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April 10, 2020

VIA Certified Letter

Samsung Electronics
Attn: General Counsel Jamal Haughton
85 Challenger Rd.
Ridgefield Park, NJ 07660

Re: Patent Infringement based on information on Samsung's website relating to Making, Offering and Selling Samsung Bluetooth-Compatible Products

Dear Mr. Haughton

One-E-Way is an electronics research and development company located in Pasadena, California. One-E-Way makes, offers and sells wireless audio products, including transmitters, speakers and headsets. One-E-Way is also a technology licensing company that owns a growing number of patents directed to wireless audio devices that transmit and/or receive data suitable for high-quality music. This letter is to address infringement of One-E-Way's patents by initiating a patent licensing discussion with the aim of avoiding patent infringement litigation.

One-E-Way recently concluded patent infringement litigation before the International Trade Commission (Investigation No. 337-TA-943) in which it asserted that Sony, Sennheiser, Jawbone, GN Netcom (Jabra) and others were infringing One-E-Way patents by importing Bluetooth-compatible headsets into the United States. As the litigation approached final hearing, the ITC found the asserted patent claims invalid. One-E-Way appealed that decision, and the U.S. Court of Appeals for the Federal Circuit reversed the ITC's decision as erroneous, confirming the validity of One-E-Way's patents. See *One-E-Way, Inc. v. Int'l Trade Comm'n* 859 F.3d 1059 (Fed.

Cir. 2017). On remand following the Federal Circuit's reversal, the remaining respondents, including Sony and Jabra, joined other respondents, who had settled earlier, and agreed to take a license under One-E-Way's patents. Subsequent to the ITC litigation, and through cooperative license negotiations without the need for litigation, JLab Audio has also taken a license under One-E-Way's patents.

One-E-Way is committed to protecting its innovations and its substantial investment in wireless technology, including enforcing its patents as needed. Since the filing of the ITC investigation, the U.S. Patent Office has granted additional patents to One-E-Way, including allowance of patents over prior art and invalidity theories identified by the respondent parties. The list of One-E-Way's patents now includes U.S. Patent Nos. 7,412,294, 7,684,885, 7,865,258, 8,131,391, 9,100,000, 9,282,396, 10,129,627, and 10,468,047 with a continuing application pending.

Base on information on Samsung's website, Bluetooth-Compatible products by Samsung have been made, offered and sold for some time and continue to be made and sold, including wireless **earbud, headphone, speaker, tablet, computer, TV, smartphone and wearable products** (e.g., Galaxy Buds, Noise Cancelling Headphones, Radiant360 Speaker, Galaxy Tab Tablet, Chromebook Computer, QLED TV, Galaxy Phone, Galaxy Watch).

The conduct of making, offering and selling these wireless earbud, headphone, speaker, tablet, computer, TV, smartphone and wearable products in the United States constitutes infringement of One-E-Way's patents, namely the '885, '258, '391, '000, '396, '627 and '047 patents. One-E-Way does not assert patent infringement lightly, but rather does so based on years of experience, thorough research and expert analysis. Moreover, litigation-based testing of One-E-Way's patents, as well as the results of several recent, independent, arms-length license negotiations, including the legal teams of Sony, Sennheiser and Jabra, and more recently with the legal team of JLab Audio, provide a compelling framework for valuing the rights to make, offer and sell devices that use One-E-Way's patented inventions.

Please respond to the undersigned immediately, and confirm that Samsung will meet with One-E-Way to discuss the patent issues mentioned above.

Sincerely,

C. Earl Woolfork, CEO/CTO
One-E-Way, Inc.