

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

<p>WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC.,</p> <p>Plaintiff,</p> <p>v.</p> <p>HP INC.</p> <p>Defendant.</p>	<p>Civil Case No. 2:24-cv-00752-JRG [Lead Case]</p> <p>JURY TRIAL DEMANDED</p>
<p>WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC.,</p> <p>Plaintiff,</p> <p>v.</p> <p>SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC.</p> <p>Defendants.</p>	<p>Civil Case No. 2:24-cv-00746-JRG [Member Case]</p> <p>JURY TRIAL DEMANDED</p>
<p>WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC.,</p> <p>Plaintiff,</p> <p>v.</p> <p>SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC.</p> <p>Defendants.</p>	<p>Civil Case No. 2:24-cv-00765-JRG [Member Case]</p> <p>JURY TRIAL DEMANDED</p>

SAMSUNG DEFENDANTS' SECONDARY ELECTION OF PRIOR ART

Pursuant to the Eighth Amended Docket Control Order (Dkt. 182), Samsung Electronics Co., Ltd., Samsung Electronics America, Inc.'s (collectively, "Samsung") hereby identifies its Secondary Election of Prior Art. Despite this prior art narrowing, Samsung reserves the right to rely on any art it has produced or identified (regardless of whether it is listed below) to show the state of the art at the time of alleged invention. Further, Samsung reserves the right to supplement and/or revise its elections, including in the event Plaintiff moves to amend its infringement contentions, in the event stipulations conditioned on institution of co-pending IPRs are negated by de-institution, or for other good cause shown at a later date.

U.S. Patent No 10,313,077:

1. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of Zhang *et al.*, "HE PHY Padding and Packet Extension," July 2015, IEEE 802.11-15/0810 ("Zhang 0810") and in further view of IEEE 802.11-2012 and/or IEEE 802.11ac
2. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 10,142,067 ("Cao 067") and/or US 10,044,476 ("Cao 476")
3. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 9,001,929 ("Lee 929"), and in further view of Zhang 0810, Cao 067, and/or Cao 476
4. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of Cao 067, Zhang 0810, Lee 929, IEEE 802.11-2012, and/or IEEE 802.11ac
5. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2018/0102929 ("Lin 929")
6. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of Lin 929, and in further view of Zhang 0810, Lee 929, IEEE 802.11-2012, and/or IEEE 802.11ac

U.S. Patent No. 10,687,281:¹

1. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2016/0330300A1 ("Josiam") and US 2016/0353322A1 ("Li")
2. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2016/0330300A1 ("Josiam") and US 2016/0353322A1 ("Li") and US 2016/0174200A1 ("Seok")
3. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2016/0353322A1 ("Li") and US 2016/0174200A1 ("Seok")
4. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of IEEE 802.11ac and US 2016/0353322A1 ("Li")

¹ Samsung will no longer pursue ground no. 6 if IPR2025-00988 is instituted.

5. Samsung Device (e.g., Samsung Galaxy Tab S) in view of IEEE 802.11ac and US 2016/0330300A1 (“Josiam”) and US 2016/0353322A1 (“Li”)
6. US 2017/0181129A1 (“Bharadwaj 129”) in view of US 2016/0330058A1 (“Chen”)

U.S. Patent No. 11,116,035:

1. Samsung Device (e.g., Samsung Galaxy Tab S) in view of IEEE P802.11ax/D1.0 (“802.11ax D1.0”)
2. Samsung Device (e.g., Samsung Galaxy Tab S) in view of IEEE P802.11ax/D1.0 (“802.11ax D1.0”) and US20170048048A1 (“Seok 048”)
3. Samsung Device (e.g., Samsung Galaxy Tab S) in view of IEEE P802.11ax/D1.0 (“802.11ax D1.0”) and IEEE 802.11-16/0616r2 (“Asterjadhi 0616”).
4. Samsung Device (e.g., Samsung Galaxy Tab S) in view of US 2017/0245261 (“Cariou 261”) and US20170048048A1 (“Seok 048”)
5. Samsung Device (e.g., Samsung Galaxy Tab S) in view of US 2017/0245261 (“Cariou 261”), US20170048048A1 (“Seok 048”), and Chinese Patent No. 102958185B
6. Samsung Device (e.g., Samsung Galaxy Tab S) in view of US 2017/0245261 (“Cariou 261”), US20170048048A1 (“Seok 048”), and IEEE 802.11-15/0132r17 “Wireless LANs Specification Framework for TGax” (“Stacey 0132r17”)

U.S. Patent No. 11,129,163:

1. Samsung Device (e.g., Samsung Galaxy Tab S) in view of US 2016/0330663 (“Zhou 663”)
2. Samsung Device (e.g., Samsung Galaxy Tab S) in view of US 2016/0330663 (“Zhou 663”) and further in view of US 10,321,485 (“Noh 485”) or US 2017/257817 (“Itagaki 817”)
3. Samsung Device (e.g., Samsung Galaxy Tab S) in view of US 2016/330685 (“Asterjadhi 685”)
4. Samsung Device (e.g., Samsung Galaxy Tab S) in view of US 2016/330685 (“Asterjadhi 685”) and further in view of US 10,321,485 (“Noh 485”) or US 2017/257817 (“Itagaki 817”)
5. Samsung Device (e.g., Samsung Galaxy Tab S) in view of IEEE P802.11ax/D1.0 (“802.11ax D1.0”)
6. Samsung Device (e.g., Samsung Galaxy Tab S) in view of IEEE P802.11ax/D1.0 (“802.11ax D1.0”) and US 2017/257817 (“Itagaki 817”)

U.S. Patent No. 11,159,210:

1. Samsung Device (e.g., Samsung Galaxy Tab S) in view of IEEE 802.11-2012, IEEE 802.11ac, IEEE P802.11ax/D0.5, “High Efficiency (HE) PHY specification” (“IEEE P802.11ax/D0.5”), and/or “Wireless LANs Specification Framework for TGax,” March 2016, IEEE 802.11-15/0132r16 (“Stacey 0132r16”)²

² The first page of Stacey 0132r16 indicates that it is IEEE 802.11-15/0132r15; Stacey 0132r16’s revision history and corresponding IEEE website filename indicate that it is the r16 version.

2. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2016/0285526 (“Hedayat 526”) and in further view of IEEE P802.11ax/D0.5 and/or Stacey 0132r16
3. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2018/0176066 (“Lim 066”) and in further view of IEEE P802.11ax/D0.5 and/or Stacey 0132r16
4. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2017/0366310 (“Verma 310”), in further view of IEEE P802.11ax/D0.5 and/or Stacey 0132r16
5. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2017/0064718 (“Bharadwaj 718”) and in further view of IEEE P802.11ax/D0.5 and/or Stacey 0132r16
6. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of IEEE 802.11ac and/or IEEE P802.11ax/D0.5, in further view of Hedayat 526, Lim 066, Verma 310, and/or Bharadwaj 718

U.S. Patent No. 11,470,595:³

1. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2017/0064718A1 (“Bharadwaj 718”) and US 2017/0094664A1 (“Lee”)
2. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of IEEE 802.11ac and US 2017/0094664A1 (“Lee”)
3. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2016/0353322 (“Li”) and US 2017/0094664A1 (“Lee”)
4. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2017/0181129 (“Bharadwaj 129”) and US 2017/0094664A1 (“Lee”)
5. US 2016/0330300A1 (“Josiam”) alone or in view of US 2016/0174200A1 (“Seok”)
6. US 2016/0330058A1 (“Chen”) in view of US 2017/0070998A1 (“Wu”)

U.S. Patent No. 11,516,879:

1. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of IEEE P802.11ax/D1.0 (“802.11ax D1.0”)
2. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of IEEE P802.11ax/D1.0 (“802.11ax D1.0”) and US20170048048A1 (“Seok 048”)
3. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of IEEE P802.11ax/D1.0 (“802.11ax D1.0”) and IEEE 802.11-16/0616r2 (“Asterjadhi 0616”).
4. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2017/0245261 (“Cariou 261”) and US20170048048A1 (“Seok 048”)
5. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2017/0245261 (“Cariou 261”), US20170048048A1 (“Seok 048”), and Chinese Patent No. 102958185B (“Huawei 185”)
6. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2017/0245261 (“Cariou 261”), US20170048048A1 (“Seok 048”), and IEEE 802.11-15/0132r17 “Wireless LANs Specification Framework for TGax” (“Stacey 0132r17”)

U.S. Patent No. 11,700,597:

³ Samsung will no longer pursue ground nos. 5 and 6 if IPR2025-00933 is instituted.

1. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2016/0330663 (“Zhou 663”)
2. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2016/0330663 (“Zhou 663”) and further in view of US 10,321,485 (“Noh 485”) or US 2017/257817 (“Itagaki 817”)
3. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2016/330685 (“Asterjadhi 685”)
4. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of US 2016/330685 (“Asterjadhi 685”) and further in view of US 10,321,485 (“Noh 485”) or US 2017/257817 (“Itagaki 817”)
5. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of IEEE P802.11ax/D1.0 (“802.11ax D1.0”)
6. Samsung Device (*e.g.*, Samsung Galaxy Tab S) in view of IEEE P802.11ax/D1.0 (“802.11ax D1.0”) and US 2017/257817 (“Itagaki 817”)

Dated: January 6, 2026

Respectfully submitted,

/s/ Ralph A. Phillips

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CERTIFICATE OF SERVICE

This is to certify that on January 6, 2026, a true and correct copy of the foregoing instrument was served on Plaintiff via email per Paragraph 12(d) of the Discovery Order.

/s/ Ralph A. Phillips
Ralph A. Phillips