

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

ANCORA TECHNOLOGIES, INC.,

Plaintiff,

v.

LG ELECTRONICS INC. and LG
ELECTRONICS U.S.A., INC.,

Defendants.

CIVIL ACTION NO. 1:20-CV-00034-ADA

JURY TRIAL DEMANDED

ANCORA TECHNOLOGIES, INC.,

Plaintiff,

v.

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

Defendants.

CIVIL ACTION NO. 1:20-CV-00034-ADA

JURY TRIAL DEMANDED

**NOTICE OF FILING UNDER SEAL
ANCORA'S OPPOSITION TO SAMSUNG'S MOTION FOR SUMMARY JUDGMENT
AND RELATED EXHIBITS**

Pursuant to Judge Albright's STANDING ORDER REGARDING FILING DOCUMENTS UNDER SEAL IN PATENT CASES (Feb. 12, 2021), Plaintiff Ancora Technologies, Inc. ("Ancora"), by and through its undersigned counsel, provides notice upon all parties in this proceeding that Ancora has filed under seal Ancora's Opposition to Samsung's Motion For Summary Judgment and the exhibits listed in the table below and identified in the right-hand column as being filed under seal. The Opposition and the identified exhibits contain excerpts of or are documents that have been designated as Confidential and/or Attorneys' Eyes Only under the Protective Order entered in this case. *See* D.I. 43.

Ex.	Description (Short Title / Full Name)	Under Seal
1	Reasons for Allowance of '941 Patent (Mar. 28, 2002)	
2	Plaintiff's Preliminary Infringement Contentions	
3	Email Exchange re: RE: Ancora Technologies, Inc. v LG Electronics, Inc., et al: Claim Terms for Construction	
4	Samsung Petition for IPR Review (June 25, 2020)	
5	U.S. Patent No. 5,935,243 (Hasebe)	
6	Declaration of Erez Zadok, Ph.D. In Support of Samsung Petition for IPR (June 25, 2020)	
7	Expert Report of Dr. David Martin ("Main Report") (Nov. 20, 2020)	*
8	Expert Report of Dr. David Martin, Phones & Tablets ("Phone Report") (Nov. 20, 2020)	*
9	Expert Report of Dr. David Martin, Smart TVs ("TV Report") (Nov. 20, 2020)	*
10	Deposition Transcript of Miki Mullor / Ancora (Nov. 2, 2020)	*
11	U.S. Patent No. 6,411,941 ('941 Patent)	
12	<i>Markman</i> Order in <i>Ancora Techs., Inc. v. TCT Mobile (US) Inc.</i> , SACV 19-2192-GW-ADSx (N.D. Cal.)	
13	Simson L. Garfinkel, <i>Forensic Feature Extraction and Cross-Drive Analysis</i> , Digital Investigation 3S (2006)	
14	Amendment, '941 Patent Application (May 21, 2001)	

15	<i>Markman</i> Hearing Transcript, <i>Ancora Techs., Inc. v. Samsung Electronics Co., Ltd. et al.</i> , 20-CV-0034-ADA (May 29, 2020)	
16	SAMSUNG_ANCORA_0285277 (Qualcomm document)	*
17	Deposition Transcript of M. Schiksnis (Samsung 30(b)(6)) (Nov. 3, 2020)	*
18	SAMSUNG_ANCORA_0285814 (Qualcomm document re: booting)	*
19	Deposition Transcript of Dr. David Martin Vol. 1 (Ancora Expert) (Jan. 14, 2021)	*
20	U.S. PTAB Denial of HTC Petition for CBM Review, CBM2017-00054 (Dec. 1, 2017)	
21	End User License Agreement for Samsung Software (Ex. 86 to Shin Dep.)	
22	Deposition Transcript of Dr. David Martin Vol. II (Ancora Expert) (Jan. 15, 2021)	*
23	Expert Rebuttal Report of Dr. Scott Nettles (Samsung) (Dec. 21, 2020)	*
24	Deposition Transcript of Kyoung-Heun Shin (Samsung 30(b)(6)) (Nov. 11, 2020)	*
25	Supp. Expert Report of Dr. David Martin RE: Pseudo-Unique Key (Feb. 17, 2021)	*
26	Ancora Final Infringement Contentions (Mobile)	*
27	Ancora Final Infringement Contentions (TV)	*
28	SAMSUNG_ANCORA_0000655 (Samsung Galaxy User Manual)	
29	SAMSUNG_ANCORA_0306874 (End User License Agreement for Software)	*
30	SAMSUNG_ANCORA_0291769 (Day 2 FOTA Presentation)	*
31	SAMSUNG_ANCORA_0015306 (FOTA Introduction / Android)	*
32	Expert Report of Robert Mills (“Mills Report”) (Nov. 20, 2020)	*
33	SAMSUNG_ANCORA_0290949 (Samsung Firmware Over the Air Updates)	*
34	Deposition Transcript of Pooja Vig (Samsung 30(b)(6)) (Nov. 12, 2020)	*
35	Deposition Transcript of Kanghwa Lee (Samsung 30(b)(6)) (Nov. 4, 2020)	*
36	SAMSUNG_ANCORA_0291936 (FOTA Introduction)	*
37	Update the Software on Your Samsung Smart TV	

38	Samsung's Suppl. Responses to Ancora's 5th ROG's (Nos. 14-16) (Oct. 1, 2020)	*
39	Samsung's Responses to Ancora's 1st RFAs (Nos. 1-42) (Nov. 19, 2020)	*
40	Akamai Acceptable Use Policy	
41	Expert Report of Dr. Steven R. Kursh (Samsung) (Dec. 21, 2020)	*
42	SMSG_ATT_0009374 (Samsung/AT&T Agreement)	*
43	SAMSUNG_ANCORA_0308660 (Samsung/Verizon Agreement)	*
44	Deposition Transcript of Imad Siddiqui (Samsung 30(b)(6)) (Nov. 10, 2020)	*
45	SAMSUNG_ANCORA_0281281 (Samsung FOTA documents)	*
46	ANCORA_00000502 (Settlement Agreement)	*
47	U.S. Patent No. 6,185,678 (Arbaugh)	
48	Expert Rebuttal Report of Dr. David Martin (Dec. 21, 2020)	*
49	ANCORA_00000014 (MyBIOS.VxD)	*
50	Deposition Transcript of So Hyun Ryu (Samsung 30(b)(6)) (Nov. 5, 2020)	*
51	SAMSUNG_ANCORA_0235605 (Samsung BYOD document)	*
52	SAMSUNG_ANCORA_0182373 (Samsung marketing document)	*
53	Samsung's Suppl. Responses to Ancora's 6th ROG's (Nos. 17-18) (Nov. 13, 2020)	*
54	Samsung's 3d Suppl. Responses to Ancora's 1st ROG's (Nos. 1-10) (Nov. 13, 2020)	*
55	SAMSUNG_ANCORA_0305016 (Samsung/Limelight document)	*
56	Amazon Web Services AWS Customer Agreement (Kursh Dep. Ex. 135)	
57	Amazon Web Services AWS Change Log (Kursh Dep. Ex. 136)	
58	Microsoft Online Subscription Agreement (Kursh Dep. Ex. 138)	
59	SAMSUNG_ANCORA_0304367 (Samsung/Verizon document)	*

Date: February 17, 2021

/s/ Steven M. Seigel

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