

# Exhibit A

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

GESTURE TECHNOLOGY PARTNERS,  
LLC,

Plaintiff

v.

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

Defendants.

CASE NO. 2:21-cv-00040-JRG  
§ (Lead Case)

CASE NO. 2:21-cv-00041-JRG  
§ (Member Case)

**JURY TRIAL DEMANDED**

**DISCLOSURE OF ASSERTED CLAIMS AND  
SUPPLEMENTAL AMENDED INFRINGEMENT CONTENTIONS**

Plaintiff Gesture Technology Partners, LLC (“GTP”) provides the following disclosure of asserted claims and amended infringement contentions pursuant to P.R. 3-1.

**P.R. 3-1(a): Identification of Infringed Claims**

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Defendants” or “Samsung”) infringe the following claims of U.S. Patent Nos. 8,194,924 (the “’924 patent”); 7,933,431 (the “’431 patent”); 8,878,949 (the “’949 patent”); and 8,553,079 (the “’079 patent”) (collectively, the “Asserted Patents”):

Asserted Patent	Infringed Claims
’924 patent	1-10, 12, and 14
’431 patent	1-4, 6-9, 11-22, 25-28, and 30
’949 patent	1, 2, 4-9, 11-14, and 16-18
’079 patent	1-6, 8-9, 11, 14, 15, 19, 21-26, 28, and 30

**P.R. 3-1(b): Identification of Accused Products**

The following chart identifies the Accused Products along with specific components found in each Accused Product that form the basis of GTP’s infringement contentions against each Accused Product. Each Accused Product identified in the below chart infringes each Infringed

Claim of the Asserted Patents, as specified in the above Identification of Infringed Claims. The Accused Products include all related software for the hardware components identified in the chart below, as well as any other hardware and software utilized by the Accused Products that is integral to either the systems that employ those hardware components or the functionalities detailed in the attached claim charts.

Phone Model <sup>1</sup>	“Cameras and/or Sensors”	“Display”	“Light Sources”	“Processors or Systems-On-Chips”	Year <sup>2</sup>
Samsung Galaxy S5	Heart Rate Sensor Gyro Sensor RGB Light/Proximity/Gesture Sensor Accelerator Sensor Hall Sensor Front Camera – S5K8B1YX03 Rear Camera – Samsung S5K2P2XX ISOCELL 16 <sup>3</sup>	5.1" Full HD (1920x1080) Super AMOLED display <sup>4</sup>	Rear flash led <sup>5</sup>	Qualcomm Snapdragon 801 Quad Core 2.5 GHz <sup>6</sup>	2014
Samsung Galaxy S6	Front Camera <sup>7</sup> – SM-G920FR051585	5.1" Quad HD Super AMOLED	Front Proximi	Samsung Exynos 7420 (64-bit, 14nm)	2015

<sup>1</sup> see [https://en.wikipedia.org/wiki/Samsung\\_Galaxy](https://en.wikipedia.org/wiki/Samsung_Galaxy)

<sup>2</sup> see <https://www.samsungsfour.com/mobiles/samsung-galaxy-smartphones-complete-model-list-released-year.html>

<sup>3</sup> see [https://downloadcenter.samsung.com/content/UM/201607/20160726025349193/USC\\_SM-G900R4\\_Galaxy\\_S5\\_EN\\_UM\\_MM\\_6.0\\_FINAL\\_WAC.pdf](https://downloadcenter.samsung.com/content/UM/201607/20160726025349193/USC_SM-G900R4_Galaxy_S5_EN_UM_MM_6.0_FINAL_WAC.pdf)

<sup>4</sup> see [https://www.gsmarena.com/samsung\\_galaxy\\_s5-6033.php](https://www.gsmarena.com/samsung_galaxy_s5-6033.php)

<sup>5</sup> see [https://downloadcenter.samsung.com/content/UM/201607/20160726025349193/USC\\_SM-G900R4\\_Galaxy\\_S5\\_EN\\_UM\\_MM\\_6.0\\_FINAL\\_WAC.pdf](https://downloadcenter.samsung.com/content/UM/201607/20160726025349193/USC_SM-G900R4_Galaxy_S5_EN_UM_MM_6.0_FINAL_WAC.pdf)

<sup>6</sup> see <https://www.qualcomm.com/snapdragon/smartphones/samsung-galaxy-s5>

<sup>7</sup> see <https://www.ifixit.com/Store/Android/Galaxy-S6-S6-Edge-Front-Camera/IF302-005?o=2>

Phone Model <sup>1</sup>	“Cameras and/or Sensors”	“Display”	“Light Sources”	“Processors or Systems-On-Chips”	Year <sup>2</sup>
	Rear Camera <sup>8</sup> – G920F_16_L  Front Proximity/Light sensor <sup>9</sup>	(2560x1440) Display <sup>10</sup>	ty/Light sensor  Top infrared port  Rear flash led <sup>11</sup>	Octa core (2.1GHz Quad + 1.5GHz Quad) <sup>12</sup>	
Samsung Galaxy S6 Edge	Front Camera <sup>7</sup> – SM-G920FR051585  Rear Camera <sup>8</sup> – G920F_16_L  Front Proximity/Light sensor  Top infrared port <sup>13</sup>	5.1” Quad HD (2560 x 1440) Super AMOLED Dual Edge Display <sup>14</sup>	Front Proximity/Light sensor  Top infrared port  Rear flash led <sup>15</sup>	Samsung Exynos 7420 (64-bit, 14nm) Octa core (2.1GHz Quad + 1.5GHz Quad) <sup>16</sup>	2015
Samsung Galaxy Note 5	Front Camera <sup>17</sup> – N920F_R06 1536  Rear Camera <sup>18</sup> – G920F_16_08	5.7” 1440 x 2560 pixel Super AMOLED Display <sup>20</sup>	Front Proximity/Light sensor	Samsung Exynos 7420 (64-bit, 14nm) Octa core (2.1GHz Quad + 1.5GHz Quad) <sup>20</sup>	2015

<sup>8</sup> see <https://gadgetfix.com/oem-samsung-galaxy-s6-g920a-g920t-g920p-g920v-back-rear-camera-module-flex-16mp-7562.html>

<sup>9</sup> see [https://downloadcenter.samsung.com/content/UM/201810/20181029152035207/SM-G920W8\\_UG\\_CA\\_Lollipop\\_ENG\\_Web.pdf](https://downloadcenter.samsung.com/content/UM/201810/20181029152035207/SM-G920W8_UG_CA_Lollipop_ENG_Web.pdf)

<sup>10</sup> see <https://gadgetfix.com/lcd-screen-touch-screen-digitizer-for-black-samsung-galaxy-s6-g920a-g920v-g920p-g920t-6942.html>

<sup>11</sup> see [https://downloadcenter.samsung.com/content/UM/201810/20181029152035207/SM-G920W8\\_UG\\_CA\\_Lollipop\\_ENG\\_Web.pdf](https://downloadcenter.samsung.com/content/UM/201810/20181029152035207/SM-G920W8_UG_CA_Lollipop_ENG_Web.pdf)

<sup>12</sup> see <https://www.ifixit.com/Teardown/Samsung+Galaxy+S6+Teardown/39174>

<sup>13</sup> see [https://downloadcenter.samsung.com/content/UM/201607/20160706032840853/G925W8\\_UG\\_CA\\_E6.pdf](https://downloadcenter.samsung.com/content/UM/201607/20160706032840853/G925W8_UG_CA_E6.pdf)

<sup>14</sup> see <https://www.ifixit.com/Store/Android/Galaxy-S6-Edge-Screen/IF302-010?o=6>

<sup>15</sup> see [https://downloadcenter.samsung.com/content/UM/201607/20160706032840853/G925W8\\_UG\\_CA\\_E6.pdf](https://downloadcenter.samsung.com/content/UM/201607/20160706032840853/G925W8_UG_CA_E6.pdf)

<sup>16</sup> see <https://www.ifixit.com/Teardown/Samsung+Galaxy+S6+Edge+Teardown/39158#s88423>

<sup>17</sup> see <https://www.ifixit.com/Store/Android/Galaxy-Note5-Front-Camera/IF321-005?o=1>

<sup>18</sup> see <https://www.ifixit.com/Store/Android/Galaxy-Note5-Rear-Camera/IF321-022?o=1>

<sup>20</sup> see <https://www.samsung.com/global/galaxy/galaxy-note5/#!/spec>

Phone Model <sup>1</sup>	“Cameras and/or Sensors”	“Display”	“Light Sources”	“Processors or Systems-On-Chips”	Year <sup>2</sup>
	Front Proximity/Light sensor  Rear Heart rate sensor <sup>19</sup>		Rear Heart rate sensor  Rear flash led <sup>21</sup>		
Samsung Galaxy S6 Active	Front Camera <sup>7</sup> – SM-G920FR051585  Rear Camera <sup>8</sup> – G920F_16_L  Front Proximity/Light sensor  Rear Heart rate sensor <sup>22</sup>	5.1” Quad HD Super AMOLED (2560x1440) Display <sup>23</sup>	Front Proximity/Light sensor  Rear Heart rate sensor  Rear flash led <sup>24</sup>	Samsung Exynos 7420 (64-bit, 14nm) Octa core (2.1GHz Quad + 1.5GHz Quad) <sup>23</sup>	2015
Samsung Galaxy S6 Edge+/ Edge+	Front Camera – SM-G920FR051505 <sup>25</sup>  Rear Camera – G920F_16M_08 <sup>26</sup>  Front Proximity/Light sensor	5.7” 2560 x 1440 (518 ppi) Quad HD Super AMOLED <sup>28</sup>	Front Proximity/Light sensor  Rear Heart rate sensor	Samsung Exynos 7420 (64-bit, 14nm) Octa core (2.1GHz Quad + 1.5GHz Quad) <sup>28</sup>	2015

<sup>19</sup> see <https://www.t-mobile.com/support/public-files/images/samsung/note-5/manual/User%20manual%20Samsung%20Galaxy%20Note5.pdf>

<sup>21</sup> see <https://www.t-mobile.com/support/public-files/images/samsung/note-5/manual/User%20manual%20Samsung%20Galaxy%20Note5.pdf>

<sup>22</sup> see [https://downloadcenter.samsung.com/content/UM/201707/20170708045603280/ATT\\_SM-G890A\\_Galaxy-S6\\_Active\\_EN\\_UM\\_N\\_7.0\\_053017\\_FINAL\\_AC.PDF](https://downloadcenter.samsung.com/content/UM/201707/20170708045603280/ATT_SM-G890A_Galaxy-S6_Active_EN_UM_N_7.0_053017_FINAL_AC.PDF)

<sup>23</sup> see <https://www.samsung.com/us/mobile/phones/galaxy-s/samsung-galaxy-s6-active-at-t-gray-sm-g890azaaatt/>

<sup>24</sup> see [https://downloadcenter.samsung.com/content/UM/201707/20170708045603280/ATT\\_SM-G890A\\_Galaxy-S6\\_Active\\_EN\\_UM\\_N\\_7.0\\_053017\\_FINAL\\_AC.PDF](https://downloadcenter.samsung.com/content/UM/201707/20170708045603280/ATT_SM-G890A_Galaxy-S6_Active_EN_UM_N_7.0_053017_FINAL_AC.PDF)

<sup>25</sup> see <https://www.replacebase.co.uk/samsung-galaxy-s6-and-s6-edge-replacement-front-camera-module-oem>

<sup>26</sup> see <https://www.fixez.com/samsung-galaxy-s6-edge-plus-rear-facing-camera>

<sup>28</sup> see <https://www.samsung.com/global/galaxy/galaxy-s6-edge-plus/#!/spec>

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