

EXHIBIT 1

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 INFRINGEMENT CONTENTIONS

Plaintiff Gesture Technology Partners, LLC (“GTP”) provides the following disclosure of asserted claims and 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	1-9, 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 ¹	“Cameras and Sensors” (referred to collectively as “Cameras”)	“Display”	“Light Sources”	“Processors or Systems-On-Chips”	Year ²
Samsung Galaxy S6	Front Camera ³ – SM-G920FR051585 Rear Camera ⁴ – G920F_16_L	5.1” Quad HD Super AMOLED (2560x1440) Display ⁵	Front Proximity/Light sensor Top infrared port Rear flash led ⁶	Samsung Exynos 7420 (64-bit, 14nm) Octa core (2.1GHz Quad + 1.5GHz Quad) ⁷	2015
Samsung Galaxy S6 Edge	Front Camera ³ – SM-G920FR051585	5.1” Quad HD (2560 x 1440) Super AMOLED	Front Proximity/Light sensor	Samsung Exynos 7420 (64-bit, 14nm) Octa core (2.1GHz Quad + 1.5GHz Quad) ¹⁰	2015

¹ see https://en.wikipedia.org/wiki/Samsung_Galaxy

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

³ see <https://www.ifixit.com/Store/Android/Galaxy-S6-S6-Edge-Front-Camera/IF302-005?o=2>

⁴ see <https://gadgetfix.com/oem-samsung-galaxy-s6-g920a-g920t-g920p-g920v-back-rear-camera-module-flex-16mp-7562.html>

⁵ see <https://gadgetfix.com/lcd-screen-touch-screen-digitizer-for-black-samsung-galaxy-s6-g920a-g920v-g920p-g920t-6942.html>

⁶ see https://downloadcenter.samsung.com/content/UM/201810/20181029152035207/SM-G920W8_UG_CA_Lollipop_ENG_Web.pdf

⁷ see <https://www.ifixit.com/Teardown/Samsung+Galaxy+S6+Teardown/39174>

¹⁰ see <https://www.ifixit.com/Teardown/Samsung+Galaxy+S6+Edge+Teardown/39158#s88423>

Phone Model ¹	“Cameras and Sensors” (referred to collectively as “Cameras”)	“Display”	“Light Sources”	“Processors or Systems-On-Chips”	Year ²
	Rear Camera ⁴ – G920F_16_L	Dual Edge Display ⁸	Top infrared port Rear flash led ⁹		
Samsung Galaxy Note 5	Front Camera ¹¹ – N920F_R061536 Rear Camera ¹² – G920F_16_08	5.7” 1440 x 2560 pixel Super AMOLED Display ¹³	Front Proximity/Light sensor Rear Heart rate sensor Rear flash led ¹⁴	Samsung Exynos 7420 (64-bit, 14nm) Octa core (2.1GHz Quad + 1.5GHz Quad) ¹³	2015
Samsung Galaxy S6 Active	Front Camera ³ – SM-G920FR051585 Rear Camera ⁴ – G920F_16_L	5.1” Quad HD Super AMOLED (2560x1440) Display ¹⁵	Front Proximity/Light sensor Rear Heart rate sensor Rear flash led ¹⁶	Samsung Exynos 7420 (64-bit, 14nm) Octa core (2.1GHz Quad + 1.5GHz Quad) ¹⁵	2015

⁸ see <https://www.ifixit.com/Store/Android/Galaxy-S6-Edge-Screen/IF302-010?o=6>

⁹ see https://downloadcenter.samsung.com/content/UM/201607/20160706032840853/G925W8_UG_CA_E6.pdf

¹¹ see <https://www.ifixit.com/Store/Android/Galaxy-Note5-Front-Camera/IF321-005?o=1>

¹² see <https://www.ifixit.com/Store/Android/Galaxy-Note5-Rear-Camera/IF321-022?o=1>

¹³ see <https://www.samsung.com/global/galaxy/galaxy-note5/#!/spec>

¹⁴ see <https://www.t-mobile.com/support/public-files/images/samsung/note-5/manual/User%20manual%20Samsung%20Galaxy%20Note5.pdf>

¹⁵ see <https://www.samsung.com/us/mobile/phones/galaxy-s/samsung-galaxy-s6-active-at-t-gray-sm-g890azaaatt/>

¹⁶ see https://downloadcenter.samsung.com/content/UM/201707/20170708045603280/ATT_SM-G890A_Galaxy-S6 Active EN UM N 7.0 053017 FINAL AC.PDF

Phone Model ¹	“Cameras and Sensors” (referred to collectively as “Cameras”)	“Display”	“Light Sources”	“Processors or Systems-On-Chips”	Year ²
Samsung Galaxy S5 Neo	Front Camera – 5 MP, f/1.9, 23mm (wide) Rear Camera – 16 MP, f/1.9, 31mm (standard), AF ¹⁷	5.1” 1080 x 1920 pixel Super AMOLED Display ¹⁷	Front Proximity/Light/Gesture sensor Rear flash led ¹⁸	Samsung Exynos 7580 Octa ¹⁷	2015
Samsung Galaxy S6 Edge+/S6 Edge+ Duos	Front Camera – SM-G920FR05 1505 ¹⁹ Rear Camera – G920F_16M08 ²⁰	5.7” 2560 x 1440 (518 ppi) Quad HD Super AMOLED ²¹	Front Proximity/Light sensor Rear Heart rate sensor Rear flash led ²²	Samsung Exynos 7420 (64-bit, 14nm) Octa core (2.1GHz Quad + 1.5GHz Quad) ²¹	2015
Samsung Galaxy Tab A 8.0 (2015) ²³	Rear Camera: 8 MP, f/1.9, AF, LED flash, HDR Front Camera: 5 MP	1024x768 LCD		Quad-Core 1.2 GHz ARM Cortex-A53	
Samsung Galaxy S7/	Front Camera – Samsung	5.1” Quad HD (2560 x 1440)	Front Proximity	Global: Samsung Exynos 8890 Octa-core (4x2.3 GHz	2016

¹⁷ see https://www.gsmarena.com/samsung_galaxy_s5_neo-6506.php

¹⁸ see https://downloadcenter.samsung.com/content/UM/201607/20160706031524520/G903W_UG_CA_E2a.pdf

¹⁹ see <https://www.replacebase.co.uk/samsung-galaxy-s6-and-s6-edge-replacement-front-camera-module-oem>

²⁰ see <https://www.fixez.com/samsung-galaxy-s6-edge-plus-rear-facing-camera>

²¹ see <https://www.samsung.com/global/galaxy/galaxy-s6-edge-plus/#!/spec>

²² see https://downloadcenter.samsung.com/content/UM/201708/20170802034814167/TMO_SM-G928T_Galaxy_S6-Edge-Plus_EN_UM_N_7.0_060817_FINAL_AC.pdf

²³ see https://en.wikipedia.org/wiki/Samsung_Galaxy_Tab_A_8.0

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.