

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

KEYLESS LICENSING LLC,

Plaintiff,

v.

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

Defendants.

Civil Action No.: 2:24-cv-00464-JRG

JURY TRIAL DEMANDED

PLAINTIFF’S IDENTIFICATION OF CLAIM TERMS FOR CONSTRUCTION

Pursuant to the Court’s Docket Control Order and P.R. 4-1, Plaintiff Keyless Licensing LLC (“Keyless”) identifies the following claim terms, phrases, or clauses that may need construction.

Keyless reserves the right to supplement and/or amend its positions based on the meet-and-confer process between the parties, including Defendants’ disclosure of proposed constructions, and any contentions regarding indefiniteness. This identification is made for the purpose of facilitating the preparation of a Joint Claim Construction and Prehearing Statement.

Claim Term or Phrase	Phrase Asserted Patent Claim
No proposed terms, phrases, or clauses	U.S. Patent No. 11,503,144
No proposed terms, phrases, or clauses	U.S. Patent No. 9,304,602
No proposed terms, phrases, or clauses	U.S. Patent No. 10,976,922

Dated: June 13, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel of record who are deemed to have consented to electronic service on June 13, 2025.

/s/ Robert F. Kramer