

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

MemoryWeb, LLC,

Plaintiff

v.

Samsung Electronics Co., Ltd. (a Korean
Company) and Samsung Electronics America,
Inc.,

Defendants

Case No. 21-cv-411-ADA

JURY TRIAL DEMANDED

CASE READINESS STATUS REPORT

Plaintiff MemoryWeb, LLC and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. hereby provide the following status report in advance of the initial Case Management Conference (CMC).

FILING AND EXTENSIONS

Plaintiff's Complaint was filed on April 26, 2021. There has been one extension with respect to Defendant Samsung Electronics America, Inc. for a total of 71 days.

RESPONSE TO THE COMPLAINT

Defendants filed their Answer to the Complaint on August 5, 2021.

PENDING MOTIONS

There are no pending motions at this time.

RELATED CASES IN THIS JUDICIAL DISTRICT

Both of the patents asserted in this case are also asserted in *MemoryWeb, LLC v. Apple, Inc.*, Case No. 6:21-cv-00531-ADA, currently pending in this Judicial District.

IPR, CBM, AND OTHER PGR FILINGS

A petition seeking *inter partes* review of U.S. Pat. No. 10,621,228 (one of the asserted patents) was filed by non-party Unified Patents on the day of this filing, September 3, 2021, with the caption, *Unified Patents, LLC v. MemoryWeb, LLC*, IPR2021 -01413.

NUMBER OF ASSERTED PATENTS AND CLAIMS

Plaintiff has asserted two patents and a total of 34 claims.

APPOINTMENT OF TECHNICAL ADVISER

The Parties do not request a technical adviser to be appointed to the case to assist the Court with claim construction or other technical issues.

MEET AND CONFER STATUS

Plaintiff and Defendant conducted a meet and confer conference on September 3, 2021 and agreed to the following modifications to the schedule:

- Plaintiff to identify claims asserted: September 17, 2021;
- Plaintiff to serve preliminary infringement contentions: September 24, 2021; and
- Defendants to serve preliminary invalidity contentions: December 3, 2021.

The parties have agreed to an overall case schedule that varies from the Default Schedule by at least four weeks. The proposed scheduling order will be submitted to the Court separately.

Dated: September 3, 2021

/s/ Allan A. Kassenoff

Melissa R. Smith
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
Email: melissa@gillamsmithlaw.com

Respectfully submitted,

/s/ Arthur Gollwitzer III

Arthur Gollwitzer III
Texas Bar No. 24073336
Jackson Walker LLP
100 Congress Avenue, Suite 1100
Austin, TX 78701
Telephone: 512.236.2268
Facsimile: 512.236.2002
agollwitzer@jw.com

Richard A. Edlin
Allan A. Kassenoff
Jeffrey R. Colin
Vimal M. Kapadia
GREENBERG TRAURIG, LLP
MetLife Building, 200 Park Avenue
New York, NY 10166
Telephone: (212) 801-9200
Facsimile: (212) 801-6400
Email: edlinr@gtlaw.com
Email: kassenoffa@gtlaw.com
Email: colinj@gtlaw.com
Email: kapadiav@gtlaw.com

***Attorneys for Defendants Samsung
Electronics Co., Ltd., and Samsung
Electronics America, Inc.***

Daniel J. Schwartz (*pro hac vice*)
Zachary Sorman (*pro hac vice*)
Angelo J. Christopher (*pro hac vice*)
NIXON PEABODY LLP
70 West Madison, Suite 3500
Chicago, IL 60602-4224
Tel: 312-977-4400
djschwartz@nixonpeabody.com
achristopher@nixonpeabody.com
zsorman@nixonpeabody.com

Attorneys for Plaintiff MemoryWeb, LLC