

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

PAYGEO, LLC,	)	
	)	Case No. 2:25-cv-334
Plaintiff,	)	
	)	<b>DEMAND FOR JURY TRIAL</b>
v.	)	
	)	
SAMSUNG ELECTRONICS CO., LTD., and	)	
SAMSUNG ELECTRONICS AMERICA,	)	
INC.,	)	
	)	
Defendants.	)	
	)	
	)	

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**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff PayGeo, LLC (“Plaintiff” or “PayGeo”) files this Complaint for Patent Infringement and Demand for Jury Trial against Samsung Electronics Co., Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEA”) (collectively “Defendants” or “Samsung”) and alleges as follows:

**THE PARTIES**

1. PayGeo is a limited liability company organized and existing under the laws of Texas, with its principal place of business located at 508 South Airport Boulevard, South San Francisco, CA 94080-6912.

2. SEC is a corporation organized and existing under the laws of the Republic of Korea, with its principal place of business located at 129 Samsung-Ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, 16677, Republic of Korea. SEC designs and makes products, including telecommunication and mobile phone products that are sold throughout the United States, including in this District, and introduces products into the stream of commerce that incorporate

infringing technology knowing that they would be sold in this District and elsewhere in the United States.

3. SEA is a corporation organized and existing under the laws of New York, with its principal place of business located at 85 Challenger Road, Ridgefield Park, New Jersey 07660. SEA has been registered to do business in Texas under File Number 0011028006 since at least June 10, 1996. SEA may be served with process through its registered agent, CT Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201. SEA is a wholly-owned subsidiary of SEC. SEA conducts business operations at multiple locations within this District. For example, SEA maintains offices located at 6625 Excellence Way, Plano, Texas 75023; a retail store located at 2601 Preston Road, Frisco, Texas 75034; and a support center located at 3580 Preston Road, Suite 100, Frisco, Texas 75034. SEA markets and sells products, including consumer electronics and mobile devices, throughout the United States, including in this District, and introduces products into the stream of commerce that incorporate infringing technology knowing that they would be sold in this District and elsewhere in the United States.

### **JURISDICTION AND VENUE**

4. Jurisdiction and venue for this action are proper in this District.

5. This action for patent infringement arises under the patent laws of the United States, 35 U.S.C. § 101 *et seq.* This Court has original subject matter jurisdiction over this controversy pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this is a civil action arising under the Patent Act.

6. Each Defendant is subject to this Court's personal jurisdiction consistent with the principles of due process and the Texas Long Arm Statute. Tex. Civ. Prac. & Rem. Code §§ 17.041, *et seq.*

7. This Court has personal jurisdiction over each Defendant at least because, through each Defendant's own acts and through the acts of the other Defendants acting as its agent, representative, or alter ego, they each (i) have a presence or a regular and established place of business in the State of Texas and this District; (ii) have purposefully availed themselves of the rights and benefits of the laws of the State of Texas and this District; (iii) have done and are doing substantial business in the State of Texas and this District, directly or through intermediaries, both generally and with respect to the allegations in this Complaint, including their one or more acts of infringement in the State of Texas and this District; (iv) maintain continuous and systematic contacts in the State of Texas and this District; and (v) place products alleged to be infringing in this Complaint in the stream of commerce, directly or through intermediaries, with awareness that those products are likely destined for use, offered for sale, sold, and imported into the State of Texas and this District.

8. For example, Defendants have authorized retailers and distributors in the State of Texas and this District for the products alleged to be infringing in this Complaint, and Defendants have derived substantial revenues from their infringing acts occurring within the State of Texas and this District.

9. Defendants have established sufficient minimum contacts with the State of Texas and this District such that they should reasonably and fairly anticipate being brought into court in the State of Texas and this District without offending traditional notions of fair play and substantial justice, and Defendants have purposefully directed activities at residents of the State of Texas and this District. Moreover, the patent infringement claims alleged herein arise out and are related to one or more of the foregoing activities. A substantial part of the events giving rise

to Plaintiffs' claims, including acts of patent infringement, have occurred in the State of Texas and this District.

10. Venue is also proper in this Court under 28 U.S.C. §§ 1391(b) and (c) and 1400(b) because each Defendant is subject to personal jurisdiction in this District and has committed acts of infringement in this District. Each Defendant, through its own acts and through the acts of each other Defendant acting as its agent, representative, or alter ego, makes, uses, sells, offers to sell, and imports infringing products within this District, has a continuing presence within this District, and has the requisite minimum contacts with this District such that venue is proper.

11. For example, SEA maintains a regular and established place of business in this District located at 6625 Excellence Way, Plano, Texas 75023 and has committed acts of infringement in this District, as described herein. Further, SEC directs and controls the actions of SEA such that it too maintains a regular and established place of business in this District located at 6625 Excellence Way, Plano, Texas 75023 and has committed acts of infringement in this District. Additionally, venue is proper as to SEC, a foreign corporation, because suits against foreign entities are proper in any judicial district under 28 U.S.C. § 1391(c)(3).

12. Further, Defendants have submitted to venue and the exercise of personal jurisdiction in this District in patent infringement actions previously filed by other parties. *See, e.g.,* Answer, ¶¶ 11-20, *The Rsch. Found. for the S.U.N.Y., et. al. v. Samsung Elecs. Co., et. al.*, No. 2:23-cv-00141 (E.D. Tex. Aug. 10, 2023), ECF No. 25; Answer, ¶¶ 13, 18, *Cal. Inst. Tech v. Samsung Elecs. Co.*, No. 2:21-cv-00446 (E.D. Tex. Apr. 5, 2022), ECF No. 19; Answer to Amended Complaint, ¶¶ 6, 7, *Jawbone Innovations LLC v. Samsung Elecs. Co.*, No. 2:21-cv-00186 (E.D. Tex. Dec. 9, 2021), ECF No. 27.

**PAYGEO’S INNOVATIONS AND ASSERTED PATENTS**

13. PayGeo’s founder, Rabih Salem Ballout, invented digital wallet technology that facilitates and executes financial transactions between mobile devices. PayGeo’s inventions enable its users to transfer, receive, or otherwise conduct financial transactions in a secured mobile environment. Mr. Ballout combined his love for electronics and his hobby for building circuitry for different applications in creating a platform that enables users to conduct various financial transactions using a mobile device.

14. In recognition of its innovations, the United States Patent and Trademark Office (“USPTO”) has awarded PayGeo numerous patents covering its secure financial transaction platform.

15. On October 8, 2013, the USPTO duly and legally issued U.S. Patent No. 8,554,671 (the “’671 Patent”), entitled “System and Associated Method and Service for Providing a Platform that Allows for the Exchange of Cash Between Members in a Mobile Environment.” The ’671 Patent lists Rabih Salem Ballout as its inventor and is assigned to PayGeo. Attached hereto as Exhibit 1 is a true and correct copy of the ’671 Patent.

16. The ’671 Patent generally discloses a method and system for initiating a financial transaction via an application on a mobile device; communicating the transaction between devices using uniquely generated codes; using the codes to authenticate the transaction; and executing the transaction.

17. On October 6, 2020, the USPTO duly and legally issued U.S. Patent No. 10,796,296 (the “’296 Patent”), entitled “Kit, System and Associated Method and Service for Providing a Platform to Prevent Fraudulent Financial Transactions.” The ’296 Patent lists Rabih

Salem Ballout as its inventor and is assigned to PayGeo. Attached hereto as Exhibit 2 is a true and correct copy of the '296 Patent.

18. The '296 Patent generally discloses a system and method for registering various payment methods from various payment sources within an application on a mobile device; authenticating the payment methods by communicating between the device and corresponding credit card companies, financial institutions, and/or other third-party entities; storing the payment methods within the application; accessing the application using a security credential; initiating a financial transaction using a function identifier within the application; selecting a registered payment method; communicating the transaction between the device and the corresponding credit card company, financial institution, or other third-party entity; requesting execution of the transaction from the corresponding credit card company, financial institution, or other third-party entity; and providing a notification of the outcome of the transaction.

19. On March 2, 2021, the USPTO duly and legally issued U.S. Patent No. 10,937,018 (the "'018 Patent"), entitled "Kit, System and Associated Method and Service for Providing a Platform to Prevent Fraudulent Financial Transactions." The '018 Patent lists Rabi Salem Ballout as its inventor and is assigned to PayGeo. Attached hereto as Exhibit 3 is a true and correct copy of the '018 Patent.

20. The '018 Patent generally discloses a system and method for registering and authenticating various payment methods from various payment sources within an application on a mobile device by communicating between the device and corresponding credit card companies, financial institutions, and/or other third-party entities; storing the payment methods within the application; accessing the application using a security credential; initiating a financial transaction using a function identifier within the application; selecting a registered payment method;

communicating the transaction between the device and the corresponding credit card company, financial institution, or other third-party entity; requesting execution of the transaction from the corresponding credit card company, financial institution, or other third-party entity; and providing a notification of the outcome of the transaction.

21. On August 10, 2021, the USPTO duly and legally issued U.S. Patent No. 11,087,307 (the “’307 Patent”), entitled “Kit, System and Associated Method and Service for Providing a Platform to Prevent Fraudulent Financial Transactions.” The ’307 Patent lists Rabih Salem Ballout as its inventor and is assigned to PayGeo. Attached hereto as Exhibit 4 is a true and correct copy of the ’307 Patent.

22. The ’307 Patent generally discloses a system and method for registering various payment methods from various payment sources within an application on a mobile device; authenticating the payment methods by communicating between the device and corresponding financial institutions and/or other third-party entities; storing the payment methods within the application; accessing the application using a security credential; initiating a financial transaction using a function identifier within the application; selecting a registered payment method; communicating the transaction between the device and the corresponding financial institution or other third-party entity; requesting execution of the transaction from the corresponding financial institution or other third-party entity; and providing a notification of the outcome of the transaction.

23. On June 18, 2024, the USPTO duly and legally issued U.S. Patent No. 12,014,347 (the “’347 Patent”), entitled “Kit, System and Associated Method and Service for Providing a Platform to Prevent Fraudulent Financial Transactions.” The ’347 Patent lists Rabih Salem

Ballout as its inventor and is assigned to PayGeo. Attached hereto as Exhibit 5 is a true and correct copy of the '347 Patent.

24. The '347 Patent generally discloses a system and method for setting various security credentials on a mobile device; enabling secured access to a local application on the device and to features within the application; authenticating access to the application using one or more security credentials; and authenticating access to a feature using one or more security credentials.

25. The '671, '296, '018, '307, and '347 Patents are collectively referred to herein as the "Asserted Patents."

26. PayGeo owns all rights, title, and interest in and to the Asserted Patents.

27. PayGeo has not offered for sale or sold any product that embodies any claim of any of the Asserted Patents, nor has it licensed the Asserted Patents to any third party. Thus, PayGeo's recovery of pre-suit damages for Samsung's infringement of the Asserted Patents is not limited by 35 U.S.C. §287(a).

### **PATENT ELIGIBILITY**

28. All of the Asserted Patents are patent eligible, valid and enforceable. The Asserted Patents are not abstract and specifically claim inventive concepts that represent significant improvements over conventional systems for conducting electronic financial transactions.

29. The claimed inventions of the '671 Patent describe interactions between devices and servers that creates a highly secured mobile environment to facilitate financial transactions ('671 Patent at 4:49-53) utilizing tokenization technology to encrypt a financial transaction and to identify a user's sensitive financial information (*id.* at 4:66-5:3), and to authenticate financial

transactions utilizing a security level associated with the financial transaction (*id.* at 9:60-10:23, 10:64-11:3).

30. The '671 Patent improves the security of facilitating financial transactions between mobile devices by requiring a security level access to initiate a financial transaction via an application on an initiating mobile device; generating unique codes that identify the financial transaction and the user's sensitive financial information; using servers to transmit the generated codes from the initiating mobile device to appropriate financial institutions for verification and authentication of the financial transaction request and a reverse code from the financial institution back to the initiating mobile device accepting or declining the financial transaction request; and executing the financial transaction request accordingly on a receiving mobile device.

31. The claims of the '671 Patent describe an inventive concept because they provide a novel platform that facilitates financial transactions between mobile stations that unconventionally uses uniquely generated codes in lieu of sensitive financial information to transfer information relating to the financial transaction between mobile stations; to authenticate the transaction with corresponding financial institutions; and to transmit and execute the outcome of the transaction accordingly.

32. The claimed inventions of the '296 Patent describe interactions between a mobile device, servers, and payment sources to register and authenticate payment methods for use in future financial transactions within an application on the mobile device ('296 Patent at 3:66-4:7, 4:15-19) using bilateral communications between the payment sources of credit cards, financial institutions, and/or third-party entities, and the mobile device to store payment methods associated with a particular payment source on the application within the mobile device (*id.* at

5:14-20); utilizing function identifiers within the application to initiate a financial transaction with another mobile device using a payment method associated with a particular payment source (*id.* at 5:26-31, 6:51-61); facilitating bilateral communications between the payment source and the mobile device to execute the financial transaction (*id.* at 5:3-7, 5:31-33); and transmitting and notifying the other mobile device of the outcome of the financial transaction in real-time.

33. The '296 Patent improves the security of registering and storing financial information on a local application on a mobile device for use in future financial transactions by requiring a security level access to the application on the mobile device; establishing bilateral communication links between the mobile device and credit card companies, financial institutions, and/or third-party entities; registering payment methods associated with the credit card company, financial institution, and/or third-party entity; and storing the payment methods on the local application. Additionally, the '296 Patent improves the efficiency of facilitating financial transactions between mobile devices by utilizing a phone number associated with a receiving mobile device; requesting a financial transaction using an established bilateral communication link between an initiating mobile device and appropriate credit card company, financial institution, or third-party entity; and generating and transmitting a notification of the outcome of the financial transaction in real-time to the initiating mobile device and receiving mobile device.

34. The claims of the '296 Patent describe an inventive concept because they provide a novel and unconventional use of mobile devices with backend systems and specific authentication protocols that store payment methods associated with particular payment sources which use bilateral communications and function identifiers to initiate financial transactions with other mobile devices in real-time in order to protect the financial information of the user.

35. The claimed inventions of the '018 Patent describe an application on a mobile device configured to communicate between devices, servers, and payment sources to register and authenticate payment methods for use in future financial transactions ('018 Patent at 4:6-14, 4:22-26) using bilateral communications between the payment sources of credit cards, financial institutions, and/or third-party entities, and the mobile device to store payment methods associated with a particular payment source on the application within the mobile device (*id.* at 5:10-14, 5:22-28); utilizing function identifiers within the application to initiate a financial transaction with another mobile device using a payment method associated with a particular payment source (*id.* at 5:34-39, 6:60-7:3); facilitating bilateral communications between the payment source and the mobile device to execute the financial transaction (*id.* at 5:39-41); and transmitting and notifying the other mobile device of the outcome of the financial transaction in real-time.

36. The '018 Patent improves the security of registering and storing financial information on a local application on a mobile device for use in future financial transactions by requiring a security level access to the application on the mobile device; establishing bilateral communication links between the mobile device and credit card companies, financial institutions, and/or third-party entities; and registering and storing payment methods associated with the credit card company, financial institution, and/or third-party entity on the local application. Additionally, the '018 Patent improves the efficiency of conducting financial transactions between mobile devices by utilizing a phone number associated with a user of a receiving mobile device; requesting a financial transaction using an established bilateral communication link between an initiating mobile device and appropriate credit card company, financial institution, or third-party entity; and generating and transmitting a notification of the

outcome of the financial transaction in real-time to the initiating mobile device and receiving mobile device.

37. The claims of the '018 Patent describe an inventive concept because they provide a novel and unconventional system architecture that integrates the use of mobile devices with backend systems and servers secured by specific authentication protocols that store payment methods associated with particular payment sources which uses bilateral communications and function identifiers to initiate financial transactions with other mobile devices in real-time in order to protect the financial information of the user.

38. The claimed inventions of the '307 Patent describe an application on a mobile device configured to communicate between devices, servers, and payment sources to register and authenticate payment methods for use in future financial transactions ('307 Patent at, 4:11-19, 4:27-31) using bilateral communications between the payment sources of financial institutions and/or third-party entities, and the mobile device to store payment methods associated with a particular payment source on the application within the mobile device (*id.* at 5:16-20, 5:27-33); utilizing function identifiers within the application to initiate a financial transaction with another mobile device using a payment method associated with a particular payment source (*id.* at 5:39-44, 6:65-7:8); facilitating bilateral communications between the payment source and the mobile device to execute the financial transaction (*id.* at 5:44-46); and transmitting and notifying the other mobile device of the outcome of the financial transaction in real-time.

39. The '307 Patent improves the security of registering and storing financial information on a local application on a mobile device for use in future financial transactions by requiring a security level access to the application on the mobile device; establishing bilateral communication links between the mobile device and financial institutions and/or third-party

entities; and registering and storing payment methods associated with the financial institution and/or third-party entity on the local application. Additionally, the '307 Patent improves the efficiency of facilitating and verifying financial transactions between mobile devices by utilizing a phone number associated with a user of a receiving mobile device; requesting an electronic financial transaction using an established bilateral communication link between an initiating mobile device and appropriate financial institution or third-party entity; and generating and transmitting a notification of the outcome of the financial transaction in real-time to the initiating mobile device and receiving mobile device.

40. The claims of the '307 Patent describe an inventive concept because they provide a novel and unconventional system architecture that integrates the use of mobile devices with backend systems and servers that store payment methods associated with particular payment sources by establishing and using bilateral communications and function identifiers to initiate financial transactions with other mobile devices in real-time use of mobile devices; and that protects the sensitive financial information of the user through specific authentication protocols.

41. The claimed inventions of the '347 Patent describe a method and system of registering security levels on a mobile device ('307 Patent at 5:29-35); and enabling secure access to local applications on the mobile device and to features within the local applications by assigning one or more registered security levels (*id.* at 10:32-39, 11:26-34, 11:35-41).

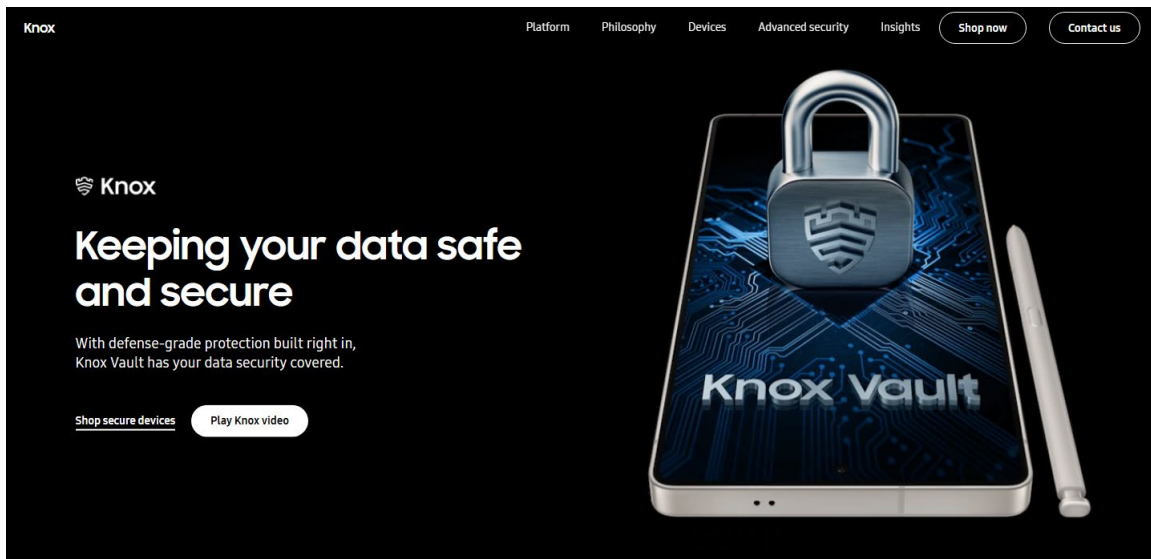
42. The '347 Patent improves the security of access to local applications on a mobile device that facilitate financial transactions and stores sensitive financial information by enabling a user to use a biometric scan as a type of security credential; to register and store one or more security credentials on a mobile device; and to designate one or more security credentials to provide access to applications and its features on a mobile device.

43. The claims of the '347 Patent describe an inventive concept because they provide a novel multi-level security platform for securing access to local applications and its features on a mobile device that is highly secure and efficient to the end user. Additionally, the '347 Patent provides a non-generic and specialized system for collecting, registering, and storing biometric information for use in security settings on a mobile device and its applications.

### **SAMSUNG'S INFRINGEMENT OF PAYGEO'S PATENTS**

44. Samsung is a multibillion-dollar worldwide technology conglomerate. Samsung is a global leader in the mobile device and wearable device market, which includes smartphones, tablets, and smartwatches.



45. In or around September 5, 2013, Samsung launched "Samsung Knox," a mobile security solution that protects applications and data by strictly defining what each process is allowed to do and which data it can access.



Ex. 6 (<https://www.samsung.com/us/business/solutions/samsung-knox/>). It is "an end-to-end solution that provides security hardening from the hardware through the application layer."

# Samsung KNOX Available for Use by Consumers

on September 5, 2013

Share  

**Samsung Electronics** announced the commercial availability of **Samsung KNOX** for use by consumers.

**Samsung KNOX** is an end-to-end solution that provides security hardening from the hardware through the application layer. Samsung KNOX implements a concept called "container" that is a separate secure execution environment for a set of pre-screened applications to run and store data.

Ex. 7 (<https://news.samsung.com/global/samsung-knox-available-for-use-by-consumers>).

46. In or around September 28, 2015, Samsung launched "Samsung Pay," a mobile payment service capable of making purchases in person, online, or via a mobile app. Ex. 8 (<https://news.samsung.com/global/samsung-announces-launch-dates-for-groundbreaking-mobile-payment-service-samsung-pay>).

47. Samsung also created "Samsung Pass," an application for storing payment cards and various types of digital content that utilizes biometric authentication software to provide secure access for its users. Samsung Pass is capable of sensing and registering physiological data such as a fingerprint or iris associated with a user of a Samsung smartphone or smartwatch to verify the identity of the user.

# what is samsung pass

Last Update date : Sep 13, 2022

These days a mobile phone is an essential part of everyday life. Now, thanks to Samsung Pass, you can customise various services to handle daily tasks and keep your important information in one secure place. Learn more about this app below.

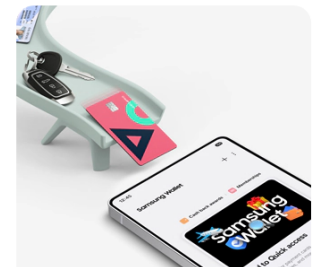


Ex. 9 (<https://www.samsung.com/levant/support/apps-services/what-is-samsung-pass/>).

48. In or around June 2022, Samsung integrated Samsung Pay and Samsung Pass into “Samsung Wallet” in certain countries, including the United States. Samsung Wallet maintained Samsung Pay’s ability to facilitate mobile payments via a Samsung device and Samsung Pass’s ability to facilitate secured access using biometric authentication, and further integrates Samsung Knox’s ability to provide secure access to users’ sensitive data.

## Use Samsung Wallet on your Galaxy phone

Samsung Pass and Samsung Pay are getting better by coming together to make the new Samsung Wallet app! But hang on, Samsung's Blockchain Wallet app will also be joining them later on. Whether you're a long-time Samsung Pay user or a new Galaxy customer who wants a digital wallet, migrating to and using the new app will be simple. Keep reading to learn more about Samsung Wallet and what it has to offer.



Ex. 10 (<https://www.samsung.com/us/support/answer/ANS10001347/>);

## Check out Samsung Wallet's new features



With everything we carry in our pockets or bags these days, it's easy to forget something at home, like your keys or credit cards. This won't be an issue when you use the Samsung Wallet app on your **Galaxy phone** to store all of your important day-to-day assets, like your car and house keys. You can even store boarding passes so getting through the airport is a breeze. Samsung Wallet can also link up with cryptocurrency accounts, such as Coinbase and Gemini, so you can manage your digital currency.

Payments	>
Samsung Pass	>
Digital keys	>
Digital assets	>
Boarding passes	>

*see, e.g.*, Ex. 11 (<https://www.samsung.com/us/support/answer/ANS00091982/>).

49. The “Accused System and Devices” as used herein refers collectively to Samsung’s mobile payment and authentication platform and associated services including Samsung Wallet, Samsung Pay, Samsung Pass, Samsung Knox, and Samsung’s servers and software which are used to implement and operate the platform and associated services, and the following Samsung devices that are manufactured, used, tested, imported, sold, offered for sale, and imported by or on behalf of Samsung:

- Galaxy A Series
- Galaxy J Series
- Galaxy Note Series

- Galaxy S Series
- Galaxy XCover Series
- Galaxy Z Series
- Galaxy M Series
- Galaxy Watch, Watch Active, Watch Active 2
- Galaxy Watch 3
- Galaxy Watch 4, Watch 4 Classic
- Galaxy Watch 5, Watch 5 Pro
- Galaxy Watch 6, Watch 6 Classic
- Galaxy Watch 7 Series
- Galaxy Watch Ultra
- Galaxy Watch FE

50. Samsung makes, uses, sells, offers for sale, and/or imports into the United States and this District the Accused System and Devices for facilitating secure electronic financial transactions that infringe the Asserted Patents.

51. Samsung has infringed and continues to infringe one or more claims of each of the Asserted Patents by engaging in acts that constitute infringement under 35 U.S.C. § 271, including but not necessarily limited to making, using, selling, and/or offering for sale, in this District and elsewhere in the United States, and/or importing into this District and elsewhere in the United States the Accused System and Devices.

52. In addition to directly infringing the Asserted Patents pursuant to 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, Samsung indirectly infringes all the Asserted Patents under 35 U.S.C. §§ 271(b) and (c), literally and/or under the doctrine of

equivalents. Samsung induces infringement of the Asserted Patents by instructing, directing and/or requiring others, including its customers, purchasers, users, and developers, to meet claim elements, literally and/or under the doctrine of equivalents, of the Asserted Patents. Samsung contributorily infringes the Asserted Patents by making and supplying the Accused System and Devices that are components in an infringing system with components from manufacturers, customers, purchasers, users, and developers that together meet all claim elements in the Asserted Patents, literally and/or under the doctrine of equivalents.

53. Samsung, at the very least, has become aware of its infringement as of the date of the filing of this Complaint.

**COUNT I**  
**(Direct Infringement of the '671 Patent)**

54. PayGeo repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs.

55. In violation of 35 U.S.C. § 271(a), Samsung directly infringed and continues to infringe at least Claim 24 of the '671 Patent by making, using, importing, selling, and offering for sale in the United States the Accused System and Devices.

56. Samsung's acts of making, using, importing, selling, and/or offering for sale the Accused System and Devices have been without the permission, consent, authorization, or license of PayGeo.

57. Samsung's infringement includes the manufacture, use, sale, importation, and/or offer for sale of the Accused System and Devices, which infringe the '671 Patent because they satisfy each element of claims of the '671 Patent, either literally, under the doctrine of equivalents, or both.

58. By way of example of Samsung's infringement of the '671 Patent, the Accused System and Devices meet all of the limitations of at least Claim 24 of the '671 Patent, which recites:

A computer program product that provides a cashless platform for enabling users to perform a financial transaction in a mobile environment, the computer program product comprising:

a module embedded in a first user mobile station to enter financial information related to the financial transaction;

a module embedded in the first user mobile station to generate a code containing the financial information, wherein the first user mobile station is in proximity to a second user mobile station;

a module embedded in the first user mobile station to transfer the generated code to a second user mobile station by means of a directional movement on the first user mobile station in the direction of the second user mobile station;

the first user mobile station further transmitting the generated code to a mobile transaction platform to confirm the executability of the financial transaction;

a module embedded in the second user mobile station automatically recognizing the transferred code;

based on the recognized code, a module embedded in the second user mobile station determines whether to accept or decline the financial transaction;

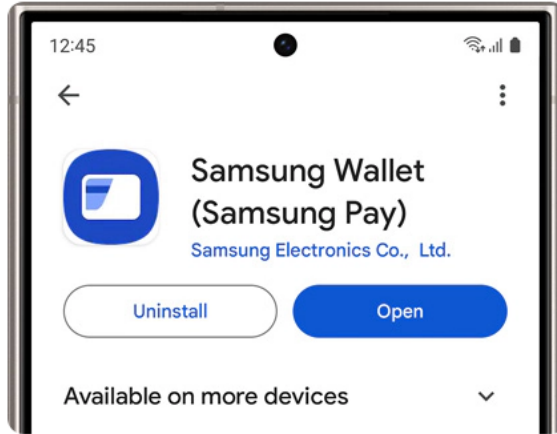
wherein when the financial transaction is accepted by the second user mobile station, the mobile transaction platform executes the financial transaction;

wherein when the financial transaction is declined by the second user mobile station, the mobile transaction platform prevents the execution of the financial transaction; and

a module embedded in the second user mobile station to transmit a reverse code to the first user mobile station, to confirm whether the financial transaction was either accepted or declined by the second user mobile station.

59. The Accused System and Devices include the recited computer program product for facilitating financial transactions between devices in a secured mobile environment, as discussed below.

Samsung Wallet often comes pre-installed on compatible devices, but if necessary, it can be [reinstalled](#). Start the app, create a PIN, and follow prompts to add your payment cards.



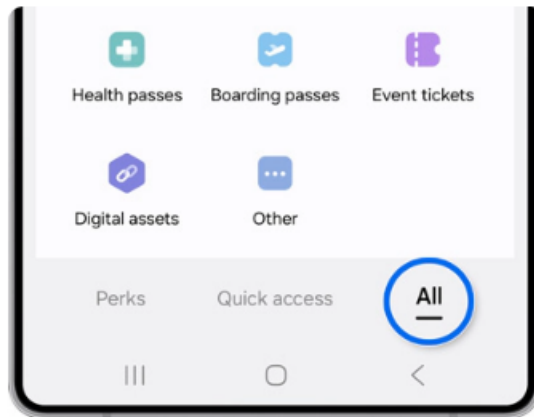
See, e.g., Ex. 12 (“Set up Samsung Wallet on your phone”)

(<https://www.samsung.com/us/support/answer/ANS10002612/>).

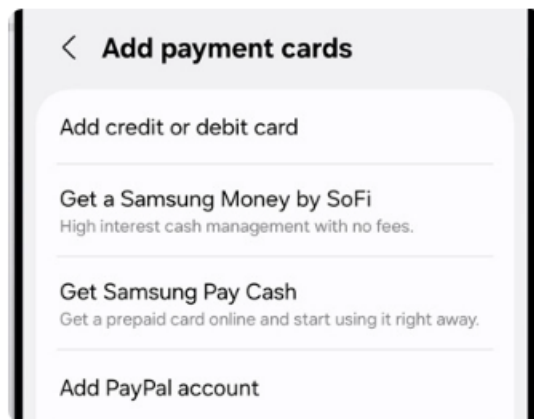
60. The Accused System and Devices include a module for entering financial information for financial transactions. For example, Samsung’s users can register and store payment methods such as credit card information or bank information into Samsung Wallet for use in future financial transactions.

Samsung Wallet lets you add payment cards, membership cards, gift cards, digital keys, health passes, digital assets, and boarding passes. That way, you can access everything in one place on your phone instead of alternating between various apps or shuffling through your wallet.

- 1 To begin adding one of these, open the **Samsung Wallet** app. Tap the **Menu** or **All** tab, and then tap your desired item, such as Payment cards.

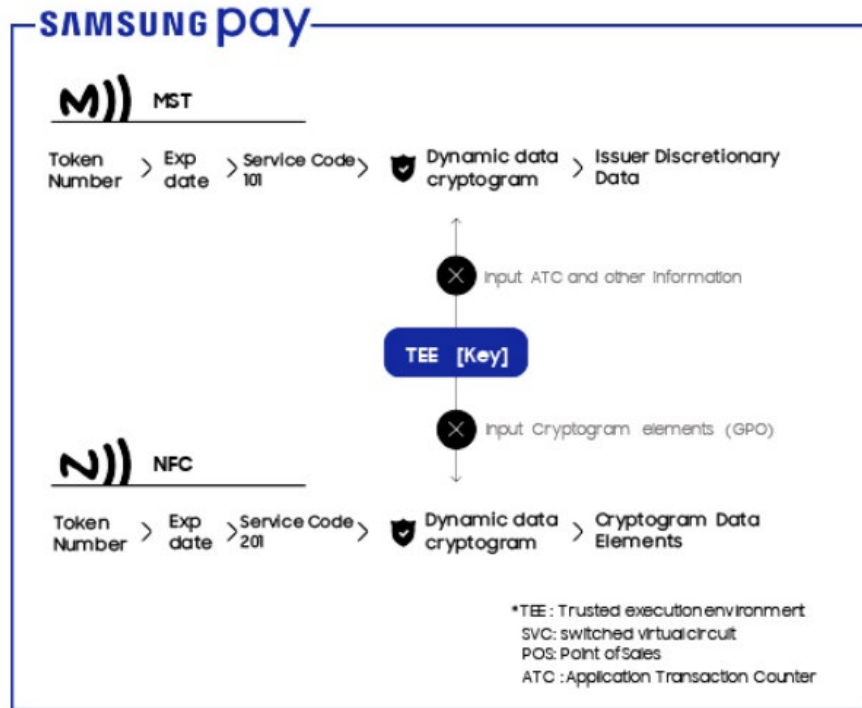


- 2 Tap **Add** (the plus sign) in the upper right corner, or follow the on-screen instructions. Choose your desired registration method.



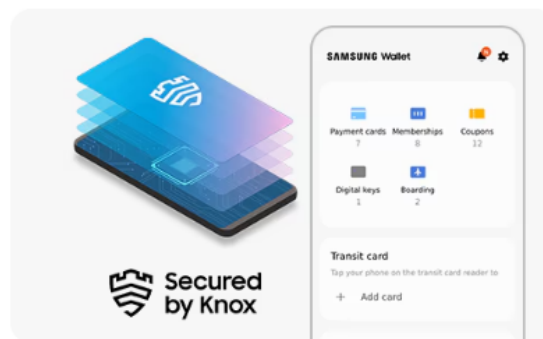
See, e.g., Ex. 10 (“Add and use a payment methods or other item in Samsung Wallet”) (<https://www.samsung.com/us/support/answer/ANS10001347/>).

61. The Accused System and Devices include a module for generating a code containing a user’s financial information when in proximity to another Samsung device. For example, Samsung Wallet users in close proximity to one another can conduct financial transactions between Samsung devices via the Samsung Wallet application.



See, e.g., Ex. 13 (<https://news.samsung.com/global/multilayer-security-and-convenience-make-samsung-pay-a-winning-choice>). When initiating a payment transaction, Samsung uses a “tokenization” approach in which Samsung Wallet generates a specific number (i.e., a “token”) that identifies the sensitive information relating to the financial transaction.

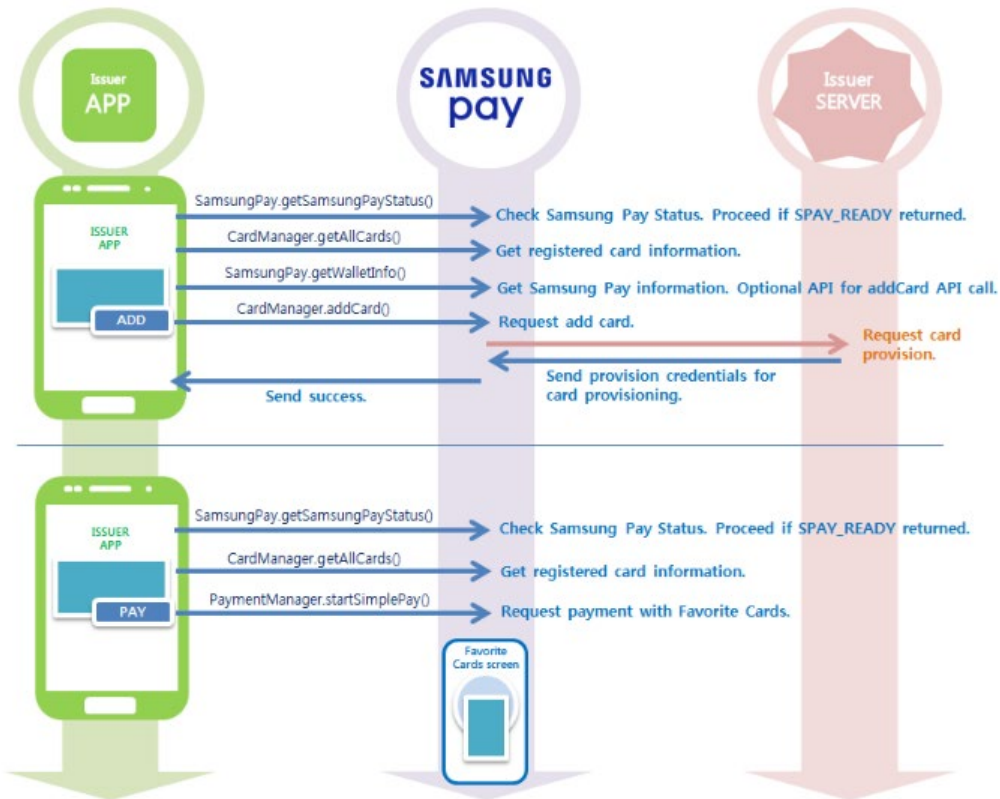
Samsung Wallet goes above and beyond to safeguard your privacy. It uses several special security methods, like tokenization, to secure your personal and financial information. Learn more about how this method protects your personal data below.



Tokenization is a method of replacing your sensitive payment information (Card Number, Expiration Date, Security code, etc.) with a device-specific “Token” which acts as a surrogate value. In mobile payments, Tokens are used to protect your payment information and to reduce the security risks inherent to plastic cards.

See, e.g., Ex. 14 (<https://www.samsung.com/levant/support/apps-services/how-secure-is-samsung-wallet/>).

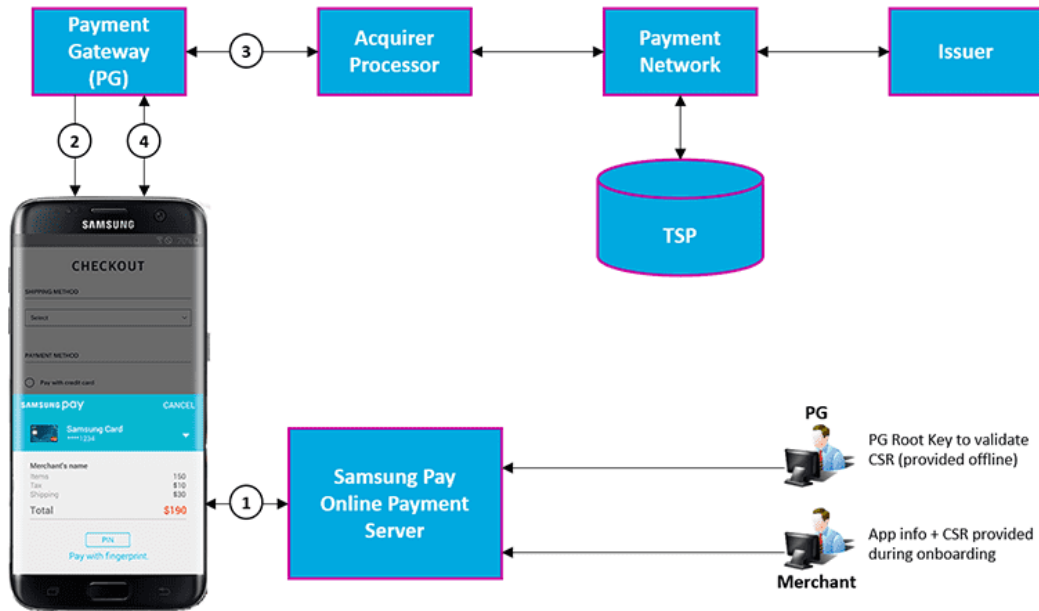
62. The Accused System and Devices include a module for transferring the generated code by a directional movement from an initiating Samsung device towards a receiving Samsung device using a variety of function calls as shown below.



See, e.g., Ex. 15

([https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03\\_00\\_using\\_samsung\\_pay\\_sdk\\_apis.html](https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03_00_using_samsung_pay_sdk_apis.html)).

63. The Accused System and Devices transmit the generated code to a transaction platform to authenticate and execute the financial transaction. For example, once a financial transaction is initiated, the initiating Samsung device transmits the generated code to the appropriate network via Samsung’s servers to authenticate the financial transaction request.

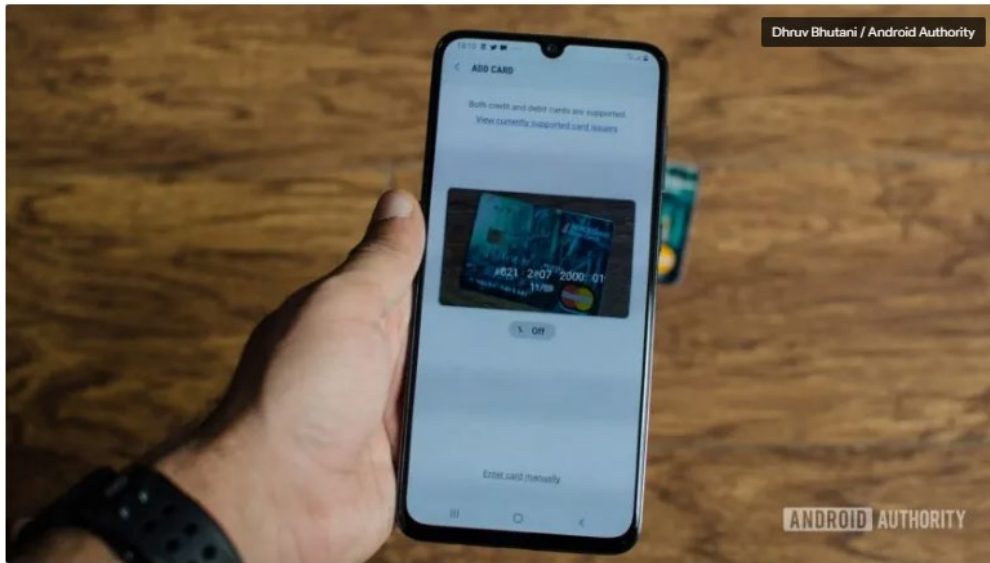


See, e.g., Ex. 16 (“Network Token Mode”)

(<https://developer.samsung.com/internet/android/web-payments-integration-guide.html>).

64. The Accused System and Devices include a module for recognizing authenticated generated codes transferred from an initiating Samsung device to a receiving Samsung device. For example, once the payment transaction request is authenticated, the receiving Samsung device accepts the payment transaction request and executes the transaction. If the receiving Samsung Wallet-equipped device declines the payment transaction request, Samsung prevents the execution of the transaction.

#### 4. Samsung Pay error messages are appearing on the phone



See, e.g., Ex. 17 (<https://www.androidauthority.com/samsung-pay-problems-fixes-3226396/>).

65. The Accused System and Devices include a module for transmitting a reverse code to confirm the outcome of the payment transaction. For example, the receiving Samsung device sends a receipt confirming the outcome of the financial transaction to the initiating Samsung device.

## View recent transactions in Samsung Pay

If you want to keep track of your spending, Samsung Wallet has you covered. You can view transactions made through the app until one month after purchase. You'll also receive a push notification with details of your transaction after each purchase.

See, e.g., Ex. 18 (Samsung users will “receive a push notification with details of your transaction after each purchase.”) (<https://www.samsung.com/us/support/answer/ANS10002614/>).

66. Thus, the Accused System and Devices satisfy all elements of at least Claim 24 of the '671 Patent.

67. Samsung's direct infringement of the '671 Patent has injured and continues to injure PayGeo in an amount to be proven at trial, but not less than a reasonable royalty.

68. Samsung's infringement has caused and is continuing to cause damage and irreparable injury to PayGeo, and PayGeo will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court.

69. PayGeo is entitled to injunctive relief, damages and any other relief in accordance with 35 U.S.C. §§ 283 and 285 for Samsung's direct infringement of the '671 Patent.

**COUNT II**  
**(Indirect Infringement of the '671 Patent)**

70. PayGeo repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs.

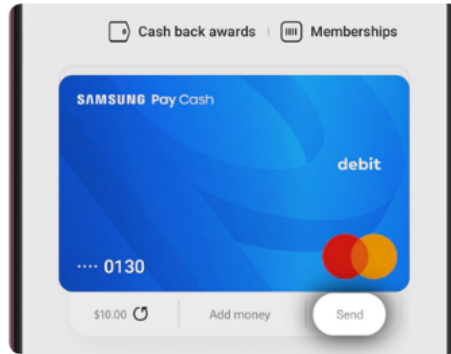
71. As set forth above, Samsung has had knowledge of PayGeo's patents and of its infringement of the '671 Patent since at least the date of this Complaint, if not earlier.

72. As set forth above, the Accused System and Devices directly infringe the '671 Patent. Additionally, Samsung has actively, knowingly, and intentionally induced and continues to induce infringement of one or more claims of the '671 Patent pursuant to 35 U.S.C. §271(b); and has contributorily infringed and continues to contributorily infringe one or more claims of the '671 Patent under 35 U.S.C. § 271(c).

73. Samsung indirectly infringes the '671 Patent pursuant to 35 U.S.C. § 271(b) by instructing, directing and/or requiring others, including customers, purchasers, shoppers, users and developers, to meet the elements of at least Claim 24 of the '671 Patent. Such use is consistent with how the Accused System and Devices are described to directly infringe the '671 Patent and how they are intended to be used, as described above and incorporated by reference here.

You can send money from your Samsung Pay Cash card to contacts in your phone.

- 1 Open the **Samsung Wallet** app on your phone, and then tap the **Quick access** tab at the bottom.
- 2 Swipe to your Samsung Pay Cash card, and then tap **Send money** below the card.



- 3 Either enter a phone number manually, or choose a contact from your phone by tapping the **Contacts** tab at the top. You can also choose from a list of your recent transfers by tapping the **Recent** tab at the top.
- 4 Then, enter the amount that you would like to send. You can also add a message if you'd like, and then tap **Next**.
- 5 If the balance on the card does not cover the amount you are trying to send, you will be prompted to add more money to your card. Tap **Add money** on the pop-up, and then follow the on-screen instructions.

*See, e.g.,* Ex. 19 (“Send money with Samsung Pay Cash”)

(<https://www.samsung.com/us/support/answer/ANS10002584/>). Samsung knew or was willfully blind to the fact that it was inducing others, including customers, purchasers, shoppers, users, and developers, to infringe the ’671 Patent, including at least Claim 24.

74. Samsung knowingly and actively aided and abetted the direct infringement of the ’671 Patent by instructing and encouraging its customers, purchasers, shoppers, users, and developers to use the Accused System and Devices.

## How to use Samsung Wallet

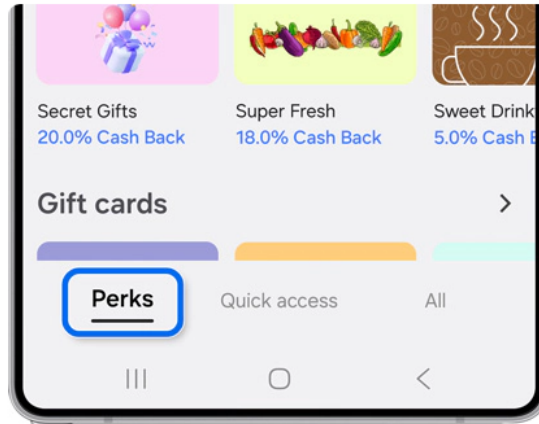


Samsung Wallet: How to use Wallet and Pay

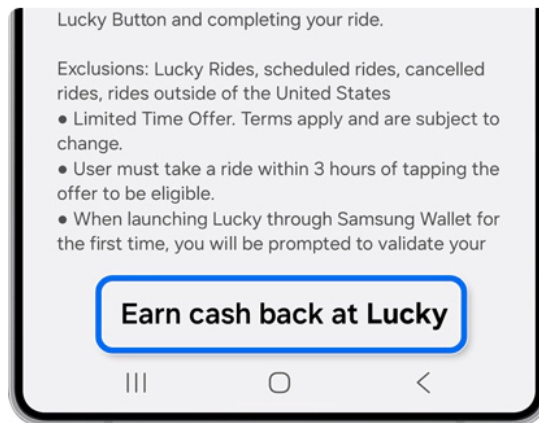
*See, e.g.,* <https://www.youtube.com/watch?v=q-1dNsPJlnw>. Such instructions and encouragement include, but is not limited to, advising third parties to use the Accused System and Devices in an infringing manner, providing the Accused System and Devices through which third parties may infringe the '671 Patent, and by advertising and promoting the use of the Accused System and Devices in an infringing manner, and distributing guidelines and instructions to third parties on how to use the Accused System and Devices in an infringing manner.

Using Samsung Wallet really pays off, because you can earn cash back on select purchases inside the app! Just check out the Perks section and the available promotions.

- 1 Navigate to and open the **Samsung Wallet** app, and then tap the **Perks** tab.



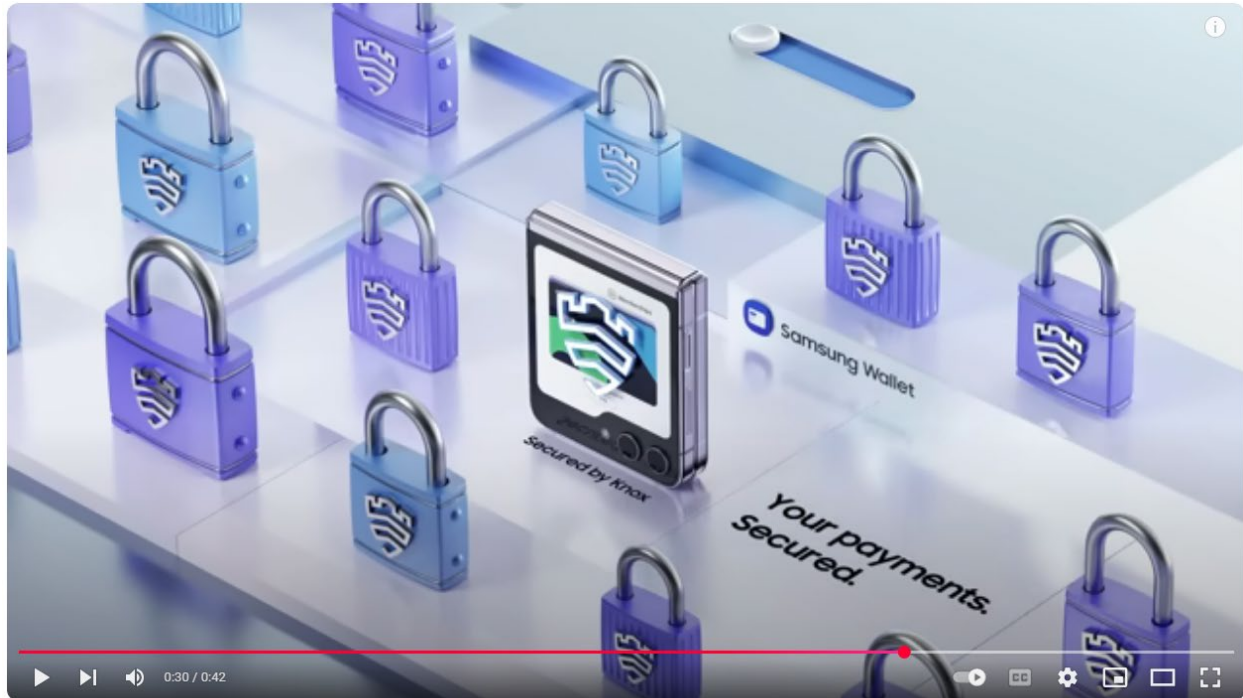
- 2 At the top of the screen, your available and pending cash back will display.
- 3 Underneath that, current cash back deals will appear. Certain brands will give you cash back for making purchases through Samsung Wallet.
- 4 Tap a category that interests you (Apparel, Entertainment, etc.), and then select a retailer or brand you'd like to purchase from.
- 5 Read the terms and conditions, and then tap **Earn cash back**.



- 6 A new window will appear. Browse around and look for something you'd like to buy.  
**Note:** To earn cash back, you need to stay in the window. If you leave the window, you will not get the cash back deal.
- 7 If you end up making a purchase, the cash back percentage will be applied to your account!
- 8 At first, the cash back will appear under Pending. Once it's ready, the amount will display in the Available cash back section.
- 9 Tap **Redeem** to get your cash! The amount will be loaded onto a digital debit card that you can use anywhere Samsung Wallet is accepted.  
**Note:** You need to have a total of \$5 before you can redeem cash back.

See, e.g., Ex. 10 (“Enjoy perks and rewards”)

(<https://www.samsung.com/us/support/answer/ANS10001347/>). Further examples of this instruction and encouragement include, for example, trainings by Samsung either in-person or by instructional videos and material, for how to utilize Samsung Wallet’s mobile payment system to authenticate and execute financial transactions in a secure mobile environment between devices.



Samsung Wallet: Your wallet is safe

See, e.g., <https://www.youtube.com/watch?v=hm3GdYeGUDk>.

75. Samsung updates and maintains help and customer service sections on its website which cover in-depth aspects of operating the Accused System and Devices in an infringing manner.



## Have questions? Find answers here.

Learn how to make the most out of your Samsung Wallet experience.

*See, e.g.,* Ex. 20 (<https://www.samsung.com/us/apps/samsung-wallet/faq/>). Further, Samsung advertises on its website the infringing features of the Accused System and Devices and instructs consumers on how to use the Accused System and Devices in an infringing manner.



## Samsung Wallet

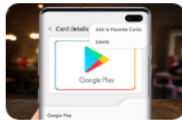
Visit the app store for more information

Google Play Store ↗

### About Samsung Wallet

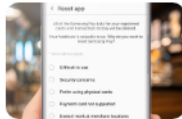
Samsung Pay is now part of Samsung Wallet. With Wallet, you get the features and benefits of Samsung Pay, plus Samsung Pass, digital home and car keys, digital asset management, and more. All this comes in a simplified in-app experience, so you'll get more and find it with ease. Just swipe up to launch Samsung Wallet with Quick Access.

### Find solutions



#### Removed card still shows in Samsung Pay

If you are trying to remove a payment card from Samsung Pay and the card continues to display in your card list, there are a couple things you can try, such as checking your internet connection.



#### Samsung Pay is crashing or not responding

You can easily fix the Samsung Pay app if it freezes, crashes, or does not respond. Most of the time, you just need to restart your phone to get the app working again.



#### Payment errors occur in Samsung Pay

Samsung Pay is a great way to keep all of your cards in one place and make quick payments. While it's usually quite convenient, it's possible you may experience payment errors. These errors could either be an issue with Samsung Pay, or they could be a result of an issue with your card network.



#### Samsung Pay connection error appears on phone

This error can occur at different times when using Samsung Pay. It means the app is unable to access the appropriate server while trying to complete the current action.

View more

See, e.g., Ex. 21 (<https://www.samsung.com/us/support/owners/app/samsung-wallet>).

76. Samsung contributorily infringes the '671 Patent pursuant to 35 U.S.C. § 271(c) because it has provided material components of claims of the '671 Patent. In particular,

Samsung knows that the Accused System and Devices are particularly suited to be used in an infringing manner and are particularly suited for this use.

Think of Samsung Wallet as a digital version of your real wallet. You carry more than just credit cards in your wallet, right? You also have your ID, transit passes, keys, and so on. The same idea is behind Samsung Wallet.

All of your important digital forms of identification will be stored in one place for easier access. This is why Samsung Pay and Samsung Pass (and eventually Blockchain Wallet) are being brought together into the Samsung Wallet app. The different apps' UI and controls will still be very similar; they're just being moved to a new home.

In Samsung Wallet, you'll be able to add and access payment cards, membership cards, gift cards, digital keys, health passes, digital assets, and boarding passes.

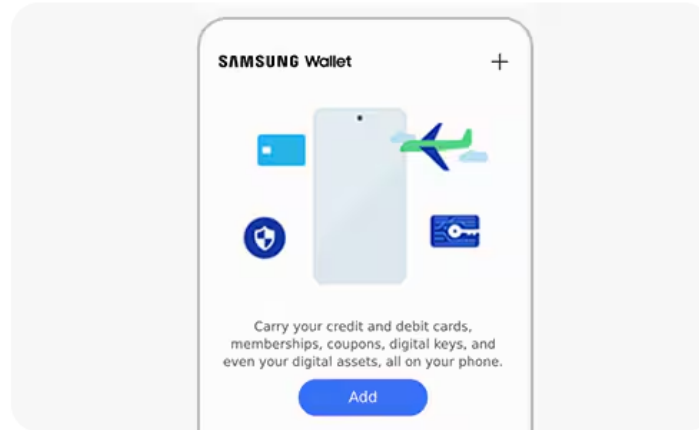
*See, e.g.*, Ex. 10 (“What is Samsung Wallet?”)

(<https://www.samsung.com/us/support/answer/ANS10001347/>). The Accused System and Devices are developed and specialized to authenticate and execute financial transactions in a secure mobile environment between devices, and are not staple articles or commodities of commerce because they are specifically made to be used in an infringing manner, as described in the direct infringement claim above.

# How to use Samsung Wallet to make a payment

Last Update date : Sep 25, 2022

Samsung Wallet is an easy and safe way to make a purchase with your phone or your watch. Learn more about how this useful feature works below.



If you have added at least one card to Samsung Pay, you can access Samsung Wallet by **swiping up** from the bottom of the display on the home screen, the lock screen. You can also access Samsung Pay when the phone is locked, and the display is off. To make a payment using Samsung Pay, here is what you need to do:

- 1 Swipe up from the bottom of the display (from the home screen or lock screen) to open **Samsung Wallet**. Your default debit or credit card will show up on the screen. If you have multiple cards set up, simply swipe left or right to switch to the card you wish to use.
- 2 To enter payment mode, tap the **fingerprint or iris button** if you have Samsung Wallet secured with the biometric sensor, or the "PIN" button if you want to enter your PIN. If you have Samsung Wallet secured via the fingerprint sensor, simply tap the sensor with your finger and the payment mode will activate.
- 3 Then, touch the back of the phone to the payment terminal or card machine. You might need to touch the phone to the side of the card machine in some cases. **You have 30 seconds to do so**, but if time runs out, simply repeat step 2. You can stop touching the phone to the payment terminal or card machine once your card has been detected. You may be required to enter your card's PIN on the terminal or card machine to authorise the payment.

See, e.g., Ex. 22 (<https://www.samsung.com/levant/support/apps-services/how-to-use-samsung-wallet-to-make-a-payment/>). Samsung has known or has been willfully blind to the fact that it is contributing to the infringement of one or more claims of the '671 Patent, including at least Claim 24.

# Set up Samsung Pay on your phone or watch

Samsung Wallet transforms your Samsung phone or **smart watch** into a digital wallet, seamlessly storing your credit, debit, or gift cards. It combines convenience with security by employing biometric safeguards to protect your financial information.

*See, e.g.,* Ex. 12 (<https://www.samsung.com/us/support/answer/ANS10002612/>).

77. Samsung's indirect infringement of the '671 Patent has injured and continues to injure PayGeo in an amount to be proven at trial, but not less than a reasonable royalty.

78. Samsung's indirect infringement has caused and is continuing to cause damage and irreparable injury to PayGeo, and PayGeo will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court.

79. PayGeo is entitled to injunctive relief, damages and any other relief in accordance with 35 U.S.C. §§ 283, and 285 for Samsung's indirect infringement.

## **COUNT III** **(Direct Infringement of the '296 Patent)**

80. PayGeo repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs, as set forth above.

81. In violation of 35 U.S.C. § 271(a), Samsung directly infringed and continues to infringe at least Claim 1 of the '296 Patent by making, using, importing, selling, and offering for sale in the United States the Accused System and Devices.

82. Samsung's acts of making, using, importing, selling, and/or offering for sale the Accused System and Devices have been without the permission, consent, authorization, or license of PayGeo.

83. Samsung's infringement includes the manufacture, use, sale, importation, and offer for sale of the Accused System and Devices, which infringe the '296 Patent because they

satisfy each element of claims of the '296 Patent, either literally, under the doctrine of equivalents, or both.

84. By way of example of Samsung's infringement of the '296 Patent, the Accused System and Devices meet all of the limitations of at least Claim 1 of the '296 Patent, which recites:

A system, comprising:

memory storing program code associated with a service provided by a third-party entity to a plurality of members who register with the service provided by the third-party entity, the program code including a first communication interface configured to communicate with a first device associated with a credit card company on behalf of the plurality of members, the program code including a second communication interface configured to communicate with a second device associated with a financial institution on behalf of the plurality of members, the program code including a third communication interface configured to communicate with a third device associated with the third-party entity; and

one or more hardware processors configured to execute the program code to cause the system to perform a process of:

providing a login interface requesting security credentials from a first member of the plurality of members before the first member can access the service, the first member having previously registered with the service;

receiving particular security credentials from the first member;

when the particular security credentials have been validated, presenting one or more interfaces configured to assist the first member to register a set of one or more payment sources for a future transaction, the one or more interfaces configured to assist the first member to register a credit card account issued by the credit card company in the set of one or more payment sources, the one or more interfaces configured to assist the first member to register a financial account associated with the financial institution in the set of one or more payment sources, the third-party entity being different than the financial institution and different than the credit card company;

presenting one or more interfaces configured to enable the first member to select a function identifier from a set of function identifiers, each function identifier of the set of function identifiers

configured to navigate to a respective function, a particular function identifier of the set of function identifiers configured to navigate to a payment function, the payment function configured to assist the first member to request sending a payment amount to a payee account, the payee account being a third-party account associated with the third-party entity and belonging to a second member of the plurality of members, the second member having previously registered with the service;

receiving selection by the first member of the particular function identifier configured to navigate to the payment function;

after receiving the selection of the particular function identifier, presenting one or more interfaces configured to enable the first member to select a payee identifier identifying the payee account;

receiving selection by the first member of the payee identifier;

presenting one or more interfaces configured to enable the first member to select a payment source identifier from a set of one or more payment source identifiers, the set of one or more payment source identifiers identifying a particular set of one or more payment sources, each payment source identifier of the set of one or more payment source identifiers identifying a respective payment source of the particular set of one or more payment sources, the program code capable of presenting in the set of one or more payment source identifiers a financial account identifier identifying the financial account associated with the financial institution, a credit card identifier identifying the credit card account issued by the credit card company, and a third-party account identifier identifying a third-party account associated with the third-party entity and belonging to the first member;

receiving identification of a particular payment source identifier of the set of one or more payment source identifiers, the particular payment source identifier identifying a particular payment source of the particular set of one or more payment sources;

presenting an interface configured to enable the first member to identify the payment amount to be transferred to the payee account;

receiving information from the first member of the payment amount;

selecting the first communication interface as a particular communication interface and establishing a communication link between the first communication interface and the first device associated with the credit card company on behalf of the first

member, when the particular payment source is the credit card account issued by the credit card company;

selecting the second communication interface as the particular communication interface and establishing a communication link between the second communication interface and the second device associated with the financial institution on behalf of the first member, when the particular payment source is the financial account associated with the financial institution;

selecting the third communication interface as the particular communication interface and establishing a communication link between the third communication interface and the third device associated with the third-party entity, when the particular payment source is the third-party account;

requesting electronic transfer of the payment amount from the particular payment source to the payee account using the selected particular communication interface;

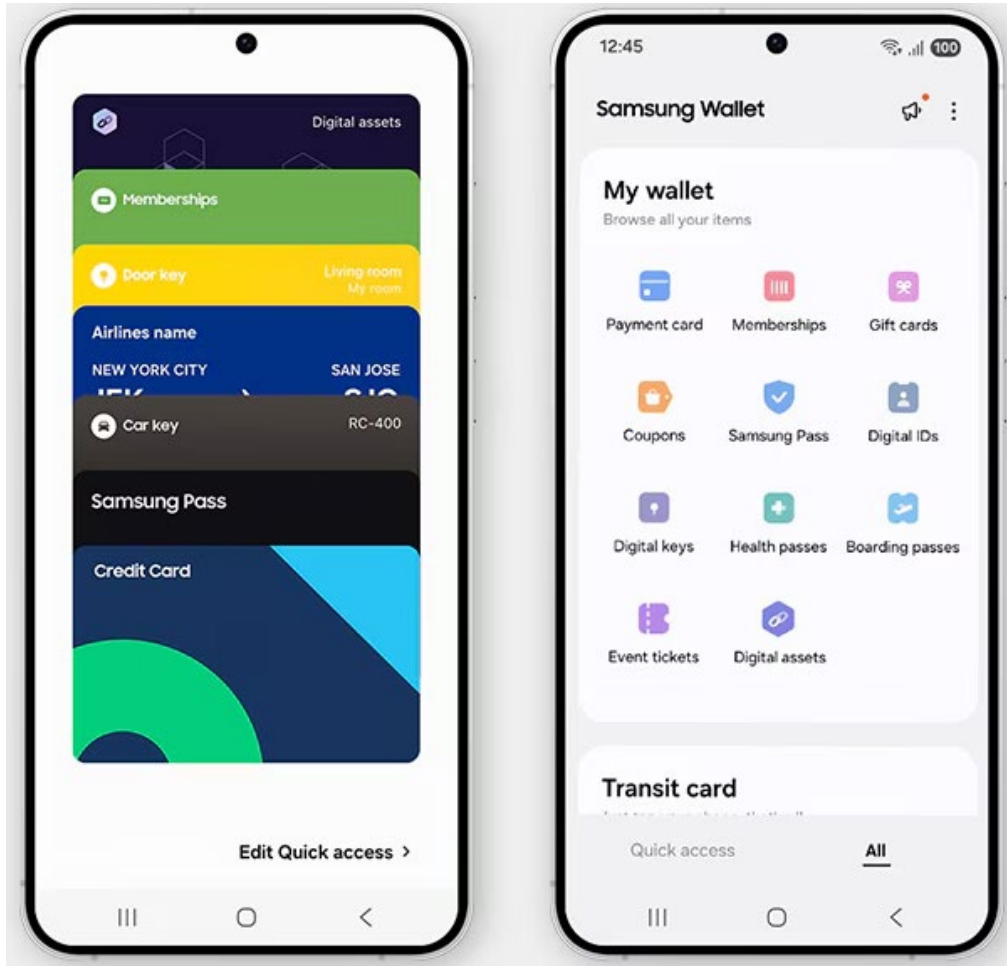
generating a notification indicating the electronic transfer to the payee account; and

transmitting the notification over a communication network to a computing device associated with the second member in real time, so that the second member has immediate access to up-to-date electronic transfers to the payee account.

85. The Accused System and Devices include the recited system of facilitating financial transactions between devices and establishing communication links with appropriate third-party entities in a secured mobile environment, as discussed below.

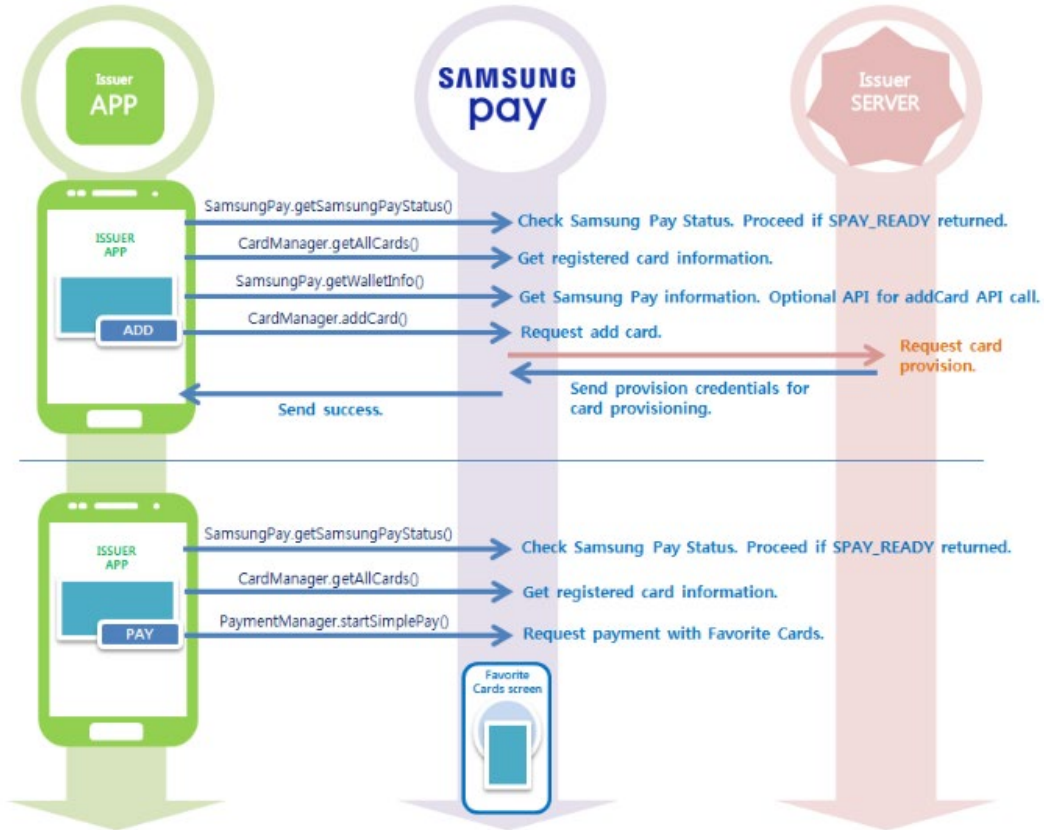
86. The Accused System and Devices include a mobile device and an application on the mobile device that stores a user's information and provides services associated with credit card companies, financial institutions and/or third-party entities to the user; and one or more hardware processing servers and server codes on the server which establish three bilateral communication links: the first being with credit card companies, the second being with financial institutions and the third being with third-party entities to perform and execute associated services for the user. For example, Samsung Wallet provides various services to its users

including, but not limited to, making payments with registered credit cards, debit cards, and/or gift cards; storing event and/or transportation tickets; and accessing loyalty accounts with vendors.



*See, e.g.,* Ex. 23 (Samsung Wallet enables users to “[m]ake payments, open doors, and gain access by tapping [the Samsung] device” and to “carry[] essentials in a single app—payment cards, ID, home and car keys, movie tickets, and more.”)

(<https://www.samsung.com/us/apps/samsung-wallet/>). Additionally, Samsung Wallet communicates with credit card companies, financial institutions and/or third-party entities using Samsung’s servers to provide their services directly to users via the Samsung Wallet application.



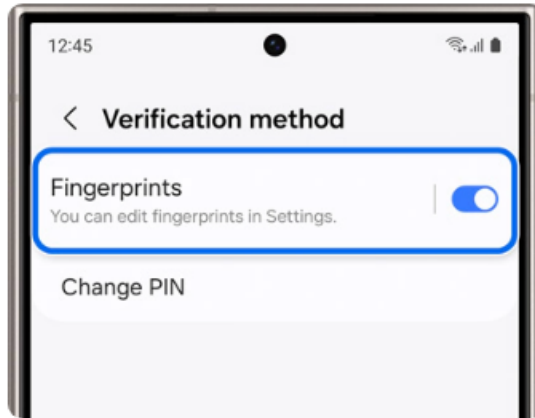
See, e.g., Ex. 15

([https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03\\_00\\_using\\_samsung\\_pay\\_sdk\\_apis.html](https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03_00_using_samsung_pay_sdk_apis.html)).

87. The Accused System and Devices include a mobile device and an application on the mobile device that provides a login interface requesting a security credential from a user to enable access to services within the application. For example, users can secure access to Samsung Wallet and its services by registering and designating a PIN and/or biometric authentication via the Samsung Wallet application directly or via Samsung Pass.

Samsung Wallet offers advanced security features to protect your account, including fingerprint and iris scan options on certain models. You can activate this feature through Samsung Wallet's settings.

Open **Samsung Wallet**, then tap the **All** tab, and then tap **More options** (the three vertical dots). Tap **Settings**, then tap **Verification method**, and then tap the **switch** next to Fingerprint or Irises. Once you have chosen a security option, follow the on-screen instructions to set up either Fingerprint or Iris verification. If you don't have a Lock screen set up, you may be required to set one up for your phone.



See, e.g., Ex. 12 (“Enhanced security with biometric verification”)

(<https://www.samsung.com/us/support/answer/ANS10002612/>);

## what is samsung pass

Last Update date : Sep 13, 2022

These days a mobile phone is an essential part of everyday life. Now, thanks to Samsung Pass, you can customise various services to handle daily tasks and keep your important information in one secure place. Learn more about this app below.

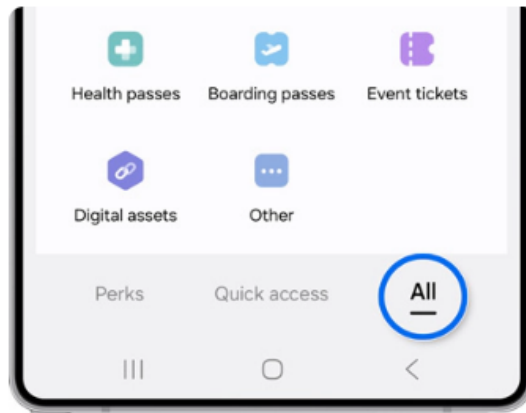


Ex. 9 (<https://www.samsung.com/levant/support/apps-services/what-is-samsung-pass/>).

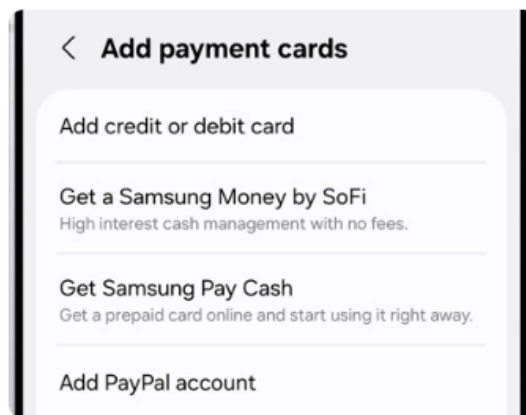
88. The Accused System and Devices include a mobile device and an application on the mobile device that, after entering a selected security credential to launch the application, utilizes one or more hardware processing servers and server codes on the server to enable a user to register and store payment methods from a payment source of credit card companies, financial institutions and third-party entities for use in future financial transactions. For example, users can register and store payment methods and/or reward accounts such as credit cards, debit cards, gift cards, event tickets, transportation tickets, and/or loyalty accounts on the Samsung Wallet application for use in future financial transactions.

Samsung Wallet lets you add payment cards, membership cards, gift cards, digital keys, health passes, digital assets, and boarding passes. That way, you can access everything in one place on your phone instead of alternating between various apps or shuffling through your wallet.

- 1 To begin adding one of these, open the **Samsung Wallet** app. Tap the **Menu** or **All** tab, and then tap your desired item, such as Payment cards.



- 2 Tap **Add** (the plus sign) in the upper right corner, or follow the on-screen instructions. Choose your desired registration method.

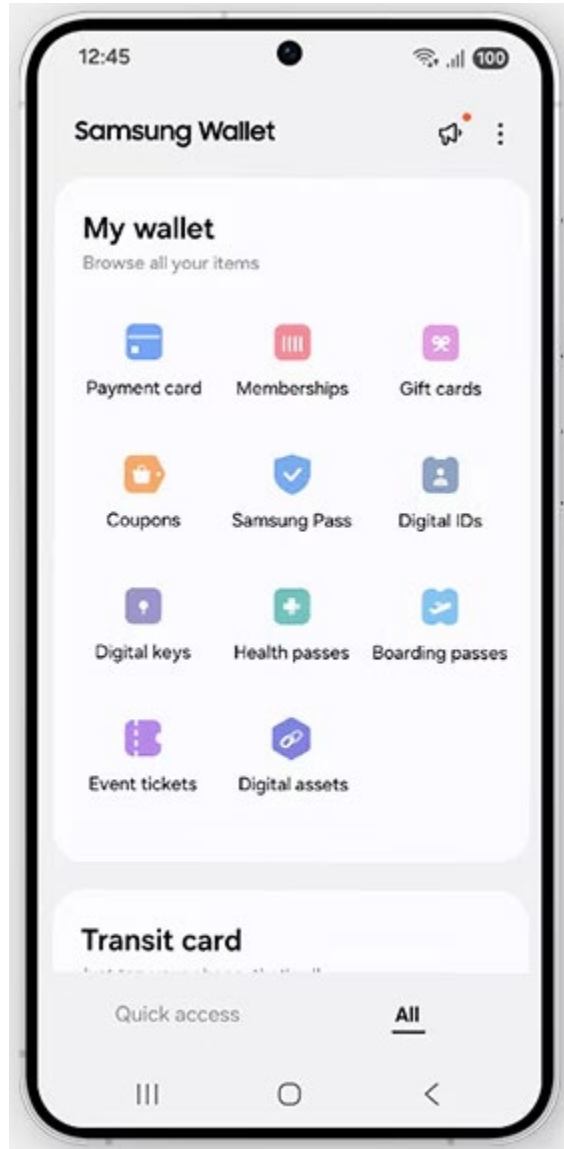


See, e.g., Ex. 10 (“Add and use a payment methods or other item in Samsung Wallet”)

(<https://www.samsung.com/us/support/answer/ANS10001347/>).

89. The Accused System and Devices include a mobile device and an application on the mobile device in which function identifiers are presented to navigate to a particular service on the application; and one such service being a payment function that enables a user to request electronic transfer of a payment amount to an account belonging to another user. For example, a

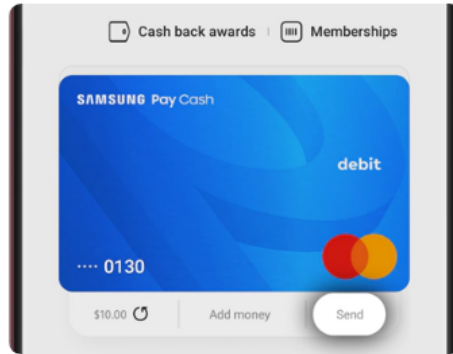
user can initiate a payment by navigating to the payment function on the Samsung Wallet application and entering payment details such as payment amount, payment source, payment method, payee, and payee’s account information.



See, e.g., Ex. 23 (<https://www.samsung.com/us/apps/samsung-wallet/>);

You can send money from your Samsung Pay Cash card to contacts in your phone.

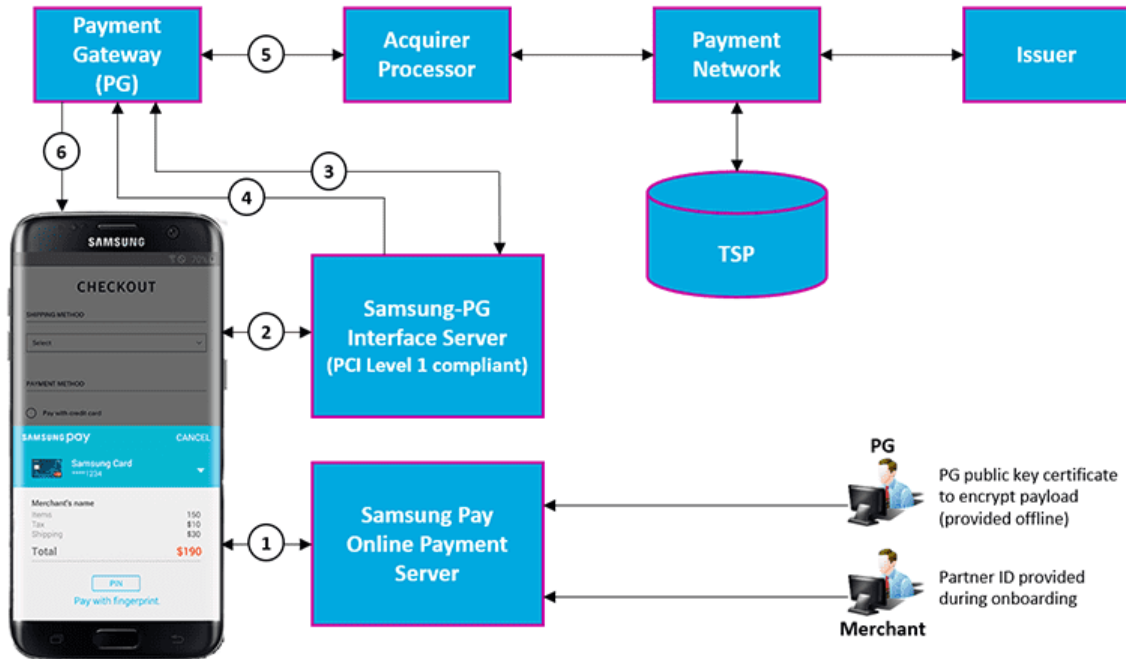
- 1 Open the **Samsung Wallet** app on your phone, and then tap the **Quick access** tab at the bottom.
- 2 Swipe to your Samsung Pay Cash card, and then tap **Send money** below the card.



- 3 Either enter a phone number manually, or choose a contact from your phone by tapping the **Contacts** tab at the top. You can also choose from a list of your recent transfers by tapping the **Recent** tab at the top.
- 4 Then, enter the amount that you would like to send. You can also add a message if you'd like, and then tap **Next**.
- 5 If the balance on the card does not cover the amount you are trying to send, you will be prompted to add more money to your card. Tap **Add money** on the pop-up, and then follow the on-screen instructions.

Ex. 19 (<https://www.samsung.com/us/support/answer/ANS10002584/>).

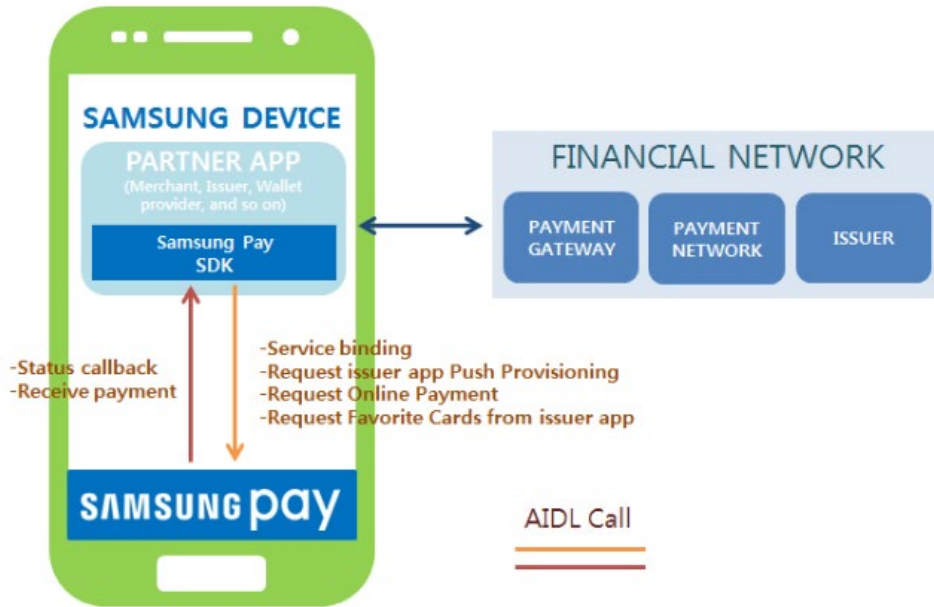
90. The Accused System and Devices include a mobile device and an application on the mobile device that, after requesting electronic transfer of a payment amount using a particular payment method from a particular payment source of credit card companies, financial institutions or third-party entities; utilizes one of three bilateral communication links to authenticate the payment method from the payment source of credit card companies, financial institutions or third-party entities established by one or more hardware processing servers and server codes on the server. For example, a Samsung Wallet-equipped device uses Samsung's servers to facilitate bilateral communications between the device and credit card companies, financial institutions, or third-party entities to authenticate a user's payment method associated with a particular payment source.



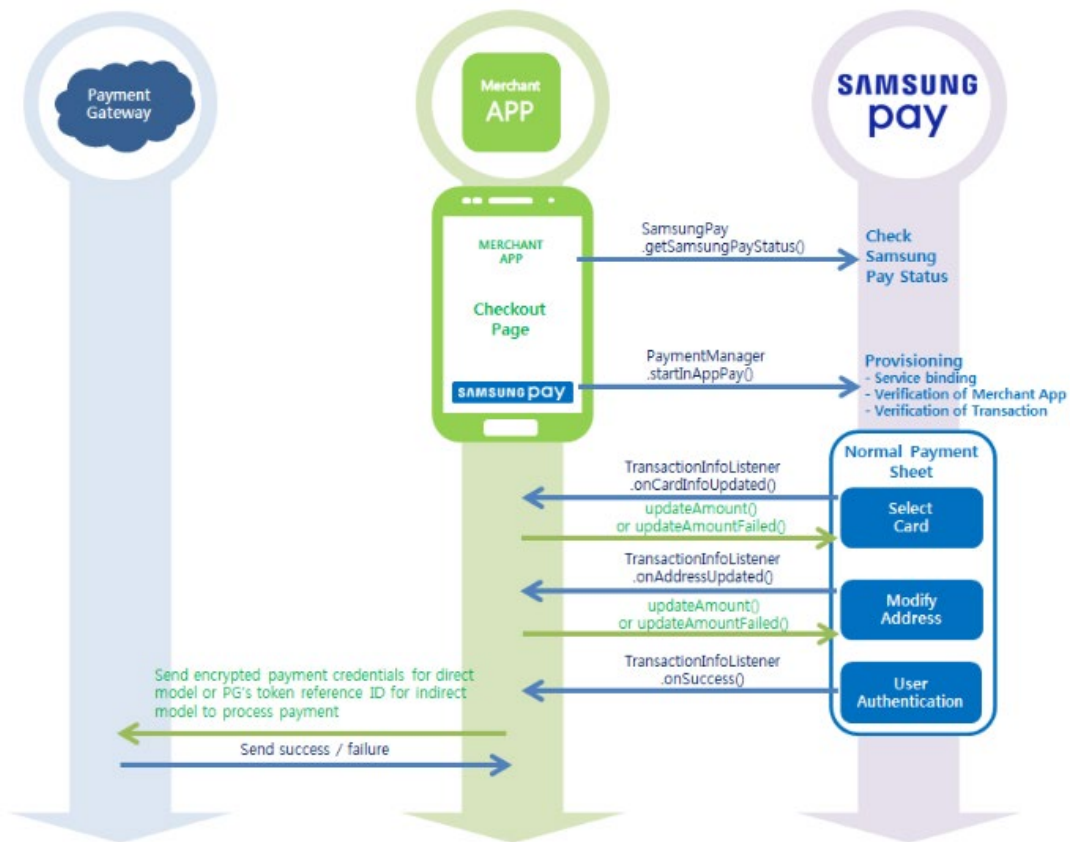
See, e.g., Ex. 16 (“Gateway Token Mode”)

(<https://developer.samsung.com/internet/android/web-payments-integration-guide.html>).

91. The Accused System and Devices include a mobile device and an application on the mobile device that utilizes one of three bilateral communication links associated with a particular payment source via one or more hardware processing servers and server codes on the server to execute a request for electronic transfer of a payment amount using a particular payment method from a particular payment source to an account belonging to another user. For example, once a user’s payment method associated with a particular payment source is authenticated, Samsung Wallet along with Samsung’s servers executes the payment request and sends the payment amount to the payee’s account.



See, e.g., Ex. 24 (<https://developer.samsung.com/pay/native/sdk-overview.html>);



Ex. 15

([https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03\\_00\\_using\\_samsung\\_pay\\_sdk\\_apis.html](https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03_00_using_samsung_pay_sdk_apis.html)).

92. The Accused System and Devices include a mobile device and an application on the mobile device that generates and transmits a notification, in real-time, to a receiving account belonging to another user indicating electronic transfer of a payment amount using a payment method from a payment source. For example, Samsung Wallet generates and transmits a notification to the payee, in real-time, indicating the completion of the financial transaction.

## **View recent transactions in Samsung Pay**

If you want to keep track of your spending, Samsung Wallet has you covered. You can view transactions made through the app until one month after purchase. You'll also receive a push notification with details of your transaction after each purchase.

*See, e.g.*, Ex. 18 (Samsung users will “receive a push notification with details of your transaction after each purchase.”) (<https://www.samsung.com/us/support/answer/ANS10002614/>).

93. Thus, the Accused System and Devices satisfy all elements of at least Claim 1 of the '296 Patent.

94. Samsung's direct infringement of the '296 Patent has injured and continues to injure PayGeo in an amount to be proven at trial, but not less than a reasonable royalty.

95. Samsung's infringement has caused and is continuing to cause damage and irreparable injury to PayGeo, and PayGeo will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court.

96. PayGeo is entitled to injunctive relief, damages and any other relief in accordance with 35 U.S.C. §§ 283 and 285 for Samsung's direct infringement of the '296 Patent.

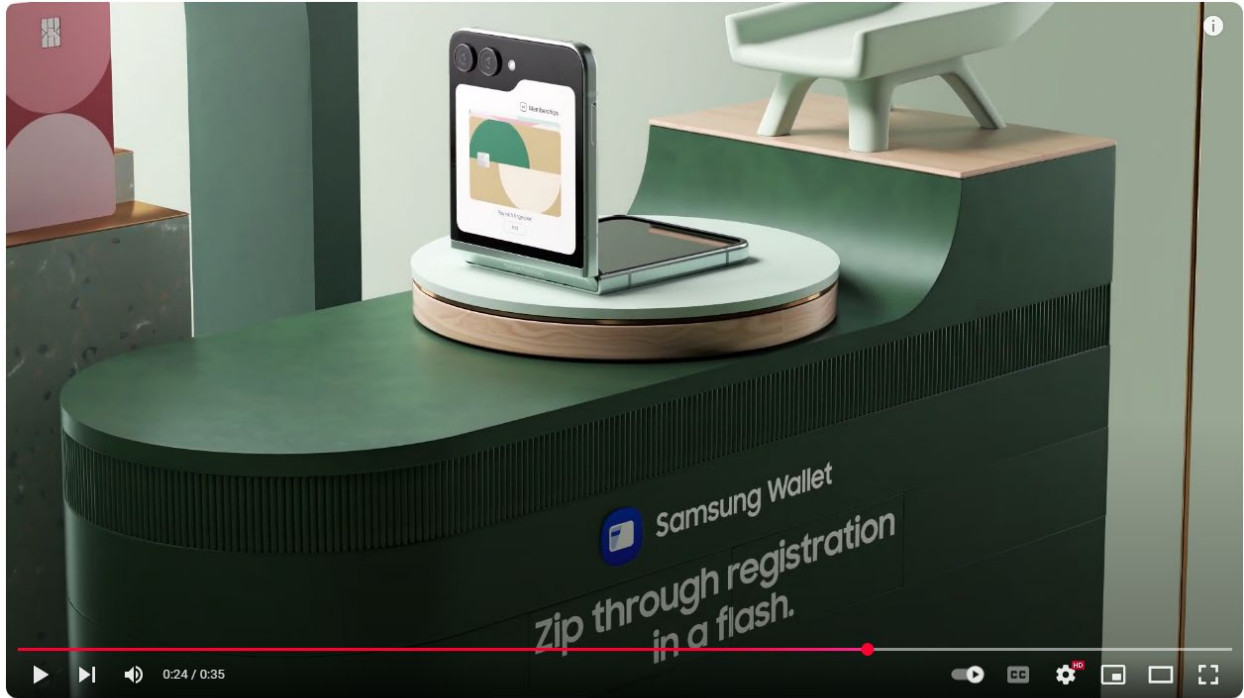
**COUNT IV**  
**(Indirect Infringement of the '296 Patent)**

97. PayGeo repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs.

98. As set forth above, Samsung has had knowledge of PayGeo's patents and of its infringement of the '296 Patent since at least the date of this Complaint, if not earlier.

99. As set forth above, the Accused System and Devices directly infringe the '296 Patent. Additionally, Samsung has actively, knowingly, and intentionally induced and continues to induce infringement of one or more claims of the '296 Patent pursuant to 35 U.S.C. §271(b); and has contributorily infringed and continues to contributorily infringe on one or more claims of the '296 Patent under 35 U.S.C. § 271(c).

100. Samsung indirectly infringes the '296 Patent pursuant to 35 U.S.C. § 271(b) by instructing, directing and/or requiring others, including customers, purchasers, shoppers, users and developers, to meet the elements of at least Claim 1 of the '296 Patent. Such use is consistent with how the Accused System and Devices are described to directly infringe the '296 Patent and how they are intended to be used, as described above and incorporated by reference here.



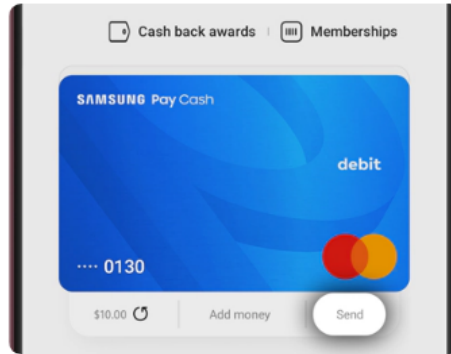
Samsung Wallet: It's simple for registration

See, e.g., <https://www.youtube.com/watch?v=43J0YMovGw8>. Samsung knew or was willfully blind to the fact that it was inducing others, including customers, purchasers, shoppers, users, and developers, to infringe the '296 Patent, including at least Claim 1.

101. Samsung knowingly and actively aided and abetted the direct infringement of the '296 Patent by instructing and encouraging its customers, purchasers, shoppers, users, and developers to use the Accused System and Devices.

You can send money from your Samsung Pay Cash card to contacts in your phone.

- 1 Open the **Samsung Wallet** app on your phone, and then tap the **Quick access** tab at the bottom.
- 2 Swipe to your Samsung Pay Cash card, and then tap **Send money** below the card.



- 3 Either enter a phone number manually, or choose a contact from your phone by tapping the **Contacts** tab at the top. You can also choose from a list of your recent transfers by tapping the **Recent** tab at the top.
- 4 Then, enter the amount that you would like to send. You can also add a message if you'd like, and then tap **Next**.
- 5 If the balance on the card does not cover the amount you are trying to send, you will be prompted to add more money to your card. Tap **Add money** on the pop-up, and then follow the on-screen instructions.

*See, e.g.,* Ex. 19 (“Send money with Samsung Pay Cash”)

(<https://www.samsung.com/us/support/answer/ANS10002584/>). Such instructions and encouragement include, but is not limited to, advising third parties to use the Accused System and Devices in an infringing manner, providing the Accused System and Devices through which third parties may infringe the '296 Patent, and by advertising and promoting the use of the Accused System and Devices in an infringing manner, and distributing guidelines and instructions to third parties on how to use the Accused System and Devices in an infringing manner.

# Samsung Pay is part of Samsung Wallet

Samsung Pay is now part of just got even better with Samsung Wallet. Upgrade your Pay app to Samsung Wallet now to experience all the great new features.

LEARN MORE

## Do more with your money.

Samsung Money by SoFi combines the convenience of a debit card, rewards of a credit card, and competitively high interest on your savings – all with no account fees.

LEARN MORE

*See, e.g.,* Ex. 25 (<https://www.samsung.com/us/samsung-pay/>). Further examples of this instruction and encouragement include, for example, trainings by Samsung either in-person or by instructional videos and material, for how to utilize Samsung Wallet’s mobile payment system to register and store payment methods and authenticate and securely execute financial transactions.

## How to use Samsung Wallet



Samsung Wallet: How to use Wallet and Pay

See, e.g., <https://www.youtube.com/watch?v=q-1dNsPJInw>.

102. Samsung updates and maintains help and customer service sections on its website which cover in-depth aspects of operating the Accused System and Devices in an infringing manner.



## Have questions? Find answers here.

Learn how to make the most out of your Samsung Wallet experience.

See, e.g., Ex. 20 (<https://www.samsung.com/us/apps/samsung-wallet/faq/>). Further, Samsung advertises on its website the infringing features of the Accused System and Devices and instructs consumers on how to use the Accused System and Devices in an infringing manner.



## Samsung Wallet

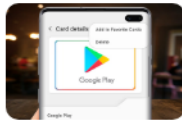
Visit the app store for more information

Google Play Store ↗

### About Samsung Wallet

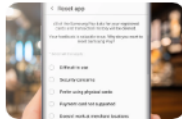
Samsung Pay is now part of Samsung Wallet. With Wallet, you get the features and benefits of Samsung Pay, plus Samsung Pass, digital home and car keys, digital asset management, and more. All this comes in a simplified in-app experience, so you'll get more and find it with ease. Just swipe up to launch Samsung Wallet with Quick Access.

### Find solutions



#### Removed card still shows in Samsung Pay

If you are trying to remove a payment card from Samsung Pay and the card continues to display in your card list, there are a couple things you can try, such as checking your internet connection.



#### Samsung Pay is crashing or not responding

You can easily fix the Samsung Pay app if it freezes, crashes, or does not respond. Most of the time, you just need to restart your phone to get the app working again.



#### Payment errors occur in Samsung Pay

Samsung Pay is a great way to keep all of your cards in one place and make quick payments. While it's usually quite convenient, it's possible you may experience payment errors. These errors could either be an issue with Samsung Pay, or they could be a result of an issue with your card network.



#### Samsung Pay connection error appears on phone

This error can occur at different times when using Samsung Pay. It means the app is unable to access the appropriate server while trying to complete the current action.

View more

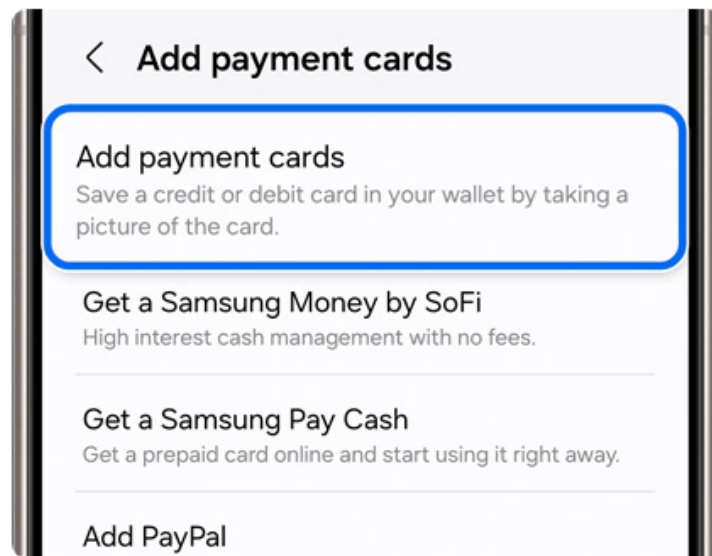
See, e.g., Ex. 21 (<https://www.samsung.com/us/support/owners/app/samsung-wallet>).

103. Samsung contributorily infringes the '296 Patent pursuant to 35 U.S.C. § 271(c) because it has provided material components of claims of the '296 Patent. In particular,

Samsung knows that the Accused System and Devices are particularly suited to be used in an infringing manner and are particularly suited for this use.

Samsung has you covered, because Samsung Wallet has partnered with top U.S. banks and credit card companies, like American Express, Visa, and MasterCard. Plus, we're always expanding our list of financial partners.

- 1 Navigate to and open **Samsung Wallet** on your phone.
- 2 Tap the **All** tab, and then tap **Payment cards**.
- 3 Next, tap **Add** (the plus sign), and then tap **Add payment cards**.



- 4 Follow the instructions to register your card. When you add a card, you must agree to the card's terms and conditions.
- 5 If you have any questions about the terms, contact the card issuer.
- 6 Once the card is added, you can start using it to make **in-store purchases** with your phone!

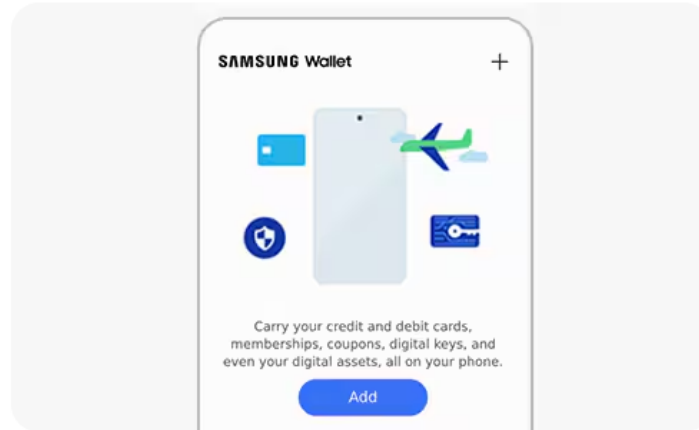
*See, e.g.*, Ex. 26 (“Add a card”) (<https://www.samsung.com/us/support/answer/ANS10002609/>).

The Accused System and Devices are developed and specialized to register and store payment methods and authenticate and securely execute financial transactions, and are not staple articles or commodities of commerce because they are specifically made to be used in an infringing manner, as described in the direct infringement claim above.

# How to use Samsung Wallet to make a payment

Last Update date : Sep 25, 2022

Samsung Wallet is an easy and safe way to make a purchase with your phone or your watch. Learn more about how this useful feature works below.



If you have added at least one card to Samsung Pay, you can access Samsung Wallet by **swiping up** from the bottom of the display on the home screen, the lock screen. You can also access Samsung Pay when the phone is locked, and the display is off. To make a payment using Samsung Pay, here is what you need to do:

- 1 Swipe up from the bottom of the display (from the home screen or lock screen) to open **Samsung Wallet**. Your default debit or credit card will show up on the screen. If you have multiple cards set up, simply swipe left or right to switch to the card you wish to use.
- 2 To enter payment mode, tap the **fingerprint or iris button** if you have Samsung Wallet secured with the biometric sensor, or the "PIN" button if you want to enter your PIN. If you have Samsung Wallet secured via the fingerprint sensor, simply tap the sensor with your finger and the payment mode will activate.
- 3 Then, touch the back of the phone to the payment terminal or card machine. You might need to touch the phone to the side of the card machine in some cases. **You have 30 seconds to do so**, but if time runs out, simply repeat step 2. You can stop touching the phone to the payment terminal or card machine once your card has been detected. You may be required to enter your card's PIN on the terminal or card machine to authorise the payment.

See, e.g., Ex. 22 (<https://www.samsung.com/levant/support/apps-services/how-to-use-samsung-wallet-to-make-a-payment/>). Samsung has known or has been willfully blind to the fact that it is contributing to the infringement of one or more claims of the '296 Patent, including at least Claim 1.

# Set up Samsung Pay on your phone or watch

Samsung Wallet transforms your Samsung phone or **smart watch** into a digital wallet, seamlessly storing your credit, debit, or gift cards. It combines convenience with security by employing biometric safeguards to protect your financial information.

*See, e.g.*, Ex. 12 (<https://www.samsung.com/us/support/answer/ANS10002612/>).

104. Samsung's indirect infringement of the '296 Patent has injured and continues to injure PayGeo in an amount to be proven at trial, but not less than a reasonable royalty.

105. Samsung's indirect infringement has caused and is continuing to cause damage and irreparable injury to PayGeo, and PayGeo will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court.

106. PayGeo is entitled to injunctive relief, damages and any other relief in accordance with 35 U.S.C. §§ 283 and 285 for Samsung's indirect infringement.

## **COUNT V** **(Direct Infringement of the '018 Patent)**

107. PayGeo repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs, as set forth above.

108. In violation of 35 U.S.C. § 271(a), Samsung directly infringed and continues to infringe at least at least Claim 1 of the '018 Patent by making, using, importing, selling, and offering for sale in the United States the Accused System and Devices.

109. Samsung's acts of making, using, importing, selling, and/or offering for sale the Accused System and Devices have been without the permission, consent, authorization, or license of PayGeo.

110. Samsung's infringement includes the manufacture, use, sale, importation, and offer for sale of the Accused System and Devices, which each infringe the '018 Patent because they satisfy each element of claims of the '018 Patent, either literally, under the doctrine of equivalents, or both.

111. By way of example of Samsung's infringement of the '018 Patent, the Accused System and Devices meet all of the limitations of at least Claim 1 of the '018 Patent, which recites:

A system, comprising:

memory storing program code associated with a service provided by a third-party entity to a plurality of members who register with the service provided by the third-party entity; and

one or more hardware processors configured to execute the program code, the program code including

a first communication interface configured to communicate with a first device associated with a credit card company on behalf of the plurality of members;

a second communication interface configured to communicate with a second device associated with a financial institution on behalf of the plurality of members;

a third communication interface configured to communicate with a third device associated with the third-party entity;

login interface code configured to request security credentials from a first member of the plurality of members before the first member can access the service, the first member having previously registered with the service;

first interface code configured to assist the first member to register a set of one or more payment sources for a future transaction, the first interface code configured to assist the first member to register a credit card account issued by the credit card company in the set of one or more payment sources, and configured to assist the first member to register a financial account associated with the financial institution in the set of one or more payment sources, the third-party

entity being different than the financial institution and different than the credit card company;

second interface code configured to enable the first member to select a payment function identifier from a set of function identifiers to navigate to a payment function, the payment function configured to assist the first member to request sending a payment amount to a payee account, the payee account being a third-party account associated with the third-party entity and belonging to a second member of the plurality of members, the second member having previously registered with the service;

third interface code configured to enable the first member to select a payee identifier identifying the payee account;

fourth interface code configured to enable the first member to select a payment source identifier from a set of one or more payment source identifiers, the set of one or more payment source identifiers identifying a particular set of one or more payment sources, the fourth interface code capable of presenting in the set of one or more payment source identifiers a financial account identifier identifying a particular financial account associated with the financial institution, a credit card identifier identifying a particular credit card account issued by the credit card company, and a third-party account identifier identifying a third-party account associated with the third-party entity and belonging to the first member;

fifth interface code configured to enable the first member to identify the payment amount to be transferred to the payee account;

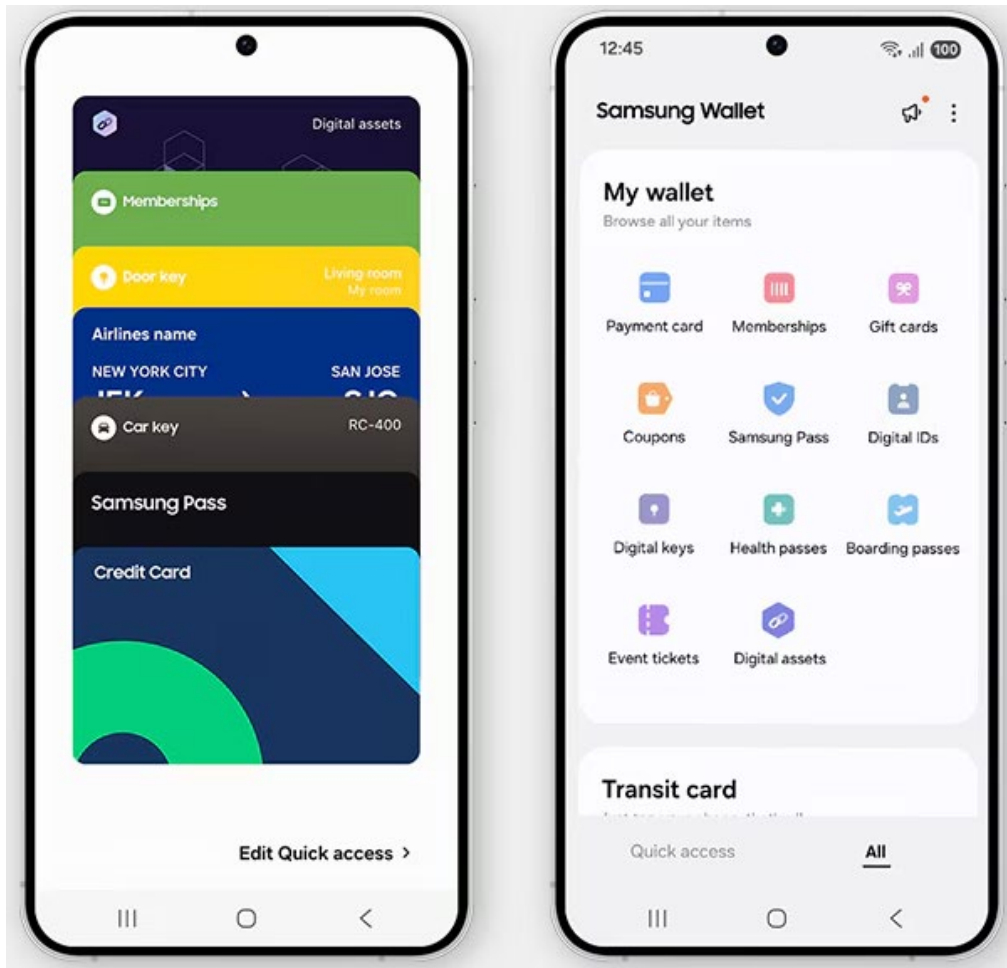
control code configured to select the first communication interface as a particular communication interface and to establish a communication link between the first communication interface and the first device associated with the credit card company on behalf of the first member when the particular payment source is the credit card account issued by the credit card company, configured to select the second communication interface as the particular communication interface and to establish a communication link between the second communication interface and the second device associated with the financial institution on behalf of the first member when the particular payment source is the financial account associated with the financial institution, and configured to select the third communication interface as the particular communication interface and to establish a communication link between the third communication interface and the third device associated with the third-party entity when the particular payment source is the third-party account, and configured to request electronic transfer of the

payment amount from the particular payment source to the payee account using the selected particular communication interface; and

notification code configured to generate a notification indicating an electronic transfer to the second member, and configured to transmit the notification over a communication network to a computing device associated with the second member in real time.

112. The Accused System and Devices include the recited system of facilitating financial transactions between devices and establishing communication links with appropriate third-party entities in a secured mobile environment, as discussed below.

113. The Accused System and Devices include a mobile device and an application on the mobile device that stores a user's information and provides services to the user; and one or more hardware processing servers and server codes on the server which perform and execute such services for the user. For example, Samsung Wallet provides various services to its users including, but not limited to, making payments with registered credit cards, debit cards, and/or gift cards; storing event and/or transportation tickets; and accessing loyalty accounts with vendors.

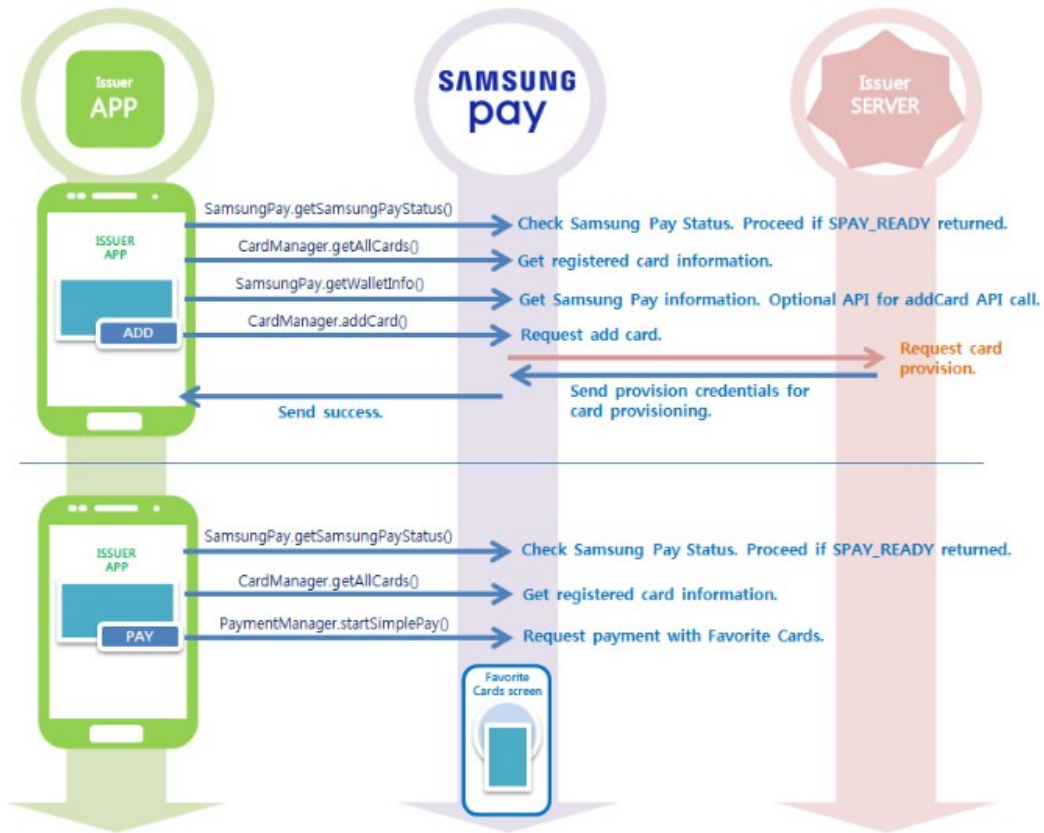


See, e.g., Ex. 23 (Samsung Wallet enables users to “[m]ake payments, open doors, and gain access by tapping [the Samsung] device” and to “carry[] essentials in a single app—payment cards, ID, home and car keys, movie tickets, and more.”)

(<https://www.samsung.com/us/apps/samsung-wallet/>).

114. The Accused System and Devices include a mobile device and an application on the mobile device utilizing one or more hardware processing servers and server codes on the server to establish three bilateral communication links: the first being with credit card companies, the second being with financial institutions and the third being with third-party entities to perform and execute associated services for the user. For example, Samsung Wallet

communicates with credit card companies, financial institutions and/or third-party entities using Samsung’s servers to provide their services directly to users via the Samsung Wallet application.



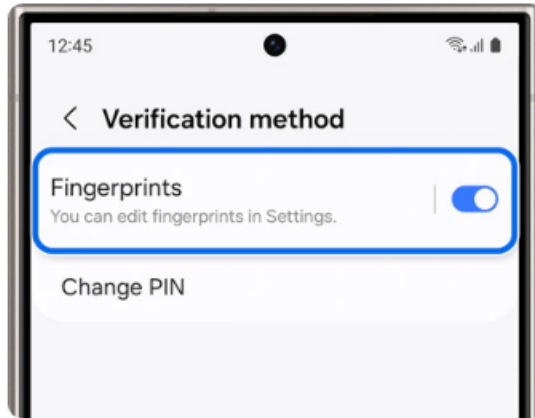
See, e.g., Ex. 15

([https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03\\_00\\_using\\_samsung\\_pay\\_sdk\\_apis.html](https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03_00_using_samsung_pay_sdk_apis.html)).

115. The Accused System and Devices include a mobile device and an application on the mobile device that provides a login interface requesting a security credential from a user to enable access to services within the application. For example, users can secure access to Samsung Wallet and its services by registering and designating a PIN and/or biometric authentication via the Samsung Wallet application directly or via Samsung Pass.

Samsung Wallet offers advanced security features to protect your account, including fingerprint and iris scan options on certain models. You can activate this feature through Samsung Wallet's settings.

Open **Samsung Wallet**, then tap the **All** tab, and then tap **More options** (the three vertical dots). Tap **Settings**, then tap **Verification method**, and then tap the **switch** next to Fingerprint or Irises. Once you have chosen a security option, follow the on-screen instructions to set up either Fingerprint or Iris verification. If you don't have a Lock screen set up, you may be required to set one up for your phone.



See, e.g., Ex. 12 (“Enhanced security with biometric verification”)

(<https://www.samsung.com/us/support/answer/ANS10002612/>);

## what is samsung pass

Last Update date : Sep 13, 2022

These days a mobile phone is an essential part of everyday life. Now, thanks to Samsung Pass, you can customise various services to handle daily tasks and keep your important information in one secure place. Learn more about this app below.

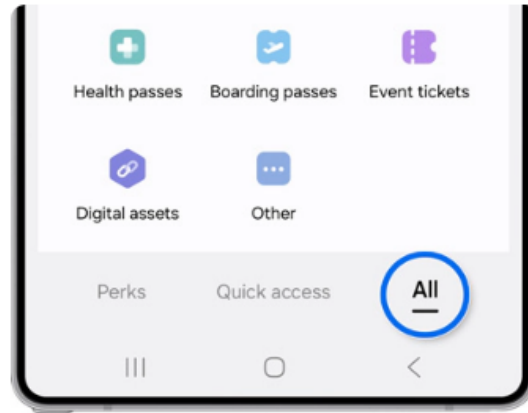


Ex. 9 (<https://www.samsung.com/levant/support/apps-services/what-is-samsung-pass/>).

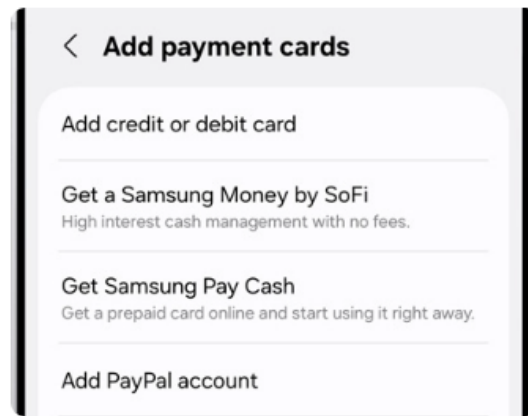
116. The Accused System and Devices include a mobile device and an application on the mobile device that utilizes one or more hardware processing servers and server codes on the server to enable a user to register and store payment methods from a payment source of credit card companies, financial institutions and/or third-party entities for use in future financial transactions. For example, users can register and store payment methods and/or reward accounts such as credit cards, debit cards, gift cards, event tickets, transportation tickets, and/or loyalty accounts on the Samsung Wallet application for use in future financial transactions.

Samsung Wallet lets you add payment cards, membership cards, gift cards, digital keys, health passes, digital assets, and boarding passes. That way, you can access everything in one place on your phone instead of alternating between various apps or shuffling through your wallet.

- 1 To begin adding one of these, open the **Samsung Wallet** app. Tap the **Menu** or **All** tab, and then tap your desired item, such as Payment cards.



- 2 Tap **Add** (the plus sign) in the upper right corner, or follow the on-screen instructions. Choose your desired registration method.

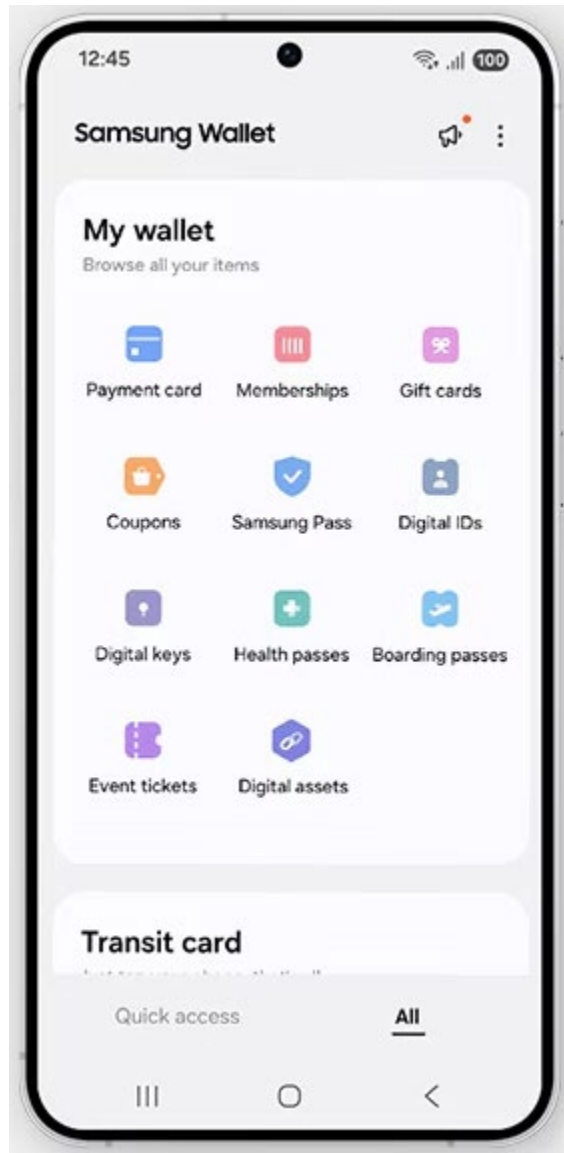


*See, e.g.,* Ex. 10 (“Add and use a payment methods or other item in Samsung Wallet”)

(<https://www.samsung.com/us/support/answer/ANS10001347/>).

117. The Accused System and Devices include a mobile device and an application on the mobile device in which a user can select from a set of function identifiers corresponding to a service on the application; and one such service being a payment function that enables a user to initiate a financial transaction with an account belonging to another user. For example, a user

can initiate a payment to a payee's account by navigating to the payment function on the Samsung Wallet application.



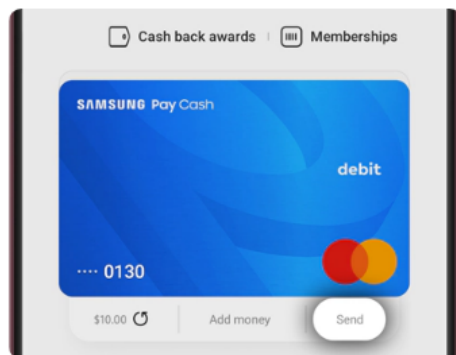
See, e.g., Ex. 23 (<https://www.samsung.com/us/apps/samsung-wallet/>).

118. The Accused System and Devices include a mobile device and an application on the mobile device that enables a user to enter information relating to a financial transaction such as a receiving account and its user; a payment source of credit card companies, financial institutions and/or third-party entities; and a payment amount. For example, a user can conduct a

payment by entering payment details such as payment amount, payment source, payment method, payee, and payee's account information.

You can send money from your Samsung Pay Cash card to contacts in your phone.

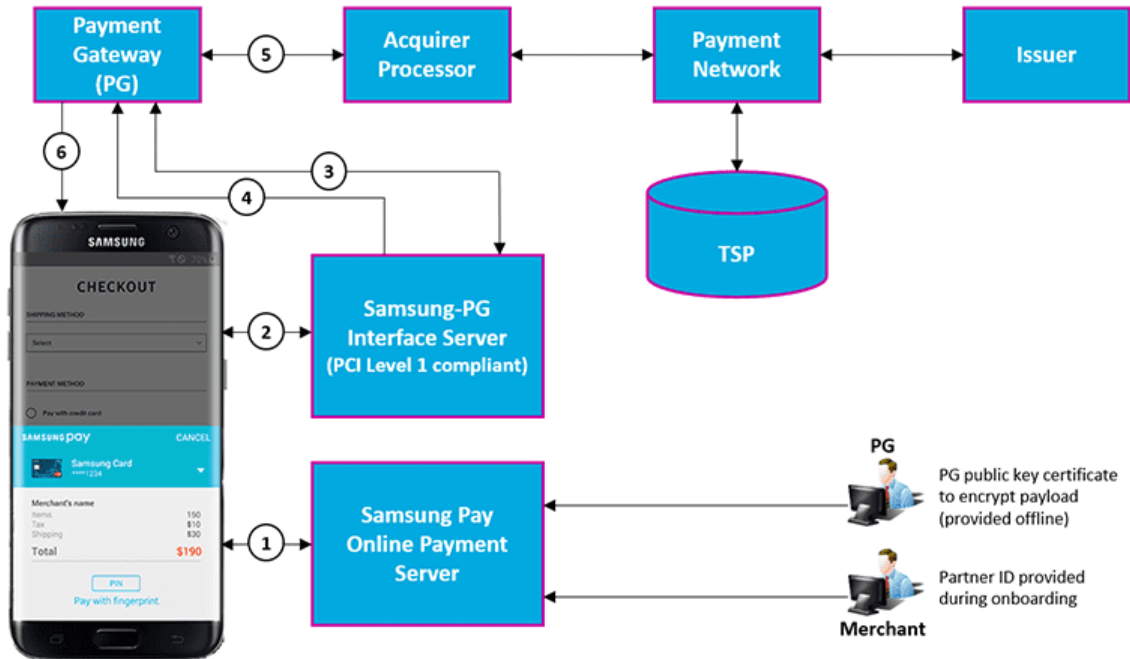
- 1 Open the **Samsung Wallet** app on your phone, and then tap the **Quick access** tab at the bottom.
- 2 Swipe to your Samsung Pay Cash card, and then tap **Send money** below the card.



- 3 Either enter a phone number manually, or choose a contact from your phone by tapping the **Contacts** tab at the top. You can also choose from a list of your recent transfers by tapping the **Recent** tab at the top.
- 4 Then, enter the amount that you would like to send. You can also add a message if you'd like, and then tap **Next**.
- 5 If the balance on the card does not cover the amount you are trying to send, you will be prompted to add more money to your card. Tap **Add money** on the pop-up, and then follow the on-screen instructions.

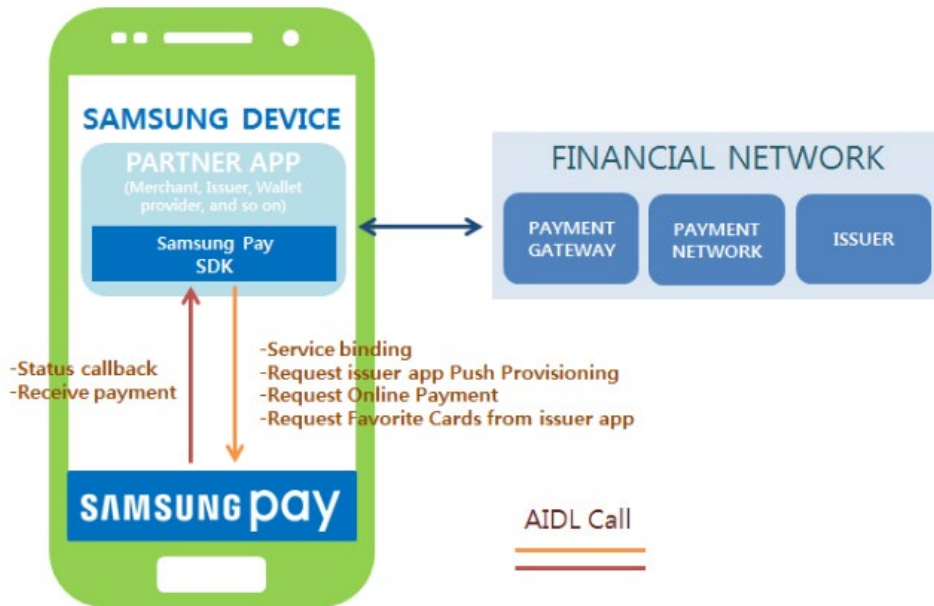
See, e.g., Ex. 19 (<https://www.samsung.com/us/support/answer/ANS10002584/>).

119. The Accused System and Devices include a mobile device and an application on the mobile device that authenticates and executes a user's financial transaction request using a payment method from a payment source of credit card companies, financial institutions or third-party entities utilizing one of three bilateral communication links established by one or more hardware processing servers and server codes on the server. For example, a Samsung Wallet-equipped device uses Samsung's servers to facilitate bilateral communications between the device and credit card companies, financial institutions, or third-party entities to authenticate a user's payment method associated with a particular payment source.

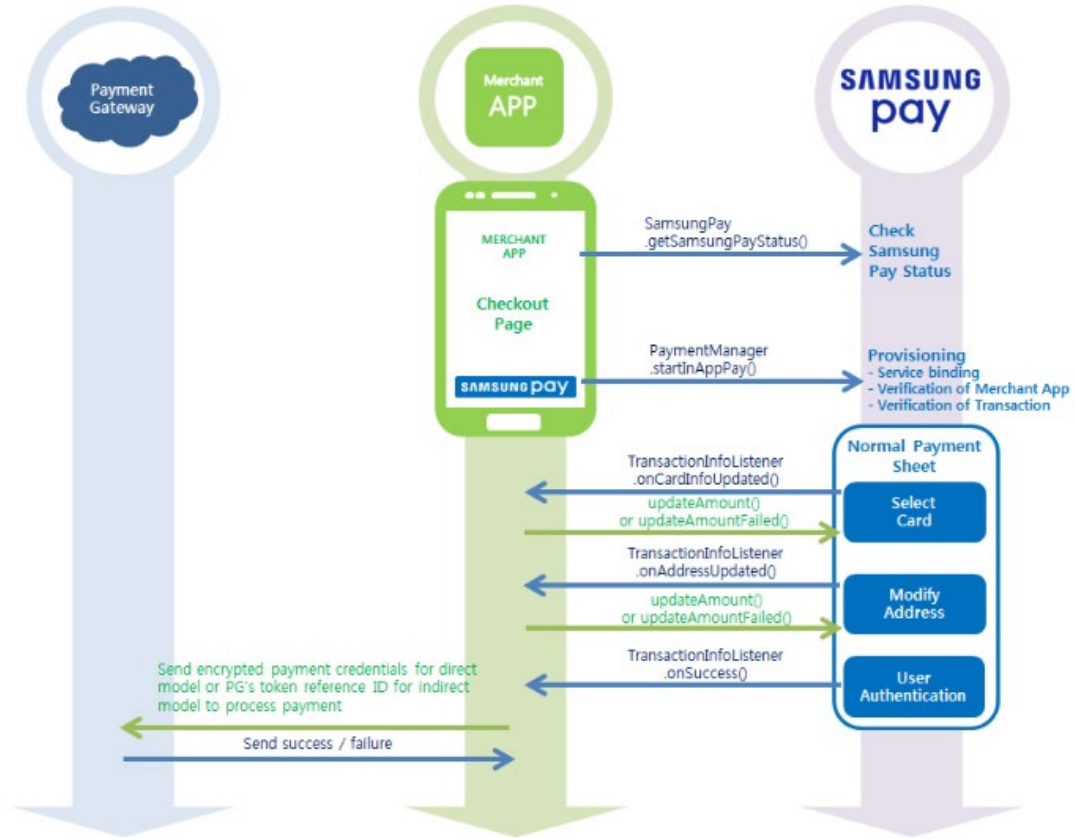


See, e.g., Ex. 16 (“Gateway Token Mode”)

(<https://developer.samsung.com/internet/android/web-payments-integration-guide.html>);



Ex. 24 (<https://developer.samsung.com/pay/native/sdk-overview.html>);



Ex. 15

([https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03\\_00\\_using\\_samsung\\_pay\\_sdk\\_apis.html](https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03_00_using_samsung_pay_sdk_apis.html)).

120. The Accused System and Devices include a mobile device and an application on the mobile device that generates and transmits a notification, in real-time, to a receiving account belonging to another user indicating electronic transfer of a payment amount using a payment method from a payment source. For example, Samsung Wallet generates and transmits a notification to the payee, in real-time, indicating the completion of the financial transaction.

## View recent transactions in Samsung Pay

If you want to keep track of your spending, Samsung Wallet has you covered. You can view transactions made through the app until one month after purchase. You'll also receive a push notification with details of your transaction after each purchase.

*See, e.g.*, Ex. 18 (Samsung users will “receive a push notification with details of your transaction after each purchase.”) (<https://www.samsung.com/us/support/answer/ANS10002614/>).

121. Thus, the Accused System and Devices satisfy all elements of at least Claim 1 of the '018 Patent.

122. Samsung's direct infringement of the '018 Patent has injured and continues to injure PayGeo in an amount to be proven at trial, but not less than a reasonable royalty.

123. Samsung's infringement has caused and is continuing to cause damage and irreparable injury to PayGeo, and PayGeo will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court.

124. PayGeo is entitled to injunctive relief, damages and any other relief in accordance with 35 U.S.C. §§ 283 and 285 for Samsung's direct infringement of the '018 Patent.

### **COUNT VI** **(Indirect Infringement of the '018 Patent)**

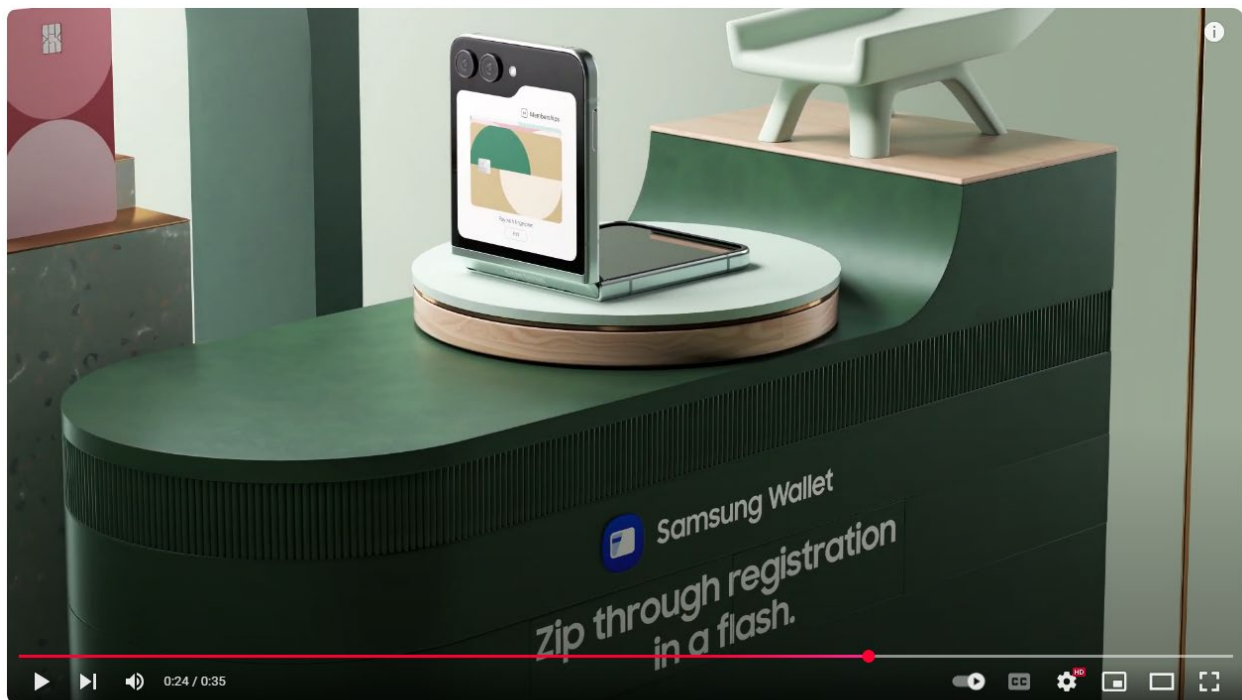
125. PayGeo repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs.

126. As set forth above, Samsung has had knowledge of PayGeo's patents and of its infringement of the '018 Patent since at least the date of this Complaint, if not earlier.

127. As set forth above, the Accused System and Devices directly infringe the '018 Patent. Additionally, Samsung has actively, knowingly, and intentionally induced and continues

to induce infringement of one or more claims of the '018 Patent pursuant to 35 U.S.C. §271(b); and has contributorily infringed and continues to contributorily infringe on one or more claims of the '018 Patent under 35 U.S.C. § 271(c).

128. Samsung indirectly infringes the '018 Patent pursuant to 35 U.S.C. § 271(b) by instructing, directing and/or requiring others, including customers, purchasers, shoppers, users and developers, to meet the elements of at least Claim 1 of the '018 Patent. Such use is consistent with how the Accused System and Devices are described to directly infringe the '018 Patent and how they are intended to be used, as described above and incorporated by reference here.



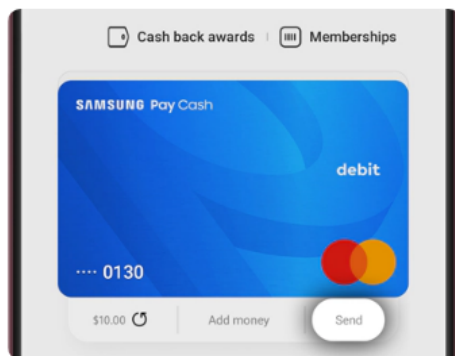
Samsung Wallet: It's simple for registration

See, e.g., <https://www.youtube.com/watch?v=43J0YMovGw8>. Samsung knew or was willfully blind to the fact that it was inducing others, including customers, purchasers, shoppers, users, and developers, to infringe the '018 Patent, including at least Claim 1.

129. Samsung knowingly and actively aided and abetted the direct infringement of the '018 Patent by instructing and encouraging its customers, purchasers, shoppers, users, and developers to use the Accused System and Devices.

You can send money from your Samsung Pay Cash card to contacts in your phone.

- 1 Open the **Samsung Wallet** app on your phone, and then tap the **Quick access** tab at the bottom.
- 2 Swipe to your Samsung Pay Cash card, and then tap **Send money** below the card.



- 3 Either enter a phone number manually, or choose a contact from your phone by tapping the **Contacts** tab at the top. You can also choose from a list of your recent transfers by tapping the **Recent** tab at the top.
- 4 Then, enter the amount that you would like to send. You can also add a message if you'd like, and then tap **Next**.
- 5 If the balance on the card does not cover the amount you are trying to send, you will be prompted to add more money to your card. Tap **Add money** on the pop-up, and then follow the on-screen instructions.

*See, e.g., Ex. 19 (“Send money with Samsung Pay Cash”)*

[\(https://www.samsung.com/us/support/answer/ANS10002584/\)](https://www.samsung.com/us/support/answer/ANS10002584/). Such instructions and encouragement include, but is not limited to, advising third parties to use the Accused System and Devices in an infringing manner, providing the Accused System and Devices through which third parties may infringe the '018 Patent, and by advertising and promoting the use of the Accused System and Devices in an infringing manner, and distributing guidelines and instructions to third parties on how to use the Accused System and Devices in an infringing manner.

# Samsung Pay is part of Samsung Wallet

Samsung Pay is now part of just got even better with Samsung Wallet. Upgrade your Pay app to Samsung Wallet now to experience all the great new features.

LEARN MORE

## Do more with your money.

Samsung Money by SoFi combines the convenience of a debit card, rewards of a credit card, and competitively high interest on your savings – all with no account fees.

LEARN MORE

*See, e.g.,* Ex. 25 (<https://www.samsung.com/us/samsung-pay/>). Further examples of this instruction and encouragement include, for example, trainings by Samsung either in-person or by instructional videos and material, for how to utilize Samsung Wallet’s mobile payment system to register and store payment methods and authenticate and securely execute financial transactions.

## How to use Samsung Wallet



Samsung Wallet: How to use Wallet and Pay

See, e.g., <https://www.youtube.com/watch?v=q-1dNsPJInw>.

130. Samsung updates and maintains help and customer service sections on its website which cover in-depth aspects of operating the Accused System and Devices in an infringing manner.



## Have questions? Find answers here.

Learn how to make the most out of your Samsung Wallet experience.

See, e.g., Ex. 20 (<https://www.samsung.com/us/apps/samsung-wallet/faq/>). Further, Samsung advertises on its website the infringing features of the Accused System and Devices and instructs consumers on how to use the Accused System and Devices in an infringing manner.



## Samsung Wallet

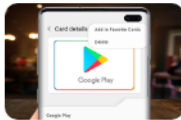
Visit the app store for more information



### About Samsung Wallet

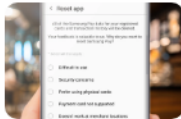
Samsung Pay is now part of Samsung Wallet. With Wallet, you get the features and benefits of Samsung Pay, plus Samsung Pass, digital home and car keys, digital asset management, and more. All this comes in a simplified in-app experience, so you'll get more and find it with ease. Just swipe up to launch Samsung Wallet with Quick Access.

### Find solutions



#### Removed card still shows in Samsung Pay

If you are trying to remove a payment card from Samsung Pay and the card continues to display in your card list, there are a couple things you can try, such as checking your internet connection.



#### Samsung Pay is crashing or not responding

You can easily fix the Samsung Pay app if it freezes, crashes, or does not respond. Most of the time, you just need to restart your phone to get the app working again.



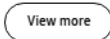
#### Payment errors occur in Samsung Pay

Samsung Pay is a great way to keep all of your cards in one place and make quick payments. While it's usually quite convenient, it's possible you may experience payment errors. These errors could either be an issue with Samsung Pay, or they could be a result of an issue with your card network.



#### Samsung Pay connection error appears on phone

This error can occur at different times when using Samsung Pay. It means the app is unable to access the appropriate server while trying to complete the current action.



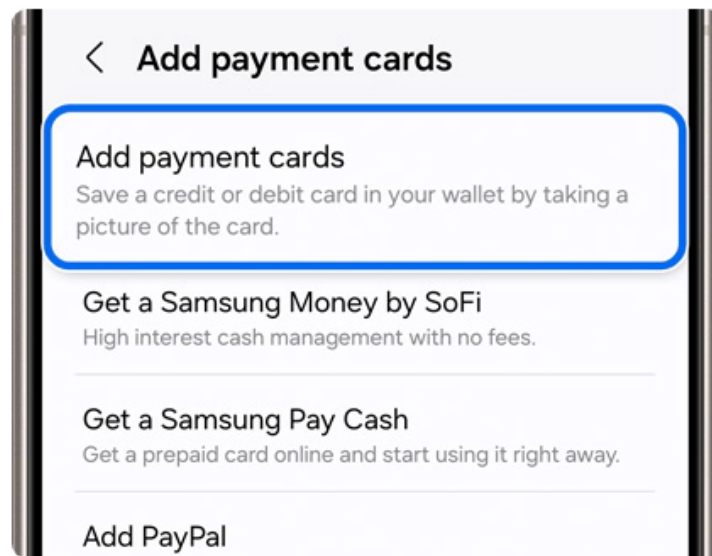
See, e.g., Ex. 21 (<https://www.samsung.com/us/support/owners/app/samsung-wallet>).

131. Samsung contributorily infringes the '018 Patent pursuant to 35 U.S.C. § 271(c) because it has provided material components of claims of the '018 Patent. In particular,

Samsung knows that the Accused System and Devices are particularly suited to be used in an infringing manner and are particularly suited for this use.

Samsung has you covered, because Samsung Wallet has partnered with top U.S. banks and credit card companies, like American Express, Visa, and MasterCard. Plus, we're always expanding our list of financial partners.

- 1 Navigate to and open **Samsung Wallet** on your phone.
- 2 Tap the **All** tab, and then tap **Payment cards**.
- 3 Next, tap **Add** (the plus sign), and then tap **Add payment cards**.



- 4 Follow the instructions to register your card. When you add a card, you must agree to the card's terms and conditions.
- 5 If you have any questions about the terms, contact the card issuer.
- 6 Once the card is added, you can start using it to make **in-store purchases** with your phone!

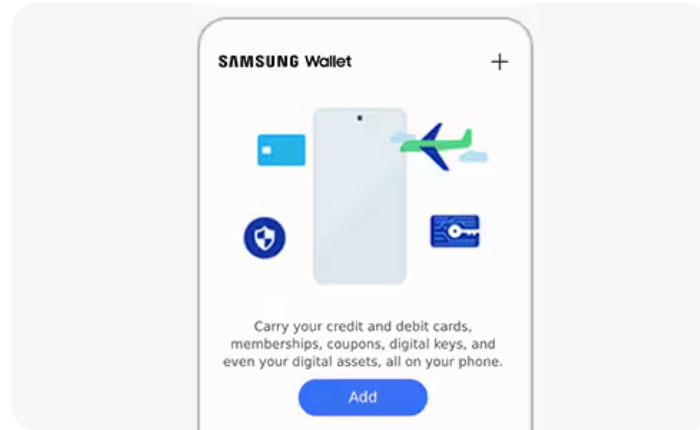
See, e.g., Ex. 26 (“Add a card”) (<https://www.samsung.com/us/support/answer/ANS10002609/>).

The Accused System and Devices are developed and specialized to register and store payment methods and authenticate and securely execute financial transactions, and are not staple articles or commodities of commerce because they are specifically made to be used in an infringing manner, as described in the direct infringement claim above.

# How to use Samsung Wallet to make a payment

Last Update date : Sep 25, 2022

Samsung Wallet is an easy and safe way to make a purchase with your phone or your watch. Learn more about how this useful feature works below.



If you have added at least one card to Samsung Pay, you can access Samsung Wallet by **swiping up** from the bottom of the display on the home screen, the lock screen. You can also access Samsung Pay when the phone is locked, and the display is off. To make a payment using Samsung Pay, here is what you need to do:

- 1 Swipe up from the bottom of the display (from the home screen or lock screen) to open **Samsung Wallet**. Your default debit or credit card will show up on the screen. If you have multiple cards set up, simply swipe left or right to switch to the card you wish to use.
- 2 To enter payment mode, tap the **fingerprint or iris button** if you have Samsung Wallet secured with the biometric sensor, or the "PIN" button if you want to enter your PIN. If you have Samsung Wallet secured via the fingerprint sensor, simply tap the sensor with your finger and the payment mode will activate.
- 3 Then, touch the back of the phone to the payment terminal or card machine. You might need to touch the phone to the side of the card machine in some cases. **You have 30 seconds to do so**, but if time runs out, simply repeat step 2. You can stop touching the phone to the payment terminal or card machine once your card has been detected. You may be required to enter your card's PIN on the terminal or card machine to authorise the payment.

See, e.g., Ex. 22 (<https://www.samsung.com/levant/support/apps-services/how-to-use-samsung-wallet-to-make-a-payment/>). Samsung has known or has been willfully blind to the fact that it is contributing to the infringement of one or more claims of the '018 Patent, including at least Claim 1.

# Set up Samsung Pay on your phone or watch

Samsung Wallet transforms your Samsung phone or **smart watch** into a digital wallet, seamlessly storing your credit, debit, or gift cards. It combines convenience with security by employing biometric safeguards to protect your financial information.

*See, e.g.,* Ex. 12 (<https://www.samsung.com/us/support/answer/ANS10002612/>).

132. Samsung's indirect infringement of the '018 Patent has injured and continues to injure PayGeo in an amount to be proven at trial, but not less than a reasonable royalty.

133. Samsung's indirect infringement has caused and is continuing to cause damage and irreparable injury to PayGeo, and PayGeo will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court.

134. PayGeo is entitled to injunctive relief, damages and any other relief in accordance with 35 U.S.C. §§ 283 and 285 for Samsung's indirect infringement.

## **COUNT VII** **(Direct Infringement of the '307 Patent)**

135. PayGeo repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs, as set forth above.

136. In violation of 35 U.S.C. § 271(a), Samsung directly infringed and continues to infringe at least at least Claim 1 of the '307 Patent by making, using, importing, selling, and offering for sale in the United States the Accused System and Devices.

137. Samsung's acts of making, using, importing, selling, and/or offering for sale the Accused System and Devices have been without the permission, consent, authorization, or license of PayGeo.

138. Samsung's infringement includes the manufacture, use, sale, importation, and offer for sale of the Accused System and Devices, which each infringe the '307 Patent because they satisfy each element of claims of the '307 Patent, either literally, under the doctrine of equivalents, or both.

139. By way of example of Samsung's infringement of the '307 Patent, the Accused System and Devices meet all of the limitations of at least Claim 1 of the '307 Patent, which recites:

A system, comprising:

memory storing program code associated with a service provided by a third-party entity to a plurality of members who register with the service provided by the third-party entity; and

one or more hardware processors configured to execute the program code, the program code including:

a first communication interface configured to communicate with a first device associated with a first financial institution on behalf of the plurality of members;

a second communication interface configured to communicate with a second device associated with a second financial institution on behalf of the plurality of members;

a third communication interface configured to communicate with a third device associated with the third-party entity;

login interface code configured to request security credentials from a first member of the plurality of members before the first member can access the service, the first member having previously registered with the service;

first interface code configured to assist the first member to register a set of one or more payment sources for a future transaction, the first interface code configured to assist the first member to register a first account associated with the first financial institution in the set of one or more payment sources, and configured to assist the first member to register a second account associated with the second financial institution in the set of one or more payment sources, the

third-party entity being different than the financial institution and different than the first financial institution;

second interface code configured to enable the first member to select a payment function identifier from a set of function identifiers to navigate to a payment function, the payment function configured to assist the first member to request sending a payment amount to a payee account, the payee account being a third-party account associated with the third-party entity and belonging to a second member of the plurality of members, the second member having previously registered with the service;

third interface code configured to enable the first member to select a payee identifier identifying the payee account;

fourth interface code configured to enable the first member to select a payment source identifier from a set of one or more payment source identifiers, the set of one or more payment source identifiers identifying a particular set of one or more payment sources, the fourth interface code capable of presenting in the set of one or more payment source identifiers a first account identifier identifying the first account associated with the first financial institution, a second account identifier identifying the second account associated with the second financial institution, and a third-party account identifier identifying a third-party account associated with the third-party entity and belonging to the first member;

fifth interface code configured to enable the first member to identify the payment amount to be transferred to the payee account;

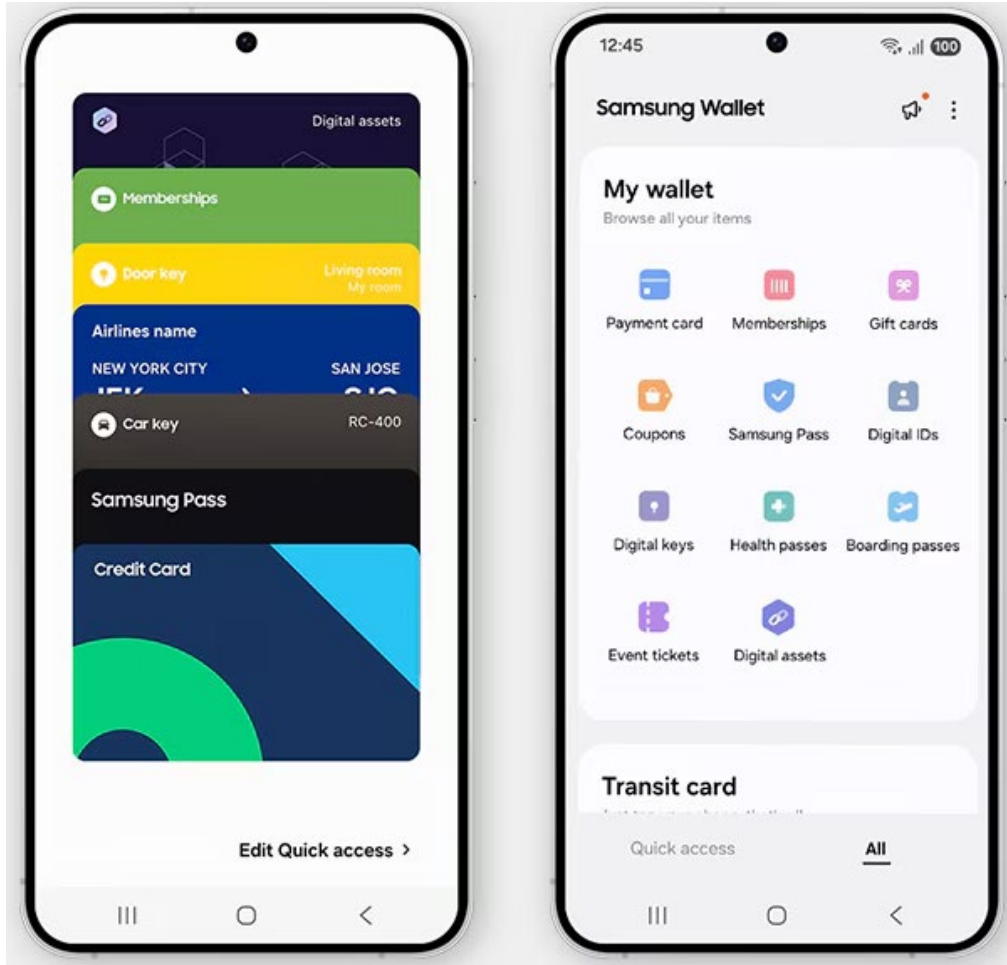
control code configured to select the first communication interface as a particular communication interface and to establish a communication link between the first communication interface and the first device associated with the first financial institution on behalf of the first member when the particular payment source is the first account associated with the first financial institution, configured to select the second communication interface as the particular communication interface and to establish a communication link between the second communication interface and the second device associated with the second financial institution on behalf of the first member when the particular payment source is the second account associated with the second financial institution, and configured to select the third communication interface as the particular communication interface and to establish a communication link between the third communication interface and the third device associated with the third-party entity when the particular payment source is the third-

party account, and configured to request electronic transfer of the payment amount from the particular payment source to the payee account using the selected particular communication interface; and

notification code configured to generate a notification indicating an electronic transfer to the second member, and configured to transmit the notification over a communication network to a computing device in real time.

140. The Accused System and Devices include the recited system of facilitating financial transactions between devices and establishing communication links with appropriate third-party entities in a secured mobile environment, as discussed below.

141. The Accused System and Devices include a mobile device and an application on the mobile device that stores a user's information and provides services to the user; and one or more hardware processing servers and server codes on the server which perform and execute such services for the user. For example, Samsung Wallet provides various services to its users including, but not limited to, making payments with registered credit cards, debit cards, and/or gift cards; storing event and/or transportation tickets; and accessing loyalty accounts with vendors.

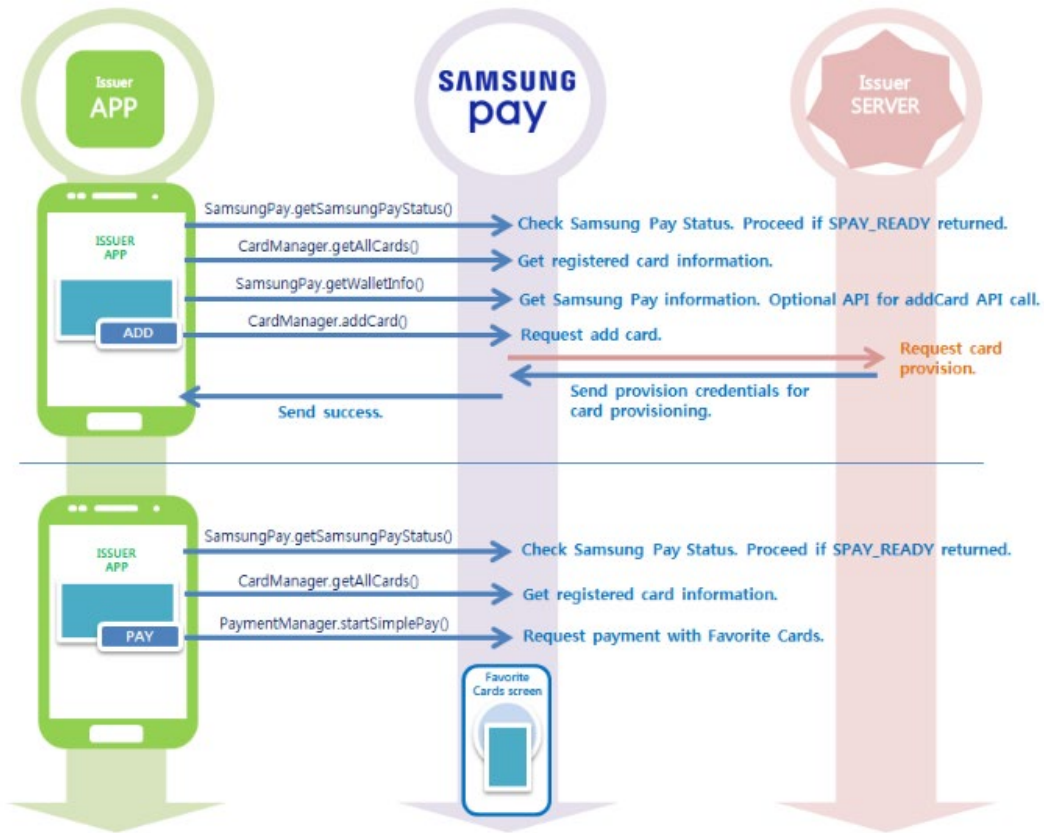


See, e.g., Ex. 23 (Samsung Wallet enables users to “[m]ake payments, open doors, and gain access by tapping [the Samsung] device” and to “carry[] essentials in a single app—payment cards, ID, home and car keys, movie tickets, and more.”)

(<https://www.samsung.com/us/apps/samsung-wallet/>).

142. The Accused System and Devices include a mobile device and an application on the mobile device utilizing one or more hardware processing servers and server codes on the server to establish a bilateral communication link with one or more financial institutions and another bilateral communication link with third-party entities to perform and execute associated services for the user. For example, Samsung Wallet communicates with credit card companies,

financial institutions and/or third-party entities using Samsung’s servers to provide their services directly to users via the Samsung Wallet application.



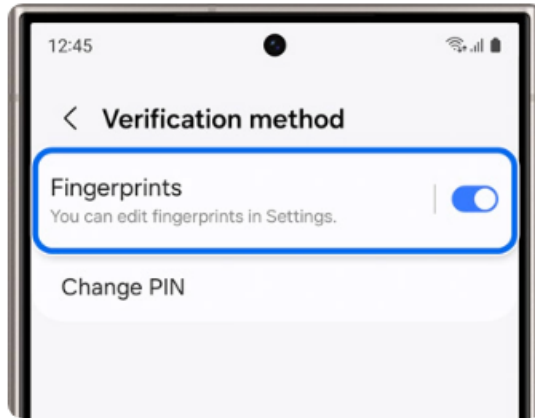
See, e.g., Ex. 15

([https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03\\_00\\_using\\_samsung\\_pay\\_sdk\\_apis.html](https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03_00_using_samsung_pay_sdk_apis.html)).

143. The Accused System and Devices include a mobile device and an application on the mobile device that provides a login interface requesting a security credential from a user to enable access to services within the application. For example, users can secure access to Samsung Wallet and its services by registering and designating a PIN and/or biometric authentication via the Samsung Wallet application directly or via Samsung Pass.

Samsung Wallet offers advanced security features to protect your account, including fingerprint and iris scan options on certain models. You can activate this feature through Samsung Wallet's settings.

Open **Samsung Wallet**, then tap the **All** tab, and then tap **More options** (the three vertical dots). Tap **Settings**, then tap **Verification method**, and then tap the **switch** next to Fingerprint or Irises. Once you have chosen a security option, follow the on-screen instructions to set up either Fingerprint or Iris verification. If you don't have a Lock screen set up, you may be required to set one up for your phone.



See, e.g., Ex. 12 (“Enhanced security with biometric verification”)

(<https://www.samsung.com/us/support/answer/ANS10002612/>);

## what is samsung pass

Last Update date : Sep 13, 2022

These days a mobile phone is an essential part of everyday life. Now, thanks to Samsung Pass, you can customise various services to handle daily tasks and keep your important information in one secure place. Learn more about this app below.

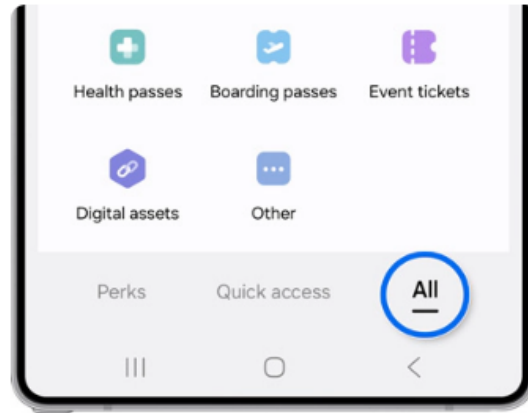


Ex. 9 (<https://www.samsung.com/levant/support/apps-services/what-is-samsung-pass/>).

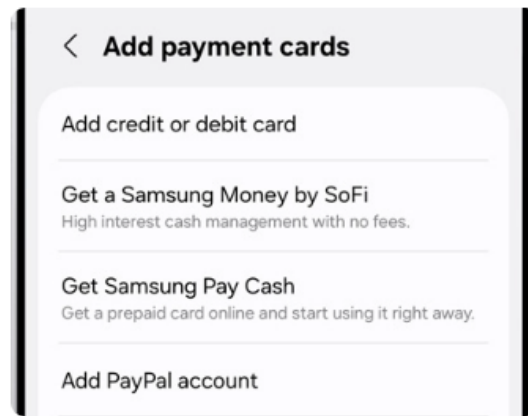
144. The Accused System and Devices include a mobile device and an application on the mobile device that utilizes one or more hardware processing servers and server codes on the server to enable a user to register and store payment methods from a payment source of financial institutions and/or third-party entities for use in future financial transactions. For example, users can register and store payment methods and/or reward accounts such as credit cards, debit cards, gift cards, event tickets, transportation tickets, and/or loyalty accounts on the Samsung Wallet application for use in future financial transactions.

Samsung Wallet lets you add payment cards, membership cards, gift cards, digital keys, health passes, digital assets, and boarding passes. That way, you can access everything in one place on your phone instead of alternating between various apps or shuffling through your wallet.

- 1 To begin adding one of these, open the **Samsung Wallet** app. Tap the **Menu** or **All** tab, and then tap your desired item, such as Payment cards.



- 2 Tap **Add** (the plus sign) in the upper right corner, or follow the on-screen instructions. Choose your desired registration method.

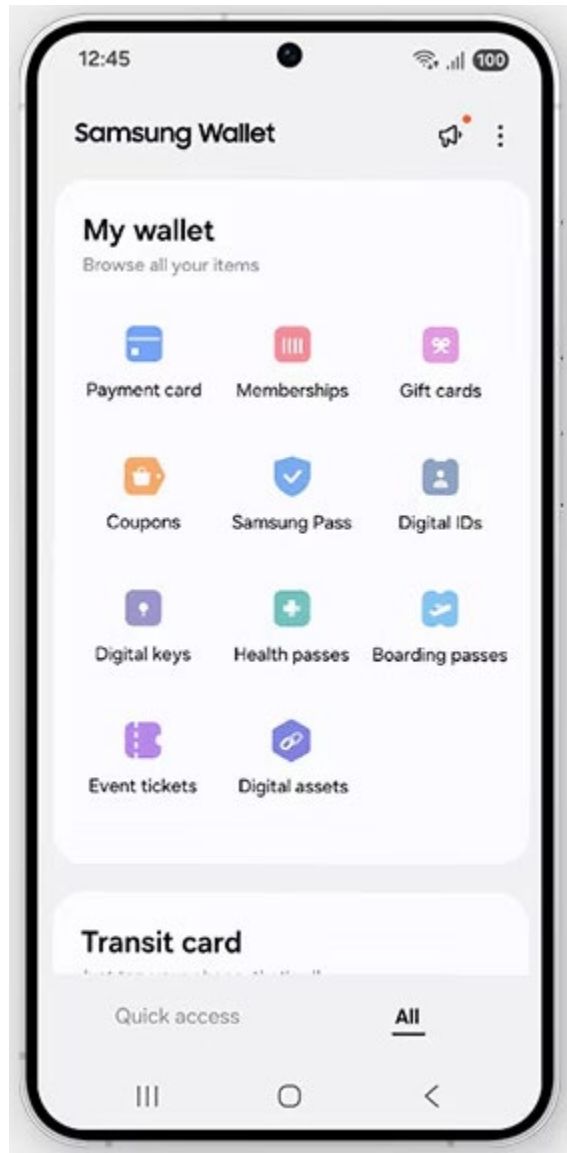


See, e.g., Ex. 10 (“Add and use a payment methods or other item in Samsung Wallet”)

(<https://www.samsung.com/us/support/answer/ANS10001347/>).

145. The Accused System and Devices include a mobile device and an application on the mobile device in which a user can select from a set of function identifiers corresponding to a service on the application; and one such service being a payment function that enables a user to initiate a financial transaction with an account belonging to another user. For example, a user

can initiate a payment to a payee's account by navigating to the payment function on the Samsung Wallet application.



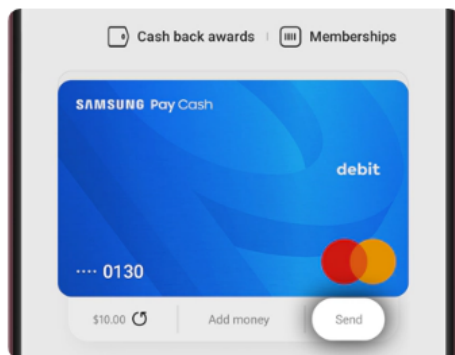
See, e.g., Ex. 23 (<https://www.samsung.com/us/apps/samsung-wallet/>).

146. The Accused System and Devices include a mobile device and an application on the mobile device that enables a user to enter information relating to a financial transaction such as a receiving account and its user; a payment source of financial institutions and/or third-party entities; and a payment amount. For example, a user can conduct a payment by entering payment

details such as payment amount, payment source, payment method, payee, and payee’s account information.

You can send money from your Samsung Pay Cash card to contacts in your phone.

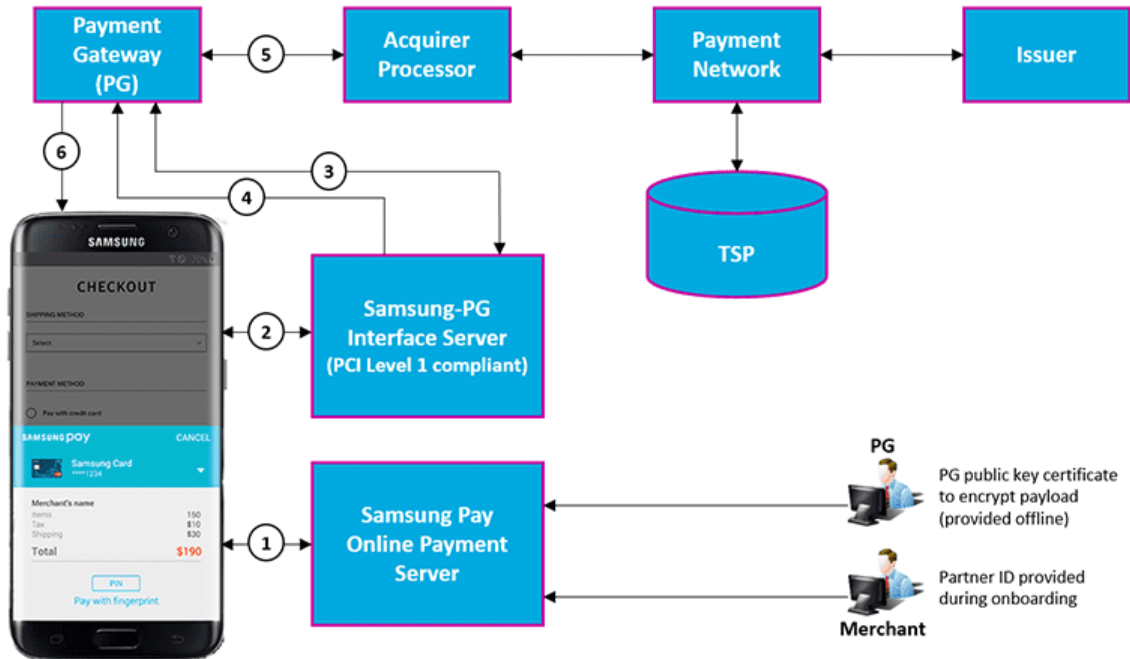
- 1 Open the **Samsung Wallet** app on your phone, and then tap the **Quick access** tab at the bottom.
- 2 Swipe to your Samsung Pay Cash card, and then tap **Send money** below the card.



- 3 Either enter a phone number manually, or choose a contact from your phone by tapping the **Contacts** tab at the top. You can also choose from a list of your recent transfers by tapping the **Recent** tab at the top.
- 4 Then, enter the amount that you would like to send. You can also add a message if you'd like, and then tap **Next**.
- 5 If the balance on the card does not cover the amount you are trying to send, you will be prompted to add more money to your card. Tap **Add money** on the pop-up, and then follow the on-screen instructions.

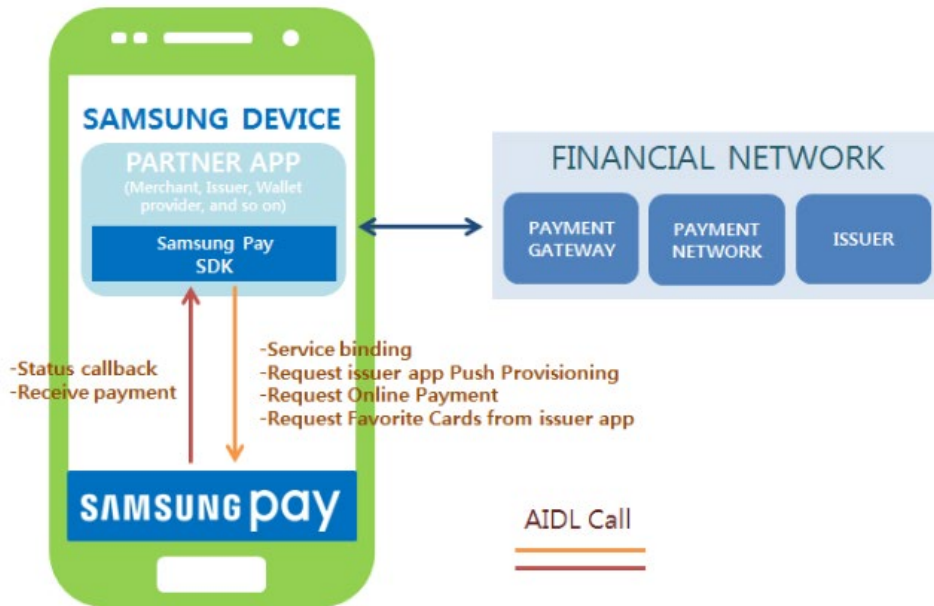
See, e.g., Ex. 19 (<https://www.samsung.com/us/support/answer/ANS10002584/>).

147. The Accused System and Devices include a mobile device and an application on the mobile device that authenticates and executes a user’s financial transaction request using a payment method from a payment source of financial institutions or third-party entities utilizing one of two bilateral communication links established by one or more hardware processing servers and server codes on the server. For example, a Samsung Wallet-equipped device uses Samsung’s servers to facilitate bilateral communications between the device and financial institutions or third-party entities to authenticate a user’s payment method associated with a particular payment source.

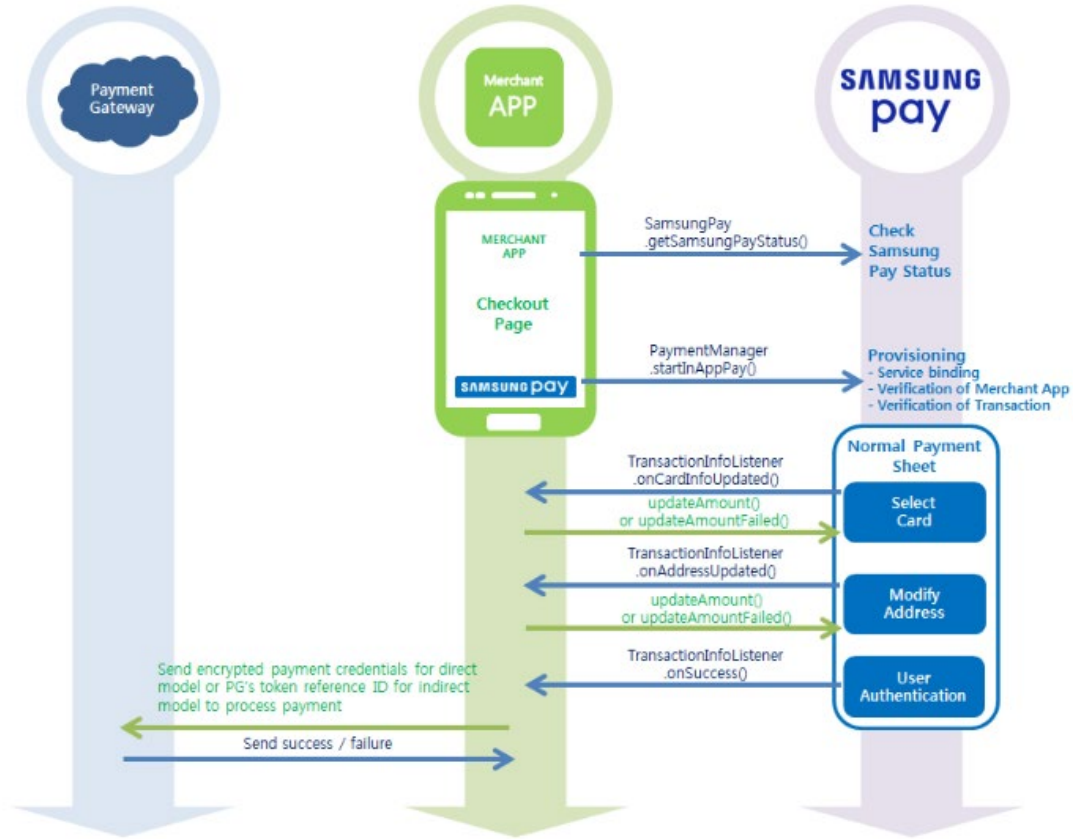


See, e.g., Ex. 16 (“Gateway Token Mode”)

(<https://developer.samsung.com/internet/android/web-payments-integration-guide.html>);



Ex. 24 (<https://developer.samsung.com/pay/native/sdk-overview.html>);



Ex. 15

([https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03\\_00\\_using\\_samsung\\_pay\\_sdk\\_apis.html](https://d3sfvyfh4b9elq.cloudfront.net/ptr/guide/techguide/v1.4/guide/03_00_using_samsung_pay_sdk_apis.html)).

148. The Accused System and Devices include a mobile device and an application on the mobile device that generates and transmits a notification, in real-time, to a receiving account belonging to another user indicating electronic transfer of a payment amount using a payment method from a payment source. For example, Samsung Wallet generates and transmits a notification to the payee, in real-time, indicating the completion of the financial transaction.

# View recent transactions in Samsung Pay

If you want to keep track of your spending, Samsung Wallet has you covered. You can view transactions made through the app until one month after purchase. You'll also receive a push notification with details of your transaction after each purchase.

*See, e.g.*, Ex. 18 (Samsung users will “receive a push notification with details of your transaction after each purchase.”) (<https://www.samsung.com/us/support/answer/ANS10002614/>).

149. Thus, the Accused System and Devices satisfy all elements of at least Claim 1 of the '307 Patent.

150. Samsung's direct infringement of the '307 Patent has injured and continues to injure PayGeo in an amount to be proven at trial, but not less than a reasonable royalty.

151. Samsung's infringement has caused and is continuing to cause damage and irreparable injury to PayGeo, and PayGeo will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court.

152. PayGeo is entitled to injunctive relief, damages and any other relief in accordance with 35 U.S.C. §§ 283 and 285 for Samsung's direct infringement of the '307 Patent.

## **COUNT VIII** **(Indirect Infringement of the '307 Patent)**

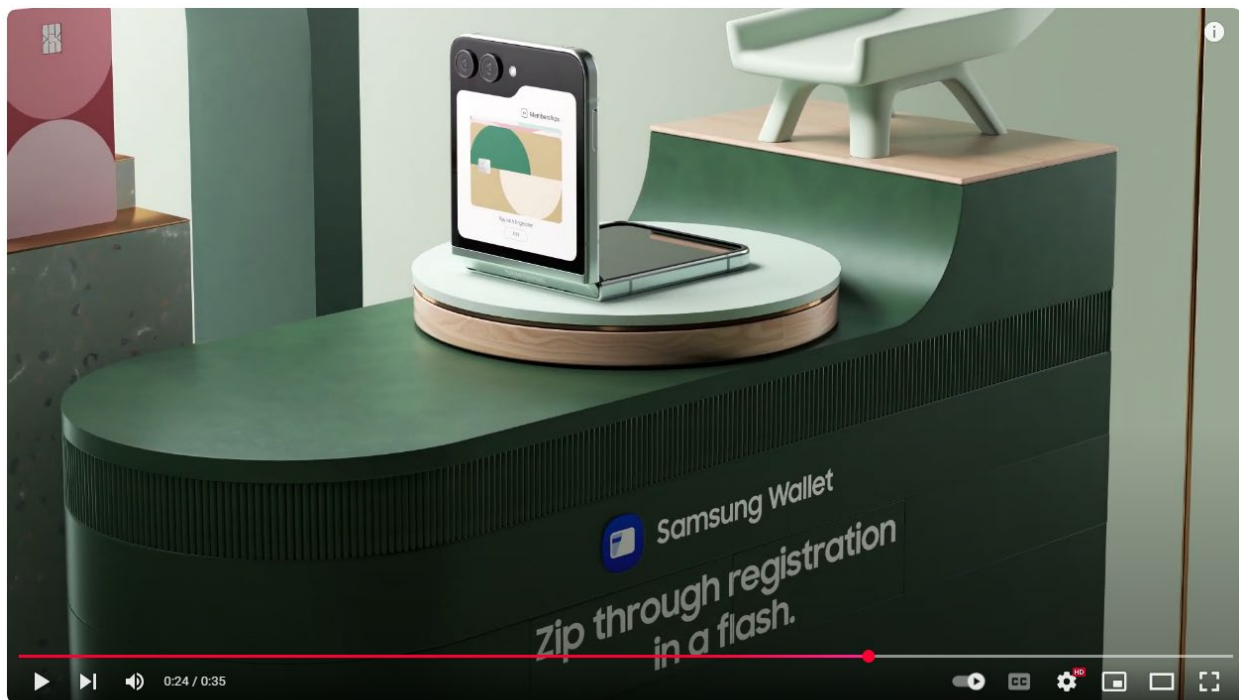
153. PayGeo repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs.

154. As set forth above, Samsung has had knowledge of PayGeo's patents and of its infringement of the '307 Patent since at least the date of this Complaint, if not earlier.

155. As set forth above, the Accused System and Devices directly infringe the '307 Patent. Additionally, Samsung has actively, knowingly, and intentionally induced and continues

to induce infringement of one or more claims of the '307 Patent pursuant to 35 U.S.C. §271(b); and has contributorily infringed and continues to contributorily infringe on one or more claims of the '307 Patent under 35 U.S.C. § 271(c).

156. Samsung indirectly infringes the '307 Patent pursuant to 35 U.S.C. § 271(b) by instructing, directing and/or requiring others, including customers, purchasers, shoppers, users and developers, to meet the elements of at least Claim 1 of the '307 Patent. Such use is consistent with how the Accused System and Devices are described to directly infringe the '307 Patent and how they are intended to be used, as described above and incorporated by reference here.



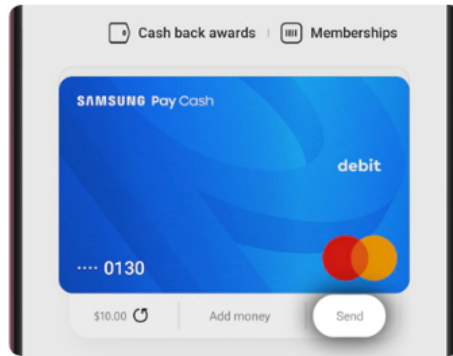
Samsung Wallet: It's simple for registration

See, e.g., <https://www.youtube.com/watch?v=43J0YMovGw8>. Samsung knew or was willfully blind to the fact that it was inducing others, including customers, purchasers, shoppers, users, and developers, to infringe the '307 Patent, including at least Claim 1.

157. Samsung knowingly and actively aided and abetted the direct infringement of the '307 Patent by instructing and encouraging its customers, purchasers, shoppers, users, and developers to use the Accused System and Devices.

You can send money from your Samsung Pay Cash card to contacts in your phone.

- 1 Open the **Samsung Wallet** app on your phone, and then tap the **Quick access** tab at the bottom.
- 2 Swipe to your Samsung Pay Cash card, and then tap **Send money** below the card.



- 3 Either enter a phone number manually, or choose a contact from your phone by tapping the **Contacts** tab at the top. You can also choose from a list of your recent transfers by tapping the **Recent** tab at the top.
- 4 Then, enter the amount that you would like to send. You can also add a message if you'd like, and then tap **Next**.
- 5 If the balance on the card does not cover the amount you are trying to send, you will be prompted to add more money to your card. Tap **Add money** on the pop-up, and then follow the on-screen instructions.

*See, e.g.,* Ex. 19 (“Send money with Samsung Pay Cash”)

(<https://www.samsung.com/us/support/answer/ANS10002584/>). Such instructions and encouragement include, but is not limited to, advising third parties to use the Accused System and Devices in an infringing manner, providing the Accused System and Devices through which third parties may infringe the '307 Patent, and by advertising and promoting the use of the Accused System and Devices in an infringing manner, and distributing guidelines and instructions to third parties on how to use the Accused System and Devices in an infringing manner.

# Samsung Pay is part of Samsung Wallet

Samsung Pay is now part of just got even better with Samsung Wallet. Upgrade your Pay app to Samsung Wallet now to experience all the great new features.

LEARN MORE

## Do more with your money.

Samsung Money by SoFi combines the convenience of a debit card, rewards of a credit card, and competitively high interest on your savings – all with no account fees.

LEARN MORE

*See, e.g.,* Ex. 25 (<https://www.samsung.com/us/samsung-pay/>). Further examples of this instruction and encouragement include, for example, trainings by Samsung either in-person or by instructional videos and material, for how to utilize Samsung Wallet's mobile payment system to register and store payment methods and authenticate and securely execute financial transactions.

## How to use Samsung Wallet



Samsung Wallet: How to use Wallet and Pay

See, e.g., <https://www.youtube.com/watch?v=q-1dNsPJInw>.

158. Samsung updates and maintains help and customer service sections on its website which cover in-depth aspects of operating the Accused System and Devices in an infringing manner.



## Have questions? Find answers here.

Learn how to make the most out of your Samsung Wallet experience.

See, e.g., Ex. 20 (<https://www.samsung.com/us/apps/samsung-wallet/faq/>). Further, Samsung advertises on its website the infringing features of the Accused System and Devices and instructs consumers on how to use the Accused System and Devices in an infringing manner.



## Samsung Wallet

Visit the app store for more information



### About Samsung Wallet

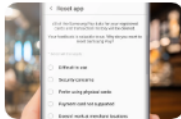
Samsung Pay is now part of Samsung Wallet. With Wallet, you get the features and benefits of Samsung Pay, plus Samsung Pass, digital home and car keys, digital asset management, and more. All this comes in a simplified in-app experience, so you'll get more and find it with ease. Just swipe up to launch Samsung Wallet with Quick Access.

### Find solutions



#### Removed card still shows in Samsung Pay

If you are trying to remove a payment card from Samsung Pay and the card continues to display in your card list, there are a couple things you can try, such as checking your internet connection.



#### Samsung Pay is crashing or not responding

You can easily fix the Samsung Pay app if it freezes, crashes, or does not respond. Most of the time, you just need to restart your phone to get the app working again.



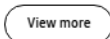
#### Payment errors occur in Samsung Pay

Samsung Pay is a great way to keep all of your cards in one place and make quick payments. While it's usually quite convenient, it's possible you may experience payment errors. These errors could either be an issue with Samsung Pay, or they could be a result of an issue with your card network.



#### Samsung Pay connection error appears on phone

This error can occur at different times when using Samsung Pay. It means the app is unable to access the appropriate server while trying to complete the current action.



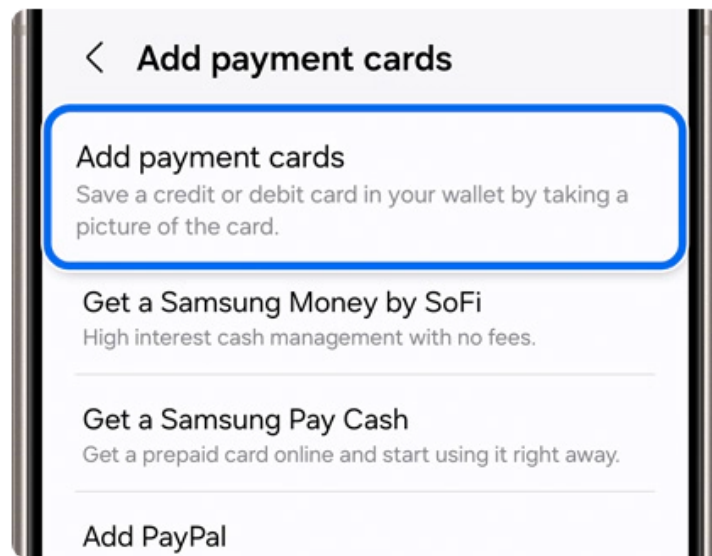
See, e.g., Ex. 21 (<https://www.samsung.com/us/support/owners/app/samsung-wallet>).

159. Samsung contributorily infringes the '307 Patent pursuant to 35 U.S.C. § 271(c) because it has provided material components of claims of the '307 Patent. In particular,

Samsung knows that the Accused System and Devices are particularly suited to be used in an infringing manner and are particularly suited for this use.

Samsung has you covered, because Samsung Wallet has partnered with top U.S. banks and credit card companies, like American Express, Visa, and MasterCard. Plus, we're always expanding our list of financial partners.

- 1 Navigate to and open **Samsung Wallet** on your phone.
- 2 Tap the **All** tab, and then tap **Payment cards**.
- 3 Next, tap **Add** (the plus sign), and then tap **Add payment cards**.



- 4 Follow the instructions to register your card. When you add a card, you must agree to the card's terms and conditions.
- 5 If you have any questions about the terms, contact the card issuer.
- 6 Once the card is added, you can start using it to make **in-store purchases** with your phone!

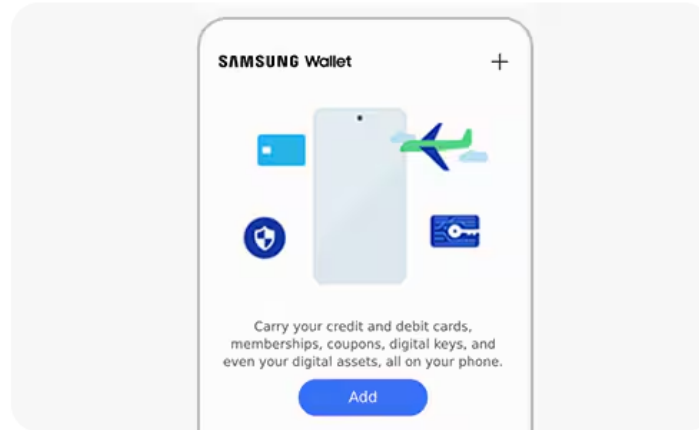
*See, e.g.,* Ex. 26 (“Add a card”) (<https://www.samsung.com/us/support/answer/ANS10002609/>).

The Accused System and Devices are developed and specialized to register and store payment methods and authenticate and securely execute financial transactions, and are not staple articles or commodities of commerce because they are specifically made to be used in an infringing manner, as described in the direct infringement claim above.

# How to use Samsung Wallet to make a payment

Last Update date : Sep 25, 2022

Samsung Wallet is an easy and safe way to make a purchase with your phone or your watch. Learn more about how this useful feature works below.



If you have added at least one card to Samsung Pay, you can access Samsung Wallet by **swiping up** from the bottom of the display on the home screen, the lock screen. You can also access Samsung Pay when the phone is locked, and the display is off. To make a payment using Samsung Pay, here is what you need to do:

- 1 Swipe up from the bottom of the display (from the home screen or lock screen) to open **Samsung Wallet**. Your default debit or credit card will show up on the screen. If you have multiple cards set up, simply swipe left or right to switch to the card you wish to use.
- 2 To enter payment mode, tap the **fingerprint or iris button** if you have Samsung Wallet secured with the biometric sensor, or the "PIN" button if you want to enter your PIN. If you have Samsung Wallet secured via the fingerprint sensor, simply tap the sensor with your finger and the payment mode will activate.
- 3 Then, touch the back of the phone to the payment terminal or card machine. You might need to touch the phone to the side of the card machine in some cases. **You have 30 seconds to do so**, but if time runs out, simply repeat step 2. You can stop touching the phone to the payment terminal or card machine once your card has been detected. You may be required to enter your card's PIN on the terminal or card machine to authorise the payment.

See, e.g., Ex. 22 (<https://www.samsung.com/levant/support/apps-services/how-to-use-samsung-wallet-to-make-a-payment/>). Samsung has known or has been willfully blind to the fact that it is contributing to the infringement of one or more claims of the '307 Patent, including at least Claim 1.

# Set up Samsung Pay on your phone or watch

Samsung Wallet transforms your Samsung phone or **smart watch** into a digital wallet, seamlessly storing your credit, debit, or gift cards. It combines convenience with security by employing biometric safeguards to protect your financial information.

*See, e.g.,* Ex. 12 (<https://www.samsung.com/us/support/answer/ANS10002612/>).

160. Samsung's indirect infringement of the '307 Patent has injured and continues to injure PayGeo in an amount to be proven at trial, but not less than a reasonable royalty.

161. Samsung's indirect infringement has caused and is continuing to cause damage and irreparable injury to PayGeo, and PayGeo will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court.

162. PayGeo is entitled to injunctive relief, damages and any other relief in accordance with 35 U.S.C. §§ 283 and 285 for Samsung's indirect infringement.

## **COUNT IX** **(Direct Infringement of the '347 Patent)**

163. PayGeo repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs, as set forth above.

164. In violation of 35 U.S.C. § 271(a), Samsung directly infringed and continues to infringe at least at least Claim 6 of the '347 Patent by making, using, importing, selling, and offering for sale in the United States the Accused System and Devices.

165. Samsung's acts of making, using, importing, selling, and/or offering for sale the Accused System and Devices have been without the permission, consent, authorization, or license of PayGeo.

166. Samsung's infringement includes the manufacture, use, sale, importation, and offer for sale of the Accused System and Devices, which each infringe the '347 Patent because they satisfy each element of claims of the '347 Patent, either literally, under the doctrine of equivalents, or both.

167. By way of example of Samsung's infringement of the '347 Patent, the Accused System and Devices meet all of the limitations of at least Claim 6 of the '347 Patent, which recites:

A system for securely accessing a local application on a mobile device, comprising the steps of:

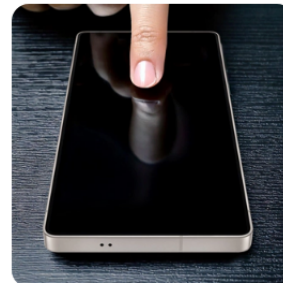
a hardware processor on a mobile device; and

a local application on the mobile device and configured to be executed by the hardware processor, the local application including a first interface enabling a user to set a desired security level configuration setting in the local application for the mobile device, the desired security level configuration setting establishing whether the local application requires a single security level or a plurality of security levels before allowing access to at least a feature in the local application, the local application including a second interface requiring, before allowing access to the at least one feature of the local application, the user to perform an authentication process based on the desired security level configuration setting, the authentication process including only a single security level scan when the desired security level configuration setting is set to a single security level, the authentication process including a plurality of security level scans when the desired security level configuration setting is set to a plurality of security levels.

168. The Accused System and Devices include the recited system and hardware processor for securely accessing a local application on a mobile device, as discussed below.

## Use the fingerprint sensor on your Galaxy phone or tablet

No one in the world is quite like you, and no two fingerprints are exactly the same. That's why fingerprint security on Galaxy phones and tablets is so reliable. However, using the fingerprint scanner may be slightly different depending on your specific device.



See, e.g., Ex. 27 (<https://www.samsung.com/us/support/answer/ANS10001613/>).

169. The Accused System and Devices enable a user to register and set one or more security level configuration settings to access the local application and its services upon launch; and require a user to perform one or more security level configuration settings to access the local application and its services. For example, Samsung Wallet is a local application on a Samsung device that enables users to select a PIN or fingerprint authentication to verify a user's identity before allowing access to Samsung Wallet and its services.

### When you make a payment

When you make a payment, you will need to authenticate your identity by using your fingerprint or Samsung Wallet PIN before the information can be sent to the payment terminal. The merchant will only receive a token, and your payment information will be kept secure. The token will be sent to the payment network, where it will be decrypted and verified against the information stored in a secure vault on internal networks. Once authenticated, the payment will be approved and sent back to the merchant. Only the payment network and your bank will have information about the transaction.

See, e.g., Ex. 28 (“When you make a payment, you will need to authenticate your identity by using your fingerprint or Samsung Wallet PIN before the information can be sent to the payment terminal.”) (<https://www.samsung.com/us/support/answer/ANS10002617/>);

## Biometric authentication

Last updated March 7th, 2025

Traditional user authentication relies on factors such as passwords or ID cards, which are susceptible to human errors, phishing, and duplication. Biometric authentication validates a personal trait, such as fingerprints, irises, or facial features, to enhance security. All biometric data collected by Samsung Knox complies with the highest security level as defined by [Class 3 in Android 7](#).

Samsung Knox provides the following security features for biometric data protection:

- Ensures that raw biometric data or its derivatives, such as templates, are never accessible outside the secure isolated environment, such as the Trusted Execution Environment (TEE) or Secure Element.
- Encrypts all the stored biometric data using a device-specific key known only to the TEE.
- Restricts hardware access to the secure isolated environment and its communication channels—Serial Peripheral Interface (SPI), Inter-Integrated Circuit (I2C)—based on device hardware support. Explicit Security-Enhanced Linux (SELinux) policies enforce this restriction on all device files.

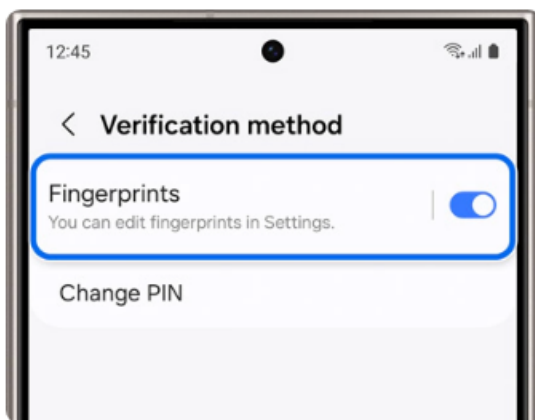
Users must still enter a pattern, PIN or password as a backup to their biometrics.

- Face recognition requires re-authentication every 24 hours or after the device has been idle for 4 hours.
- Fingerprints require re-authentication every 72 hours.

Ex. 29 (<https://docs.samsungknox.com/admin/fundamentals/whitepaper/samsung-knox-mobile-security/system-security/biometric-authentication/>). Additionally, users can secure access to Samsung Wallet and its services by registering and designating biometric authentication via the Samsung Wallet application directly or via Samsung Pass.

Samsung Wallet offers advanced security features to protect your account, including fingerprint and iris scan options on certain models. You can activate this feature through Samsung Wallet's settings.

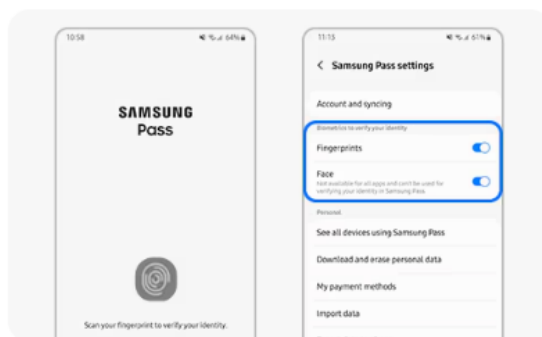
Open **Samsung Wallet**, then tap the **All** tab, and then tap **More options** (the three vertical dots). Tap **Settings**, then tap **Verification method**, and then tap the **switch** next to Fingerprint or Irises. Once you have chosen a security option, follow the on-screen instructions to set up either Fingerprint or Iris verification. If you don't have a Lock screen set up, you may be required to set one up for your phone.



See, e.g., Ex. 12 (“Enhanced security with biometric verification”)

(<https://www.samsung.com/us/support/answer/ANS10002612/>);

**Samsung Pass protects your data and applications using the most secure and useful methods, making your personal information safe and at your fingertips in the easiest way possible.**



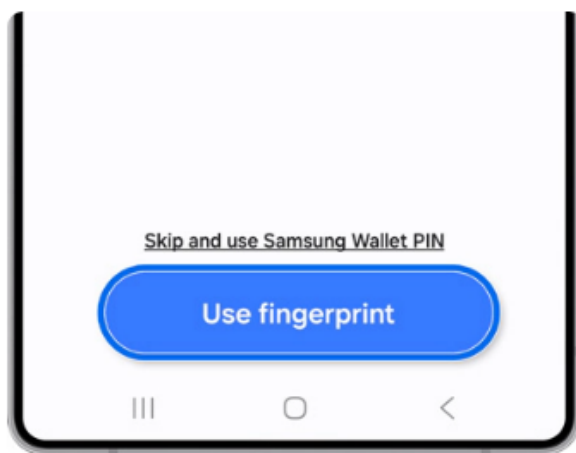
Samsung Pass offers you a simple and secure authentication method with biometric data. You may choose between an iris or fingerprint scan. If you want to use biometric data with Samsung Pass, you must register at least one form of biometric data, either iris or fingerprint, on the device.

Ex. 30 (<https://www.samsung.com/levant/support/apps-services/what-authentication-method-can-i-use-with-samsung-pass/>);

## Set up Samsung Wallet for new users

Don't stress if you've never used Samsung Pay before. You can start new in the Samsung Wallet app, and soon you'll be using it for all your purchases!

- 1 Navigate to and open the **Samsung Wallet** app.
- 2 Read the information, and then tap **Continue** to begin the process. Choose whether or not to allow permission to send notifications.
- 3 Enter your Samsung account credentials, and then tap **Continue** to allow the different permissions.
- 4 Next, you will need to register your fingerprints if you haven't already. Tap **Use fingerprint**, and follow the on-screen instructions to add your fingerprint data. If you don't want to use fingerprints, you have the option of setting a PIN.



- 5 Once your fingerprints are ready, verify your identity by placing your finger on the fingerprint sensor.  
**Note:** You may also be prompted to create a PIN, to allow contactless payment access, or to use Samsung Pay as your default payment app.
- 6 You're all done! Now you can use Samsung Wallet to make payments and much more. Check out the subsequent sections in this article to learn more about using the app.

Ex. 10 (“Set up the Samsung Wallet app”)

(<https://www.samsung.com/us/support/answer/ANS10001347/>).

170. Thus, the Accused System and Devices satisfy all elements of at least Claim 6 of the '347 Patent.

171. Samsung's direct infringement of the '347 Patent has injured and continues to injure PayGeo in an amount to be proven at trial, but not less than a reasonable royalty.

172. Samsung's infringement has caused and is continuing to cause damage and irreparable injury to PayGeo, and PayGeo will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court.

173. PayGeo is entitled to injunctive relief, damages and any other relief in accordance with 35 U.S.C. §§ 283 and 285 for Samsung's direct infringement of the '347 Patent.

**COUNT X**  
**(Indirect Infringement of the '347 Patent)**

174. PayGeo repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs.

175. As set forth above, Samsung has had knowledge of PayGeo's patents and of its infringement of the '347 Patent since at least the date of this Complaint, if not earlier.

176. As set forth above, the Accused System and Devices directly infringe the '347 Patent. Additionally, Samsung has actively, knowingly, and intentionally induced and continues to induce infringement of one or more claims of the '347 Patent pursuant to 35 U.S.C. §271(b); and has contributorily infringed and continues to contributorily infringe on one or more claims of the '347 Patent under 35 U.S.C. § 271(c).

177. Samsung indirectly infringes the '347 Patent pursuant to 35 U.S.C. § 271(b) by instructing, directing and/or requiring others, including customers, purchasers, shoppers, users and developers, to meet the elements of at least Claim 6 of the '347 Patent. Such use is consistent with how the Accused System and Devices are described to directly infringe the '347 Patent and how they are intended to be used, as described above and incorporated by reference here.

# Simple and Secure

## Fingerprint

Samsung Pass is an 'identity management as-a-service', enabling secure access through biometric authentication.



See, e.g., Ex. 31 (<https://www.samsung.com/levant/apps/samsung-pass/>). Samsung knew or was willfully blind to the fact that it was inducing others, including customers, purchasers, shoppers, users, and developers, to infringe the '347 Patent, including at least Claim 6.

178. Samsung knowingly and actively aided and abetted the direct infringement of the '347 Patent by instructing and encouraging its customers, purchasers, shoppers, users, and developers to use the Accused System and Devices.

It's time to set up fingerprint security and register your prints. The steps will be almost exactly the same, no matter what device you have. The only difference will be where the fingerprint sensor is located.

- 1** Navigate to **Settings**, then tap **Security and privacy**.
- 2** Tap **Lock screen**, and then tap **Fingerprints**.
- 3** Enter your lock screen credentials. If you do not have a screen lock set up, you may be prompted to set a secure screen lock (PIN, password, or pattern) at this point. When you're ready, follow the on-screen information.
- 4** Tap **Continue** on the Fingerprints screen, and then use the on-screen prompts to register your fingerprint.
- 5** When registering your fingerprint, make sure to fully cover the fingerprint sensor with your finger to prevent strong light from entering the sensor. When you're finished, tap **Done**.
- 6** Next, make sure that the **switch** next to Fingerprint unlock is turned on.  
**Note:** If the fingerprint sensor on your device is located on the Side button or below the Side button, you can disable the "Fingerprint always on" option to prevent accidental unlocks.
- 7** To unlock your device using your finger, tap the screen or press the **Power** button or **Side** button. Then, place the registered finger on the fingerprint scanner, wherever it's located. The device will automatically unlock if it recognizes your fingerprint.

*See, e.g.,* Ex. 27 (“Set up and use fingerprint unlock”)

(<https://www.samsung.com/us/support/answer/ANS10001613/>). Such instructions and encouragement include, but is not limited to, advising third parties to use the Accused System and Devices in an infringing manner, providing the Accused System and Devices through which third parties may infringe the '347 Patent, and by advertising and promoting the use of the Accused System and Devices in an infringing manner, and distributing guidelines and instructions to third parties on how to use the Accused System and Devices in an infringing manner.

## Ultrasonic fingerprint ID

Introduced first on Samsung's Galaxy S10 and S10+, [ultrasonic fingerprint ID](#) is a new type of fingerprint sensor that uses ultrasonic waves to create a 3D image of your fingertip. An ultrasonic sensor is much harder to fool, as the scanner doesn't just reference your fingerprint's pattern but also the exact contours of the ridges, notches and abnormalities. This upgrade is also backed by Samsung's machine learning algorithm, which helps detect the differences between real fingerprints and forged 3D replicas.

See, e.g., Ex. 32 (<https://insights.samsung.com/2021/05/25/which-biometric-authentication-method-is-most-secure-3/>). Further examples of this instruction and encouragement include, for example, trainings by Samsung either in-person or by instructional videos and material, for how to register biometric authentication to enable secure access to the Samsung Wallet application and its services.

## How to use the fingerprint scanner on the Galaxy S10

Last Update date : Sep 23, 2020

The S10 and S10+ come with a secure Ultrasonic Fingerprint Scanner which is located on the front of the screen.

The sensor on the S10e is intuitively located on the Power key, making it easier than ever to unlock your phone.

Set up the Ultrasonic Fingerprint Scanner on the S10/S10+ ▼

Register your fingerprint on the S10e ▼

Deactivate the fingerprint scanner ▼

Remove your fingerprint ▼

See, e.g., Ex. 33 (<https://www.samsung.com/levant/support/mobile-devices/how-to-use-the-fingerprint-scanner/>).

179. Samsung updates and maintains help and customer service sections on its website which cover in-depth aspects of operating the Accused System and Devices in an infringing manner.

## Set up and use the fingerprint sensor on your Galaxy phone

Last Update date : May 08, 2024




No one in the world is quite like you, and no two fingerprints are exactly the same. That is why fingerprint security on Galaxy phones is so dependable. However, using the fingerprint scanner may be a little different based on which type of phone you have.

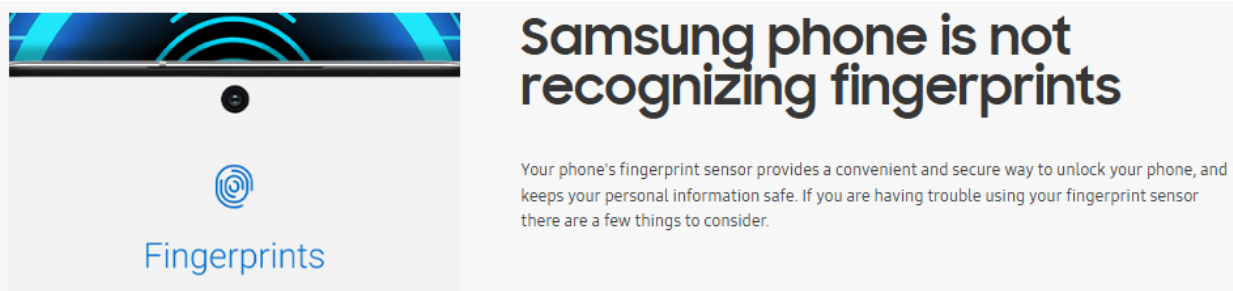
**Note:** Available screens and settings may vary by wireless service provider, software version, and phone model.

- Find the fingerprint scanner's location
- Set up and use fingerprint security
- Add additional fingerprints
- Remove a fingerprint from your phone
- Trouble unlocking phone with fingerprint

**Call us!**  
We would love to help you out  
Contact Samsung Assistance at 1-800-SAMSUNG (726-7864)  
[Other ways to contact us](#)



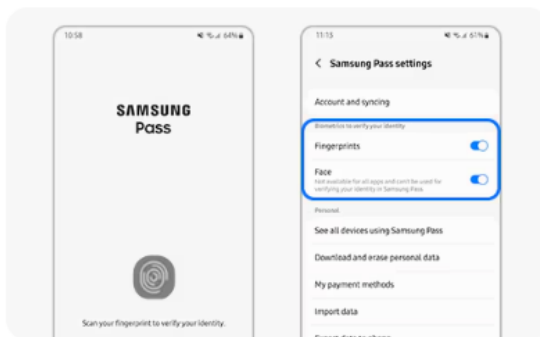
See, e.g., Ex. 34 (<https://www.samsung.com/ca/support/mobile-devices/galaxy-phone-fingerprint-sensor/>). Further, Samsung advertises on its website the infringing features of the Accused System and Devices and instructs consumers on how to configure and use the Accused System and Devices in an infringing manner.



See, e.g., Ex. 35 (<https://www.samsung.com/us/support/troubleshooting/TSG01200322/>).

180. Samsung contributorily infringes the '347 Patent pursuant to 35 U.S.C. § 271(c) because it has provided material components of claims of the '347 Patent. In particular, Samsung knows that the Accused System and Devices are particularly suited to be used in an infringing manner and are particularly suited for this use.

**Samsung Pass protects your data and applications using the most secure and useful methods, making your personal information safe and at your fingertips in the easiest way possible.**



Samsung Pass offers you a simple and secure authentication method with biometric data. You may choose between an iris or fingerprint scan. If you want to use biometric data with Samsung Pass, you must register at least one form of biometric data, either iris or fingerprint, on the device.

See, e.g., Ex. 30 (<https://www.samsung.com/levant/support/apps-services/what-authentication-method-can-i-use-with-samsung-pass/>). The Accused System and Devices are developed and specialized to register biometric authentication to enable secure access to the Samsung Wallet application and its services, and are not staple articles or commodities of commerce because they

are specifically made to be used in an infringing manner, as described in the direct infringement claim above.

## General questions and information about Samsung Pass

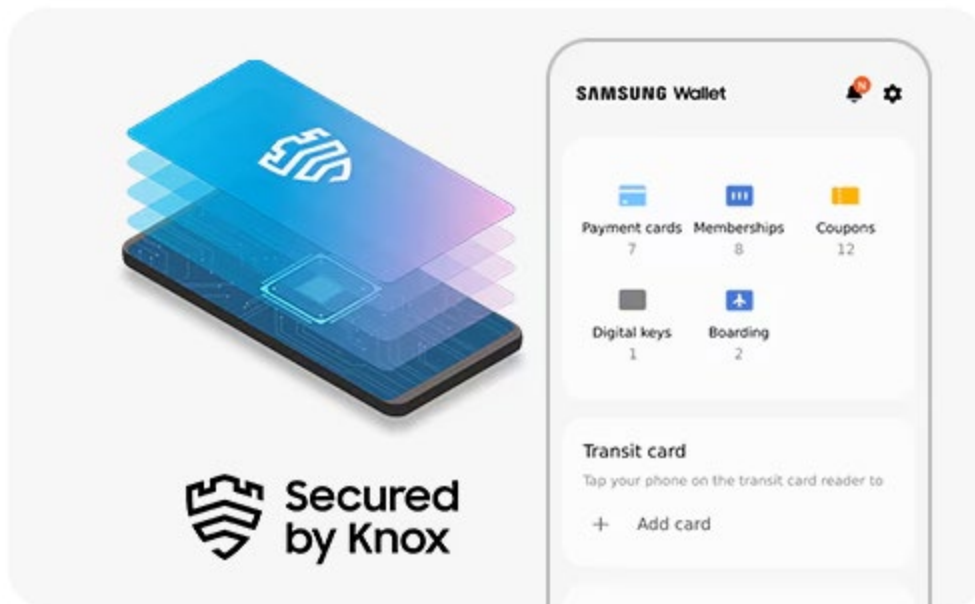


Samsung Pass is a secure and easy way to use your biometrics to sign in to websites and apps on your phone. Once you scan your fingerprints, you can sign in without typing in your ID and password. With Samsung Pass, there's no need to memorize all those IDs and passwords for all your accounts.

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### Samsung Pass frequently asked questions

*See, e.g.,* Ex. 36 (<https://www.samsung.com/us/support/answer/ANS00066601/>). Samsung has known or has been willfully blind to the fact that it is contributing to the infringement of one or more claims of the '347 Patent, including at least Claim 6.



See, e.g., Ex. 14 (<https://www.samsung.com/levant/support/apps-services/how-secure-is-samsung-wallet/>).

181. Samsung’s indirect infringement of the ’347 Patent has injured and continues to injure PayGeo in an amount to be proven at trial, but not less than a reasonable royalty.

182. Samsung’s indirect infringement has caused and is continuing to cause damage and irreparable injury to PayGeo, and PayGeo will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court.

183. PayGeo is entitled to injunctive relief, damages and any other relief in accordance with 35 U.S.C. §§ 283 and 285 for Samsung’s indirect infringement.

### **PRAYER FOR RELIEF**

WHEREFORE, PayGeo prays for judgment and relief as follows:

A. an entry of judgment holding that Samsung has infringed and is infringing, is inducing infringement of, and is contributing to infringement of each of the Asserted Patents;

B. an entry of judgment holding that Samsung’s infringement of each of the Asserted Patents has been willful and deliberate, at least from the filing of this Complaint;

C. a preliminary and permanent injunction against Samsung and its officers, employees, agents, servants, attorneys, instrumentalities, and/or those in privity with them, from infringing, inducing infringement, and contributing to infringement of the Asserted Patents and for all further and proper injunctive relief pursuant to 35 U.S.C. § 283;

D. an award to PayGeo of such damages as it shall prove at trial against Samsung that is adequate to fully compensate PayGeo for Samsung's infringement of each of the Asserted Patents that will account for infringement up to trial based on the relevant information and financial data produced, where said damages will be no less than a reasonable royalty;

E. a finding that this case is exceptional and an award to PayGeo of its costs and reasonable attorneys' fees, as provided by 35 U.S.C. § 285;

F. an award of pre-judgment interest, post-judgment interest, and costs under 35 U.S.C. § 284;

G. an accounting of all infringing sales and revenues from the first date of infringement; and

H. such other and further relief, including equitable relief, as this Court deems just and proper.

Respectfully submitted,

Dated: April 2, 2025

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