

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

PERSONALIZED MEDIA
COMMUNICATIONS, LLC,

Plaintiff,

v.

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

Defendants.

Civil Action No. 2:15-cv-1754

JURY TRIAL DEMANDED

**PLAINTIFF’S DISCLOSURE OF ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS PURSUANT TO P.R. 3-1**

Pursuant to Patent Rule 3-1, Plaintiff Personalized Media Communications, LLC (“PMC”) hereby provides its Disclosure of Asserted Claims and Preliminary Infringement Contentions Concerning Defendants Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd. (collectively, the “Defendants” or “Samsung”). PMC reserves the right to further amend or modify its disclosures herein—including to supplement its infringement contentions pursuant to P.R. 3-6—based on additional information obtained through discovery or other means concerning the Defendants’ products or services.

I. PMC’s P.R. 3-1(a) Disclosures: Infringed Claims

Subject to ongoing discovery and investigation, PMC hereby contends that the Defendants infringe the following claims of U.S. Patent Nos. 7,747,217, 7,752,649, 7,752,650, 7,856,649, 8,675,775, 8,711,885 (“Patents-in-Suit”) under 35 U.S.C. § 271(a) by making, using, offering to sell, and/or selling in the United States and/or importing into the United States, the

Accused Instrumentalities set forth in Part II below. PMC further contends that Defendants infringe the Patents-in-Suit by (i) practicing the asserted method claims of the Patents-in-Suit in the United States, and/or (ii) by making, using, offering to sell, and/or selling in the United States and/or importing into the United States the Accused Instrumentalities set forth in Part II below, which practice the asserted method claims of the Patents-in-Suit. PMC further contends that the Defendants infringe the following claims of the Patents-in-Suit under 35 U.S.C. § 271(b) by actively and knowingly inducing, directing, causing, and encouraging others, including, but not limited to, their designers, manufacturers, suppliers, distributors, resellers, audio and video integrators and consultants, software developers, customers, end users, subscribers, and repair providers, to infringe the Patents-in-Suit by making, using, selling, and/or offering to sell in the United States, and/or importing into the United States, the Accused Instrumentalities set forth in Part II below. PMC contends that the Defendants actively and knowingly induce infringement by others by, *inter alia*, providing the aforementioned direct infringers with (i) infringing functionality and/or devices; (ii) manuals and guides, technical documentation, technical support and assistance, advertisements and marketing; and/or (iii) software and/or firmware updates. PMC reserves the right to supplement its position as to infringement following further discovery and/or claim construction.

U.S. Patent No.	Claims Infringed by Samsung Digital Televisions
7,747,217	1, 2, 3, 4, 5, 7, 9, 11, 30, 31, 32, 38
7,752,649	1, 2, 3, 7, 8, 11, 12, 13, 22, 23, 24, 26, 27, 28, 29, 39, 40, 41, 42, 45, 48, 49, 50, 51, 62, 63, 64, 67, 78, 79, 80, 81, 82, 83, 84, 88, 89, 90, 91, 92, 93, 94, 97, 98
7,752,650	1, 2, 3, 4, 9, 18, 32, 33
7,856,649	9, 10
8,675,775	2, 3, 4, 5, 6, 11, 12, 13, 14, 15, 16, 17, 18, 19, 21, 23
8,711,885	1, 9, 10, 11, 12, 13, 14, 15, 17, 21, 23, 26, 27, 100, 102, 103, 105, 106

U.S. Patent No.	Claims Infringed by Samsung Android Smartphones
8,675,775	2, 3, 6, 11, 12, 13, 14, 15, 16, 17, 18, 19, 21, 23

II. PMC's P.R. 3-1(b) Disclosures: Accused Instrumentality

Subject to ongoing discovery and investigation, and based on available information obtained to date, PMC hereby contends that the following Accused Instrumentalities infringe the Asserted Claims:

(A) Samsung digital televisions, including LED televisions such as the 9 Series (including, but not limited to, models UN46B9000 and UN55B9000), the 8 Series (including, but not limited to, models UN46B8000 and UN55B8000), the 7100 Series (including, but not limited to, models UN40B7100, UN46B7100, and UN55B7100), the 7 Series (including, but not limited to, models UN40B7000, UN46B7000, and UN55B7000), the 6 Series (including, but not limited to, models UN40B6000, UN46B6000, and UN55B6000), the 7 750 Series (including, but not limited to, models LN40750, LN46750, and LN52750), the 6 650 Series (including, but not limited to, models LN22650, LN32650, LN37650, LN40650, LN46650, and LN55650), the C9000 Series (including, but not limited to, models 46C9000 and 55C9000), the C8000 Series (including, but not limited to, models 32C8000, 40C8000, 46C8000, 55C8000, and 65C8000), the C7000 Series (including, but not limited to, models 40C7000, 46C7000, and 55C7000), the C6500 Series (including, but not limited to, models 32C6500, 37C6500, 40C6500, 46C6500, and 55C6500), the C6000 Series (including, but not limited to, models 32C6000, 37C6000, 40C6000, and 46C6000), the C5000 Series (including, but not limited to, models UA32C5000QR and UA40C5000QR), the D8000 Series (including, but not limited to, models 40D8000, 46D8000, 55D8000 and 65D8000), the D7000 Series (including, but not limited to, models 40D7000, 46D7000, 55D7000 and 65D7000), the D6500/6400 Series (including, but not limited to, models

40D6500, 46D6500, 55D6500 and 60D6500), the ES8000 Series (including, but not limited to, models UN40ES8000, UN46ES8000, UN55ES8000, and UN65ES8000), the ES7500/7000 Series (including, but not limited to, models UN46ES7500, UN55ES7500, UN60ES7500), the ES6500 Series (including, but not limited to, models UN40ES6500, UN46ES6500, UN50ES6500, UN55ES6500, and UN60ES6500), the ES6100 Series (including, but not limited to, models UN40ES6100, UN46ES6100, UN50ES6100, UN55ES6100, and UN60ES6100), the UHD S9 Series (including, but not limited to, models UN85S9AF, UN110S9BF, UN110S9VF, and UN105S9WAF), the F9000 Series (including, but not limited to, models UN65F9000 and UN55F9000), the F8000 Series (including, but not limited to, models UN46F8000, UN55F8000, UN60F8000, UN65F8000, and UN75F8000), the F7500 Series (including, but not limited to, models UN46F7500, UN55F7500, and UN60F7500), the F7100 Series (including, but not limited to, models UN46F7100, UN55F7100, UN60F7100, UN65F7100, and UN75F7100), the F6800 Series (including, but not limited to, models UN46F6800, UN50F6800, and UN55F6800), the F6400 Series (including, but not limited to, models UN46F6400, UN50F6400, UN60F6400, UN65F6400, and UN75F6400), the F5500 Series (including, but not limited to, models UN32F5500, UN40F5500, UN46F5500, and UN50F5500), the F5000 Series (including, but not limited to, models UN22F5000, UN32F5000, UN40F5000, UN46F5000, and UN50F5000), the F4000 Series (including, but not limited to, model UN19F4000), the HU9000 Series (including, but not limited to, models UN55HU9000, UN65HU9000, and UN78HU9000), the HU8700 Series (including, but not limited to, models UN55HU8700 and UN65HU8700), the HU8550 Series (including, but not limited to, models UN50HU8550, UN55HU8550, UN65HU8550, and UN75HU8550), the HU7250 Series (including, but not limited to, models UN55HU7250 and UN65HU7250), the HU6900 Series (including, but not limited to, models UN40HU6950,

UN50HU6950, and UN55HU6950), the HU8000 Series (including, but not limited to, models UN48H8000, UN55H8000, UN65H8000), the H7150 Series (including, but not limited to, models UN46H7150, UN55H7150, UN60H7150, UN65H7150, and UN75H7150), the H6400 Series (including, but not limited to, models UN40H6400, UN48H6400, UN50H6400, UN55H6400, UN60H6400, and UN65H6400), the H6350 Series (including, but not limited to, models UN32H6350, UN40H6350, UN48H6350, UN50H6350, UN55H6350, UN60H6350, and UN65H6350), the H5500 Series (including, but not limited to, models UN32H5500, UN40H5500, and UN48H5500), the H4000 Series (including, but not limited to, model UN28H4000), JS9500 (including, but not limited to, models UN65JS9500, UN78JS9500, and UN88JS9500), JS9000 (including, but not limited to, models UN48JS9000, UN558JS9000, and UN65JS0500), JS8500 (including, but not limited to, models UN48JS8500, UN55JS8500, and UN65JS8500), JS7000 (including, but not limited to, models UN50JS7000, UN55JS7000, and UN88JS7000), JU7500 (including, but not limited to, models UN48JU7500, UN55JU7500, UN65JU7500, and UN78JU7500), JU7100 (including, but not limited to, models UN40JU7100, UN50JU7100, UN55JU7100, UN60JU7100, UN65JU7100, and UN75JU7100), JU6700 (including, but not limited to, models UN40JU6700, UN48JU6700, UN55JU6700, and UN65JU6700), JU6600 (including, but not limited to, models UN40JU6600, UN48JU6600, and UN55JU6600), JU6500 (including, but not limited to, models UN40JU6500, UN48JU6500, UN50JU6500, UN55JU6500, UN60JU6500, UN65JU6500, UN75JU6500), JU6400 (including, but not limited to, models UN40JU6400, UN48JU6400, UN50JU6400, UN55JU6400, UN60JU6400, UN65JU6400, UN75JU6400), JU6300 (including, but not limited to, models UN32JU6300, UN40JU6300, UN48JU6300, UN55JU6300), and JU6200 (including, but not limited to, models UN32JU6200, UN40JU6200, UN48JU6200, UN50JU6200, UN55JU6200,

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