

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

VASU HOLDINGS LLC,

Plaintiff,

v.

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

Defendants.

CIVIL ACTION NO. 2:24-cv-00034-JRG-RSP

JURY TRIAL DEMANDED

**DEFENDANTS' OBJECTIONS AND RESPONSES TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES (NOS. 1-11)**

Pursuant to Federal Rules of Civil Procedure 26 and 33 and subject to this Court's Local Rules, Patent Rules, and orders governing discovery, Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively "Samsung" or "Defendants") by and through their undersigned counsel, request that Plaintiff Vasu Holdings LLC ("Vasu") respond to the following interrogatories separately and fully, in writing, under oath, and in accordance with the following instructions and definitions, within 30 days from the date of service thereof.

GENERAL OBJECTIONS

Samsung incorporates by reference the following General Objections within each response and objection to individual Interrogatories, and all responses and objections to individual Interrogatories are made subject to and without waiving these objections.

1. Samsung objects to Plaintiff's First Set of Interrogatories in their entirety, and to each Interrogatory contained therein, to the extent that they are broader than, or attempt to impose

any other applicable privilege, immunity, or protection. Samsung objects to this Interrogatory to the extent that it calls for a legal conclusion. Samsung objects to this Interrogatory to the extent that it seeks information that is not within Samsung's possession, custody, or control.

Subject to its General and Specific Objections, and based on its investigation to date, Samsung responds as follows:

A letter identifying the patents asserted in this case was delivered to CT Corporation System on January 16, 2014, six days before the complaint was filed in this action. Samsung, in an answer filed on May 14, 2024, in accordance with the due date set by the Court, responded to the claims asserted in Vasu's complaint, including by denying infringement and denying that the asserted patents are valid.

Discovery is ongoing, and Samsung has not yet completed its investigation of the facts relating to this Interrogatory. Samsung will amend, modify, and/or supplement this response as its investigation continues in accordance with Federal Rule of Civil Procedure 26, the Docket Control Order, the Discovery Order, the E-Discovery Order, and the Local Rules.

INTERROGATORY NO. 2:

Identify all Samsung products (and all of their respective models, sub-models, variants, or versions) that use or are capable of using the Accused Galaxy Products Functionalities and the Accused WEP Products Functionalities and specify the availability dates and which of the Accused Galaxy Products Functionalities and the Accused WEP Products Functionalities the Samsung products use. These Samsung products include but are not limited to the Accused Products.

OBJECTIONS AND RESPONSES TO INTERROGATORY NO. 2

Samsung incorporates by reference its Objections to Definitions and Instructions and General Objections as if fully stated herein. In addition, Samsung objects to this Interrogatory on the ground that Vasu has failed to timely comply with its disclosure and discovery obligations, including without limitation, Vasu's infringement allegations in this action. Samsung objects to this Interrogatory as unduly burdensome and overbroad to the extent it seeks information that exceeds the permissible scope of discovery and seeks information that is neither relevant to any claim or defense in this case nor reasonably calculated to lead to the discovery of admissible evidence. Samsung objects to this Interrogatory as overbroad, unduly burdensome, not proportional to the needs of the case, and not relevant to the claims, defenses, and subject matter of the litigation to the extent it requests information regarding products that have not been accused of infringing the patents asserted in this case. Samsung objects to this Interrogatory as overbroad, unduly burdensome, not proportional to the needs of the case, and not relevant to the claims, defenses, and subject matter of the litigation to the extent it requests information regarding products that were not sold in the United States during the relevant time period. Samsung objects to this Interrogatory as vague, ambiguous, and overbroad to the extent it uses vague, ambiguous, and/or insufficiently specific phrases, including "all Samsung products ... that use or are capable of using the Accused Galaxy Products Functionalities and the Accused WEP Products Functionalities" and "which of the Accused Galaxy Products Functionalities and the Accused WEP Products Functionalities the Samsung products use." Samsung will respond to this Interrogatory only with respect to the specifically identified products in plaintiff's Infringement Contentions that were sold in the United States during the relevant time period, and the specifically identified functionalities identified in plaintiff's Interrogatories to the extent the feature name identified by Vasu is a feature name used by Samsung.

Samsung objects to this Interrogatory to the extent that it purports to require the premature identification of any expert witnesses, or the disclosure of expert testimony, evidence, argument, contentions, or any other disclosure inconsistent with the Federal Rules of Civil Procedure, Docket Control Order, Discovery Order, the E-Discovery Order, Local Rules, or any other order entered by the Court. Samsung objects to this Interrogatory to the extent that it seeks to improperly place on Samsung the burden of identifying products that allegedly infringe the asserted claims. *See Ultra-Tex Surfaces Inc. v. Hill Bros. Chem. Co.*, 204 F.3d 1360, 1364 (Fed. Cir. 2000) (“[I]t is axiomatic that the patentee bears the burden of proving infringement.”). Samsung objects to this Interrogatory because it is compound and includes multiple discrete subparts. Samsung objects to this Interrogatory to the extent that it seeks information protected from discovery by the attorney-client privilege, the work-product doctrine, the common-interest privilege, and/or any other applicable privilege, immunity, or protection. Samsung objects to this Interrogatory to the extent that it calls for a legal conclusion. Samsung objects to this Interrogatory to the extent that it seeks information that is not within Samsung’s possession, custody, or control.

Subject to its General and Specific Objections, and based on its investigation to date, Samsung responds as follows:

Samsung’s response is limited to the specifically identified products in Plaintiff’s infringement contentions and without any admission regarding infringement. Samsung identifies the following products:

Galaxy Phone Products:

Accused Product	U.S. Model Code (Carrier)	Android Version¹
Galaxy A02s	SM-A025	Android 10.0
Galaxy A03s	SM-A037	Android 11.0
Galaxy A10e	SM-A102	Android 9.0
Galaxy A11	SM-A115	Android 10.0
Galaxy A12	SM-A125	Android 10.0
Galaxy A13	SM-A135	Android 12.0
Galaxy A13 5G	SM-A136	Android 11.0
Galaxy A14 5G	SM-A146	Android 13.0
Galaxy A20	SM-A205	Android 9.0
Galaxy A21	SM-A215	Android 10.0
Galaxy A23 5G	SM-A236	Android 12.0
Galaxy A23 5G UW	SM-A236	Android 12.0
Galaxy A51	SM-A515	Android 10.0
Galaxy A51 5G	SM-A516	Android 10.0
Galaxy A51 5G UW	SM-A516	Android 10.0
Galaxy A52 5G	SM-A526	Android 11.0
Galaxy A53 5G	SM-A536	Android 12.0
Galaxy A53 5G UW	SM-A536	Android 12.0
Galaxy A54 5G	SM-A546	Android 14.0
Galaxy A71 5G	SM-A716	Android 10.0
Galaxy A71 5G UW	SM-A716	Android 10.0
Galaxy Amp Prime	SM-J320	Android 5.1
Galaxy Amp Prime 3	SM-J337	Android 8.0
Galaxy J2	SM-J260	Android 8.1
Galaxy J2 Pure	SM-J260	Android 8.1
Galaxy J3	SM-J320	Android 5.1
Galaxy J7	SM-J700	Android 6.0
Galaxy J7 Prime	SM-J727	Android 7.0
Galaxy J7 Star	SM-J737	Android 8.0
Galaxy J7 V	SM-J727	Android 7.0
Galaxy Note 10	SM-N970	Android 9.0
Galaxy Note 10 5G	SM-G977	Android 9.0
Galaxy Note 10+	SM-N975	Android 9.0
Galaxy Note 10+ 5G	SM-N976	Android 9.0
Galaxy Note 20 5G	SM-N981	Android 10.0
Galaxy Note 20 Ultra 5G	SM-N986	Android 10.0

¹ The listed Android Version for each product is the version that was first available for the listed product.

Accused Product	U.S. Model Code (Carrier)	Android Version¹
Galaxy Note 5	SM-N920	Android 5.1
Galaxy Note 8	SM-N950	Android 7.1
Galaxy Note 9	SM-N960	Android 8.1
Galaxy Note II	SCH-I605 (VZW)	Android 4.0
Galaxy Note II	SGH-I317 (ATT)	Android 4.0
Galaxy Note II	SPH-L900 (SPR)	Android 4.0
Galaxy Note II	SGH-T889 (TMB)	Android 4.0
Galaxy S10	SM-G973	Android 9.0
Galaxy S10 Lite	SM-G770	Android 10.0
Galaxy S10+	SM-G975	Android 9.0
Galaxy S10e	SM-G970	Android 9.0
Galaxy S20	SM-G981	Android 10.0
Galaxy S20 5G	SM-G981	Android 10.0
Galaxy S20 FE 5G	SM-G781	Android 10.0
Galaxy S20 Ultra 5G	SM-G988	Android 10.0
Galaxy S20+	SM-G986	Android 10.0
Galaxy S20+ 5G	SM-G986	Android 10.0
Galaxy S21 5G	SM-G991	Android 11.0
Galaxy S21 FE 5G	SM-G990	Android 11.0
Galaxy S21 Ultra 5G	SM-G998	Android 11.0
Galaxy S21+ 5G	SM-G996	Android 11.0
Galaxy S22	SM-S901	Android 12.0
Galaxy S22 Ultra	SM-S908	Android 12.0
Galaxy S22+	SM-S906	Android 12.0
Galaxy S23	SM-S911	Android 14.0
Galaxy S23 Ultra	SM-S918	Android 14.0
Galaxy S23+	SM-S916	Android 14.0
Galaxy S24	SM-S921	Android 15.0
Galaxy S24 Ultra	SM-S928	Android 15.0
Galaxy S24+	SM-S926	Android 15.0
Galaxy S4	SCH-I545 (VZW)	Android 4.2
Galaxy S4	SGH-I337 (ATT)	Android 4.2
Galaxy S4	SPH-L720 (SPR)	Android 4.2
Galaxy S4	SGH-M919 (TMB)	Android 4.2
Galaxy S5	SM-G900	Android 4.4
Galaxy S5 Active	SM-G870	Android 4.4
Galaxy S5 Mini	SM-G800	Android 4.4
Galaxy S5 Sport	SM-G860	Android 4.4
Galaxy S6	SM-G920	Android 5.1
Galaxy S6 Active	SM-G890	Android 5.1

Accused Product	U.S. Model Code (Carrier)	Android Version¹
Galaxy S6 Edge	SM-G925	Android 5.1
Galaxy S6 Edge+	SM-G928	Android 5.1
Galaxy S7	SM-G930	Android 6.0
Galaxy S7 Active	SM-G891	Android 6.0
Galaxy S7 Edge	SM-G935	Android 6.0
Galaxy S8	SM-G950	Android 7.0
Galaxy S8 Active	SM-G892	Android 7.0
Galaxy S8+	SM-G955	Android 7.0
Galaxy S9	SM-G960	Android 8.0
Galaxy S9+	SM-G965	Android 8.0
Galaxy SIII	SCH-I535 (VZW)	Android 4.0
Galaxy SIII	SGH-I747 (ATT)	Android 4.0
Galaxy SIII	SPH-L710 (SPR)	Android 4.0
Galaxy SIII	SGH-T999 (TMB)	Android 4.0
Galaxy XCover 5	SM-G525	Android 14.0
Galaxy XCover 6 Pro	SM-G736	Android 14.0
Galaxy XCover FieldPro	SM-G889	Android 8.1
Galaxy XCover Pro	SM-G715	Android 10.0
Galaxy Z Flip	SM-F700	Android 10.0
Galaxy Z Flip 3 5G	SM-F711	Android 11.0
Galaxy Z Flip 4	SM-F721	Android 12.0
Galaxy Z Flip 4 5G	SM-F721	Android 12.0
Galaxy Z Flip 5	SM-F731	Android 14.0
Galaxy Z Fold 4	SM-F936	Android 12.0
Galaxy Z Fold 5	SM-F946	Android 14.0

Accused Feature (Accused Galaxy Phone Products)	Earliest Android Version
Adaptive WiFi	Android 4.2 (2013)
Smart Network Switch	Android 4.2 (2013)
Switch to Mobile data	Android 9 (2019)
Auto WiFi	Android 7.1 (2017)
Switch to Better WiFi	Android 13 (2022)
Intelligent WiFi	Android 9 (2019)
Call & Text on other devices	Android 9 (2019)

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Subject to its General and Specific Objections, and based on its investigation to date, Samsung responds as follows:

In-Sick Jung, Sunghye Lee, and Kyusung Lee have knowledge of the structure, characteristics, and/or operation of the relevant features of the accused functionalities in the accused Galaxy devices.

Seomin Yang has knowledge of the structure, characteristics, and/or operation of the relevant features of the accused functionalities in the accused WLAN access points, access controllers, and enterprise manager.

Discovery is ongoing, and Samsung has not yet completed its investigation of the facts relating to this Interrogatory. Samsung will amend, modify, and/or supplement this response as its investigation continues in accordance with Federal Rule of Civil Procedure 26, the Docket Control Order, the Discovery Order, the E-Discovery Order, and the Local Rules.

Dated: July 29, 2024 Counsel for Defendants

/s/ Christopher M. Bonny

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*Attorneys for Defendants Samsung Electronics Co., Ltd. and
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above document was served on July 29, 2024 to all counsel of record via electronic mail.

/s/ Drago Gregov
Drago Gregov