



Maxell, Ltd.
IP Innovation Division

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November 28, 2024

VIA EMAIL

Mr. Hanyong Lee
Samsung Electronics Co., Ltd.
Intellectual Property Center
Corporate Legal Office
(Seoul R&D Campus, Umyeon dong)
33, Seongchon-gil, Seocho-gu,
Seoul, 06765, Korea

Re: Maxell's Smartphones, Tablets, Smartwatches, and Smart appliances Related Patents

Dear Han-san:

Thank you for your time for the meeting of November 27. As we mentioned during the meeting, we are sending a follow-up letter. We remain hopeful that we can resolve the current dispute before the parties continue to expend additional significant litigation expenses. So that Samsung's counteroffer is commensurate with the value of Maxell's portfolio—as recognized by many licensees—we wanted to inform Samsung that since our prior notice letters of July 7, 2021, December 29, 2021 and September 8, 2023, Maxell's patent portfolio has continued to grow and goes from strength to strength. Indeed, the USPTO continues to grant additional patents to Maxell that covers various features of at least Samsung's smartphones, tablets, laptops, smartwatches, and SmartThings enabled appliances. In that regard, we would like to call your attention to additional U.S. patents that have issued and patent applications that have been allowed since the list Maxell provided in its prior notice letters. For the sake of completeness, and where appropriate, we also include herein the patents for Samsung was put on notice of infringement at least via our prior correspondence.

Maxell's Smartphones, Tablets, Laptops, Smartwatches, and Smart Appliances Patents

Maxell would like to bring your attention to the following patents that are being infringed by variety of Samsung's Galaxy products including smartphones, tablets, laptops, smartwatches, and SmartThings enabled appliances. Such infringing Samsung products include the Samsung Galaxy A, S, Z, Note series smartphones available for sale at, for example, <https://www.samsung.com/us/smartphones/>. Infringing Samsung products also include: (1)

Maxell, Ltd.
Ex. 2014
IPR2025-01312
1 of 7

Samsung Galaxy Tab Series tablets available for sale at, for example, <https://www.samsung.com/us/tablets/>; (2) Samsung Book Series laptops available for sale at, for example, <https://www.samsung.com/us/galaxybooks/>; (3) Samsung Galaxy Watch smartwatches available for sale at, for example, <https://www.samsung.com/us/watches/>; and (4) Samsung appliances that are SmartThings enabled and available for sale at, for example, <https://www.samsung.com/us/shop/all-deals/home-appliance-and-smart-home-sales/>. To aid in your review of the patents listed below, we have included exemplary claims.

No.	U.S. Pat. No.	Claims	No.	U.S. Pat. No.	Claims
1.	8130280	1-11, 14-17	123.	11711585	1, 2, 6, 7, 9, 13, 14
2.	8363087	2-8	124.	11727960	1-30
3.	8484299	6, 13	125.	11729324	1, 9, 10, 11, 19, 20
4.	10555042	1	126.	11743583	1-5,11-16
5.	10616529	5-10	127.	11750529	1
6.	11076104	10-14	128.	11750915	1, 3-8, 11, 13-17
7.	11221707	1-14	129.	11785292	1-8
8.	11223757	1, 2, 9, 11	130.	11803727	1, 9
9.	11277650	1-4	131.	11812071	1, 8
10.	11297242	1	132.	11812091	1-20
11.	11303794	1, 3	133.	11860987	1-3, 5, 8-10, 12
12.	11323611	1, 3-7, 9-11	134.	11863648	1-10
13.	11349977	1, 8-11	135.	11870944	1-4, 11-14
14.	11363132	1-3, 5-7	136.	11871120	1, 3, 5, 6, 9, 11, 13, 14, 17, 19, 20
15.	11388593	1-2, 4-6, 11-12, 14-16, 21-22, 24-26	137.	11899825	1, 2, 6, 7
16.	11438648	1-10	138.	11924502	1-22
17.	11445241	1-26	139.	11924633	1, 2, 4, 5, 7, 8, 20
18.	11451646	1, 3, 4	140.	11930245	1, 4, 6, 10
19.	11451860	1-23, 26-28	141.	11947609	1, 7, 9, 15
20.	11451861	1-24	142.	11948605	1-4,7-14,17-20

No.	U.S. Pat. No.	Claims	No.	U.S. Pat. No.	Claims
21.	11461446	1-7	143.	11974007	1-21
22.	11461501	1-14	144.	11974008	1-20
23.	11470379	1-16	145.	12022238	1, 5, 10, 14
24.	11477316	5-10	146.	12061760	1, 3, 4, 5, 8
25.	11490004	1-20	147.	12075168	1, 4-12, 14-22
26.	11496692	1-8	148.	12081910	1
27.	11507793	1, 8	149.	12108103	1-21
28.	11509953	1-29	150.	11783863	1-28
29.	11514120	1, 8	151.	12052556	1-9
30.	11539921	1-10	152.	12101521	1-5, 7-12, 16-17
31.	11570599	1, 3-4, 6-9	153.	11973821	1-20
32.	11581758	1-4	154.	18/093719 (Allowed)	1-20
33.	11593524	1	155.	18/105527 (Allowed)	2-4, 8-11, 15
34.	11611718	1-4	156.	RE49,669E1	1-16
35.	11653081	1-20	157.	11,026,088	1-15
36.	11665390	1-8	158.	10,878,456	1, 11
37.	RE 48,830	1-5	159.	10,911,661	1-17
38.	11,017,815	1-27	160.	8,319,848	1, 2
39.	11,094,350	1-10	161.	10,432,876	1, 5
40.	11,159,853	1, 6, 11	162.	18/113545 (Allowed)	15-34
41.	11,140,438	1, 9, 14	163.	11778084	1-17
42.	10,887,441	4	164.	18/453,561	1-32
43.	11,165,715	1-7	165.	11,159,830	1, 8, 15, 23
44.	10,582,134	1, 8, 15	166.	11,086,422	1, 6, 8, 9
45.	10,909,435	1, 7	167.	10,915,220	1, 7

No.	U.S. Pat. No.	Claims	No.	U.S. Pat. No.	Claims
46.	7,835,543	1, 11	168.	8,471,950	1
47.	7,139,533	1, 18	169.	10,529,372	1-6, 16-21, 31-36
48.	10,349,030	15-28	170.	8,037,161	1, 3, 6
49.	6,612,488	1-5	171.	10,389,978	1, 2, 8
50.	10,244,284	1-20	172.	10,854,237	1-7, 14, 19, 27, 32
51.	7,104,444	1, 3	173.	8,130,284	1-8
52.	7,403,226	1-2, 7	174.	8,170,394	1-5, 7-8
53.	7,447,241	1, 3-4, 5, 17, 21	175.	8,214,459	1-2
54.	7,047,052	2	176.	8,311,389	3-4, 7-8
55.	10,264,456	1-3, 5-20	177.	7,362,952	1, 10, 14
56.	7,577,417	1, 2	178.	8,477,850	1, 16, 17, 18, 20
57.	7,054,649	1	179.	8,504,544	1-2
58.	10,635,962	1	180.	8,549,109	1-5
59.	6,816,444	4, 10	181.	8,644,684	1-2
60.	8,156,077	1, 10, 15, 20	182.	8,654,093	1-7
61.	8,112,503	1, 9	183.	10,911,719	1-14
62.	10,176,848	1-7, 9, 11-12, 14, 16-17, 19- 33, 51-100	184.	8,892,688	1-8
63.	6,913,194	1-4	185.	8,982,086	1-15
64.	9,099,154	1	186.	9,083,942	1, 4, 7, 10, 13, 16, 19, 22
65.	6,928,292	1-2	187.	10,210,904	1, 7, 12, 18
66.	6,928,306	2, 5-6, 12-15	188.	9,124,758	1-4, 6-17
67.	6,940,494	1-11	189.	9,197,917	9-16, 25-48
68.	6,954,583	1, 3	190.	9,313,295	1, 5-10, 13-14, 17-18
69.	10,685,681	1, 8, 14, 21	191.	8,255,679	1, 7
70.	6,983,140	1-5	192.	9,418,704	1-10

No.	U.S. Pat. No.	Claims	No.	U.S. Pat. No.	Claims
71.	10,423,769	1-15	193.	9,420,212	1-6
72.	10,298,737	1, 3	194.	9,432,618	1-8
73.	7,113,909	1, 2, 6-7, 12-13	195.	6,987,978	1, 5
74.	12,040,633	1-20	196.	9,489,985	1-12
75.	7,190,833	1-20	197.	7,158,770	1, 7
76.	7,199,821	1, 4, 7	198.	9,661,101	1-12
77.	8,289,450	2	199.	9,743,129	1-8
78.	7,203,517	9-44	200.	9,773,522	13-14, 16-17, 19-20, 22-23
79.	7,245,293	1-3	201.	9,818,449	1-16
80.	7,248,743	1, 7	202.	9,159,368	1-5
81.	10,679,674	1, 9, 17, 23	203.	11,775,129	1-7
82.	7,312,791	1-7	204.	8,005,960	1, 3
83.	7,324,487	1-5	205.	6,484,034	1, 8-9
84.	7,952,645	1, 3, 4	206.	7,072,673	1-4, 9, 15
85.	7,464,170	1	207.	9,723,268	1-4
86.	7,457,529	1-41	208.	10,084,991	1-16
87.	7,509,139	1, 7-14	209.	9,066,058	1, 2, 4, 5
88.	7,515,810	1, 2, 6	210.	9,369,761	1, 2, 5-6, 9
89.	7,551,209	1-6	211.	8,571,392	1-6
90.	7,613,383	1-4	212.	10,057,371	1-12
91.	7,626,498	1-22	213.	10,070,099	1, 6
92.	7,671,901	1-2	214.	10,129,590	1-25
93.	7,689,201	1-4, 7	215.	10,212,586	1-3, 6-11, 13-20
94.	7,508,760	2	216.	10,418,069	1, 6-12
95.	8,334,933	1	217.	7,584,431	1
96.	7,293,294	17-20	218.	10,645,424	1, 7

No.	U.S. Pat. No.	Claims	No.	U.S. Pat. No.	Claims
97.	10,747,832	1	219.	10,199,072	1, 6, 11, 16
98.	7,084,757	1, 5	220.	7,719,417	1
99.	9,032,438	2	221.	7,562,231	1-3
100.	8,180,198	1, 6	222.	8,526,791	1, 8, 15
101.	8,059,177	1-2	223.	9,942,483	1, 8
102.	9,774,776	1, 3, 4, 5, 7-10	224.	9,704,389	1, 5
103.	9,721,462	1, 9, 11	225.	10,511,757	1-8
104.	8,111,263	1, 12	226.	7,084,880	1, 14, 16
105.	10,783,228	1-6, 12-17	227.	7,421,188	1-9
106.	10,812,646	1-8, 13-20	228.	10,462,278	1-17
107.	10,834,459	1-13	229.	7,639,706	1, 2, 4
108.	10,757,344	1, 3	230.	8,599,244	1, 8, 14
109.	9,503,648	1-8	231.	8,724,962	1, 2
110.	7,391,964	1, 9, 11, 19	232.	8,139,927	1-4
111.	10,728,362	1, 7	233.	8,566,890	1
112.	9,154,545	1, 4, 7	234.	9,154,003	1, 7, 14, 15
113.	10,050,474	1, 4, 5, 6, 11	235.	8,099,136	1
114.	7,283,671	1, 19	236.	9,591,261	1, 5, 10
115.	10,726,159	1	237.	11,882,233	1-16
116.	10,467,515	1	238.	11,765,465	1-10
117.	11,810,567	1-7	239.	12,081,352	1-20
118.	18/357568 (Allowed)	20-38	240.	18/298020	1-2, 5-8, 21-34
119.	11468916	1-8,22-28	241.	11687177	1
120.	11223865	9-11	242.	11589095	12-14
121.	9812254	1,7,8			
122.	11696021	1-4, 6			

Mr. Hanyong Lee
November 28, 2024
Page 7

As with Maxell's prior identifications, the foregoing listing of patents, claims, and accused products is exemplary. Nevertheless, the breadth of Maxell's patent portfolio indicates the broad applicability of Maxell's patents to multiple product lines of Samsung. We hope that these lists make clear to Samsung what Samsung's competitors—including those represented by DLA Piper recognized—that Maxell's patent portfolio is extremely valuable, continues to grow, and should be licensed commiserate with the value recognized by prior licensees.

We look forward to hearing from you.

Sincerely yours,



Tatsuya YAMAMOTO
General Manager
IP Innovation Division