

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

SNAPAID, LTD.,

Plaintiff

v.

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

Defendants

Civil Action No. 2:25-cv-00378-RWS-RSP

JURY TRIAL DEMANDED

SAMSUNG’S ANSWER AND COUNTERCLAIMS

Defendants Samsung Electronics Co., Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEA”) (collectively, “Samsung”) submits this Answer to the claims for patent infringement filed by SnapAid, Ltd. (“SnapAid” or “Plaintiff”), as well as Counterclaims in response. Samsung denies all allegations in Plaintiff’s claims unless expressly admitted. Any admissions herein are for purposes of this matter only. Samsung also reserves the right to take further positions and raise additional defenses and counterclaims that may become apparent as a result of additional information discovered subsequent to filing this Answer.

BACKGROUND AND NATURE OF THE SUIT

1. Admitted that Plaintiff asserts claims of patent infringement involving eight asserted patents against Samsung under the listed patents. Otherwise denied.
2. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 2 of the Complaint, and denies them on that basis.

THE PARTIES

3. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 3 of the Complaint, and denies them on that basis.

4. Denied that the Asserted Patents reflect revolutionary technology. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 4 of the Complaint, and denies them on that basis.

5. Admitted.

6. Admitted that SEC designs, manufactures, and makes smartphones and tablets, a portion of which are marketed, used, offered for sale, and/or sold by SEA in the United States, including this District. Otherwise denied.

7. Admitted that SEA is a wholly owned subsidiary of SEC and oversees domestic sales and distribution of Samsung's consumer electronics products, including the products accused of infringement in this case. Admitted that SEA may be served via CT Corporation System. Otherwise denied.

8. Admitted.

9. Admitted.

10. Admitted.

11. Admitted with respect to SEA. Otherwise denied.

12. Admitted with respect to SEA. Otherwise denied.

JURISDICTION AND VENUE

13. The allegations contained in paragraph 13 of the Complaint are legal conclusions as to which no responsive pleading is necessary. To the extent that a response is required, Samsung admits that SnapAid's claims purport to arise under the patent laws and, for the purposes of this action only, this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

14. The allegations contained in paragraph 14 of the Complaint are legal conclusions as to which no responsive pleading is necessary. To the extent that a response is required, for the

purposes of this action only, Samsung does not challenge that this Court has personal jurisdiction over Samsung.

15. The allegations contained in paragraph 15 of the Complaint are legal conclusions as to which no responsive pleading is necessary. To the extent that a response is required, SEA admits that it transacts business in Texas. Otherwise denied.

16. Denied.

17. Admitted that SEA conducts certain business relating to accused mobile devices in Texas. Otherwise denied.

18. The allegations contained in paragraph 18 of the Complaint are legal conclusions as to which no responsive pleading is necessary. To the extent that a response is required, for purposes of this action only, Samsung does not dispute venue in this Court for SEC or SEA. Samsung denies that it has committed any acts of infringement with respect to the Asserted Patents anywhere, including in this District.

19. The allegations contained in paragraph 19 of the Complaint are legal conclusions as to which no responsive pleading is necessary. To the extent that a response is required, for purposes of this action only, SEC does not dispute venue in this Court.

20. The allegations contained in paragraph 20 of the Complaint are legal conclusions as to which no responsive pleading is necessary. To the extent that a response is required, for purposes of this action only, SEA does not dispute venue in this Court.

21. The allegations contained in paragraph 21 of the Complaint are legal conclusions as to which no responsive pleading is necessary. To the extent that a response is required, for purposes of this action only, Samsung does not dispute venue in this Court for SEC or SEA.

Samsung denies that it has committed any acts of infringement with respect to the Asserted Patents anywhere, including in this District.

22. Admitted that SEA sells, offers for sale, and/or imports Samsung-branded smartphones, tablets, laptops, and other electronics in this District. Otherwise denied.

23. Admitted that SEA has an office at 6625 Excellence Way, Plano, Texas 75023. Otherwise denied.

24. Admitted.

25. Admitted that SEA conducts certain business operations relating to cellular mobile devices at SEA facilities in this District. Otherwise denied.

26. Denied.

27. The allegations contained in paragraph 27 of the Complaint are legal conclusions as to which no responsive pleading is necessary. To the extent that a response is required, SEA admits that it has a place of business at 2601 Preston Road, Frisco, Texas 75034. Otherwise denied.

28. Admitted that a website operated by SEA contains the quoted text. Otherwise denied.

29. Admitted that SEA provides customer support and marketing to consumers in this District. Otherwise denied.

THE ASSERTED PATENTS

U.S. Patent No. 9,338,348

30. Admitted that United States Patent No. 9,338,348 (“the ’348 Patent”) is titled “Real Time Assessment of Picture Quality” and lists an issue date of May 10, 2016, and that a copy is purported to be attached as Exhibit A to the Complaint. Samsung lacks knowledge or information

sufficient to form a belief as to the truth of the remaining allegations in Paragraph 30 and denies them on that basis.

31. Denied.

32. Denied.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Admitted that paragraph 37 quotes language of claim 1 of the '348 Patent. Otherwise denied.

38. Admitted that paragraph 38 quotes certain language from the '348 Patent file history. Otherwise denied.

U.S. Patent No. 9,661,226

39. Admitted that United States Patent No. 9,661,226 (“the '226 Patent”) is titled “Real Time Assessment of Picture Quality” and lists an issue date of May 23, 2017, and that a copy is purported to be attached as Exhibit B to the Complaint. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 39 and denies them on that basis.

40. Denied.

41. Denied.

42. Denied.

43. Denied.

44. Denied.

45. Denied.

46. Admitted that paragraph 46 quotes language of claim 1 of the '226 Patent. Otherwise denied.

47. Admitted that paragraph 47 quotes certain language from the '226 Patent file history. Otherwise denied.

U.S. Patent No. 10,009,537

48. Admitted that United States Patent No. 10,009,537 (“the '537 Patent”) is titled “Real Time Assessment of Picture Quality” and lists an issue date of June 26, 2018, and that a copy is purported to be attached as Exhibit C to the Complaint. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 48 and denies them on that basis.

49. Denied.

50. Denied.

51. Denied.

52. Denied.

53. Denied.

54. Denied.

55. Admitted that paragraph 55 quotes language of claim 1 of the '537 Patent. Otherwise denied.

56. Admitted that paragraph 56 quotes certain language from the '537 Patent file history. Otherwise denied.

U.S. Patent No. 10,659,682

57. Samsung admits that United States Patent No. 10,659,682 (“the '682 Patent”) is titled “Real Time Assessment of Picture Quality” and lists an issue date of May 19, 2020, and that a copy is purported to be attached as Exhibit D to the Complaint. Samsung lacks knowledge or

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 57 and denies them on that basis.

58. Denied.

59. Denied.

60. Denied.

61. Denied.

62. Denied.

63. Denied.

64. Admitted that paragraph 64 quotes language of claim 1 of the '682 Patent. Otherwise denied.

65. Admitted that paragraph 65 quotes certain language from the '682 Patent file history. Otherwise denied.

U.S. Patent No. 10,944,901

66. Samsung admits that United States Patent No. 10,944,901 (“the '901 Patent”) is titled “Real Time Assessment of Picture Quality” and lists an issue date of March 9, 2021, and that a copy is purported to be attached as Exhibit E to the Complaint. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 66 and denies them on that basis.

67. Denied.

68. Denied.

69. Denied.

70. Denied.

71. Denied.

72. Denied.

73. Admitted that paragraph 73 quotes language of claim 1 of the '901 Patent. Otherwise denied.

74. Admitted that paragraph 74 quotes certain language from the '901 Patent file history. Otherwise denied.

U.S. Patent No. 11,252,325

75. Samsung admits that United States Patent No. 11,252,325 (“the '325 Patent”) is titled “Real Time Assessment of Picture Quality” and lists an issue date of February 15, 2022, and that a copy is purported to be attached as Exhibit F to the Complaint. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 75 and denies them on that basis.

76. Denied.

77. Denied.

78. Denied.

79. Denied.

80. Denied.

81. Denied.

82. Admitted that paragraph 82 paraphrases certain language of claim 1 of the '325 Patent. Otherwise denied.

83. Admitted that paragraph 83 quotes language of claim 1 of the '325 Patent. Otherwise denied.

84. Admitted that paragraph 84 quotes certain language from the '325 Patent file history. Otherwise denied.

U.S. Patent No. 11,671,702

85. Samsung admits that United States Patent No. 11,671,702 (“the ’702 Patent”) is titled “Real Time Assessment of Picture Quality” and lists an issue date of June 6, 2023, and that a copy is purported to be attached as Exhibit G to the Complaint. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 85 and denies them on that basis.

86. Denied.

87. Denied.

88. Denied.

89. Denied.

90. Denied.

91. Denied.

92. Admitted that paragraph 92 paraphrases certain language of claim 1 of the ’702 Patent. Otherwise denied.

93. Admitted that paragraph 93 quotes language of claim 1 of the ’702 Patent. Otherwise denied.

94. Admitted that paragraph 94 quotes certain language from the ’702 Patent file history. Otherwise denied.

U.S. Patent No. 12,250,452

95. Samsung admits that United States Patent No. 12,250,452 (“the ’452 Patent”) is titled “Real Time Assessment of Picture Quality” and lists an issue date of March 11, 2025, and that a copy is purported to be attached as Exhibit H to the Complaint. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 95 and denies them on that basis.

96. Denied.

97. Denied.

98. Denied.

99. Denied.

100. Denied.

101. Denied.

102. Admitted that paragraph 102 paraphrases certain language of claim 1 of the '452 Patent. Otherwise denied.

103. Admitted that paragraph 103 quotes language of claim 1 of the '452 Patent. Otherwise denied.

104. Admitted that paragraph 104 quotes certain language from the '452 Patent file history. Otherwise denied.

ALLEGED KNOWLEDGE OF SNAPAID'S PROPRIETARY TECHNOLOGY

105. Samsung states that it lacks sufficient knowledge or information at this point regarding what is meant by “disclosed its technology.” Samsung admits that Samsung Electronics (UK) Ltd. entered into a dual non-disclosure agreement with SnapAid in September 2015. Otherwise denied.

106. Samsung admits that personnel of SnapAid met with personnel of a particular group within Samsung in September 2015.

107. Samsung states that it lacks sufficient knowledge or information at this point regarding what is meant by “its proprietary image improvement technology” and “proprietary image improvement algorithms.” Samsung admits that personnel of SnapAid provided personnel of a particular group within Samsung with materials purporting to be several versions of a SnapAid Android APK containing executable object code. Otherwise denied.

108. Samsung states that it lacks sufficient knowledge or information at this point regarding what is meant by “critical technical details.” Admitted that personnel of SnapAid provided personnel of a particular group within Samsung with a user manual. Otherwise denied.

109. On information and belief, denied.

110. Denied.

SAMSUNG’S ACCUSED PRODUCTS

111. Admitted that Samsung smartphones and tablets provide cutting edge photography, including taking clear, high-resolution pictures. Otherwise denied.

112. Admitted that SEA sells, offers for sale, and/or imports into the United States Galaxy smartphones and tablets. Otherwise denied.

113. Admitted that the Complaint purports to characterize the scope of products it refers to as The Flaw Detection Accused Products. Otherwise denied.

114. Admitted that the Complaint purports to characterize the scope of products it refers to as the Shot Suggestion Accused Products. Otherwise denied.

115. Admitted that the Complaint purports to characterize the scope of products it refers to as the Palm Gesture Accused Products. Otherwise denied.

COUNT I – ALLEGED INFRINGEMENT OF THE ’348 PATENT

116. Samsung incorporates its responses to the allegations set forth in paragraphs 1 through 115 as set forth above.

117. Denied.

118. Denied that the attached claim chart shows infringement.

119. Admitted that Samsung had knowledge of the ’348 Patent due to receipt of the Complaint. Otherwise denied.

120. Denied.

121. Denied.

122. Denied.

123. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123, and denies them on that basis.

124. Denied.

125. Denied.

126. Denied.

127. Denied.

128. Denied.

COUNT II – ALLEGED INFRINGEMENT OF THE '226 PATENT

129. Samsung incorporates its responses to the allegations set forth in paragraphs 1 through 128 as set forth above.

130. Denied.

131. Denied that the attached claim chart shows infringement.

132. Admitted that Samsung had knowledge of the '226 Patent due to receipt of the Complaint. Otherwise denied.

133. Denied.

134. Denied.

135. Denied.

136. Denied.

137. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137, and denies them on that basis.

138. Denied.

139. Denied.

140. Denied.

141. Denied.

142. Denied.

COUNT III – ALLEGED INFRINGEMENT OF THE '537 PATENT

143. Samsung incorporates its responses to the allegations set forth in paragraphs 1 through 142 as set forth above.

144. Denied.

145. Denied that the attached claim chart shows infringement.

146. Admitted that Samsung had knowledge of the '537 Patent due to receipt of the Complaint. Otherwise denied.

147. Denied.

148. Denied.

149. Denied.

150. Denied.

151. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151, and denies them on that basis.

152. Denied.

153. Denied.

154. Denied.

155. Denied.

156. Denied.

COUNT IV – ALLEGED INFRINGEMENT OF THE '682 PATENT

157. Samsung incorporates its responses to the allegations set forth in paragraphs 1 through 156 as set forth above.

158. Denied.

159. Denied that the attached claim chart shows infringement.

160. Admitted that Samsung had knowledge of the '682 Patent due to receipt of the Complaint. Otherwise denied.

161. Denied.

162. Denied.

163. Denied.

164. Denied.

165. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165, and denies them on that basis.

166. Denied.

167. Denied.

168. Denied.

169. Denied.

170. Denied.

COUNT V – ALLEGED INFRINGEMENT OF THE '901 PATENT

171. Samsung incorporates its responses to the allegations set forth in paragraphs 1 through 170 as set forth above.

172. Denied.

173. Denied that the attached claim chart shows infringement.

174. Admitted that Samsung had knowledge of the '901 Patent due to receipt of the Complaint. Otherwise denied.

175. Denied.

176. Denied.

177. Denied.

178. Denied.

179. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 179, and denies them on that basis.

180. Denied.

181. Denied.

182. Denied.

183. Denied.

184. Denied.

COUNT VI – ALLEGED INFRINGEMENT OF THE '325 PATENT

185. Samsung incorporates its responses to the allegations set forth in paragraphs 1 through 184 as set forth above.

186. Denied.

187. Denied that the attached claim chart shows infringement.

188. Admitted that Samsung had knowledge of the '325 Patent due to receipt of the Complaint. Otherwise denied.

189. Denied.

190. Denied.

191. Denied.

192. Denied.

193. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193, and denies them on that basis.

194. Denied.

195. Denied.

196. Denied.

197. Denied.

198. Denied.

COUNT VII – ALLEGED INFRINGEMENT OF THE '702 PATENT

199. Samsung incorporates its responses to the allegations set forth in paragraphs 1 through 198 as set forth above.

200. Denied.

201. Denied that the attached claim chart shows infringement.

202. Admitted that Samsung had knowledge of the '702 Patent due to receipt of the Complaint. Otherwise denied.

203. Denied.

204. Denied.

205. Denied.

206. Denied.

207. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 207, and denies them on that basis.

208. Denied.

209. Denied.

210. Denied.

211. Denied.

212. Denied.

COUNT VIII – ALLEGED INFRINGEMENT OF THE '452 PATENT

213. Samsung incorporates its responses to the allegations set forth in paragraphs 1 through 212 as set forth above.

214. Denied.

215. Denied that the attached claim chart shows infringement.

216. Admitted that Samsung had knowledge of the '452 Patent due to receipt of the Complaint. Otherwise denied.

217. Denied.

218. Denied.

219. Denied.

220. Denied.

221. Samsung lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 221, and denies them on that basis.

222. Denied.

223. Denied.

224. Denied.

225. Denied.

226. Denied.

RESPONSE TO JURY TRIAL DEMAND

This sentence contains a demand for jury trial to which no response is required.

PRAYER FOR RELIEF

Denied that SnapAid is entitled to any of the relief it seeks.

SAMSUNG'S AFFIRMATIVE DEFENSES

Subject to the responses above, and fully incorporating by reference the statements in Samsung Counterclaims below, Samsung alleges and asserts the following defenses in response to the Complaint, undertaking the burden of proof only as to those defenses deemed affirmative defenses by law, regardless of how such defenses are denominated herein. In addition to the

Affirmative Defenses described below, and subject to the responses above, Samsung specifically reserves all rights to allege additional defenses that become known through the course of discovery or otherwise.

Defense No. 1: Failure to State a Claim

The Complaint fails to state a claim upon which relief can be granted as Plaintiff has failed to plead its claims with sufficient specificity or support to place Samsung on notice of Plaintiff's theories of alleged infringement with respect to the Asserted Patents.

Defense No. 2: Non-Infringement

Samsung does not infringe and has not infringed any valid and enforceable claims of the Asserted Patents, either literally or under the doctrine of equivalents, directly or indirectly.

Defense No. 3: Invalidity

At least certain claims of the Asserted Patents are invalid because they do not meet the conditions of patentability and/or comply with the requirements of 35 U.S.C. §§ 101, et seq., including without limitations Sections 102, 103, and 112 or judicially created doctrines of invalidity.

Defense No. 4: Prosecution Bars

Plaintiff's claims are barred, in whole or in part, under the doctrine of prosecution history estoppel and/or prosecution disclaimer.

Defense No. 5: Prosecution Laches

Plaintiff's claims are barred, in whole or in part, under the doctrine of prosecution laches.

Defense No. 6: Equity & No Irreparable Harm

Plaintiff's claims, including with regard to injunctive relief are barred, in whole or in part, under additional principles of equity. Further, the requirements for injunctive relief cannot be satisfied here, including lack of irreparable harm.

Defense No. 7: Use or Manufacture for the United States

Plaintiff's claims for relief are barred by 28 U.S.C. § 1498 to the extent they arise from use or manufacture of the alleged inventions of the Asserted Patents by or for the United States government.

Defense No. 8: Ensnarement

Plaintiff's claims for relief under the doctrine of equivalents, if any, are barred by the doctrine of ensnarement.

Defense No. 9: No Entitlement to Enhanced Damages or Attorneys' Fees

Plaintiff is not entitled to enhanced or increased damages or attorneys' fees. Samsung reserves the option to move for attorneys' fees under 35 U.S.C. § 285.

Defense No. 10: No Standing

On information and belief, Plaintiff's claims for relief are barred to the extent that Plaintiff lacks standing to bring this action.

Defense No. 11: No Willful Infringement

The Complaint fails to state a claim for relief against Samsung for willful infringement and the requirements for willful infringement cannot be satisfied.

Additional Defenses

227. Samsung reserves the right to assert and rely on any additional defenses that may become known or available to Samsung during the course of the litigation, including through discovery.

SAMSUNG’S COUNTERCLAIMS

1. Pursuant to Federal Rule of Civil Procedure 13, Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Counterclaim-Plaintiffs” or “Samsung”) counterclaim against SnapAid, Ltd. (“SnapAid”) and, in support of thereof, allege the following:

2. On April 10, 2025, SnapAid filed its Complaint against Samsung, alleging that eight patents are allegedly infringed by certain smartphone and tablet products.

3. Contrary to SnapAid’s assertions, the Asserted Patents are not infringed and/or are invalid, as set forth below.

PARTIES

4. Counterclaim-Plaintiff Samsung Electronics Co., Ltd. is a Korean corporation with its principal place of business at 129 Samsungro, Maetan-3dong, Yeongtong-gu Suwon-si, Gyeonggi-do, 16677, Korea.

5. Counterclaim-Plaintiff Samsung Electronics America, Inc. is a New York corporation with its principal place of business at 85 Challenger Road, Ridgefield Park, New Jersey, 07660.

6. Counterclaim-Defendant SnapAid, Ltd. (“SnapAid”) has represented that it is an Israeli company with its principal place of business at Rehov Moshe Lerer 40, Ness Ziona, Rehovot - Mehoz HaMerkaz - Israel 7404987.

JURISDICTION AND VENUE

7. This Court has jurisdiction over Counterclaim-Plaintiffs’ Declaratory Judgment claims pursuant to 28 U.S.C. §§ 2201–2202 and subject matter jurisdiction over patent infringement and validity pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. The Court has personal jurisdiction over SnapAid, at least because SnapAid has submitted to the personal jurisdiction of this Court by filing the Complaint.

9. Venue is proper in this District as to these Counterclaims pursuant to 28 U.S.C. §§ 1391(b)-(c) and 1400(b) inter alia, at least because SnapAid has submitted to the venue of this Court by filing its Complaint here and because SnapAid is a foreign entity.

FIRST COUNTERCLAIM

(DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF '348 PATENT)

10. Samsung realleges Counterclaim paragraphs 1-9 as if fully set forth herein.

11. SnapAid contends that various Samsung products infringe the '348 Patent. Samsung has not infringed and does not infringe, directly or indirectly, any claim of the '348 Patent.

12. As demonstrated by the Complaint and the defenses and counterclaim raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid regarding non-infringement of the '348 Patent.

13. A judicial declaration of non-infringement of the '348 Patent is necessary and appropriate to resolve this controversy.

14. This is an exceptional case entitling Counterclaim-Plaintiffs to an award of their attorneys' fees incurred in connection with this action pursuant to 35 U.S.C. § 285.

SECOND COUNTERCLAIM

(DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF '226 PATENT)

15. Samsung realleges Counterclaim paragraphs 1-14 as if fully set forth herein.

16. SnapAid contends that various Samsung products infringe the '226 Patent. Samsung has not infringed and does not infringe, directly or indirectly, any claim of the '226 Patent.

17. As demonstrated by the Complaint and the defenses and counterclaim raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid regarding non-infringement of the '226 Patent.

18. A judicial declaration of non-infringement of the '226 Patent is necessary and appropriate to resolve this controversy.

19. This is an exceptional case entitling Counterclaim-Plaintiffs to an award of their attorneys' fees incurred in connection with this action pursuant to 35 U.S.C. § 285.

THIRD COUNTERCLAIM

(DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF '537 PATENT)

20. Samsung realleges Counterclaim paragraphs 1-19 as if fully set forth herein.

21. SnapAid contends that various Samsung products infringe the '537 Patent. Samsung has not infringed and does not infringe, directly or indirectly, any claim of the '537 Patent.

22. As demonstrated by the Complaint and the defenses and counterclaim raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid regarding non-infringement of the '537 Patent.

23. A judicial declaration of non-infringement of the '537 Patent is necessary and appropriate to resolve this controversy.

24. This is an exceptional case entitling Counterclaim-Plaintiffs to an award of their attorneys' fees incurred in connection with this action pursuant to 35 U.S.C. § 285.

FOURTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF '682 PATENT)

25. Samsung realleges Counterclaim paragraphs 1-24 as if fully set forth herein.

26. SnapAid contends that various Samsung products infringe the '682 Patent. Samsung has not infringed and does not infringe, directly or indirectly, any claim of the '682 Patent.

27. As demonstrated by the Complaint and the defenses and counterclaim raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid regarding non-infringement of the '682 Patent.

28. A judicial declaration of non-infringement of the '682 Patent is necessary and appropriate to resolve this controversy.

29. This is an exceptional case entitling Counterclaim-Plaintiffs to an award of their attorneys' fees incurred in connection with this action pursuant to 35 U.S.C. § 285.

FIFTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF '901 PATENT)

30. Samsung realleges Counterclaim paragraphs 1-29 as if fully set forth herein.

31. SnapAid contends that various Samsung products infringe the '901 Patent. Samsung has not infringed and does not infringe, directly or indirectly, any claim of the '901 Patent.

32. As demonstrated by the Complaint and the defenses and counterclaim raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid regarding non-infringement of the '901 Patent.

33. A judicial declaration of non-infringement of the '901 Patent is necessary and appropriate to resolve this controversy.

34. This is an exceptional case entitling Counterclaim-Plaintiffs to an award of their attorneys' fees incurred in connection with this action pursuant to 35 U.S.C. § 285.

SIXTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF '325 PATENT)

35. Samsung realleges Counterclaim paragraphs 1-34 as if fully set forth herein.

36. SnapAid contends that various Samsung products infringe the '325 Patent. Samsung has not infringed and does not infringe, directly or indirectly, any claim of the '325 Patent.

37. As demonstrated by the Complaint and the defenses and counterclaim raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid regarding non-infringement of the '325 Patent.

38. A judicial declaration of non-infringement of the '325 Patent is necessary and appropriate to resolve this controversy.

39. This is an exceptional case entitling Counterclaim-Plaintiffs to an award of their attorneys' fees incurred in connection with this action pursuant to 35 U.S.C. § 285.

SEVENTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF '702 PATENT)

40. Samsung realleges Counterclaim paragraphs 1-39 as if fully set forth herein.

41. SnapAid contends that various Samsung products infringe the '702 Patent. Samsung has not infringed and does not infringe, directly or indirectly, any claim of the '702 Patent.

42. As demonstrated by the Complaint and the defenses and counterclaim raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid regarding non-infringement of the '702 Patent.

43. A judicial declaration of non-infringement of the '702 Patent is necessary and appropriate to resolve this controversy.

44. This is an exceptional case entitling Counterclaim-Plaintiffs to an award of their attorneys' fees incurred in connection with this action pursuant to 35 U.S.C. § 285.

EIGHTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF '452 PATENT)

45. Samsung realleges Counterclaim paragraphs 1-44 as if fully set forth herein.

46. SnapAid contends that various Samsung products infringe the '452 Patent. Samsung has not infringed and does not infringe, directly or indirectly, any claim of the '452 Patent.

47. As demonstrated by the Complaint and the defenses and counterclaim raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid regarding non-infringement of the '451 Patent.

48. A judicial declaration of non-infringement of the '452 Patent is necessary and appropriate to resolve this controversy.

49. This is an exceptional case entitling Counterclaim-Plaintiffs to an award of their attorneys' fees incurred in connection with this action pursuant to 35 U.S.C. § 285.

NINTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF INVALIDITY OF '348 PATENT)

50. Samsung realleges Counterclaim paragraphs 1-49 as if fully set forth herein.

51. One or more claims of the '348 Patent is invalid for failure to meet the conditions of patentability and/or otherwise comply with one or more of 35 U.S.C. §§ 101, 102, 103, and 112. For example, one or more claims are invalid in view of the prior art, including for example U.S.

Pat. App. Pub. No. 2010/0149361, U.S. Patent No. 8,508,622, and U.S. Pat. App. Pub. 2012/0105662.

52. As a result of at least the allegations contained in the Complaint and the defenses raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid concerning the validity of the '348 Patent.

53. A judicial declaration of invalidity of the '348 Patent is appropriate and necessary to resolve this controversy.

TENTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF INVALIDITY OF '226 PATENT)

54. Samsung realleges Counterclaim paragraphs 1-53 as if fully set forth herein.

55. One or more claims of the '226 Patent is invalid for failure to meet the conditions of patentability and/or otherwise comply with one or more of 35 U.S.C. §§ 101, 102, 103, and 112. For example, one or more claims are invalid in view of the prior art, including for example U.S. Pat. App. Pub. No. 2010/0149361, U.S. Patent No. 8,508,622, and U.S. Pat. App. Pub. No. 2008/0192129.

56. As a result of at least the allegations contained in the Complaint and the defenses raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid concerning the validity of the '226 Patent.

57. A judicial declaration of invalidity of the '226 Patent is appropriate and necessary to resolve this controversy.

ELEVENTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF INVALIDITY OF '537 PATENT)

58. Samsung realleges Counterclaim paragraphs 1-57 as if fully set forth herein.

59. One or more claims of the '537 Patent is invalid for failure to meet the conditions of patentability and/or otherwise comply with one or more of 35 U.S.C. §§ 101, 102, 103, and 112. For example, one or more claims are invalid in view of the prior art, including for example U.S. Pat. App. Pub. No. 2010/0149361, U.S. Patent No. 8,508,622, and U.S. Pat. App. Pub. No. 2008/0192129.

60. As a result of at least the allegations contained in the Complaint and the defenses raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid concerning the validity of the '537 Patent.

61. A judicial declaration of invalidity of the '537 Patent is appropriate and necessary to resolve this controversy.

TWELFTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF INVALIDITY OF '682 PATENT)

62. Samsung realleges Counterclaim paragraphs 1-61 as if fully set forth herein.

63. One or more claims of the '682 Patent is invalid for failure to meet the conditions of patentability and/or otherwise comply with one or more of 35 U.S.C. §§ 101, 102, 103, and 112. For example, one or more claims are invalid in view of the prior art, including for example U.S. Pat. App. Pub. No. 2010/0149361, U.S. Patent No. 8,508,622, and U.S. Pat. App. Pub. No. 2008/0192129.

64. As a result of at least the allegations contained in the Complaint and the defenses raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid concerning the validity of the '682 Patent.

65. A judicial declaration of invalidity of the '682 Patent is appropriate and necessary to resolve this controversy.

THIRTEENTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF INVALIDITY OF '901 PATENT)

66. Samsung realleges Counterclaim paragraphs 1-65 as if fully set forth herein.

67. One or more claims of the '901 Patent is invalid for failure to meet the conditions of patentability and/or otherwise comply with one or more of 35 U.S.C. §§ 101, 102, 103, and 112. For example, one or more claims are invalid in view of the prior art, including for example U.S. Pat. App. Pub. No. 2010/0149361, U.S. Patent No. 8,508,622, and U.S. Pat. App. Pub. No. 2008/0192129.

68. As a result of at least the allegations contained in the Complaint and the defenses raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid concerning the validity of the '901 Patent.

69. A judicial declaration of invalidity of the '901 Patent is appropriate and necessary to resolve this controversy.

FOURTEENTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF INVALIDITY OF '325 PATENT)

70. Samsung realleges Counterclaim paragraphs 1-69 as if fully set forth herein.

71. One or more claims of the '325 Patent is invalid for failure to meet the conditions of patentability and/or otherwise comply with one or more of 35 U.S.C. §§ 101, 102, 103, and 112. For example, one or more claims are invalid in view of the prior art, including for example U.S. Pat. App. Pub. No. 2010/0149361, U.S. Patent No. 8,508,622, and U.S. Pat. App. Pub. No. 2008/0192129.

72. As a result of at least the allegations contained in the Complaint and the defenses raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid concerning the validity of the '325 Patent.

73. A judicial declaration of invalidity of the '325 Patent is appropriate and necessary to resolve this controversy.

FIFTEENTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF INVALIDITY OF '702 PATENT)

74. Samsung realleges Counterclaim paragraphs 1-73 as if fully set forth herein.

75. One or more claims of the '702 Patent is invalid for failure to meet the conditions of patentability and/or otherwise comply with one or more of 35 U.S.C. §§ 101, 102, 103, and 112. For example, one or more claims are invalid in view of the prior art, including for example U.S. Pat. App. Pub. No. 2010/0149361, U.S. Patent No. 8,508,622, and U.S. Pat. App. Pub. No. 2008/0192129.

76. As a result of at least the allegations contained in the Complaint and the defenses raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid concerning the validity of the '702 Patent.

77. A judicial declaration of invalidity of the '702 Patent is appropriate and necessary to resolve this controversy.

SIXTEENTH COUNTERCLAIM

(DECLARATORY JUDGMENT OF INVALIDITY OF '452 PATENT)

78. Samsung realleges Counterclaim paragraphs 1-77 as if fully set forth herein.

79. One or more claims of the '452 Patent is invalid for failure to meet the conditions of patentability and/or otherwise comply with one or more of 35 U.S.C. §§ 101, 102, 103, and 112. For example, one or more claims are invalid in view of the prior art, including for example U.S. Pat. App. Pub. No. 2010/0149361, U.S. Patent No. 8,508,622, and U.S. Pat. App. Pub. No. 2008/0192129.

80. As a result of at least the allegations contained in the Complaint and the defenses raised by Samsung, an actual and justiciable controversy exists between Samsung and SnapAid concerning the validity of the '452 Patent.

81. A judicial declaration of invalidity of the '452 Patent is appropriate and necessary to resolve this controversy.

**RESERVATION OF RIGHTS TO ASSERT
ADDITIONAL DEFENSES OR COUNTERCLAIMS**

Counterclaim-Plaintiffs reserve the right to supplement their Counterclaims. Counterclaim-Plaintiffs have not knowingly or intentionally waived any counterclaims, and reserve the right to assert and rely upon other counterclaims that may become available or apparent throughout the course of this action. Counterclaim-Plaintiffs continue to investigate this matter and reserve the right to amend or seek to amend their Counterclaims to assert any counterclaims that come to light upon further investigation and discovery.

DEMAND FOR A JURY TRIAL

In accordance with Rule 38 of the Federal Rules of Civil Procedure, Samsung demands a trial by jury as to all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Samsung respectfully requests entry of judgement in its favor and against SnapAid and that Samsung be granted the following relief:

- a) dismissal with prejudice of the claims raised in SnapAid's Complaint;
- b) denial of all remedies sought by SnapAid;
- c) declaratory judgment that Samsung does not infringe and has not infringed any claim of the Asserted Patents, either directly or indirectly, literally or under the doctrine of equivalents, willfully, or otherwise;

- d) declaratory judgment that all asserted claims of the Asserted Patents are invalid;
- e) a ruling that this is an exceptional case pursuant to 35 U.S.C. § 285 and an award to Samsung of its costs, expenses, and attorneys' fees; and
- f) all such other and further relief as this Court deems just and proper.

Dated: August 4, 2025

Respectfully submitted,

By: /s/ Melissa R. Smith

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Ltd., and Samsung Electronics America, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 4th day of August 2025.

/s/ Melissa R. Smith
Melissa R. Smith