

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

UNILOC 2017 LLC, et al.,	§	
Plaintiffs,	§	
	§	Case No. 2:18-cv-00309-JRG
v.	§	
	§	
SAMSUNG ELECTRONICS AMERICA, INC., et al.,	§	
Defendants.		

**PLAINTIFFS’ DISCLOSURE OF ASSERTED
CLAIMS AND INFRINGEMENT CONTENTIONS**

Pursuant to P.R. 3-1 and 3-2, Plaintiffs, Uniloc USA, INC., Uniloc 2017 LLC and Uniloc Licensing USA, LLC (collectively, “Uniloc”), submit this disclosure of asserted claims and infringement contentions to Defendants, Samsung Electronics America, Inc. and Samsung Electronics Co., LTD. (collectively, “Samsung”):

I. P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions

a. Samsung infringes the claims of U.S. Patent No. 6,836,654 (“the ’654 Patent”) for at least the reasons set forth in the attached chart (Exhibit A).

b. Samsung infringes the ’654 Patent by making, using, selling, offering to sell, and importing electronic devices that utilize antitheft measures, including: Galaxy Note8, Galaxy A6+, Galaxy A6, Galaxy J7 Duo, Galaxy J7 Prime 2, Galaxy S9+, Galaxy S9, Galaxy S7, Galaxy J2 Pro, Galaxy A8, Galaxy J2, Galaxy C7, Galaxy S8 Active, Galaxy J7 V, Galaxy Note FE, Galaxy J7 MAX, Galaxy J7 Pro, Galaxy J7, Galaxy J5, Galaxy J3, Z4, Galaxy S8, Galaxy S8+, Galaxy C5 Pro, Galaxy XCover 4, Galaxy J1 mini prime, Galaxy J3 Emerge, Galaxy C7 Pro, Galaxy A7, Galaxy A5, Galaxy A5 Duos, Galaxy A3, Galaxy A9, Galaxy Grand Prime Plus, Galaxy J2 Prime, Galaxy C9 Pro, Galaxy On7, Galaxy On8, Galaxy S6, Galaxy S5, Galaxy S4, Galaxy J1, Galaxy J7, Galaxy E5, Galaxy E7, Galaxy A3, Galaxy A5, Galaxy Ace, Galaxy

Note 3, Galaxy Note Pro, Galaxy Fame, Galaxy Discover, Galaxy Premier, Galaxy Note II, Galaxy SIII, Galaxy Pocket, Galaxy S II, Galaxy S Blaze, Galaxy Attain 4G, Omnia M, Galaxy Proclaim, Z3, Galaxy Note5, Galaxy A8, Galaxy Note 4, Galaxy Avant, Galaxy Alpha, Galaxy Young, Galaxy Star, Galaxy Core, Galaxy Exhibit, Galaxy Mega, Galaxy Trend, Galaxy Win, Galaxy S LightRay, Galaxy I8250, Galaxy Appeal, Galaxy Nexus, Galaxy Note, Galaxy M Style, Galaxy I9500, Focus 2, Galaxy Note7, Galaxy mini, Galaxy J Max, Galaxy S6 edge+, Galaxy Note Edge, Galaxy W, ATIV SE, Galaxy Grand 2, Galaxy Express 2, Galaxy Light, Galaxy Y Plus, Galaxy Grand, Galaxy Rush, Galaxy Stellar, Galaxy Reverb, Focus 2, Samsung I8530 Galaxy Beam, W999, Star 3, Galaxy V, Galaxy Mega 2, Galaxy K Zoom, Galaxy Beam2 (collectively “Accused Instrumentalities”).

c. Charts identifying specifically where each element of each asserted claim is found within each of the Accused Instrumentalities are provided in Exhibit A. This claim chart is based on information currently available to Uniloc.

d. Assuming that the Court construes the claims as Uniloc has requested, Uniloc believes that each element is literally present. Uniloc may, however, revise these contentions to identify an element as present under the doctrine of equivalents if 1) the Court’s construction so requires; or 2) discovery – in particular, review of source code – reveals Samsung’s products operate differently than Uniloc had contended.

e. Uniloc will amend these contentions, if merited by information obtained through discovery, or in response to the Court’s claim construction. In particular, because many of the claim elements are software limitations, Uniloc expects to substantially revise these contentions, after completion of source code inspection, as P.R. 3-1(g) allows.

f. The asserted claims of the ’654 Patent claim priority to December 21, 1999.

II. P.R. 3-2 Document Production Accompanying Disclosure

Uniloc refers Samsung to documents labeled UNILOC_SAMSUNG-654_001 - UNILOC_SAMSUNG-654_337.

Date: November 15, 2018

Respectfully submitted,

/s/ Kevin Gannon

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ATTORNEYS FOR THE PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing document on the parties in this case by causing a copy to be sent via electronic mail to their counsel of record.

/s/ Kevin Gannon