



potential customers located in Texas, including in the Judicial District of the Eastern District of Texas.

3. Defendant Samsung Electronics America is a corporation organized under the laws of New York, with its principal place of business at 85 Challenger Road, Ridgefield Park, NJ 07660. Upon information and belief, Samsung Electronics America has corporate offices in the Eastern District of Texas at 1303 East Lookout Drive, Richardson, Texas 75082 and 2800 Technology Drive, Suite 200, Plano, Texas 75074. Samsung Electronics America has publicly indicated that in early 2019, it would be centralizing multiple offices in a new location in the Eastern District of Texas at the Legacy Central office campus, located at 6225 Declaration Drive, Plano, Texas 75023. Samsung Electronics America may be served with process in Texas through its registered agent CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136.

### **JURISDICTION**

4. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.* This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has specific and personal jurisdiction over each of the Defendants consistent with the requirements of the Due Process Clause of the United States Constitution and the Texas Long Arm Statute. Upon information and belief, each Defendant has sufficient minimum contacts with the forum because each Defendant transacts substantial business in the State of Texas and in this Judicial District. Further, each Defendant has, directly or through subsidiaries or intermediaries, committed and continues to commit acts of patent infringement in

the State of Texas and in this Judicial District as alleged in this Complaint, as alleged more particularly below.

6. Venue is proper in this Judicial District pursuant to 28 U.S.C. §§ 1400(b) and 1391(b) and (c) because each Defendant is subject to personal jurisdiction in this Judicial District, has committed acts of patent infringement in this Judicial District, and is either a foreign company or has a regular and established place of business in this Judicial District. Venue is proper in this Judicial District as to Samsung Electronics, specifically, pursuant to 28 U.S.C. § 1391 because, among other things, Samsung Electronics is not a resident in the United States, and thus may be sued in any judicial district pursuant to 28 U.S.C. § 1391(c)(3). Each Defendant, through its own acts and/or through the acts of each other Defendant, makes, uses, sells, and/or offers to sell infringing products within this Judicial District, regularly does and solicits business in this Judicial District, and has the requisite minimum contacts with the Judicial District such that this venue is a fair and reasonable one. Further, upon information and belief, the Defendants have admitted or not contested proper venue in this Judicial District in other patent infringement actions.

#### **PATENTS-IN-SUIT**

7. On October 31, 2017, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,804,678 (the “’678 Patent”) entitled “Method and Circuit for Switching a Wristwatch from a First Power Mode to a Second Power Mode”. A true and correct copy of the ’678 Patent is available at: <http://pdfpiw.uspto.gov/.piw?Docid=9804678>.

8. On February 5, 2019, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,198,085 (the “’085 Patent”) entitled “Method and Circuit for Switching a Wristwatch from a First Power Mode to a Second Power Mode”. A true and correct copy of the ’085 Patent is available at: <http://pdfpiw.uspto.gov/.piw?Docid=10198085>.

9. On November 19, 2013, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,588,033 (the “’033 Patent”) entitled “Wristwatch with Electronic Display”. A true and correct copy of the ’033 Patent is available at: <http://pdfpiw.uspto.gov/.piw?Docid=8588033>.

10. On May 16, 2017, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,651,922 (the “’922 Patent”) entitled “Wristwatch with a Touch Screen and Method for Displaying on a Touch-Screen Watch”. A true and correct copy of the ’922 Patent is available at: <http://pdfpiw.uspto.gov/.piw?Docid=9651922>.

11. Slyde is the sole and exclusive owner of all right, title, and interest in the ’678 Patent, the ’085 Patent, the ’033 Patent, and the ’922 Patent, (collectively, the “Patents-in-Suit”), and holds the exclusive right to take all actions necessary to enforce its rights to the Patents-in-Suit, including the filing of this patent infringement lawsuit. Slyde also has the right to recover all damages for past, present, and future infringement of the Patents-in-Suit and to seek injunctive relief as appropriate under the law.

12. Slyde has at all times complied with the marking provisions of 35 U.S.C. § 287 with respect to the Patents-in-Suit. Upon information and belief, prior assignees and licensees have also complied with the marking provisions of 35 U.S.C. § 287.

### **FACTUAL ALLEGATIONS**

13. The Patents-in-Suit generally relate to methods and apparatuses related to wristwatches with a digital display.

14. The ’678 Patent and ’085 Patent relate to technology involving a wristwatch with a display that can operate in a plurality of power modes, where the wristwatch switches from a first power mode to a second power mode upon the detection of a gesture such as a wrist movement.

The technology described in the '678 Patent and '085 Patent was developed by Swiss watch engineers Alex Bezinge, Adrian Mohni, Daniel Pfeifer, and Musa Dogan. For example, the technology is implemented by infringing smartwatches with a digital display including, not limited to, the Samsung Galaxy Watch Active, Samsung Galaxy Watch Active2, Samsung Galaxy Watch, Samsung Galaxy Watch3, Samsung Galaxy Watch4, Samsung Galaxy Watch4 Classic, Samsung Galaxy Watch5, and Samsung Galaxy Watch5 Pro.

15. The '033 Patent relates to technology involving a wristwatch with an electronic display that displays a simulation of the internal movement of a mechanical watch. The technology described in the '033 Patent was developed by famed watch designers Pascal Pozzo Di Borgo and Jorg Hysek. For example, the technology is implemented by infringing smartwatches with a digital display including, not limited to, the Samsung Galaxy Watch Active, Samsung Galaxy Watch Active2, Samsung Galaxy Watch, Samsung Galaxy Watch3, Samsung Galaxy Watch4, Samsung Galaxy Watch4 Classic, Samsung Galaxy Watch5, and Samsung Galaxy Watch5 Pro.

16. The '922 Patent relates to technology involving a wristwatch with a digital matrix display, a sheet of touch-sensitive glass, and a processing circuit for interpreting signals from the touch-sensitive glass in order to make changes to what is displayed on the digital matrix display. The technology described in the '922 Patent was developed by famed watch designers Pascal Pozzo Di Borgo and Jorg Hysek. For example, the technology is implemented by infringing smartwatches with a digital display including, not limited to, the Samsung Galaxy Watch Active, Samsung Galaxy Watch Active2, Samsung Galaxy Watch, Samsung Galaxy Watch3, Samsung Galaxy Watch4, Samsung Galaxy Watch4 Classic, Samsung Galaxy Watch5, and Samsung Galaxy Watch5 Pro.

17. Samsung has infringed and is continuing to infringe the Patents-in-Suit by making,

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