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

SLYDE ANALYTICS LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD. and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Case No. 2-23-cv-00083-RWS-RSP **JURY TRIAL DEMANDED**

SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.'S ANSWER, AFFIRMATIVE DEFENSES, AND COUNTERCLAIMS

Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (collectively, "Samsung") submit this Answer, Affirmative Defenses, and Counterclaims to the Complaint filed February 8, 2023, by Plaintiff Slyde Analytics LLC ("Plaintiff" or "Slyde"). Except as hereinafter specifically admitted, qualified, or affirmatively alleged, Samsung denies each and every allegation, matter, or thing contained in the Complaint and states in response to each of the numbered paragraphs of said Complaint as follows:

THE PARTIES

1. Samsung is without sufficient information or knowledge to form a belief as to the truth of the allegations of Paragraph 1 and therefore denies them.

2. Samsung admits that SEC is a corporation organized under the laws of the Republic of Korea. Samsung admits that SEC has a place of business at 129 Samsung-Ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, 443-742, Republic of Korea. Samsung admits that SEC manufactures certain smartphones that are sold in the United States, including in Texas, and other markets,

including certain products accused in the Complaint. Samsung admits that SEA distributes certain smartphones in the United States. Samsung denies any remaining allegations in Paragraph 2 of the Complaint, and specifically denies that it has committed or is committing any act of patent infringement.

3. Samsung admits that SEA is a corporation organized under the laws of New York. Samsung admits that SEA has a principal place of business at 85 Challenger Rd., Ridgefield Park, New Jersey 07660. Samsung admits that SEA has offices located at 6225 Declaration Drive, Plano, Texas 75023. Samsung admits that SEA may be served with process in Texas through its registered agent CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3136. Samsung denies any remaining allegations in Paragraph 3 of the Complaint.

JURISDICTION

4. Samsung admits that the Complaint purports to make claims under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.* Samsung admits, for purposes of this action only, that this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a). Samsung denies any remaining allegations in Paragraph 4 of the Complaint, and specifically denies that it has committed or is committing any act of patent infringement.

5. Samsung, for purposes of this action only, will not challenge personal jurisdiction in this Court. Samsung denies that it has committed or is committing any act of patent infringement. Samsung denies any remaining allegations in Paragraph 5 of the Complaint.

6. Samsung, for purposes of this action only, will not challenge that venue over Samsung properly lies in this District. Samsung admits that it has not contested venue in this District in certain other cases, but only for purposes of those other cases. Samsung denies any

remaining allegations in Paragraph 6 of the Complaint, and specifically denies that it has committed or is committing any act of patent infringement.

PATENTS-IN-SUIT

7. Samsung admits that, on its face, the '678 Patent is entitled "Method and Circuit for Switching a Wristwatch from a First Power Mode to a Second Power Mode" and includes an issuance date of October 31, 2017. Samsung admits a copy of the '678 Patent is available at the USPTO website. Samsung denies that the USPTO duly and legally issued the '678 Patent. Samsung denies any remaining allegations in Paragraph 7 of the Complaint.

8. Samsung admits that, on its face, the '085 Patent is entitled "Method and Circuit for Switching a Wristwatch from a First Power Mode to a Second Power Mode" and includes an issuance date of February 5, 2019. Samsung admits a copy of the '085 Patent is available at the USPTO website. Samsung denies that the USPTO duly and legally issued the '085 Patent. Samsung denies any remaining allegations in Paragraph 8 of the Complaint.

9. Samsung admits that, on its face, the '033 Patent is entitled "Wristwatch with Electronic Display" and includes an issuance date of November 19, 2013. Samsung admits a copy of the '033 Patent is available at the USPTO website. Samsung denies that the USPTO duly and legally issued the '033 Patent. Samsung denies any remaining allegations in Paragraph 9 of the Complaint.

10. Samsung admits that, on its face, the '922 Patent is entitled "Wristwatch with a Touch Screen and Method for Displaying on a Touch-Screen Watch" and includes an issuance date of May 16, 2017. Samsung admits a copy of the '922 Patent is available at the USPTO website. Samsung denies that the USPTO duly and legally issued the '922 Patent. Samsung denies any remaining allegations in Paragraph 10 of the Complaint.

11. Samsung is without sufficient information or knowledge to form a belief as to the truth of the allegations of Paragraph 11 of the Complaint and therefore denies them.

12. Samsung is without sufficient information or knowledge to form a belief as to the truth of the allegations of Paragraph 12 of the Complaint and therefore denies them.

FACTUAL ALLEGATIONS

13. Samsung is without sufficient information or knowledge to form a belief as to the truth of the allegations of Paragraph 13 of the Complaint and therefore denies them.

14. Samsung denies that any Samsung products infringe, literally and/or under the doctrine of equivalents, any claim of the '678 or '085 Patents. Samsung is without sufficient information or knowledge to form a belief as to the truth of the remaining allegations of Paragraph 14 of the Complaint and therefore denies them.

15. Samsung denies that any Samsung products infringe, literally and/or under the doctrine of equivalents, any claim of the '033 Patent. Samsung is without sufficient information or knowledge to form a belief as to the truth of the remaining allegations of Paragraph 15 of the Complaint and therefore denies them.

16. Samsung denies that any Samsung products infringe, literally and/or under the doctrine of equivalents, any claim of the '922 Patent. Samsung is without sufficient information or knowledge to form a belief as to the truth of the remaining allegations of Paragraph 16 of the Complaint and therefore denies them.

17. Samsung denies the allegations in Paragraph 17 of the Complaint, and specifically denies that it has committed or is committing any act of patent infringement.

COUNT I
(Alleged Infringement of the '678 Patent)

18. Samsung incorporates by reference its responses to Paragraph 1-17 as if set forth fully herein.

19. Samsung is without sufficient information or knowledge to form a belief as to the truth of the allegations of Paragraph 19 of the Complaint and therefore denies them.

20. Samsung denies the allegations in Paragraph 20 of the Complaint, and specifically denies that it has committed or is committing any act of patent infringement.

21. Samsung denies the allegations in Paragraph 21 of the Complaint, and specifically denies that it has committed or is committing any act of patent infringement.

22. The allegations in Paragraph 22 set forth legal conclusions, to which no response is required. To the extent a response is required, Samsung denies the allegations in Paragraph 22.

23. The allegations in Paragraph 23 set forth legal conclusions, to which no response is required. To the extent a response is required, Samsung denies the allegations in Paragraph 23.

24. The allegations in Paragraph 24 set forth legal conclusions, to which no response is required. To the extent a response is required, Samsung denies the allegations in Paragraph 24.

25. The allegations in Paragraph 25 set forth legal conclusions, to which no response is required. To the extent a response is required, Samsung denies the allegations in Paragraph 25.

26. The allegations in Paragraph 26 set forth legal conclusions, to which no response is required. To the extent a response is required, Samsung denies the allegations in Paragraph 26.

27. Samsung denies the allegations in Paragraph 27 of the Complaint, and specifically denies that it has committed or is committing any act of patent infringement.

28. Samsung denies the allegations in Paragraph 28 of the Complaint, and specifically denies that it has committed or is committing any act of patent infringement.

DOCKET ALARM

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.