the screen is off.
- Find it fast. Watch it now. – Easily find what to watch from over 1.8 million movies and TV episodes (subscriptions fees may apply), including over 400,000 episodes of free content.
- Game away – Download free games from the Appstore or stream games from the cloud with Amazon Luna.
- Designed to protect your privacy – Built with privacy protections and controls, including a switch that electronically disconnects the microphones.
- Quick connections – Connect your soundbar, gaming consoles, and more with four HDMI inputs. Use AirPlay to share content from compatible devices to your TV.

Ex. 17 at 2; *see also id.* at 2-4, 8-9.

164. Additionally, on information and belief, Amazon publishes customer reviews of the TV Accused Products that show its customers in fact use the TV Accused Products to stream and watch video:

Top reviews from the United States



OneFineDay

★★★★★ Excellent 50 inch TV and a great monitor

Reviewed in the United States on November 12, 2025

Size: 50-inch | [Amazon Vine Customer Review of Free Product](#) (What's this?)

The Amazon Fire smart TV comes in several sizes. This review is for the 50 inch model. The TV is very light weight and easy to handle. A quick installation of the steel legs and the TV is ready to go. The legs that function like a built in stand are heavy duty one piece steel so the TV sits firmly. The initial set up can not be easier but updates did take a few minutes. After the initial set up and updates, each time the TV starting up takes no time. There is no bloatware and no lags. Linking to Amazon account can be done via a cell phone or by the remote. Downloading popular apps such as YouTube is also fast. Using voice or Alexa is also easy and straight forward. The remote is simple, easy to use, and also takes voice. Sharp Omni 4K image, HDR10+, Dolby vision and sound, a simple easy to use remote, and the friendly Alexa eco system makes this TV a great value. I only use Alexa when I want to be hands free. But the TV works just as well without using Alexa. Not only with super sharp image and contrast, the sound of this TV is so great I do streaming without external speakers with this.

Other than being a great TV, I am also using this as a monitor. There are four HDMI ports on this TV, one 2.1 and three 2.0. A live HDMI connection is automatically detected on the INPUT setting. So setting INPUT is a no brainer. The settings such as display and sound are also easily controlled with the remote. This works very well with my laptop which is a Lenovo. Having a 50 inch as a monitor allows me to open more windows without using dual monitors. And the high resolution and sharp image on the TV enables using this as a monitor. I will mention that the legs placement is on the outer most corners of the TV. So in order to accommodate the TV as a free standing unit, the desk or TV stand need to be at least 11 inch wide and 44 inch long for a solid placement. As a TV, the quad core processor is plenty fast for all the apps I use. When used as a 50 inch monitor for my laptop, there is no lags in syncing and really zero complaint at this price. Again, great value all around and an excellent choice to meet all my needs.

[^ Read less](#)



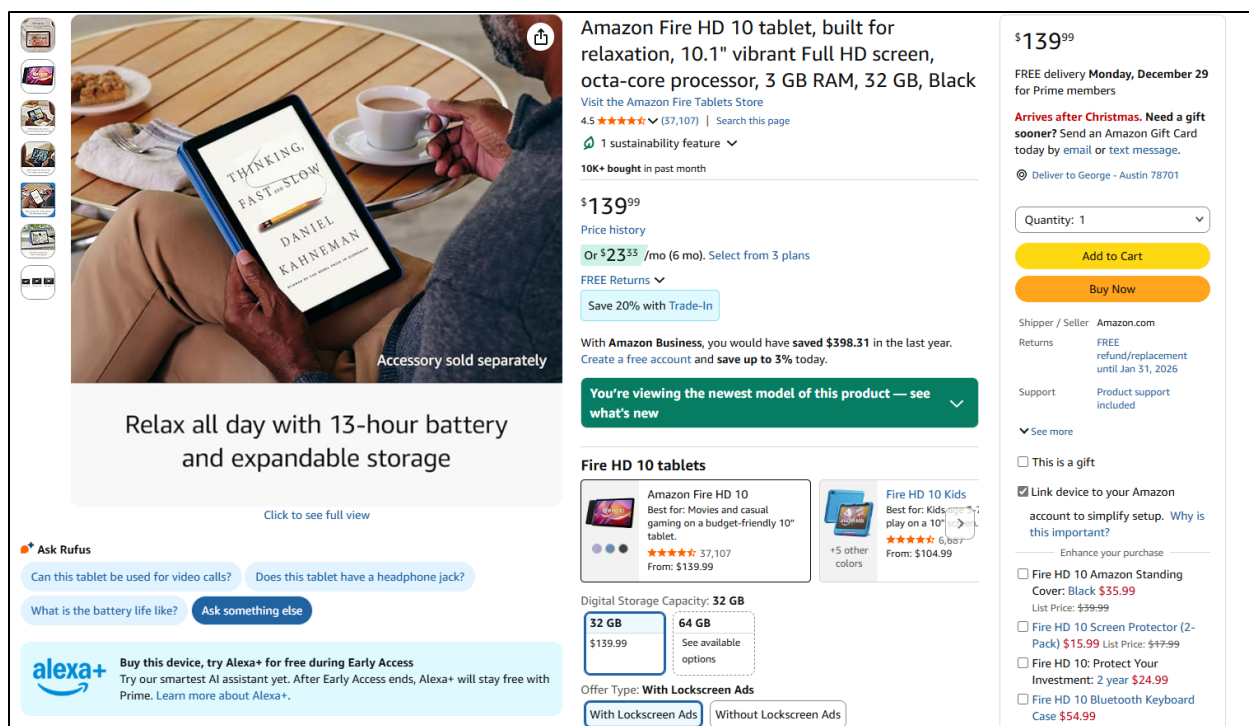
2 people found this helpful

[Helpful](#)

[Report](#)

Ex. 17 at 11-12; *see also* Ex. 50 (Customer Reviews of Fire TV Omni QLED Series).

165. As another example of Amazon's infringement, Amazon manufactures and sells tablets that infringe the '146 Patent. One example of an infringing Tablet Accused Product is the Fire HD 10.



The image is a screenshot of the Amazon product page for the Amazon Fire HD 10 tablet. The main image shows a person's hands holding the tablet, which displays the book cover of 'Thinking, Fast and Slow' by Daniel Kahneman. The background of the image is a wooden table with a cup of coffee and some food. Below the main image, there's a text overlay: 'Relax all day with 13-hour battery and expandable storage'. To the right of the main image, the product title is 'Amazon Fire HD 10 tablet, built for relaxation, 10.1" vibrant Full HD screen, octa-core processor, 3 GB RAM, 32 GB, Black'. Below the title, it says 'Visit the Amazon Fire Tablets Store', '4.5 stars (37,107)', and '1 sustainability feature'. The price is '\$139.99' with a 'Price history' link. Below the price, it says 'Or \$23.33 /mo (6 mo). Select from 3 plans'. There's a 'FREE Returns' link and a 'Save 20% with Trade-In' button. A note says 'With Amazon Business, you would have saved \$398.31 in the last year. Create a free account and save up to 3% today.' Below this is a green button that says 'You're viewing the newest model of this product — see what's new'. To the right of the main image, there's a section for 'Fire HD 10 tablets' with two options: 'Amazon Fire HD 10' (Best for: Movies and casual gaming on a budget-friendly 10" tablet, 4.5 stars, 37,107 reviews, From: \$139.99) and 'Fire HD 10 Kids' (Best for: Kids, play on a 10" tablet, 4.5 stars, 6,657 reviews, From: \$104.99). Below this is a section for 'Digital Storage Capacity: 32 GB' with two options: '32 GB' (\$139.99) and '64 GB' (See available options). To the right of the main image, there's a section for the price '\$139.99' with a 'FREE delivery Monday, December 29 for Prime members' note. Below the price, it says 'Arrives after Christmas. Need a gift sooner? Send an Amazon Gift Card today by email or text message.' and 'Deliver to George - Austin 78701'. There's a 'Quantity: 1' dropdown, an 'Add to Cart' button, and a 'Buy Now' button. Below these are links for 'Shipper / Seller: Amazon.com', 'Returns: FREE refund/replacement until Jan 31, 2026', and 'Support: Product support included'. There's a 'See more' link and a 'This is a gift' checkbox. Below that is a 'Link device to your Amazon account to simplify setup. Why is this important?' section with an 'Enhance your purchase' link. Below this are several optional add-ons: 'Fire HD 10 Amazon Standing Cover: Black \$35.99' (List Price: \$59.99), 'Fire HD 10 Screen Protector (2-Pack) \$15.99' (List Price: \$17.99), 'Fire HD 10: Protect Your Investment: 2 year \$24.99', and 'Fire HD 10 Bluetooth Keyboard Case \$54.99'.

Ex. 18 (Amazon Fire HD 10 tablet).

VIDEO CODECS		
	H.263	D (HW) baseline, 1080P@60FPS
	H.264 AVC	D (HW) High profile, L4.2 1080p@60FPS, E (HW)
	H.265 HEVC	D (HW) Main Profile L4.2 1080p@60FPS
	MPEG2	D (HW) 1080P@60FPS
	MPEG4	D (HW) Advanced Simple Profile@L5 1080P@60FPS
	VP8	D (HW)
	VP9	D (HW) 1080P@60FPS
	AV1 with film grain	Not supported
	VC-1	Not supported

Ex. 49 (Amazon Fire HD 10 Tablet Specifications).

166. Additionally, Amazon instructs and encourages users to use the Tablet Accused Products in a manner that infringes the Asserted Claims of the '146 Patent by advertising the products' ability to stream and display video:



Amazon Fire HD 10 tablet, built for relaxation, 10.1" vibrant Full HD screen, octa-core processor, 3 GB RAM, 32 GB, Black

Visit the Amazon Fire Tablets Store

4.5 ★★★★★ (35,702) | [Ask questions and search reviews](#)

Amazon's Choice

1 sustainability feature

10K+ bought in past month

Black Friday Deal

-50% \$69⁹⁹

\$69⁹⁹

prime Today

FREE delivery **Today 2 PM - 6 PM.**
Order within **12 hrs 2 mins**

📍 Deliver to Jamie - Washington 20037

In Stock

Quantity: 1

Add to Cart

Buy Now

Shipper / Seller Amazon.com

Returns **FREE** refund/replacement until Jan 31, 2026

Support [Product support](#)

Watch videos and more on the 10.1" 1080p Full HD display

[Click to see full view](#)

Ex. 18.



Stream

Take a front row seat to all the popular shows with Prime Video, Netflix, and Hulu. (Subscriptions for some apps required.)



Read

Use apps like Kindle as your personal library with thousands of titles to choose from. Let the book club commence.



Listen

Stay in the know with podcasts from Audible, or chill out to your favorite music with apps like Amazon Music.

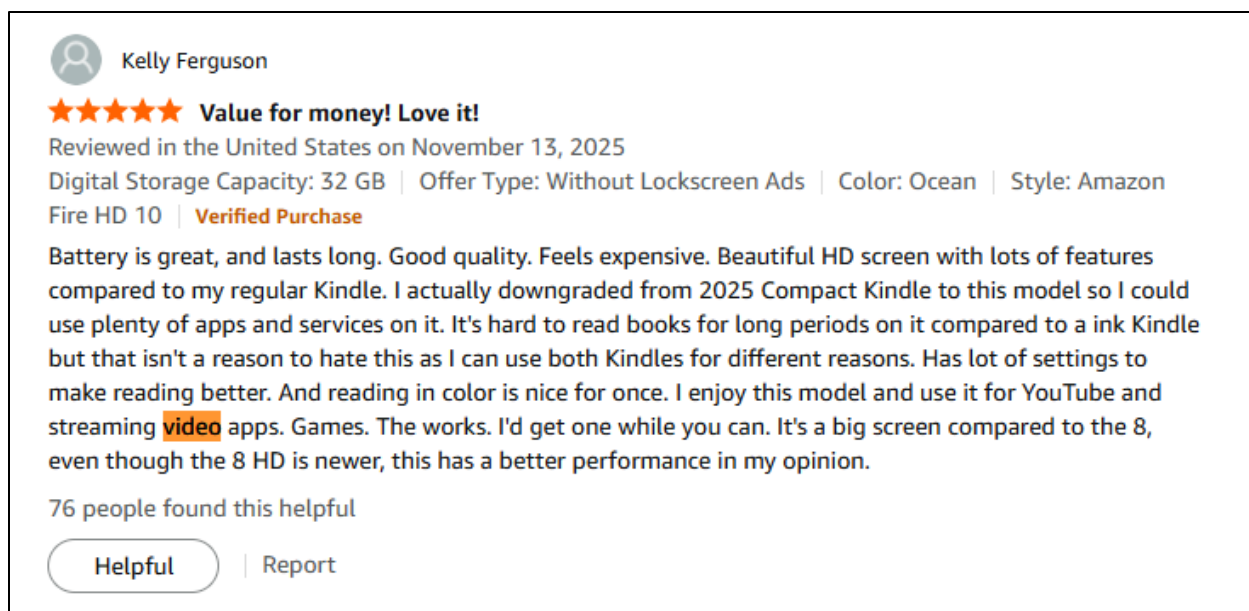


Play

Beat your highest score or start a new record with games like Candy Crush and Roblox.

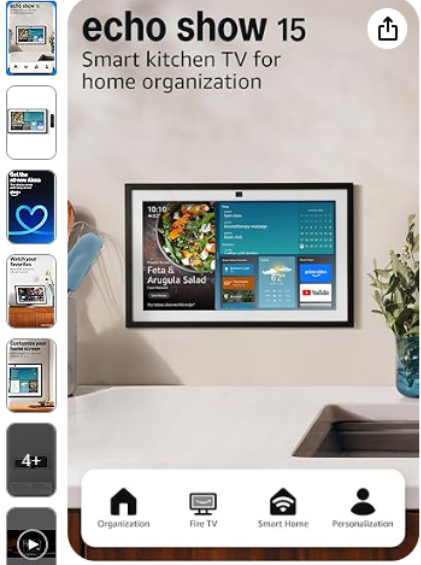
Ex. 18.

167. Additionally, on information and belief, Amazon publishes customer reviews of the Tablet Accused Products that show its customers in fact use the Tablet Accused Products to stream and watch video:



Ex. 51 (Amazon Fire HD 10 Customer Reviews).

168. As another example of Amazon’s infringement, Amazon manufactures and sells smart displays that infringe the ’146 Patent. One example of an infringing Smart Display Accused Product is the Echo Show 15.



echo show 15
Smart kitchen TV for home organization

Organization Fire TV Smart Home Personalization

Click to see full view

6 VIDEOS

Amazon Echo Show 15 (newest model), Full HD 15.6" kitchen hub for home organization, with built-in Fire TV and Alexa+ Early Access

Visit the Amazon Echo & Alexa Store

4.4 ★★★★★ 3,443 ratings

Amazon's Choice

1 sustainability feature

10K+ bought in past month

Black Friday Deal

-15% \$254⁹⁹

List Price: \$299.99

FREE Returns

Get a \$60 Amazon Gift Card instantly upon approval for Amazon Visa. No annual fee.

You're viewing the newest model of this product — see what's new

Size: 15-inch

15-inch	21-inch
\$254.99 ~~\$299.99~~	\$349.99 ~~\$399.99~~

\$254⁹⁹

FREE delivery **Saturday, November 29**

Or **Prime members** get FREE delivery **Tomorrow, November 25**. Order within 23 hrs 16 mins. [Join Prime](#)

Delivering to Philadelphia 19103 - [Update location](#)

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon.com

Sold by Amazon.com

Returns FREE refund/replacement until Jan 31, 2026

Packaging Ships in product packaging

See more

☐ This is a gift

☒ Link device to your Amazon account to simplify setup. [Why is this important?](#)

alex+ Buy this device, try Alexa+ for free during Early Access

Try our smartest AI assistant yet. After Early Access ends, Alexa+ will stay free with Prime. [Learn more about Alexa+](#).

Ex. 19.

Video codecs	AV1: Hardware accelerated up to 1080p @ 60fps, 20 Mbps, Main Profile Level 4.1 H.265 (HEVC) (High Efficiency Video Coding): Hardware accelerated up to 1080p @ 60fps, 20 Mbps, Main Profile Level 4.1 H.264: Hardware accelerated up to 1080p @ 60fps, or 720p @ 60fps, 20 Mbps, High Profile up to Level 4 H.263: Supported up to 1080p @ 30fps, 6 Mbps, Profile 0 Level 70 VP9: Hardware accelerated up to 1080p @ 60fps, Profile 2 up to 20 Mbps VP8: Supported up to 1080p 30fps. Baseline profile, non-secure MPEG-4: Hardware accelerated up to 1080p @ 60fps MPEG-2: Hardware accelerated up to 1080p @ 60fps
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Ex. 52 (Echo Show 15 Specifications).

169. Additionally, Amazon instructs and encourages users to use the Smart Display Accused Products in a manner that infringes the Asserted Claims of the '146 Patent by advertising the products' ability to stream and display video:

- **MEET THE ALL-NEW ECHO SHOW 15** - A stunning 15.6" Full-HD (1080p) smart display that's perfect for your kitchen and ready to show you more. Use customizable widgets to keep your day on track, watch your favorite shows with Fire TV and powerful vibrant sound, and enjoy natural video calling, with 3.3x zoom and wide field of view.
- **FAMILY ORGANIZATION HUB** - See your top widgets at a glance, like your family's calendars and to-do lists, local weather, smart home, and more.
- **ALL YOUR FAVORITES, ALL RIGHT HERE** - Built-in Fire TV unlocks endless entertainment, so you can enjoy your favorite content from thousands of apps like Prime Video, Netflix, YouTube, Apple TV, and more (subscription may be required). Fire TV remote included. Plus, now you can quickly add a device to play music with Active Media - start playing a song in the kitchen, then add the living room and bedroom on the fly.
- **SMART HOME CENTRAL** - Control smart devices with your voice or a few taps using the smart home dashboard. Easily turn on all your living room lights at once or check live camera feeds to see what's happening around your home.
- **FRAME YOUR FAVORITE MEMORIES** - Brighten your space (and your day) by turning your home screen into a stylish digital photo frame that displays your favorite memories. Auto curate your images and show off your favorite family memories.
- **CONNECT LIKE NEVER BEFORE** - Video calling with family and friends will feel even more natural with a centered, auto-framing camera, wide field of vision, 3.3x zoom, and noise reduction technology.

Ex. 19.

170. Additionally, on information and belief, Amazon publishes customer reviews of the Smart Display Accused Products that show its customers in fact use the Smart Display Accused Products to stream and watch video:


Alisun


10 Stars! No issues, read for user tips

Reviewed in the United States on December 16, 2024

Size: 21-inch | **Verified Purchase**

I've had so many Echos over the years, beginning with the 1st Gen, can't live without them anymore since so much of our home is Alexa connected. I originally got a refurbished 1st Gen Echo Show 15", not knowing the 2nd gen was coming out. So glad I returned it for the new 21" Echo Show, it's absolutely phenomenal!

Streaming video: Easy to set up streaming (which I've done on our 5", 8", and 10" Echos). The best part of the Echo Show is that Fire TV is included. I easily logged into Hulu, Netflix, Amazon, Max, Peacock, Paramount, Disney+, and Apple TV (other Echo shows only allowed me Hulu, Netflix, and Amazon, I believe). The setup and remote is the same as FireTV.

Ex. 53 (Echo Show 15 Customer Reviews).

171. Amazon knowingly and intentionally induces users of one or more Accused Product to directly infringe one or more claim of the '146 Patent by encouraging, instructing, and aiding one or more persons in the United States, including Amazon employees who test and operate Accused Products at the direction of Amazon, to make, use (including testing those devices and methods), sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '146 Patent. *See* Ex. 11 (Accused Product List).

172. For example, as seen in the Amazon publications above, Amazon advertises the Accused Products on its website so that customers may purchase and use the products, thus inducing its customers to also infringe the '146 Patent. On information and belief, Amazon also advertises other Amazon products that infringe the '146 Patent on its website for consumer purchase.

173. Upon information and belief, Amazon has been aware of the '146 Patent and its infringement thereof since at least November 7, 2025. Ex. 48 (Complaint, *InterDigital, Inc. et al v. Amazon.com Services LLC*, Case No. 1:25-cv-1365-GBW, D.I. 1 (D. Del. Nov. 7, 2025)).

174. On information and belief, Amazon continues to infringe one or more Asserted Claim of the '146 Patent by offering for sale or selling and/or importing a patented component or material and/or apparatus used to practice a patented process, constituting a material part of the inventions, knowing the same to be especially made or especially adapted for use in an infringement and not a staple article or commodity of commerce suitable for substantial non-infringing use.

175. A claim chart mapping each of the asserted independent claims of the '146 Patent to the Accused Products is attached as Exhibit 36.

VI. SPECIFIC INSTANCES OF IMPORTATION AND SALE

176. Amazon has imported Accused Products and sold the Accused Products after importation, thereby infringing one or more valid claims of the Asserted Patents.

177. Upon information and belief, Amazon is engaged in the design, manufacturing, research, development, testing, marketing, distribution, shipping, importation, sale for importation, use, and/or sale within the United States after importation of Accused Products that infringe the Asserted Patents. The Accused Products are sold by Amazon for importation into the United States, imported by or on behalf of Amazon, and/or sold by Amazon within the United States after importation. *See, e.g.,* Ex. 24 (Stipulation and Exhibit A, *Certain Video Processing Devices and Components Thereof*, Inv. No. 337-TA-1343, Doc. ID 801044 (July 28, 2023)) (Amazon admission to importation, sale for importation, and sale after importation of various generations and screen sizes of Amazon Fire tablets, Amazon Fire TV/Cube devices, Amazon Echo Show devices, and Amazon Fire TV sets, including the Accused Products); Ex. 25 (Stipulation, *Certain Video Capable Electronic Devices, Including Computers, Streaming Devices, Televisions, Cameras, and Components and Modules Thereof*, Inv. No. 337-TA-1379, Doc. ID 819248 (April 22, 2024)) (Amazon admission to importation and sale after importation of certain Amazon-branded products, including the Accused Products).

178. On information and belief, the Accused Products are manufactured outside of the United States and imported into the United States. For example, attached as Exhibits 54-57 are exemplary bills of lading in which Amazon is listed as the consignee for shipments of the Accused Products identified by Harmonized Tariff Schedule number being imported into the United States. These exemplary bills of lading show shipments being made by or on behalf of Amazon.com, Inc. from Vietnam, South Korea, the People's Republic of China, Singapore, and the Republic of China to ports in the United States. Exs. 54-57 (exemplary importation records).

179. Attached as Exhibits 58-65 are photos of four Accused Products (a Fire Stick 4K Plus, a Fire TV 50" Omni QLED Series, a Fire HD 10, and an Echo Show 15) and their packaging. These products were purchased and delivered in the United States. Exs. 20-23 (Order Details for Fire Stick 4K Plus, Fire TV 50" Omni QLED Series, Fire HD 10, and Echo Show 15 purchases). On information and belief, these four Amazon products were assembled abroad and imported into the United States.

180. For example, attached as Exhibits 58-59 are photos of a Fire Stick 4K Plus and its packaging with "Assembled in Vietnam" labels. Ex. 58 (Fire Stick 4K Plus); Ex. 59 (Fire Stick 4K Plus packaging). InterDigital purchased the photographed Fire Stick 4K Plus from Amazon.com on November 20, 2025 and it was shipped and delivered to Austin, Texas. Ex. 20 (Order Details for Fire TV Stick 4K Plus purchase). Attached as Exhibits 60-61 are photos of a Fire TV 50" Omni QLED Series and its packaging with "Assembled in China" labels. Ex. 60 (Fire TV 50" Omni QLED Series); Ex. 61 (Fire TV 50" Omni QLED Series packaging). InterDigital purchased the photographed Fire TV 50" Omni QLED Series from Amazon.com on November 20, 2025 and it was shipped and delivered to Austin, Texas. Ex. 21 (Order Details for Fire TV 50" Omni QLED Series purchase). Attached as Exhibits 62-63 are photos of a Fire HD 10 and its packaging with "Assembled in Vietnam" labels. Ex. 62 (Fire HD 10); Ex. 63 (Fire HD 10 packaging). InterDigital purchased the photographed Fire HD 10 from Amazon.com on September 6, 2025 and it was shipped and delivered to Austin, Texas. Ex. 22 (Order Details for Fire HD 10 purchase). Attached as Exhibits 64-65 are photos of an Echo Show 15 and its packaging with "Assembled in Vietnam" labels. Ex. 64 (Echo Show 15); Ex. 65 (Echo Show 15 packaging). InterDigital purchased the photographed Echo Show 15 from Amazon.com on November 20, 2025

and it was shipped and delivered to Austin, Texas. Ex. 23 (Order Details for Echo Show 15 purchase).

181. Given the large number of Accused Products, it is not practical for InterDigital to identify all Accused Products sold for importation into the United States, imported into the United States, and/or sold within the United States after importation. InterDigital reserves the right to supplement its allegations, to amend the complaint and to add respondents in the future.

VII. CLASSIFICATION OF THE ACCUSED PRODUCTS UNDER THE HARMONIZED TARIFF SCHEDULE

182. On information and belief, the Accused Products have been imported into the United States under at least the following Harmonized Tariff Schedule of the United States item number(s): 8525.50, 8528.69.00; 8528.72.6460; 8471.30.0100; and 8517.62. *See* Exs. 54-57, Exemplary Bills of Lading.

VIII. RELATED LITIGATION

183. Amazon commenced litigation against InterDigital in the United Kingdom and Brazil in August of 2025. *See Amazon.com, Inc. et al. v. InterDigital VC Holdings, Inc. et al.*, High Court of Justice, Business & Property Courts of England & Wales, Intellectual Property List (ChD) Patents Court, Case No. HP-2025-000043; *Amazon.com, Inc. et al. v. InterDigital VC Holdings, Inc. et al.*, Sao Paulo State Court of First Instance, Case No. 1109939-15.2025.8.26.0100.

184. As a result, InterDigital commenced litigation against Amazon. The Asserted Patents are the subject of a civil action in the United States District Court for the District of Delaware filed by InterDigital on November 7, 2025 naming Respondent Amazon.com Services LLC as the Defendant. *See* Ex. 48 (Complaint, *InterDigital, Inc. et al v. Amazon.com Services LLC*, Case No. 1:25-cv-1365-GBW, D.I. 1 (D. Del. Nov. 7, 2025)). The case remains pending.

185. Additionally, InterDigital and Amazon are engaged in the following litigations:

- *InterDigital VC Holdings, Inc. et al. v. Amazon.com, Inc. et al.*, Unified Patent Court, Local Division Mannheim, Case No. UPC_CFI_936/2025.
- *InterDigital VC Holdings, Inc. et al. v. Amazon.com, Inc. et al.*, Unified Patent Court, Local Division Mannheim, Case No. UPC_CFI_1376/2025.
- *InterDigital VC Holdings, Inc. et al. v. Amazon.com, Inc. et al.*, Unified Patent Court, Local Division Mannheim, Case No. UPC_CFI_1481/2025.
- *InterDigital VC Holdings, Inc. et al. v. Amazon.com, Inc. et al.*, Unified Patent Court, Local Division Mannheim, Case No. UPC_CFI_1482/2025.
- *InterDigital VC Holdings, Inc. et al. v. Amazon.com, Inc. et al.*, Regional Court Munich I, Case No. 21 O 12112/25.
- *InterDigital VC Holdings, Inc. et al. v. Amazon.com, Inc. et al.*, Regional Court Munich I, Case No. 7 O 14917/25.
- *InterDigital VC Holdings, Inc. et al. v. Amazon.com, Inc. et al.*, Rio de Janeiro State Court of First Instance, Case No. 3021485-26.2025.8.19.0001.

IX. DOMESTIC INDUSTRY

186. An industry as required by Section 337(a)(2) and as defined by Section 337(a)(3) exists or is in the process of being established in the United States. InterDigital's licensees, including Apple and Samsung, are some of the other largest electronics companies in the world and, in the United States, have made significant investments in plants and equipment, have employed significant labor and capital, and have made substantial investments in engineering and research development related to articles that are protected by the Asserted Patents.

187. The articles protected by the Asserted Patents are the Domestic Industry Products, which are complete end-user video-capable electronic devices, including smartphones, tablet computers, televisions, smart displays, and streaming devices. Specifically, the Domestic Industry Products are Apple iPhones, Apple iPads, Apple Macs, Apple TVs, Apple Displays, Samsung Galaxy Mobile Phones, and Samsung Smart TVs. Exhibit 12 contains a list of the Domestic Industry Products that practice each of the Asserted Patents. Apple and Samsung periodically release new models of the Domestic Industry Products, which are included within the domestic industry. For example, on information and belief, Samsung will release its Galaxy S26, S26 Plus, and S26 Ultra in early 2026; and Apple will release its iPhone 18 and new versions of iPads and Macs in 2026.

188. The Domestic Industry Products are sold as complete, integrated devices with integrated subcomponents and software, which together provide video capabilities and exploit the technologies of the Asserted Patents.

189. Licensees Apple and Samsung are sellers in the video-capable electronic devices marketplace and sell the Domestic Industry Products to end-user consumers. *See, e.g.*, Ex. 26-31 (consumer retail outlets offering for sale Amazon's products); Ex. 79 (consumer retail outlets offering for sale Apple Domestic Industry Products); Ex. 80 (consumer retail outlets offering for sale Samsung Domestic Industry Products).

190. The consumers in the video-capable electronic devices marketplace are end-users who wish to use the devices to, for example, record video, stream movies, play video games, and participate in video meetings.

A. Technical Prong

191. As stated above, for purposes of this Complaint, InterDigital submits that the Apple and Samsung Domestic Industry Products practice at least one claim of each of the Asserted

Patents. The following table provides examples of the Domestic Industry Products that practice the Asserted Patents:

U.S. Patent No.	Example of Domestic Industry Products
U.S. Patent No. 10,741,211	<i>See Exs. 66-67</i>
U.S. Patent No. 9,747,674	<i>See Exs. 68-69</i>
U.S. Patent No. 8,363,724	<i>See Exs. 70-71</i>
U.S. Patent No. 8,681,855	<i>See Exs. 72-73</i>
U.S. Patent No. 11,917,146	<i>See Exs. 74-75</i>

192. Exs. 66-67 contain claim charts showing that Apple and Samsung Domestic Industry Products practice at least Claim 1 of the '211 Patent.

193. Exs. 68-69 contain claim charts showing that Apple and Samsung Domestic Industry Products practice at least Claim 1 of the '674 Patent.

194. Exs. 70-71 contain claim charts showing that Apple and Samsung Domestic Industry Products practice at least Claim 39 of the '724 Patent.

195. Exs. 72-73 contain claim charts showing that Apple and Samsung Domestic Industry Products practice at least Claim 13 of the '855 Patent.

196. Exs. 74-75 contain claim charts showing that Apple and Samsung Domestic Industry Products practice at least Claim 7 of the '146 Patent.

B. Economic Prong

197. InterDigital's domestic industry is based on its licensees Apple's and Samsung's investments related to the Domestic Industry Products in the United States. Ex. 76C (Apple license); Exs. 37C and 77C-78C (Samsung licenses). Apple and Samsung have each made significant and substantial investments in research, development, engineering, testing, readying-

for-market, servicing, support, and other qualifying activities with respect to the Domestic Industry Products in the United States. These investments enable the Domestic Industry Products to access the United States consumer market, which is one of the largest consumer electronics markets in the world and, on information and belief, the most important market for each of their businesses. Apple and Samsung specifically make, market, and sell U.S.-specific models of the Domestic Industry Products, and the United States market for the Domestic Industry Products comprises a substantial share of each company's overall revenue. Without these investments in the Domestic Industry Products, Apple and Samsung would not be able to tap into the U.S. market and U.S. consumers would not be able to use the patented technologies.

198. Apple's and Samsung's investments in certain of the Domestic Industry Products, and prior versions thereof, have previously been determined to satisfy the domestic industry requirement under Section 337(a)(3). For example, in the 1302 Investigation, ALJ Bhattacharyya determined that Apple's significant domestic investments in iPhone and iPad models, certain of which are Domestic Industry Products here, satisfied the economic domestic industry requirement under Section 337(a)(3)(A) and (B). Ex. 81 (*Certain Cellular Base Station Communication Equipment, Components Thereof, And Products Containing Same*, Inv. No. 337-TA-1302, Order No. 17 Granting Summary Determination on Apple Economic Domestic Industry (Nov. 2, 2022) ("Order Granting Summary Determination on Apple Economic Domestic Industry, 337-TA-1302")). Similarly, in the 1379 Investigation, ALJ Johnson-Hines determined that Samsung's significant domestic investments in Galaxy phone models, certain of which are Domestic Industry Products here, satisfied the economic domestic industry requirement under Section 337(a)(3)(A) and (B). Ex. 82 (*Certain Video Capable Electronic Devices, Including Computers, Streaming Devices, Televisions, Cameras, and Components and Modules Thereof*, Inv. No. 337-TA-1379,

Initial Determination on Violation of Section 337 and Recommended Determination on Remedy and Bond (Jan. 29, 2025) (“Initial Determination on Violation of Section 337 and Recommended Determination on Remedy and Bond, 337-TA-1379”)).

199. Thus, as described herein, Apple’s and Samsung’s activities comprise a significant investment in plant and equipment and significant employment of labor or capital, for the Domestic Industry Products, and a substantial investment in the exploitation of the Asserted Patents through engineering, research, and development under Section 337(a)(3)(A), (B), and (C), respectively.

1. Apple Inc.

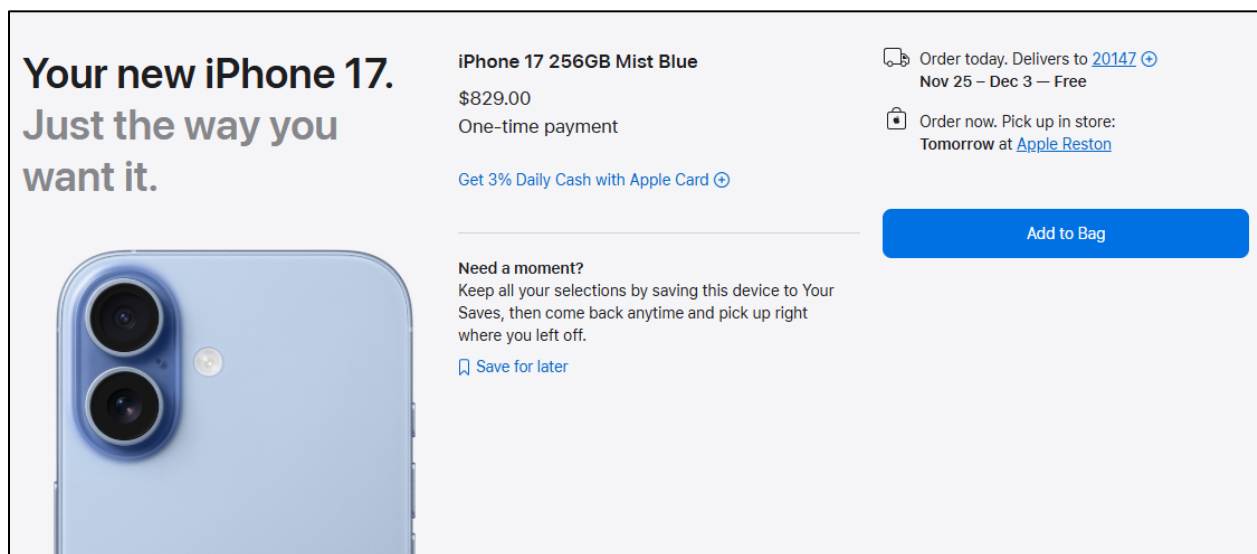
200. Apple Inc. is the quintessential domestic technology company that has invested billions into the United States economy and its domestic industry. InterDigital licensed Apple to practice the Asserted Patents and to design, develop, manufacture, sell and distribute the Apple Domestic Industry Products. Ex. 76C (InterDigital license with Apple). Exhibits 66, 68, 70, 72, and 74 are claim charts demonstrating that at least one claim of each of the Asserted Patents is practiced by the Apple Domestic Industry Products. Thus, the Apple Domestic Industry Products are protected by the Asserted Patents.

201. Apple has made, and continues to make, significant and substantial domestic investments within the United States in connection with the Apple Domestic Industry Products. As a result of Apple’s significant investment in plant and equipment and significant employment of labor and/or capital within the United States, a domestic industry as defined by 19 U.S.C. § 1337(a)(3)(A) and (B) exists in the United States with respect to the Apple Domestic Industry. A domestic industry defined by 19 U.S.C. § 1337(a)(3)(C) also exists by virtue of Apple’s substantial investment exploitation of the patented technologies through research and development and engineering related to the Apple Domestic Industry Products. In addition, based on Apple’s

product release cadence, Apple is likely to release additional Apple Domestic Industry Products during the pendency of the investigation. On information and belief, based on the historical releases and product development timelines, Apple has taken discrete steps on design, research, and development for the anticipated releases. To the extent a domestic industry does not already exist as to the anticipated next generation of products, it is in the process of being established.

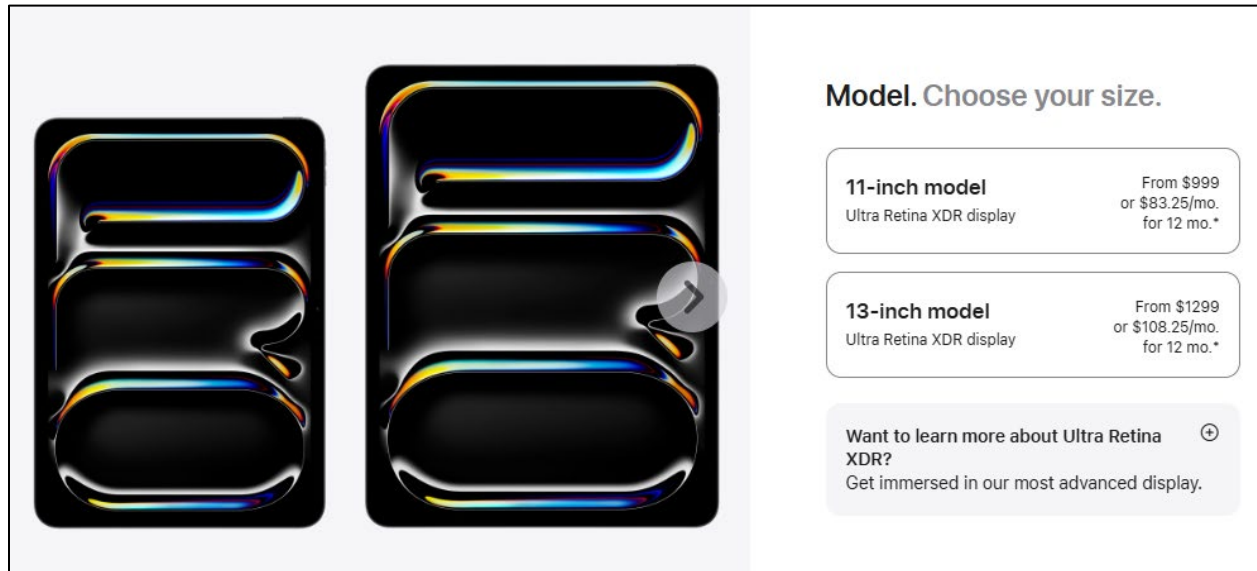
202. The Apple Domestic Industry Products include iPhones, iPads, Macs, Apple TVs, and Apple Displays. *See* Ex. 12 (list of Domestic Industry Products). As detailed in this section, Apple designs, markets, and sells each of these devices in the United States.

203. An example of an Apple iPhone in the domestic industry is the iPhone 17.



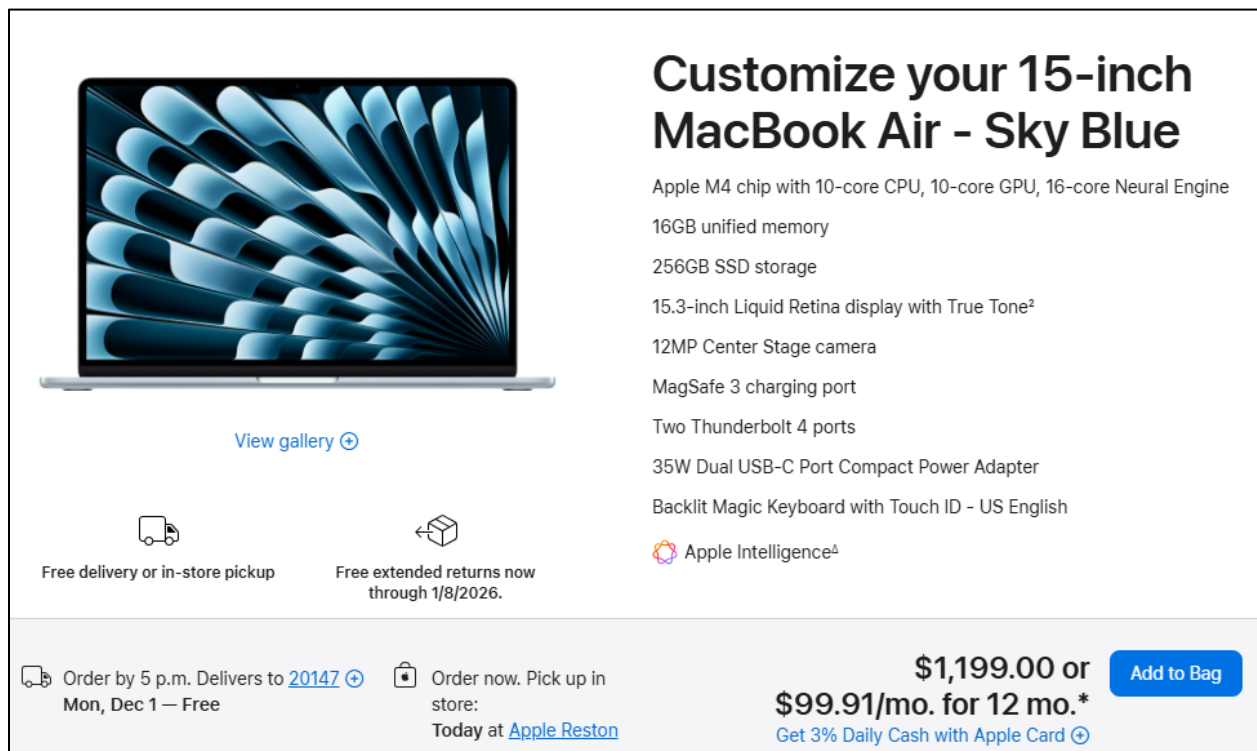
Ex. 83 (<https://www.apple.com/shop/buy-iphone/iphone-17/6.3-inch-display-256gb-mist-blue-unlocked>) (last accessed November 16, 2025).

204. An example of an Apple iPad in the domestic industry is the iPad Pro.



Ex. 84 (<https://www.apple.com/shop/buy-ipad/ipad-pro>) (last accessed November 23, 2025).

205. An example of an Apple Mac in the domestic industry is the Apple MacBook Air.



Ex. 85 (<https://www.apple.com/shop/buy-mac/macbook-air/15-inch-sky-blue-m4-chip-with-10-core-cpu-10-core-gpu-16gb-memory-256gb>) (last accessed November 26, 2025)

206. An example of an Apple TV in the domestic industry is the Apple TV 4K.

Buy Apple TV 4K



Choose your model
Which Apple TV 4K is right for you? ⓘ

Wi-Fi with 64GB ¹ storage	\$129.00 or \$21.50/mo. for 6 mo. [§]
Wi-Fi + Ethernet with 128GB ¹ storage	\$149.00 or \$24.83/mo. for 6 mo. [§]

AppleCare coverage. Choose your plan.

AppleCare+
Cover this product only*
\$0.99/mo. or \$9.99/yr. until cancelled

- Unlimited repairs for accidents like drops and spills
- 24/7 priority support from Apple experts
- Express Replacement Service — we'll ship you a replacement so you don't have to wait for a repair

Ex. 87 (<https://www.apple.com/shop/buy-tv/apple-tv-4k>) (last accessed November 23, 2025).

207. An example of an Apple Display in the domestic industry is the Apple Studio Display.

Buy Apple Studio Display

27-inch 5K Retina display. 12MP Ultra Wide camera with Center Stage. Studio-quality mics. Six-speaker sound system with Spatial Audio.

Standard glass has an industry-leading anti-reflective coating for viewing comfort and readability.



Display

Choose from two anti-reflective glass options. Standard glass is engineered for extremely low reflectivity. Nano-texture glass scatters light to further minimize glare while delivering outstanding image quality in workspaces with bright light sources.

Standard glass	From \$1599 or \$133.25/mo. for 12 mo.*
Nano-texture glass	From \$1899 or \$158.25/mo. for 12 mo.*

Ex. 86 (<https://www.apple.com/shop/buy-mac/apple-studio-display>) (last accessed November 16, 2025).

208. Apple is a publicly traded company founded in 1976. Apple is organized under the laws of California and has a principal place of business at One Apple Park Way, Cupertino, CA 95014. Ex. 88 at 1, 17 (Apple 2025 10K); Ex. 89 (<https://www.apple.com/contact/>); Ex. 90 (Apple Inc. Restated Articles of Incorporation).

209. Apple has expended, and continues to expend, considerable resources on plant and equipment, labor or capital, and engineering and research and development to support the Apple Domestic Industry Products in the United States.

210. Regarding plant and equipment, “[a]s of September 27, 2025, the Company owned or leased facilities and land for corporate functions, R&D, data centers, retail and other purposes at locations throughout the U.S. . . .” Ex. 88 at 17 (Apple 2025 10-K). Apple has invested in facilities across the United States, including at least its corporate (non-retail) offices in the following American cities: Cupertino, California; Boulder, Colorado; Culver City, California; New York City, New York; Pittsburgh, Pennsylvania; San Diego, California; Miami, Florida; Portland, Oregon; Boston, Massachusetts; Seattle, Washington; and Austin, Texas. Ex. 81 at 6, 8 (Order Granting Summary Determination on Apple Economic Domestic Industry, 337-TA-1302); Ex. 91 (<https://www.apple.com/careers/us/work-at-apple/locations.html>).

211. In 2025, Apple reported \$16.8 billion in fixed lease payment obligations, with \$2.6 billion payable within 12 months. Ex. 88 at 25 (Apple 2025 10-K). Apple also reported approximately \$49.834 billion in property, plant, and equipment on its balance sheet, having spent \$12.715 billion in the fiscal year on those assets. *Id.* at 31, 33. On information and belief, a significant portion of these fixed lease payments and property, plant, and equipment are for facilities and equipment within the United States and used for activities related to the Apple Domestic Industry Products.

212. Apple has retail locations throughout the country supporting its sales, marketing, repair, and support for the Apple Domestic Industry Products. On information and belief, those facilities and the corresponding equipment are dedicated to Apple’s extensive marketing, selling, distribution, repair and warranty support activities, including for U.S. customers of Apple Domestic Industry Products on-site at Apple Stores located throughout the United States. Ex. 92 (Apple Store List). Apple also maintains a network of support and repair facilities throughout the United States with respect to the Apple Domestic Industry Products. Ex. 93 (Repair Options).

213. Apple’s physical footprint in the United States is growing. Apple announced in 2021 that it would invest \$430 billion in its US operations over the next five years. Ex. 94 (Apple Commits \$430B, <https://www.apple.com/newsroom/2021/04/apple-commits-430-billion-in-us-investments-over-five-years/>). Apple has now expanded that commitment to more than \$600B. Ex. 95 (<https://www.apple.com/newsroom/2025/08/apple-increases-us-commitment-to-600-billion-usd-announces-ambitious-program/>). As part of that investment, Apple “partners with thousands of suppliers across all 50 states, supporting more than 450,000 supplier and partner jobs.” *Id.* Apple’s investment in the domestic economy has been exemplified by, among other things, establishing a North Carolina research campus with plans to invest over \$1 billion in the state, and construction of a \$1 billion Austin, Texas campus. Ex. 96 (Apple plans \$19.3 M renovation of temporary offices in North Carolina, <https://appleinsider.com/articles/22/04/26/apple-plans-193m-renovation-of-temporary-offices-in-north-carolina>); Ex. 97 (Apple’s northwest Austin campus reportedly adding \$279M in new structures, <https://www.kvue.com/article/money/economy/boomtown-2040/apple-northwest-austin-campus-new-structures/269-2963b2a6-0030-431c-96d3-db1d299ff747>).

214. Regarding labor and capital, Apple employs around 80,000 people in the U.S. Ex. 98 at 2 (Job Creation, Apple’s U.S. job footprint). On information and belief, a significant portion of those employees perform work related to the Domestic Industry Products, which include designing and marketing Apple’s flagship devices in the United States. *See, e.g.*, Ex. 102 (Pro XDR Display job listings); Ex. 103 (iPhone job listings). These employees include engineers, designers, and project and product managers working on research, design, development, engineering, and testing of the Domestic Industry Products. Personnel working for or on behalf of Apple also engage in extensive marketing, selling, distribution, repair and warranty support

activities, including for U.S. customers of Apple products on-site at Apple Stores located throughout the United States that are described above. Ex. 92 (Apple Store List). Apple has also invested extensively in expanding its stock of accumulated goods and to design, develop, engineer, sell, market, and distribute its large stock of inventory of Domestic Industry Products in the United States. For example, in 2025, Apple reported having spent \$1.4 billion on inventories in the fiscal year. Ex. 88 at 33 (Apple 2025 10-K). With respect to distribution of the Domestic Industry Products, Apple sells its products “in most of its major markets directly to customers through its retail and online stores and its direct sales force.” *Id.* at 2.

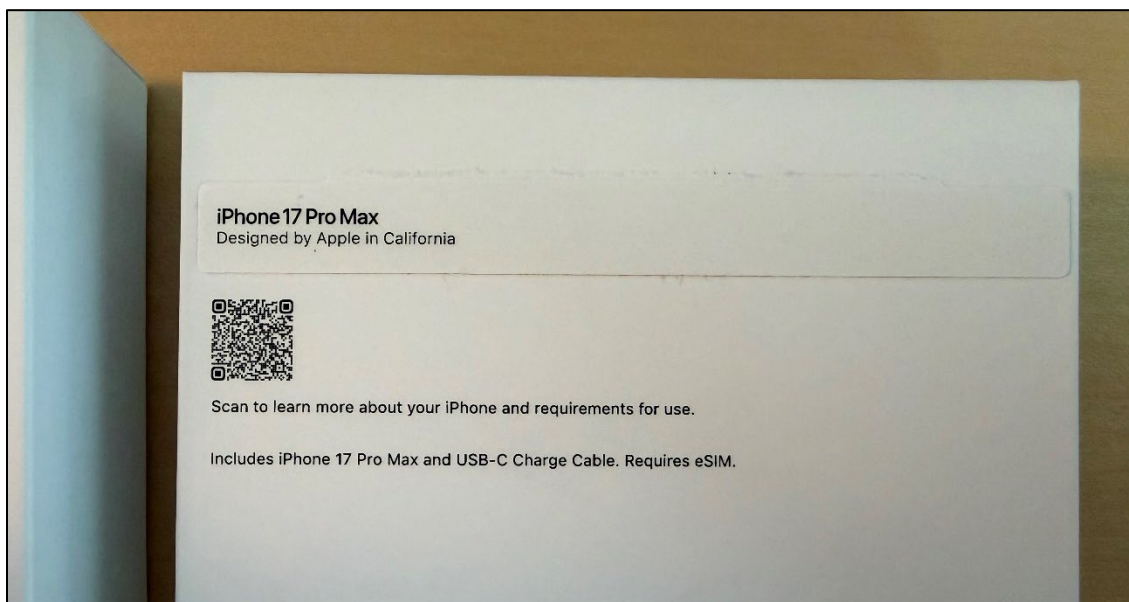
215. As a result of these activities, Apple reported over \$34.6 billion worth of operating expenses with respect to research and development and \$27.6 billion worth of operating expenses with respect to selling, general, and administrative in 2025. *See* Ex. 88 at 24 (Apple 2025 10-K). In 2025, Apple’s more than \$34.6 billion investment in R&D is growing, increasing 10.14% from 2024 to 2025 and 15.49% from 2023 to 2024. Ex. 99 (Apple Research and Development Expenses 2011-2025, MacroTrends, <https://www.macrotrends.net/stocks/charts/AAPL/apple/research-development-expenses>); Ex. 88 at 24 (Apple 2025 10-K). Apple also maintains significant stocks of accumulated inventory and goods dedicated to the domestic industry. In 2025, Apple reported \$5.72 billion in inventories on its balance sheet, having spent \$1.4 billion on those assets in the fiscal year. Ex. 88 at 31, 33 (Apple 2025 10-K). Year-on-year growth in operating expenses was primarily driven by increased employee headcounts and infrastructure-related expenses. Ex. 88 at 24 (Apple 2025 10-K).

216. In the next four years, Apple plans to directly hire 20,000 people in the United States—the vast majority focused on R&D, silicon engineering, software development, and AI and machine learning. Ex. 95 (<https://www.apple.com/newsroom/2025/08/apple-increases-us->

[commitment-to-600-billion-usd-announces-ambitious-program/](#)). Apple also supports manufacturing at 79 U.S. factories. *Id.* For example, Apple has partnered with Corning to manufacture 100% of iPhone cover glass in Kentucky. “The new \$2.5 billion commitment from Apple is part of the company’s expanded plan to invest \$600 billion in the U.S. over the next four years.” Ex. 100 (<https://www.apple.com/newsroom/2025/08/apple-corning-to-manufacture-all-iphone-apple-watch-cover-glass-in-kentucky/>). “Since the creation of Apple’s U.S. Advanced Manufacturing Fund in 2017, Apple has invested nearly \$500 million in Corning’s Kentucky operations, with billions more spent on glass manufactured in the U.S.” *Id.* Apple’s engineers work closely with Corning’s engineers to innovate the Apple Domestic Industry Products. *Id.* Likewise, “Apple has also entered into a new multiyear agreement with Coherent, a long-standing partner that produces the VCSEL lasers that enable multiple features — including Face ID — on iPhone and iPad devices shipped around the world. This work takes place at Coherent’s Sherman, Texas, facility.” Ex. 95 (<https://www.apple.com/newsroom/2025/08/apple-increases-us-commitment-to-600-billion-usd-announces-ambitious-program/>). “In July, Apple also committed to buying American-made rare earth magnets developed by MP Materials — the only fully integrated rare earth producer in the United States — significantly expanding their flagship Independence facility in Fort Worth, Texas. These magnets will become part of Apple devices shipped around the world.” *Id.* Furthermore, Apple has invested in an end-to-end US silicon supply chain, which on information and belief has and will supply the processors for iPhones. *Id.*

217. On information and belief, significant portions of these U.S. R&D, sales and marketing, and other employment of labor and capital are directly related to the Apple Domestic Industry Products and to improving use of video coding technology in its own devices. Apple

famously advertises that its Domestic Industry Products, processors (including CPUs and GPUs), and components, are “designed in California.”



Ex. 135 (Photo of iPhone 17 packaging).

218. Apple also employs U.S. facilities and labor to develop and test the Apple Domestic Industry Products which incorporate the patented technologies. Ex. 101 (Independent Article regarding iPhone testing in California); *see also* Testing Video available at <https://www.youtube.com/watch?v=8reaJG7z-is&t=215s>. On information and belief, Apple’s domestic investments include work toward custom components and software involved with video coding that are incorporated into the Apple Domestic Industry Products. On information and belief, these Apple investments are directly related to the Apple Domestic Industry Products, including the exemplary iPhone 17. For example, Apple lists significant numbers of U.S.-based jobs for the Domestic Industry Products in just the hardware engineering space. Ex. 102 (Pro XDR Display job listings); Ex. 103 (iPhone job listings). Apple’s domestic investments in labor and capital related to the Apple Domestic Industry Products also include significant expenditures for the personnel engaged in Apple’s repair and warranty support efforts within the United States,

marketing, selling, and distribution, and the personnel staffing Apple's call center support for the iPhones it sells within the United States.

219. Significant portions of Apple's investments in plant and equipment, labor and capital, engineering, and research and development in the United States relate to the Apple Domestic Industry Products given that they are designed by Apple in the United States and constitute a significant portion of Apple's product revenue. Sales of the Apple Domestic Industry Products represent significant portions of Apple's revenue. More than \$209 billion in 2025 iPhone sales represents approximately 50% of Apple's overall revenue. *See* Ex. 88 at 23 (Apple 2025 10-K); Ex. 104 at 2 (Business of Apps, Apple Statistics). Apple iPads and Macs, which includes Apple Displays, also represent a significant component of Apple's non-iPhone sales. In 2025, Apple's sales of iPads amounted to over \$28 billion and its sales of Macs, which includes Apple's Displays, amounted to over \$33 billion. *See* Ex. 88 at 23 (Apple 2025 10-K). Apple's 2025 iPad and Mac sales collectively represent approximately 14% of overall revenue. *See id.* at 23. On information and belief, Apple TVs also represent and contribute to significant sources of revenue to Apple. A significant proportion of Apple's sales of the Domestic Industry Products occurred in the United States. *Id.* at 36, 47-48. In 2024, approximately half of Apple's iPhone sales occurred in the United States. Ex. 104 at 7 (Business of Apps, Apple Statistics). Thus, upon information and belief, approximately half or more of Apple's investments in the United States in recent years are properly attributable to the Apple Domestic Industry Products. These investments are "crucial to the development, improvement, production, and sale of its DI Products." Ex. 81 at 9 (Order Granting Summary Determination on Apple Economic Domestic Industry, 337-TA-1302).

220. Based on at least the foregoing, and other evidence that will be provided by Apple during the investigation, Apple has a domestic industry related to the Apple Domestic Industry Products that satisfies the definitions of 19 U.S.C. § 1337(a)(3)(A), (B), and (C).

- a. Apple has significant investments in plant and equipment within the United States, including its substantial investments in the United States in facilities, plant, and equipment described above to support research, development, design, testing, sales, support, and marketing of the Apple Domestic Industry Products to the United States.
- b. Apple has employed significant labor and capital within the United States, including its substantial investments in engineers, professionals, and employees and other expenses described above to support research, development, design, testing, sales, support, and marketing of the Apple Domestic Industry Products to the United States.
- c. Apple has made substantial investments in research and development and engineering related to the Apple Domestic Industry Products related to the exploitation of the Asserted Patents through research, design, engineering, and testing described above.

221. Apple's domestic investments in the Apple Domestic Industry Products are significant and substantial within the meaning of Section 337 by any reasonable metric, viewed both quantitatively and qualitatively. They are significant both in terms of importance to development and commercialization of the Domestic Industry Products, when compared to financial metrics such as worldwide investments and sales, and based on the contributions of

Apple's activities in the United States to the Domestic Industry Products. *See generally* Ex. 81 (Order Granting Summary Determination on Apple Economic Domestic Industry, 337-TA-1302).

222. Furthermore, Apple releases new versions of the Domestic Industry Products on regular cadences. Ex. 105 (release dates for iPhones). On information and belief, based on the historical releases and product development timelines, Apple has taken discrete steps on design, research, and development for the anticipated releases. To the extent its domestic investments related to the next generation of Domestic Industry Products do not qualify as an existing industry, they are an industry in the process of being established.

223. A domestic industry therefore exists or is in the process of being established within the United States based on the activities and investments of InterDigital's domestic licensee, Apple.

2. Samsung

224. Samsung also invests billions into the United States domestic industry through the commercialization of the Samsung Domestic Industry Products. InterDigital licensed Samsung and its relevant subsidiaries to practice the Asserted Patents and to design, develop, manufacture, sell and distribute the Samsung Domestic Industry Products. Exs. 37C and 77C-78C (InterDigital licenses with Samsung). Exhibits 67, 69, 71, 73, and 75 are representative claim charts demonstrating that each of the Asserted Patents is practiced by at least one of the Samsung Domestic Industry Products. Thus, the Samsung Domestic Industry Products are protected by the Asserted Patents.

225. The Samsung Domestic Industry Products include Samsung Galaxy mobile phones and Samsung TVs.

226. Samsung has made, and continues to make, significant and substantial domestic investments within the United States with respect to the Samsung Domestic Industry Products.

Samsung Electronics America (“SEA”) and Samsung Research America, Inc. (“SRA”), and on information and belief other related Samsung entities that are licensed to the Asserted Patents, perform extensive work in the United States with respect to the Samsung Domestic Industry Products.⁷ Ex. 107 (SEC 2024 Consolidated Financial Statements); Ex. 108 (<https://www.samsung.com/global/business/networks/insights/blog/north-america/>); Ex. 109 (Samsung Research America: About). Those investments include research, development, testing, deployment, readying-for-market, sales and marketing, and service and repair of the Samsung Domestic Industry Products in the United States as part of its device experiences (DX) unit.

227. As a result of Samsung’s significant investment in plant and equipment and significant employment of labor and/or capital within the United States, a domestic industry as defined by 19 U.S.C. § 1337(a)(3)(A) and (B) exists in the United States. A domestic industry defined by 19 U.S.C. § 1337(a)(3)(C) also exists by virtue of Samsung’s substantial investment exploitation of the patented technologies through research and development and engineering related to the Samsung Domestic Industry Products. In addition, based on Samsung’s product release cadence, it is likely to release additional Samsung Domestic Industry Products during the pendency of the investigation. On information and belief, based on the historical releases and product development timelines, Samsung has taken discrete steps on design, research, and

⁷ In total, SEC has 65 SEC subsidiaries in the Americas, including SEA (which is based in New Jersey and is responsible for the sales of finished products including TVs and smartphones), SRA (which is based in California and is responsible for research and development of Samsung products), Samsung International Inc. (which is based in California and is responsible for the manufacturing of TVs), Samsung Semiconductor Inc. (which is based in California and is responsible for sales of semiconductors and DPs), Samsung Austin Semiconductor (which is based in Texas and is responsible for the manufacturing of semiconductor products), and Harman (which is based in Connecticut and is responsible for the manufacture and design of automotive components). Ex. 106 at 5, 42 (Samsung 2025 Q3 Interim Business Report).

development for the anticipated releases. To the extent a domestic industry does not already exist as to the anticipated next generation of products, it is in the process of being established.

228. An example of a Samsung Galaxy phone in the domestic industry is the Galaxy S25 Ultra.

Early Access

Galaxy S25 Ultra

Unlocked | 512GB | Titanium Jetblack

\$849.99 was \$1,419.99
or
\$35.42/mo
Save \$570.00

[Continue](#)



Titanium Silverblue Titanium Whitesilver Titanium Gray Titanium Black Galaxy AI

Device **Galaxy AI**

Galaxy S25 Ultra	was: \$1,419.99 \$849.99
Galaxy S25 Edge	\$1,219.99

Connectivity

Ex. 110 (<https://www.samsung.com/us/smartphones/galaxy-s25-ultra/buy/galaxy-s25-ultra-512gb-unlocked-sku-sm-s938uztexas/>) (last accessed November 16, 2025).

229. A further example of a Samsung Galaxy phone in the domestic industry is the Galaxy S25.

Early Access

Galaxy S25

Unlocked | 128GB | Icyblue

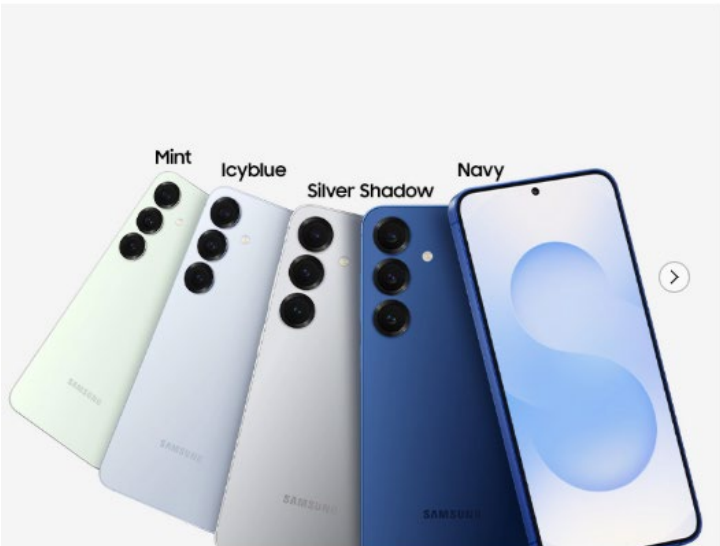
\$674.99 was \$799.99 or

\$28.13/mo Save \$125.00

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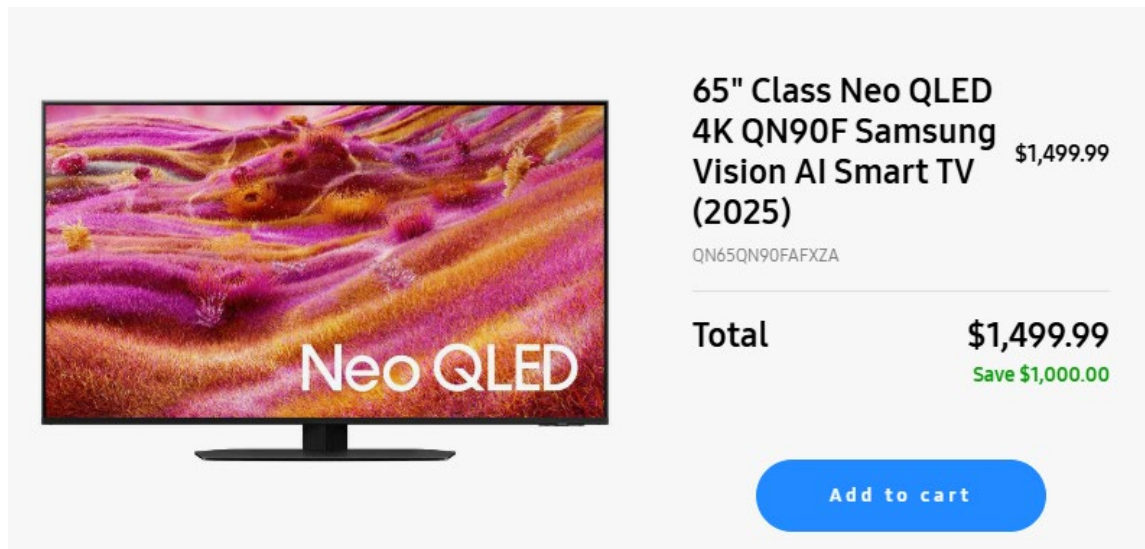
Device **Galaxy AI** 🌟



Galaxy S25 FE	was: \$649.99 \$474.99
Galaxy S25	was: \$799.99 \$674.99
Galaxy S25+	was: \$999.99 \$849.99

Ex. 111 (<https://www.samsung.com/us/smartphones/galaxy-s25/buy/galaxy-s25-128gb-unlocked-sku-sm-s931ulbaxaa/>) (last accessed November 16, 2025).

230. An example of a Samsung Smart TV in the domestic industry is the Samsung 65" Class Neo QLED QN90F 4K Samsung Vision AI Smart TV (2025).



Ex. 112 (<https://www.samsung.com/us/tvs/neo-qled/65-class-neo-qled-4k-tv-qn90f-sku-qn65qn90fafxza/>) (last accessed November 16, 2025).

231. Samsung’s finished product business consists of the DX Division, which “is responsible for the production and sales of TVs, monitors, refrigerators, washing machines, air conditioners, smartphones, computers, network systems, and PC.” Ex. 106 at 5 (Samsung 2025 Q3 Interim Business Report). SEC identifies SEA as a major subsidiary. *Id.* at 49. Samsung’s DX division has a United States headquarters through SEA in Englewood Cliffs, New Jersey, and on information and belief, the DX division includes SRA and other subsidiaries. *Id.* at 9 (Samsung 2025 Q3 Interim Business Report).

232. SEA is the U.S. Sales and Marketing subsidiary of SEC and “a leader in mobile technologies, consumer electronics, home appliances, enterprise solutions and networks systems. For more than four decades, Samsung has driven innovation, economic growth and workforce opportunity across the United States—investing over \$100 billion and employing more than 20,000 people nationwide.” Ex. 113 (<https://www.linkedin.com/company/samsung-electronics->

[america/about/](#)). SEA brings “mobile devices, connected appliances, home entertainment, 5G networks and digital solutions to life for people across the nation — to make our days more productive, more delightful, more inspired.” Ex. 114 (Samsung: Careers). SEA’s activities include a corporate support team that “serv[es] as the central nervous system of Samsung culture and systems.” *Id.* at 3.

233. In Q3 of 2025, Samsung reported that its sales strategy included to “[e]xpand market leadership based on premium products; [p]rovide differentiated value to customers through brand, products, and services; [and] [s]trengthen marketing activities to boost demand from customer/market.” Ex. 106 at 12 (Samsung 2025 Q3 Interim Business Report). Similarly, Samsung notes that it “continue[s] to bolster the competitiveness of our products” to “solidify [its] status in the overall mobile market.” *Id.* at 23; *see also* Ex. 115 (Samsung Electronics Marks 19 Consecutive Years as the Global TV Market Leader) (Samsung’s “continued success is driven by the company’s commitment to premium and ultra-large screen innovation, as well as the introduction of cutting-edge, AI-powered TVs.”). To support those business goals, Samsung provides products specifically for the U.S. market, “establish[ing] optimal portfolios for each region, accounting for varying market conditions and the competitive environment, to offer a wide smartphone lineup ranging from mass-market to premium devices.” Ex. 106 at 23 (Samsung 2025 Q3 Interim Business Report).

234. SEA invests in significant plant and equipment in the United States to commercialize the Samsung Domestic Industry Products. SEA has a corporate footprint in over 25 locations in the United States. Ex. 117 (SEA: Life at Samsung). SEA is headquartered in Englewood Cliffs, New Jersey, and maintains corporate offices in at least the following American cities: Plano, Texas; Bellevue, Washington; Mountain View, California; Washington, DC; Atlanta,

Georgia; and New York City, New York. Ex. 117 (Life at Samsung); Ex. 118 (job listings in numerous cities). In addition, SRA is headquartered in Mountain View, California, and has locations in Berkeley Heights, New Jersey; Cambridge, Massachusetts; Irvine, California; Logan, Utah; New York, New York; Plano, Texas; San Francisco, California; and Valencia, California. Ex. 119 (SRA: Locations). On information and belief, these offices are used for research, development, design, commercialization, support, sales, marketing, and distribution of the Samsung Domestic Industry Products. *Id.*; Ex. 82 at 95-97 (Initial Determination on Violation of Section 337 and Recommended Determination on Remedy and Bond, 337-TA-1379). On information and belief, Samsung also invests significantly in equipment to support its research, testing, marketing, sales, and related qualifying activities with respect to the Samsung Domestic Industry Products.

235. In addition, Samsung has six retail stores, known as “Experience Stores,” in the United States in support of Samsung’s advertising and sales efforts, which are located in Frisco, Texas; Houston, Texas; Garden City, New York; Elmhurst, New York; Bloomington, Minnesota; and Glendale, California. Ex. 120 (Samsung Experience Stores). A seventh Experience Store in Cerritos, California is expected to open by the end of 2025. *Id.*; Ex. 121 (New Samsung Experience Stores Open the World of Galaxy). Upon opening its first stores in 2019, it was reported that the Experience Stores will be used “to push its other products besides smartphones including its TVs, tablets, wearables and SmartThings devices.” Ex. 122 (Tech Radar: Samsung Launches First Ever US Retail Stores); *see also* Ex. 123 (Samsung Newsroom: Celebrating 10 Years of Galaxy at Samsung’s New Experiential Retail Locations).

236. As a result of these activities, Samsung has spent, and continues to spend, significant sums on domestic facilities and equipment related to this plant and equipment for the

Samsung Domestic Industry Products. In the first nine months of 2025, Samsung spent over \$25.4 billion on the “acquisition of property, plant and equipment.” Ex. 106 at 40 (Samsung 2025 Q3 Interim Business Report). In 2023 and 2024, Samsung spent \$42.2 billion and \$37.7 billion, respectively, on the “acquisition of property, plant and equipment.” Ex. 107 at 13 (SEC 2024 Consolidated Financial Statements). “SEA has made and continues to make cognizable investments in plant and equipment domestically related to its Galaxy domestic industry products.” Ex. 82 at 95 (Initial Determination on Violation of Section 337 and Recommended Determination on Remedy and Bond, 337-TA-1379). Further, “SEA’s domestic investments in plant and equipment . . . in the Galaxy domestic industry products are necessary to bring these products to market, and Galaxy domestic industry products are important to SEA, SEC, and the marketplace.” *Id.* at 96.

237. Regarding labor and capital, SEA employs teams of employees that carry out research, customization, readying-for-market, marketing, sales, distribution, technological advancement, service and repair, programming, customer solutions, and public affairs duties. On information and belief, Samsung has more than 20,000 employees located in the United States. Ex. 125 (Samsung Fast Facts); Ex. 113 (<https://www.linkedin.com/company/samsung-electronics-america/about/>). SEA and SRA engineers and other personnel located in the United States are engaged in the planning, development, commercialization, and support for Samsung’s Domestic Industry Products. *See, e.g.*, Ex. 126 (LinkedIn Profiles for SEA Personnel Working on Domestic Industry Products); Ex. 127 (LinkedIn Profiles for SRA Personnel Working on Samsung Video Products). SEA employs engineering and management teams in the United States responsible for developing, marketing, and selling Samsung television, tablet, computer, and other devices, including, on information and belief, the Samsung Domestic Industry Products. *See, e.g.*, Ex. 118

(SEA Careers Listing). SRA engineers and other personnel located in the United States are also engaged in the planning, development, commercialization, and support for Samsung's Domestic Industry Products. For example, SRA's U.S.-based engineers develop innovations in video technology for Samsung's smartphone, television, tablet, and other products, including, upon information and belief, for the Samsung Domestic Industry Products. *See, e.g.*, Ex. 128 (SRA: Careers (Director of Product Management, Samsung TV Plus)). According to Samsung, its technology team, "pioneer[s] to impact the globe and introduc[es] groundbreaking technology and solutions to [Samsung's] customers. Ex. 114 (<https://www.samsung.com/us/careers/>). "SEA's domestic investments in . . . labor and capital in the Galaxy domestic industry products are necessary to bring these products to market, and Galaxy domestic industry products are important to SEA, SEC, and the marketplace." Ex. 82 at 96 (Initial Determination on Violation of Section 337 and Recommended Determination on Remedy and Bond, 337-TA-1379).

238. Samsung has spent, and continues to spend, significant sums on domestic research and development activities for the Samsung Domestic Industry Products. For example, in the first three quarters of 2025, Samsung spent over approximately \$19 billion on research and development expenses. Ex. 106 at 68 (Samsung 2025 Q3 Interim Business Report). Previously, in 2023 and 2024, Samsung spent approximately \$21.6 billion and \$25.6 billion in research and development expenses, respectively. Ex. 116 at 61 (SEC 2023 Consolidated Financial Statements); Ex. 107 at 63 (SEC 2024 Consolidated Financial Statements). Samsung has affirmed that "[m]any of Samsung Electronics' products are specifically developed for and tested in the United States." Ex. 124 at ¶ 375 (Amended Complaint, 1351 Investigation). In addition, SRA conducts significant research and development activities on behalf of SEC in the United States. For example, SRA publicly states that it is "engaged in researching emerging technology to create new business and

developing core technology to enhance the competitiveness of Samsung products.” Ex. 129 (SRA LinkedIn “About” Page). SRA also publicly states that one of its activity areas is “Industry & Standards,” stating “Experts in these areas work for SRA to insure [sic] that these technologies are properly standardized and to inform, educate and support partner companies in growth of these news [sic] ways to be entertained.” Ex. 130 at 6 (SRA: Digital Media). SRA’s team “also includes many software engineers building tools to help [SRA] innovate faster and to support use by [SRA’s] partners such as in streaming and HDR creation tools.” *Id.* Moreover, SRA has a Standards and Mobility Innovation Team which it describes as “actively engaged in a broad set of global industry standards, including 3GPP, IEEE, MPEG, Matter, FiRa, CSA, CCC, etc.” Ex. 131 at 1 (SRA: Next Generation Communication). On information and belief, Samsung’s domestic investments include work toward customization of components and software involved with video coding that are incorporated into the Samsung Domestic Industry Products. Thus, on information and belief, significant portions of these expenditures are spent on research and development of the Samsung Domestic Industry Products that takes place in the United States.

239. Further, SEA invests significantly in U.S. plant, equipment, and personnel to provide carrier services, technical support and training, service, warranty, and repair to Samsung customers in the United States who have purchased the Samsung Domestic Industry Products. SEA has an ongoing partnership with uBreakiFix by Asurion that “brings same-day, in-person support to more than 300 Samsung Care Authorized uBreakiFix stores nationwide, and will continue to grow.” Ex. 132 (Samsung uBreakiFix FAQ). Samsung invests in this partnership: As a Samsung Care Authorized Service Provider, uBreakiFix technicians “have gone through the official Samsung Authorization process” and customers “are guaranteed genuine parts, and same-day repairs by certified pros using official Samsung repair tools.” *Id.*

240. Samsung also commits significant resources to advertising and sales activity for the Samsung Domestic Industry Products in the United States, one of the world’s largest consumer markets for electronic devices. *See, e.g.*, Ex. 133 (Samsung Job Postings Related to Sales and Marketing). SEA publicly states that its sales team, including its Consumer, Enterprise, and Retail Sales teams, is “[f]irst to get their hands on [Samsung’s] new devices” and “bring[s] [Samsung’s] innovations to the world by driving strong relationships with [its] customers and understanding how [its] technology empowers them.” Ex. 114 (<https://www.samsung.com/us/careers/>). The “Marketing teams bring [Samsung’s] technology to life in the marketplace.” *Id.* And the customer solutions team “ensure[s] that [Samsung’s] customers are cared for and fully empowered, protecting and supporting the invaluable core components of [Samsung’s] brand.” *Id.* Samsung has also invested extensively in expanding its stock of accumulated goods and to design, develop, engineer, sell, market, and distribute its large stock of inventory of Domestic Industry Products in the United States. Samsung reported having spent \$1.06 billion on inventories in the first nine months of 2025. Ex. 106 at 72 (Samsung 2025 Q3 Interim Business Report). Further, in 3Q25, the DX Division’s “smartphone output was 161,012 thousand units.” *Id.* at 8.

241. To that end, Samsung has spent, and continues to spend, significant sums on domestic advertising and sales activity related to the Samsung Domestic Industry Products. In the first nine months of 2025, Samsung’s expenses for advertising and sales promotion amounted to approximately \$7.53 billion. Ex. 106 at 68 (Samsung 2025 Q3 Interim Business Report). In 2024 and 2023, Samsung spent approximately \$9.33 billion and \$9.27 billion, respectively, on advertising and sales promotion expenses. Ex. 107 at 63 (SEC 2024 Consolidated Financial Statements); Ex. 116 at 62 (SEC 2023 Consolidated Financial Statements). This includes significant employment of labor for advertising and sales. In the first three quarters of 2025,

Samsung's wages and expenses specifically under the selling and administrative expenses category amounted to approximately \$4.71 billion. Ex. 106 at 68 (Samsung 2025 Q3 Interim Business Report). In 2024 and 2023, Samsung's wages and salaries expenses under the selling and administrative category amounted to approximately \$6.34 billion and \$6.37 billion, respectively. Ex. 107 at 63 (SEC 2024 Consolidated Financial Statements); Ex. 116 at 62 (SEC 2023 Consolidated Financial Statements). Samsung also maintains significant stocks of accumulated inventory and goods dedicated to the domestic industry. In the first nine months of 2025, Samsung reported its subsidiaries holding approximately \$35.6 billion in inventories, nearly half of which—approximately \$17.4 billion—is held by Samsung subsidiaries. Ex. 106 at 29-31 (Samsung 2025 Q3 Interim Business Report). More specifically, Samsung reported that its subsidiaries held \$6.8 billion in finished goods, which comprises over 73% of Samsung's overall inventories in that nine-month period. *Id.* at 56, 101. Samsung further reported having spent \$1.06 billion on inventories in the first nine months of 2025. *Id.* at 72.

242. On information and belief, significant portions of Samsung's overall investments in plant and equipment, employment of labor or capital, and investments in engineering, and research and development in the United States relate to the Samsung Domestic Industry Products. In the first nine months of 2025, Samsung reported that 59.9% of its total revenue came from its DX Division, including sales of the Samsung Domestic Industry Products. Ex. 106 at 6 (Samsung 2025 Q3 Interim Business Report). In 2024, 58.1% of SEC's total revenue came from its DX division, including sales of the Samsung Domestic Industry Products. Ex. 107 at 79 (SEC 2024 Consolidated Financial Statements).

243. In turn, SEA's revenue for the first nine months of 2025 was over approximately \$22 billion, which is approximately 13% of SEC's overall sales for that period. Ex. 106 at 49

(Samsung 2025 Q3 Interim Business Report). For the year 2024, SEA's revenue was approximately \$29.8 billion, which accounts for 13.5% of SEC's sales for the year 2024. Ex. 107 at 22 (SEC 2024 Consolidated Financial Statements). In 2023, SEA recorded \$30.2 billion in sales, which accounts for 15.2% of SEC's sales for the year 2023. Ex. 116 at 22 (SEC 2023 Consolidated Financial Statements). For all three time periods, Samsung reported that SEA was one of SEC's highest earning subsidiaries and the most significant region for sales of end user devices like the Samsung Domestic Industry Products. *See* Ex. 106 at 49 (Samsung 2025 Q3 Interim Business Report); Ex. 107 at 22 (SEC 2024 Consolidated Financial Statements); Ex. 116 at 22 (SEC 2023 Consolidated Financial Statements). Given that sales in the Americas constituted approximately 38.93% and 39.49% of Samsung's worldwide sales for the six-month periods ending September 30, 2025 and FY2024, respectively, a significant number of Samsung's overall investments detailed below are properly attributable to its operations in the United States. *See* Ex. 106 at 79-80 (Samsung 2025 Q3 Interim Business Report); Ex. 107 at 80 (SEC 2024 Consolidated Financial Statements).

244. Thus, Samsung's investments related to its Samsung Domestic Industry Products comprise a significant investment in plant and equipment, significant employment of labor or capital, and/or a substantial investment in the exploitation of the Asserted Patents through engineering and research and development, both in absolute terms and in comparison to worldwide metrics.

245. Based on at least the foregoing, and other evidence that will be provided by Samsung during the investigation, Samsung has a domestic industry related to the Samsung Domestic Industry Products that satisfies the definitions of 19 U.S.C. § 1337(a)(3)(A), (B), and (C).

- a. Samsung has significant investments in plant and equipment within the United States, including its substantial investments in the United States in facilities, plant, and equipment described above to support research, development, design, testing, sales, support, and marketing of the Samsung Domestic Industry Products to the United States.
- b. Samsung has employed significant labor and capital within the United States, including its substantial investments in engineers, professionals, and employees and other expenses described above to support research, development, design, testing, sales, support, and marketing of the Samsung Domestic Industry Products to the United States.
- c. Samsung has made substantial investments in research and development and engineering related to the Samsung Domestic Industry Products related to the exploitation of the Asserted Patents through research, design, engineering, and testing described above.

246. Samsung's domestic investments in the Samsung Domestic Industry Products are significant and substantial within the meaning of Section 337 by any reasonable metric, viewed both quantitatively and qualitatively. They are significant both in terms of importance to development and commercialization of the Domestic Industry Products and when compared to worldwide investments and sales. *See* Ex. 82 at 96-98 (Initial Determination on Violation of Section 337 and Recommended Determination on Remedy and Bond, 337-TA-1379).

247. Furthermore, Samsung releases new versions of the Domestic Industry Products on regular cadences. Ex. 134 (release dates for Galaxy Phones). On information and belief, based on the historical releases and product development timelines, Samsung has taken discrete steps on

design, research, and development for the anticipated releases. To the extent its domestic investments related to the next generation of Domestic Industry Products do not qualify as an existing industry, they are an industry in the process of being established.

248. A domestic industry therefore exists or is in the process of being established within the United States based on the activities and investments of InterDigital's domestic licensee, Samsung.

X. RELIEF REQUESTED

249. WHEREFORE, by reason of the foregoing, InterDigital respectfully requests that the United States International Trade Commission:

250. Institute an immediate investigation, pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, with respect to violations of Section 337 based upon the sale for importation into the United States, the importation into the United States, and/or the sale within the United States after importation of the Accused Products that infringe one or more claims of the Asserted Patents;

251. Determine that there has been a violation of Section 337 by each of the Respondents;

252. Issue a permanent limited exclusion order, pursuant to 19 U.S.C. § 1337(d), prohibiting entry into the United States of the Respondents' electronic devices, including the Accused Products that infringe one or more claims of the Asserted Patents;

253. Issue permanent cease and desist orders, pursuant to 19 U.S.C. § 1337(f), prohibiting the Respondents, or their parents, subsidiaries, or other affiliates, from importing, admitting or withdrawing from a foreign trade zone, marketing, advertising, demonstrating, warehousing inventory of, distributing, offering for sale, selling, licensing, repairing, programming, updating, soliciting U.S. agents or distributors for, or aiding or abetting other

entities in the importation, sale for importation, sale after importation, transfer, or distribution of Respondents' electronic devices, including the Accused Products that infringe one or more claims of the Asserted Patents;

254. Impose a bond upon Respondents to the extent they continue to import the Accused Products during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j); and

255. Grant such other and further relief as the Commission deems just and proper based on the facts determined by the investigation and the authority of the Commission.

Dated: December 18, 2025

Respectfully submitted,

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