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Pursuant to the Court’s Scheduling Order (Dkt. 20) and the Court’s Order Governing Proceedings – Patent Case (“OGP”), Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., Samsung Austin Semiconductor, LLC, Dell Technologies Inc., and Dell Inc. (collectively, “Defendants”) provide Plaintiff MyPAQ Holdings Ltd. (“Plaintiff”) with notice of Defendants’ Preliminary Invalidation Contentions. These contentions are with respect to the claims identified in Plaintiff’s Preliminary Infringement Contentions, dated November 3, 2021 to Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, LLC (collectively, “Samsung”), and Plaintiff’s Preliminary Infringement Contentions, dated November 29, 2021 to Defendants Dell Technologies Inc. and Dell Inc., (collectively “Dell”) (collectively, “Infringement Contentions”).

Plaintiff asserts that Samsung infringes the following claims:

- Claims 1-3, 6, 11-13, 16, and 19 of U.S. Pat. No. 7,675,759 (“the ’759 Patent”);
- Claims 1-3, 5-8, 10-12, 15-17, and 20 of U.S. Pat. No. 8,477,514 (“the ’514 Patent”);
- Claims 1, 2, 4-6, 10, and 13 of U.S. Pat. No. 7,403,399 (“the ’399 Patent”); and
- Claims 1, 4-9, 11, 12, 22, 25-30, 32, 33, 39, 42, 43, 46-51, 53, 54, 60, and 63 of U.S. Pat. No. 7,978,489 (“the ’489 Patent”).

Samsung contends that all such claims are invalid for the reasons described below.

Plaintiff asserts that Dell infringes the following claims:

- Claims 1, 2, 6, 11, and 16 of the ’759 Patent; and
- Claims 1-3, 5-8, 10-12, 14-17, and 19-20 of the ’514 Patent.

Dell contends that all such claims are invalid for the reasons described below.

As used in these Preliminary Invalidation Contentions, “Asserted Claims” include any and all claims asserted against the Defendants. Defendants’ submission of a common set of Preliminary Invalidation Contentions across multiple cases shall not be misconstrued as a concession

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