

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

XIFI NETWORKS R&D, INC.,

Plaintiff,

v.

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

Defendants.

Civil Action No. 2:24-cv-01057

JURY TRIAL DEMANDED

**PLAINTIFF XIFI NETWORKS R&D, INC.’S DISCLOSURE OF ASSERTED CLAIMS
AND INFRINGEMENT CONTENTIONS**

Pursuant to Patent Rules 3-1 and 3-2, the Court’s Order dated February 24, 2025 (Dkt. 9), and the Court’s Order dated March 12, 2025 (Dkt. 14), Plaintiff XiFi Networks R&D, Inc. (“XiFi”) hereby provides its Disclosure of Asserted Claims and Infringement Contentions (“Infringement Contentions”) against Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung” or “Defendants”) and identifies the documents included in its document production made herewith.

XiFi reserves the right to amend or supplement these Infringement Contentions pursuant to Patent Rule 3-6(a) in view of any claim construction ruling(s) issued by the Court. XiFi further reserves the right to seek leave pursuant to Patent Rule 3-6(b) to supplement and/or amend these Infringement Contentions, including identification of asserted claims, accused instrumentalities, and additional infringing structures within already accused instrumentalities, based upon information obtained through discovery and/or other means.

XiFi is providing these Infringement Contentions before it has had any discovery from Samsung. Detailed information regarding Samsung’s smartphones, TVs, laptops, tablets, and wearable devices and aspects of their multi-link WiFi operations functionality is not publicly available. XiFi expects to obtain more detailed information through discovery.

XiFi’s Infringement Contentions do not constitute a disclosure of any information that is subject to attorney-client privilege or work-product protection or that is otherwise immune from discovery.

I. Identification of Infringed Claims (P.R. 3-1(a))

XiFi asserts eleven patents: U.S. Patent Nos. 11,818,591 (“’591 patent”), 11,849,337 (“’337 patent”), 11,856,414 (“’414 patent”), 11,974,143 (“’143 patent”), 11,950,105 (“’105 patent”), 12,003,976 (“’976 patent”), 12,015,933 (“’933 patent”), 12,114,177 (“’177 patent”), 12,169,756 (“’756 patent”), 12,190,198 (“’198 patent”), and 12,250,564 (“’564 patent”) (collectively, the “Asserted Patents”). Based on information presently available, XiFi identifies in the table below each claim of each Asserted Patent that Samsung has infringed and/or continues to infringe.

| Patent | Infringed Claims |
|---------------|---------------------------|
| ’591 patent | 1-5, 10, 13-18, 20-22, 26 |
| ’337 patent | 1-2, 15-26, 30 |
| ’414 patent | 1-4, 13-26, 30 |
| ’143 patent | 1, 5-10, 12-20, 25, 30 |
| ’105 patent | 1-8, 10-11, 14-23, 30 |
| ’976 patent | 1-8, 10-11, 14-30 |
| ’933 patent | 1-8, 10-11, 14-30 |
| ’177 patent | 1-9, 11-12, 14-21, 24-26 |
| ’756 patent | 1-8, 10, 12, 14-30 |
| ’198 patent | 1-8, 10, 12, 14-30 |
| ’564 patent | 1-8, 10, 12, 14-29 |

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

XiFi contends that Samsung has infringed, and/or continues to infringe, the Asserted Patents by making, using, testing, offering for sale, selling, and/or importing into the United States, Samsung electronics devices (including smartphones, TVs, laptops, tablets, and wearable devices) that implement multi-link WiFi operations functionality. The accused instrumentalities include all Samsung electronics devices (including smartphones, TVs, laptops, tablets, and wearable devices) that implement Multi-Link Operation (“MLO”) as specified in IEEE 802.11be Draft Standard for Information Technology—Telecommunications and Information Exchange Between Systems Local and Metropolitan Area Networks—Specific Requirements (D7.0, Aug. 2024) using two or more transceivers. The accused instrumentalities include Samsung products released with MLO capabilities as well as Samsung products made MLO-capable through, for example, Samsung firmware updates. Based on information presently available, XiFi identifies in the table below, the Accused Instrumentalities.

| Product Category | Accused Instrumentalities |
|-------------------------|--|
| Smartphones | All Samsung smartphones that implement MLO as specified in IEEE 802.11be Draft Standard for Information Technology—Telecommunications and Information Exchange Between Systems Local and Metropolitan Area Networks—Specific Requirements (D7.0, Aug. 2024) using two or more transceivers. Examples include, but are not limited to, the Samsung Galaxy S23, Galaxy S23+, Galaxy S23 Ultra, Galaxy S24, Galaxy S24 Ultra, Galaxy S24+, Galaxy S25, Galaxy S25+, Galaxy S25 Ultra, Galaxy Z Fold 5, Galaxy Z Fold 6, Galaxy Z Fold 6 Slim, Galaxy Z Flip 5, and Galaxy Z Flip 6. |
| TVs | All Samsung TVs that implement MLO as specified in IEEE 802.11be Draft Standard for Information Technology—Telecommunications and Information Exchange Between Systems Local and Metropolitan Area Networks—Specific Requirements (D7.0, Aug. 2024) using two or more transceivers. |
| Laptops | All Samsung laptops that implement MLO as specified in IEEE 802.11be Draft Standard for Information Technology—Telecommunications and Information Exchange Between Systems Local and Metropolitan Area Networks—Specific |

| Product Category | Accused Instrumentalities |
|------------------|--|
| | Requirements (D7.0, Aug. 2024) using two or more transceivers. Examples include, but are not limited to, the Samsung Galaxy Book 5 Pro 360, the Galaxy Book 4 Edge 14/16, and the Galaxy Book 4 Edge 15. |
| Tablets | All Samsung tablets that implement MLO as specified in IEEE 802.11be Draft Standard for Information Technology—Telecommunications and Information Exchange Between Systems Local and Metropolitan Area Networks—Specific Requirements (D7.0, Aug. 2024) using two or more transceivers. Examples include, but are not limited to, the Samsung Galaxy Tab S9, Galaxy Tab S9+, Galaxy Tab S9 Ultra, Galaxy Tab S10, Galaxy Tab S10+, and Galaxy Tab S10 Ultra. |
| Wearable Devices | All Samsung wearable devices that implement MLO as specified in IEEE 802.11be Draft Standard for Information Technology—Telecommunications and Information Exchange Between Systems Local and Metropolitan Area Networks—Specific Requirements (D7.0, Aug. 2024) using two or more transceivers. |

XiFi may identify additional devices, and may accuse additional models, as it obtains discovery.

XiFi’s infringement charts, attached hereto, correlate the asserted claims to the Accused Instrumentalities. XiFi expects to identify during discovery additional infringing devices, including devices for which limited information is available, newly released devices, and newly updated devices that fall within the scope of XiFi’s Infringement Contentions.

III. Charts Identifying Each Element of Each Asserted Claim within Accused Instrumentalities (P.R. 3-1(c))

XiFi contends that Samsung has infringed and continues to infringe the Asserted Patents, directly and indirectly, by: (1) making, using, testing, offering to sell, selling, and/or importing into the United States smartphones, TVs, laptops, tablets, and wearable devices that practice the claims of the Asserted Patents (35 U.S.C. § 271(a)); (2) importing, offering to sell, selling, and/or using within the United States smartphones, TVs, laptops, tablets, and wearable devices made by patented processes (35 U.S.C. § 271(g)); and (3) inducing third parties (*e.g.*, Samsung

customers and end users) to directly infringe by using, offering to sell, selling, and/or importing into the United States Samsung smartphones, TVs, laptops, tablets, and wearable devices that practice the claims of the Asserted Patents, with knowledge of the Asserted Patents and of the third parties' direct infringement and specific intent to cause that direct infringement (35 U.S.C. § 271(b)). (See Dkt. 13 at ¶¶ 3, 48-61).

Attached as Exhibits A-K, and as set forth below, XiFi provides charts identifying specifically where each element of each asserted claim is found within the Accused Instrumentalities.

| Patent | Claim Chart |
|---------------|--------------------|
| '591 patent | Exhibit A |
| '337 patent | Exhibit B |
| '414 patent | Exhibit C |
| '143 patent | Exhibit D |
| '105 patent | Exhibit E |
| '976 patent | Exhibit F |
| '933 patent | Exhibit G |
| '177 patent | Exhibit H |
| '756 patent | Exhibit I |
| '198 patent | Exhibit J |
| '564 patent | Exhibit K |

XiFi contends that the charted products provide representative infringement reads applicable to the broader set of Accused Instrumentalities, including substantially similar products that XiFi may identify during discovery, based at least on the Accused Instrumentalities' implementation of MLO as specified in IEEE 802.11be Draft Standard for Information Technology—Telecommunications and Information Exchange Between Systems Local and Metropolitan Area Networks—Specific Requirements (D7.0, Aug. 2024). XiFi

reserves the right to provide additional support, based on information obtained during discovery, for its contention that the charted products are representative, or to chart additional products as additional information becomes available.

XiFi does not contend that any element of any asserted claim is governed by 35 U.S.C. § 112(6).

IV. Literal Infringement and Infringement under the Doctrine of Equivalents (P.R. 3-1(d))

XiFi contends that each element of each asserted claim is literally present in each Accused Instrumentality.

XiFi reserves the right to assert, in the alternative, that certain elements of certain asserted claims are present in the Accused Instrumentalities under the doctrine of equivalents in light of information obtained during discovery and/or in view of any claim construction ruling(s) issued by the Court.

V. Priority Dates of the Asserted Patents (P.R. 3-1(e))

XiFi asserts that all asserted claims of all eleven Asserted Patents (U.S. Patent Nos. 11,818,591, 11,849,337, 11,856,414, 11,974,143, 11,950,105, 12,003,976, 12,015,933, 12,114,177, 12,169,756, 12,190,198, and 12,250,564) claim priority to U.S. Provisional Applications 61/897,216 and 61/897,219, and are thus entitled to a priority date of October 30, 2013, the filing date of those provisional applications.

VI. Disclosure Regarding Practice of Claimed Inventions (P.R. 3-1(f))

XiFi does not contend that any XiFi apparatus, device, process, method, act, or other instrumentality practices any of the asserted claims.

VII. Document Production Accompanying Disclosure (P.R. 3-2)

In accordance with Patent Rule 3-2, XiFi produces the following categories of documents in the following production ranges.

Patent Rule 3-2(a): XiFi is not presently aware of any documents evidencing a discussion, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, the claimed invention(s) prior to the dates of application for the Asserted Patents.

Patent Rule 3-2(b): XIFI_0018310–XIFI_0018323

Patent Rule 3-2(c):

| Patent | File History Production Range |
|---------------|--------------------------------------|
| '591 patent | XIFI_0000244–XIFI_0001716 |
| '337 patent | XIFI_0001717–XIFI_0003000 |
| '414 patent | XIFI_0003001–XIFI_0004227 |
| '143 patent | XIFI_0005878–XIFI_0007572 |
| '105 patent | XIFI_0004228–XIFI_0005877 |
| '976 patent | XIFI_0007573–XIFI_0009128 |
| '933 patent | XIFI_0009129–XIFI_0010685 |
| '177 patent | XIFI_0010686–XIFI_0012342 |
| '756 patent | XIFI_0012343–XIFI_0014196 |
| '198 patent | XIFI_0014197–XIFI_0016055 |
| '564 patent | XIFI_0016056–XIFI_0018260 |

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Respectfully submitted,

By: /s/ Aaron R. Fahrenkrog

Aaron R. Fahrenkrog
MN Bar No. 0386673 (admitted in this District)
Email: afahrenkrog@robinskaplan.com

Logan J. Drew
MN Bar No. 0389449 (admitted in this District)
Email: ldrew@robinskaplan.com

Jessica L. Gutierrez
MN Bar No. 0396359 (*pro hac vice*)
Email: jgutierrez@robinskaplan.com

Nicole R. Olson
MN Bar No. 0402774 (*pro hac vice*)
Email: nolson@robinskaplan.com

ROBINS KAPLAN LLP

2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402
Telephone: 612-349-8500
Facsimile: 612-339-4181

Of Counsel:

Andrea L. Fair
Texas State Bar No. 24078488
E-mail: andrea@millerfairhenry.com

MILLER FAIR HENRY, PLLC

1507 Bill Owens Parkway
Longview, TX 75604
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)

Attorneys for Plaintiff XiFi Networks, R&D, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on March 26, 2025 on all counsel of record for Defendants via electronic mail using the following contact information:

Kevin Hardy
Quinn Emanuel Urquhart & Sullivan, LLP
1300 I Street, N.W., Suite 900
Washington, D.C. 20005
202-538-8000
202-538-8100 (fax)
kevinhardy@quinnemanuel.com

Patrick Thomas Schmidt
Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa St., 10th Floor
Los Angeles, CA 90017
213-443-3191
213-443-3100 (fax)
patrickschmidt@quinnemanuel.com

Sean S. Pak
Quinn Emanuel Urquhart & Sullivan, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6600
415-875-6700 (fax)
seanpak@quinnemanuel.com

Melissa Richards Smith
Gillam & Smith, LLP
303 South Washington Avenue
Marshall, TX 75670
903-934-8450
903-934-9257 (fax)
melissa@gillamsmithlaw.com

/s/ Jessica L. Gutierrez
Jessica L. Gutierrez