

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

VASU HOLDINGS, LLC, a Texas Corporation,)	
)	
Plaintiff,)	Case No. 2:24-cv-00034-JRG-RSP
)	
v.)	
)	
SAMSUNG ELECTRONICS CO., LTD., a Korean Corporation, and SAMSUNG ELECTRONICS AMERICA, INC., a New York Corporation,)	
)	
Defendants.)	
)	

PLAINTIFF VASU HOLDINGS, LLC’S DISCLOSURE OF ASSERTED CLAIMS AND AMENDED INFRINGEMENT CONTENTIONS

Pursuant to Local Patent Rule 3-1(a), 3-6(a)(1), Dkt. No. 29 (Discovery Order), and Dkt. No. 46 (Order on Joint Motion to Focusing Patent Claims and Prior Art to Reduce Costs), Plaintiff Vasu Holdings, LLC (“Vasu”) makes the following Disclosure of Asserted Claims and Amended Infringement Contentions (“Amended ICs”) to Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc., (“Defendants”), including the claim charts attached hereto as Appendix B-1, Appendix D-1, Appendix E-1, and Appendix F-1 (the “Appendices”) for each of the Accused Products of U.S. Patent Nos. 8,886,181 (the “181 Patent”), 10,206,154 (the “154 Patent”), 10,368,281 (the “281 Patent”), and 10,419,996 (the “996 Patent”) (collectively, the “Asserted Patents”).

Vasu amends its First Supplemental Infringement Contentions (Dkt. Nos. 52-53) after reviewing this Court’s Claim Construction Order and identifying newly discovered information during depositions including source code. Accordingly, Vasu reserves the right to amend,

modify, supplement and/or amend these Amended ICs, as appropriate, if discovery is provided to address any additional information.

I. 3-1(a). Identification of Each Claim in Suit

Based on the information presently known to Vasu and the Court’s claim construction, Vasu provides the following contentions pursuant to Patent Local Rules 3-1(a): Defendant has infringed and continues to infringe Claims 1, 3, 4, 8, and 9 of the ’181 Patent, Claim 1 of the ’154 Patent, Claims 1, 12, 23, 37, and 45 of the ’281 Patent, and Claims 1, 12, 23, 35, and 41 of the ’996 Patent (collectively, the “Asserted Claims”). Defendants have directly infringed and continue to directly and indirectly infringe the Asserted Claims pursuant to 35 U.S.C. § 271(a).

II. 3-1(b). Identification of Accused Instrumentalities

Based on the information presently known to Vasu, Vasu provides the following contentions pursuant to Patent Local Rule 3-1(b):

U.S. Pat. No. 8,886,181
<p>The Accused Products are mobile phones in Galaxy A Series, J Series, Note Series, S Series, XCover Series, and Z Series that infringe through their “Switch to mobile data,” “Smart Network Switch,” “Adaptive Wi-Fi,” and “Wi-Fi Calling” technologies. The Accused Products include:</p> <ul style="list-style-type: none">• Galaxy A Series (“A Series”): A01, A02s, A03s, A10e, A11, A12, A13, A13 5G, A14 5G, A20, A21, A23 5G, A32 5G, A42 5G, A50, A51, A51 5G, A52 5G, A53 5G, A54 5G, A71 5G• Galaxy J Series (“J Series”): J2, J3, J3 Top, J7, J7 Pop, J7 Top• Galaxy Note Series (“Note”): Note 8, Note 9, Note 10, Note 10+, Note 10+ 5G, Note 20 5G, Note 20, Note 20 Ultra 5G, Note 20 Ultra• Galaxy S Series (“S Series”): S6, S6 Active, S6 Edge, S6 Edge+, S7, S7 Active, S7 Edge, S8, S8 Active, S8+, S9, S9+, S10, S10 5G, S10 Lite, S10e, S10+, S20 Ultra, S20 Ultra 5G, S20+, S20+ 5G, S20, S20 5G, S20 FE, S20 FE 5G, S21, S21 5G, S21 Ultra, S21 Ultra 5G, S21+, S21+ 5G, S21 FE, S21 FE 5G, S22, S22 5G, S22+, S22 Ultra, S23, S23 5G, S23 Ultra, S23+, S23 FE, S24, S24 FE, S24+, S24 Ultra• Galaxy XCover Series (“XCover”): XCover, XCover Pro, XCover Pro 2, X Cover FieldPro, XCover 6 Pro• Galaxy Z Series (“Z Series”): Z Flip, Z Flip 5G, Z Fold2, Z Fold3, Z Flip3 5G, Z Fold4, Z Flip4, Z Flip4 5G, Z Flip5, Z Fold5, Z Fold6, Z Flip6

Defendants infringe the asserted claims (Claims 1, 3, 4, 8, 9) of the '181 Patent through direct infringement, inducement of infringement, and contributory infringement. The Accused Products all include technology that operates the same concerning the claims asserted.

U.S. Pat. No. 10,206,154

The Accused Products are mobile phones in Galaxy A Series, J Series, Note Series, S Series, XCover Series that infringe through their “Switch to mobile data,” “Smart Network Switch,” “Adaptive Wi-Fi,” “Wi-Fi Calling,” and “Auto Wi-Fi” technologies. The Accused Products include:

- Galaxy A Series (“A Series”): A01, A02s, A03s, A10e, A11, A12, A13, A13 5G, A14 5G, A20, A21, A23 5G, A32 5G, A42 5G, A50, A51, A51 5G, A52 5G, A53 5G, A54 5G, A71 5G
- Galaxy J Series (“J Series”): J2, J3, J3 Top, J7, J7 Pop, J7 Top
- Galaxy Note Series (“Note”): Note 8, Note 9, Note 10, Note 10+, Note 10+ 5G, Note 20 5G, Note 20, Note 20 Ultra 5G, Note 20 Ultra
- Galaxy S Series (“S Series”): S6, S6 Active, S6 Edge, S6 Edge+, S7, S7 Active, S7 Edge, S8, S8 Active, S8+, S9, S9+, S10, S10 5G, S10 Lite, S10e, S10+, S20 Ultra, S20 Ultra 5G, S20+, S20+ 5G, S20, S20 5G, S20 FE, S20 FE 5G, S21, S21 5G, S21 Ultra, S21 Ultra 5G, S21+, S21+ 5G, S21 FE, S21 FE 5G, S22, S22 5G, S22+, S22 Ultra, S23, S23 5G, S23 Ultra, S23+, S23 FE, S24, S24 FE, S24+, S24 Ultra
- Galaxy XCover Series (“XCover”): XCover, XCover Pro, XCover Pro 2, X Cover FieldPro, XCover 6 Pro
- Galaxy Z Series (“Z Series”): Z Flip, Z Flip 5G, Z Fold2, Z Fold3, Z Flip3 5G, Z Fold4, Z Flip4, Z Flip4 5G, Z Flip5, Z Fold5, Z Fold6, Z Flip6

Defendants infringe the asserted Claim 1 of the '154 Patent through direct infringement, inducement of infringement, and contributory infringement. The Accused Products all include technology that operates the same concerning the claims asserted.

U.S. Pat. No. 10,368,281

The Accused Products are mobile phones in Galaxy A Series, J Series, Note Series, S Series, XCover Series, and Z Series that infringe through their “Switch to mobile data,” “Smart Network Switch,” “Adaptive Wi-Fi,” and “Wi-Fi Calling” technologies. The Accused Products include:

- Galaxy A Series (“A Series”): A01, A02s, A03s, A10e, A11, A12, A13, A13 5G, A14 5G, A20, A21, A23 5G, A32 5G, A42 5G, A50, A51, A51 5G, A52 5G, A53 5G, A54 5G, A71 5G
- Galaxy J Series (“J Series”): J2, J3, J3 Top, J7, J7 Pop, J7 Top
- Galaxy Note Series (“Note”): Note 8, Note 9, Note 10, Note 10+, Note 10+ 5G, Note 20 5G, Note 20, Note 20 Ultra 5G, Note 20 Ultra
- Galaxy S Series (“S Series”): S6, S6 Active, S6 Edge, S6 Edge+, S7, S7 Active, S7 Edge, S8, S8 Active, S8+, S9, S9+, S10, S10 5G, S10 Lite, S10e, S10+, S20 Ultra, S20

Ultra 5G, S20+, S20+ 5G, S20, S20 5G, S20 FE, S20 FE 5G, S21, S21 5G, S21 Ultra, S21 Ultra 5G, S21+, S21+ 5G, S21 FE, S21 FE 5G, S22, S22 5G, S22+, S22 Ultra, S23, S23 5G, S23 Ultra, S23+, S23 FE, S24, S24 FE, S24+, S24 Ultra

- Galaxy XCover Series (“XCover”): XCover, XCover Pro, XCover Pro 2, X Cover FieldPro, XCover 6 Pro
- Galaxy Z Series (“Z Series”): Z Flip, Z Flip 5G, Z Fold2, Z Fold3, Z Flip3 5G, Z Fold4, Z Flip4, Z Flip4 5G, Z Flip5, Z Fold5, Z Fold6, Z Flip6

Defendants infringe the asserted claims (Claims 1, 12, 23, 37, and 45) of the ’281 Patent through direct infringement, inducement of infringement, and contributory infringement. The Accused Products all include technology that operates the same concerning the claims asserted.

U.S. Pat. No. 10,419,996

The Accused Products are mobile phones in Galaxy A Series, J Series, Note Series, S Series, XCover Series, and Z Series that infringe through their “Switch to mobile data,” “Smart Network Switch,” “Adaptive Wi-Fi,” “Wi-Fi Calling,” and “Auto Wi-Fi” technologies. The Accused Products include:

- Galaxy A Series (“A Series”): A01, A02s, A03s, A10e, A11, A12, A13, A13 5G, A14 5G, A20, A21, A23 5G, A32 5G, A42 5G, A50, A51, A51 5G, A52 5G, A53 5G, A54 5G, A71 5G
- Galaxy J Series (“J Series”): J2, J3, J3 Top, J7, J7 Pop, J7 Top
- Galaxy Note Series (“Note”): Note 8, Note 9, Note 10, Note 10+, Note 10+ 5G, Note 20 5G, Note 20, Note 20 Ultra 5G, Note 20 Ultra
- Galaxy S Series (“S Series”): S6, S6 Active, S6 Edge, S6 Edge+, S7, S7 Active, S7 Edge, S8, S8 Active, S8+, S9, S9+, S10, S10 5G, S10 Lite, S10e, S10+, S20 Ultra, S20 Ultra 5G, S20+, S20+ 5G, S20, S20 5G, S20 FE, S20 FE 5G, S21, S21 5G, S21 Ultra, S21 Ultra 5G, S21+, S21+ 5G, S21 FE, S21 FE 5G, S22, S22 5G, S22+, S22 Ultra, S23, S23 5G, S23 Ultra, S23+, S23 FE, S24, S24 FE, S24+, S24 Ultra
- Galaxy XCover Series (“XCover”): XCover, XCover Pro, XCover Pro 2, X Cover FieldPro, XCover 6 Pro
- Galaxy Z Series (“Z Series”): Z Flip, Z Flip 5G, Z Fold2, Z Fold3, Z Flip3 5G, Z Fold4, Z Flip4, Z Flip4 5G, Z Flip5, Z Fold5, Z Fold6, Z Flip6

Defendants infringe the asserted claims (Claims 1, 12, 23, 35, and 41) of the ’996 Patent through direct infringement, inducement of infringement, and contributory infringement. The Accused Products all include technology that operates the same concerning the claims asserted.

III. 3-1(c)-(d) Claim Charts

Based on the information presently known to Vasu, Vasu provides the following Charts:

- Appendix B-1: showing how the Accused Galaxy A Series, J Series, Note Series, S Series, XCover, and Z Series phones infringe the Asserted Claims 1, 3, 4, 8, and 9 of the '181 Patent;
- Appendix D-1: showing how the Accused Galaxy A Series, J Series, Note Series, S Series, XCover Series, and Z Series phones infringe the Asserted Claim 1 of the '154 Patent;
- Appendix E-1: showing how the Accused Galaxy A Series, J Series, Note Series, S Series, XCover Series, and Z Series phones infringe the Asserted Claims 1, 12, 23, 37, and 45 of the '281 Patent;
- Appendix F-1: showing how the Accused Galaxy A Series, J Series, Note Series, S Series, XCover Series, and Z Series phones infringe the Asserted Claims 1, 12, 23, 35, and 41 of the '996 Patent;

Vasu makes this disclosure based upon information presently known and reasonably available as of the date hereof. Vasu has subdivided the Asserted Claims in the Charts to explain where the Accused Instrumentalities in the Accused Products meet each claim element. These subdivisions are not to be taken as an indication of the boundaries of claim elements concerning the doctrine of equivalents or any other issue. In addition, the Accused Products may infringe the Asserted Claims in multiple ways. Vasu reserves the right to provide an alternative claim mapping or infringement contentions for such Accused Products or other products and services. Vasu further reserves the right to rely upon the opinions of one or more experts in support of its infringement contentions by the Court's Scheduling Order.

The Asserted Claims cover a variety of inventions for mobile switches between cellular and Wi-Fi seamless roaming and broadband content access. Vasu's Amended ICs set forth an exemplary detailed explanation of infringement by the Accused Products. As described in the specifications of the Asserted Patents and as recited in the claims, Vasu's invention provides seamless roaming and seamless session continuity. As such, there are multiple ways that the Asserted Claims are infringed, including as set forth in Vasu's Amended ICs as well as by other arrangements of technologies in the Accused Products, such as Wi-Fi calling, Switch to Mobile Data, and Auto Wi-Fi. Vasu incorporates by reference the Expert Report of Todor Cooklev, Ph.D., regarding Infringement by Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. of U.S. Patent Nos. 8,886,181, 10,206,154, 10,368,281, and 10,419,996, dated June 18, 2025.

IV. 3-1(e). Priority Date of Asserted Claims

Pursuant to Local Patent Rule 3-1(e), Vasu hereby identifies the priority date of asserted claims (identified in the accompanying Appendices) of the Asserted Patents as January 6, 2004.

V. 3-1(f). Identification of Own Practicing Products

Based on the information presently known to Vasu and Vasu's present understanding, Vasu provides the following contentions pursuant to Patent Local Rule 3-1 (f): Vasu does not identify any of its products as practicing the patents. Vasu reserves the right to amend, modify, supplement, or narrow these contentions pursuant to Patent Local Rule 3-6.

Dated: June 18, 2025

By: /s/ Paul J. Andre

Paul J. Andre (*pro hac vice*)
Lisa Kobialka (*pro hac vice*)
James Hannah (*pro hac vice*)
Kristopher Kastens (*pro hac vice*)
Michael H. Lee (*pro hac vice*)
Jennifer L. Gilbert
Melissa T.G. Brenner (*pro hac vice*)
Carlos J. Tirado (*pro hac vice*)
Girija Gaur (*pro hac vice*)
HERBERT SMITH FREEHILLS
KRAMER (US) LLP
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065
Telephone: (650) 752-1700
Paul.Andre@hsfkramer.com
Lisa.Kobialka@hsfkramer.com
James.Hannah@hsfkramer.com
Kris.Kastens@hsfkramer.com
Michael.Lee@hsfkramer.com
Jennifer.Gilbert@hsfkramer.com
Missy.Brenner@hsfkramer.com
Carlos.Tirado@hsfkramer.com
Girija.Gaur@hsfkramer.com

S. Calvin Capshaw (Bar No. 03783900)
Elizabeth L. DeRieux (Bar No. 05770585)
Capshaw DeRieux LLP
114 E. Commerce Ave.
Gladewater, TX 75647
Telephone: 903-845-5770
ccapshaw@capshawlaw.com
ederieux@capshawlaw.com

Attorneys for Plaintiff
Vasu Holdings, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2025, a true and correct copy of the foregoing document,

PLAINTIFF VASU HOLDINGS, LLC'S DISCLOSURE OF ASSERTED CLAIMS AND AMENDED INFRINGEMENT CONTENTIONS were served via electronic mail upon counsel for Defendant Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.:

Melissa R. Smith
State Bar No. 24001351
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
melissa@gillamsmithlaw.com

Andrew Thompson (Tom) Gorham
State Bar No. 24012715
GILLAM & SMITH, LLP
102 N. College, Suite 800
Tyler, TX 75702
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
tom@gillamsmithlaw.com

Steven Pepe
(NY Bar No. 2810430)
Alexander E. Middleton
(NY Bar No. 4797114)
Jolene L. Wang
(NY Bar No. 5462619)
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
Steven.Pepe@ropesgray.com
Alexander.Middleton@ropesgray.com
Jolene.Wang@ropesgray.com

David S. Chun
(CA Bar No. 315958)
Christopher M. Bonny
(CA Bar No. 280554)
ROPES & GRAY LLP
1900 University Avenue 6th Floor
East Palo Alto, CA 94303-2284
Telephone: (650) 617-4000
Facsimile: (650) 617-4090
David.Chun@ropesgray.com
Christopher.Bonny@ropesgray.com

Fan (Frances) Zhang
(DC Bar No. 1721165)
ROPES & GRAY LLP
2099 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
Telephone: (202) 508-4600
Facsimile: (202) 508-4650
Frances.Zhang@ropesgray.com

Attorneys for Defendants
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

By: /s/ Paul J. Andre
Paul J. Andre