

Exhibit B

Infringement of U.S. Patent No. 11,495,875 by Samsung Accused Products

The Samsung Accused Products are described in a variety of documents, including:

- Exemplary Samsung Galaxy S21 product teardown (“S21 Teardown”) , available online at <https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all>

On information and belief, these exemplary products are representative of the Samsung Accused Products as the smartphone antenna modules of the Samsung Accused Products (specifically the Galaxy S21 through S23 generations of phones, including the associated Z models, listed here ~ <https://www.samsung.com/au/support/mobile-devices/how-to-use-powershare-on-your-galaxy-phone/?srsltid=AfmBOooVEPPdyBpK-WClzQNdJFup7WCGAsBQtuurVldbQPlc2JiO9KY>) are substantially identical in both design and function. Samsung introduced the infringing design with the Galaxy S21 generation of phones, and then modified that design with the S24 and S25 generations of phones, as described in Exhibit C. Galaxy smartphones beginning with the S21 up until the S24 generation include materially identical smartphone antenna modules, and thus the S21 Ultra model is representative.

As shown below and in the chart with exemplary support, the Samsung Accused Products infringe at least claims 1 through 9 and 11 through 19 of U.S. Patent No. 11,495,875 (the “’875 Patent”). The ’875 Patent was filed on July 13, 2022, issued on November 8, 2022, and is entitled “Smartphone Antenna in Flexible PCB.”

Exhibit B

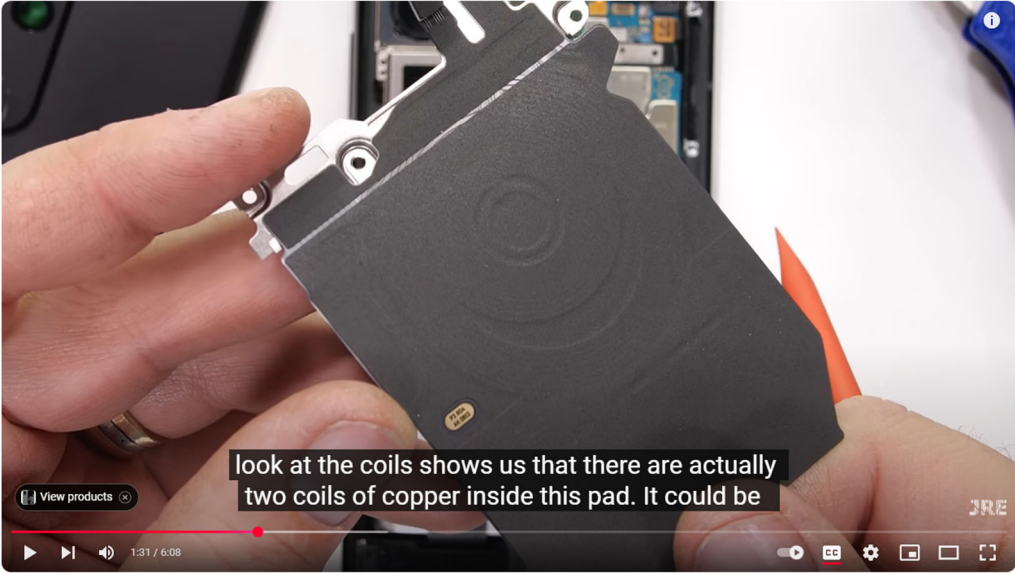
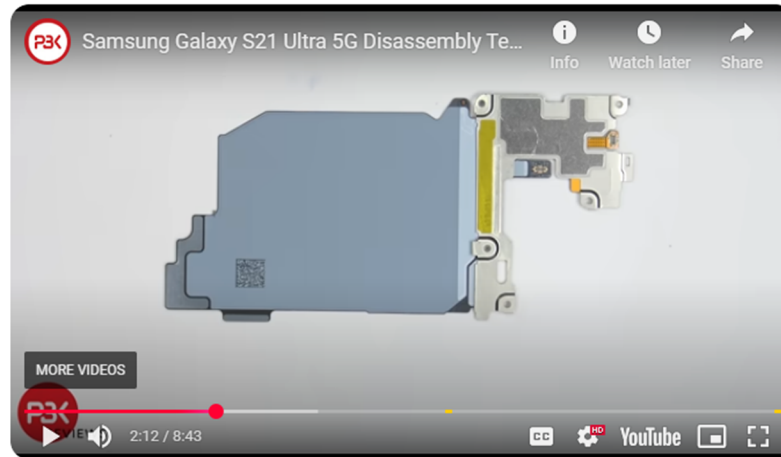
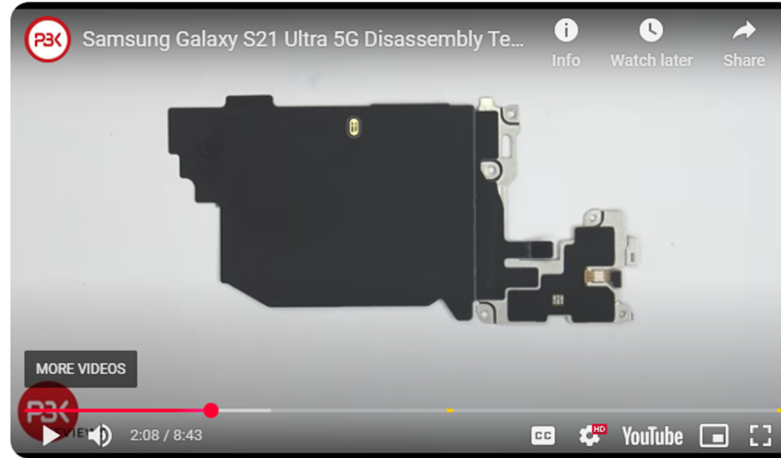
Claim	Samsung Accused Products
1. A smartphone antenna module comprising:	Accused infringer Samsung Electronics America, LLC and Samsung Electronics Co. Ltd. (together “Samsung”) manufacture, distribute, and sell products that contain a smartphone antenna module. Specifically, Samsung manufactures, distributes, and sells Samsung Galaxy smartphones including at least the Galaxy S21, S21+, S21 Ultra, S21 FE, Z Fold 3, Z Flip 3, S22, S22+, S22 Ultra, Z Fold 4, Z Flip 4, S23, S23+, S23 Ultra, S23 FE, Z Fold 5, and Z Flip 5.
a. a substrate having a first major surface and a second major surface facing away from the first major surface;	<p>The smartphone antenna module of the Accused Products includes a substrate having a first major surface and a second major surface facing away from the first major surface. Specifically, the smartphone antenna module includes a flexible printed circuit board (FPCB) with a first and second major surface.</p>  <p>Galaxy S21 Ultra Teardown! - Its bigger than you think....</p> <p>https://www.youtube.com/watch?v=MYSQub76fH8</p>

Exhibit B

The FPCB has two major surfaces: a first major surface (the “top”) and a second major surface (the “bottom”).



<https://www.youtube.com/watch?v=cU3QXPoFOUI&t=132s>

The below X-ray image of the Galaxy S21 Ultra displays both the first antenna pattern formed on the first major surface *and* the second antenna pattern formed on the second major surface (in other words, the X-ray image shows both sides of the flexible PCB simultaneously as overlapping images).

Exhibit B

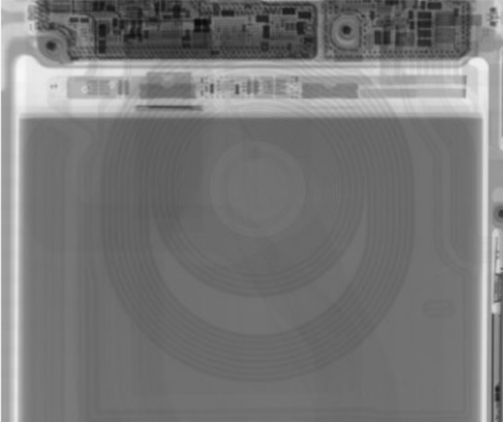
Claim	Samsung Accused Products
	 <p>(X-ray image of S21 showing first and second major surfaces on opposite sides of the FPCB) https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
b. a first antenna pattern formed on the first major surface and comprising an inner coil and an outer coil surrounding the inner coil;	The first antenna pattern is formed on the first major surface (m2) and comprises an inner coil formed on the first inner ring portion surrounded by an outer coil.

Exhibit B

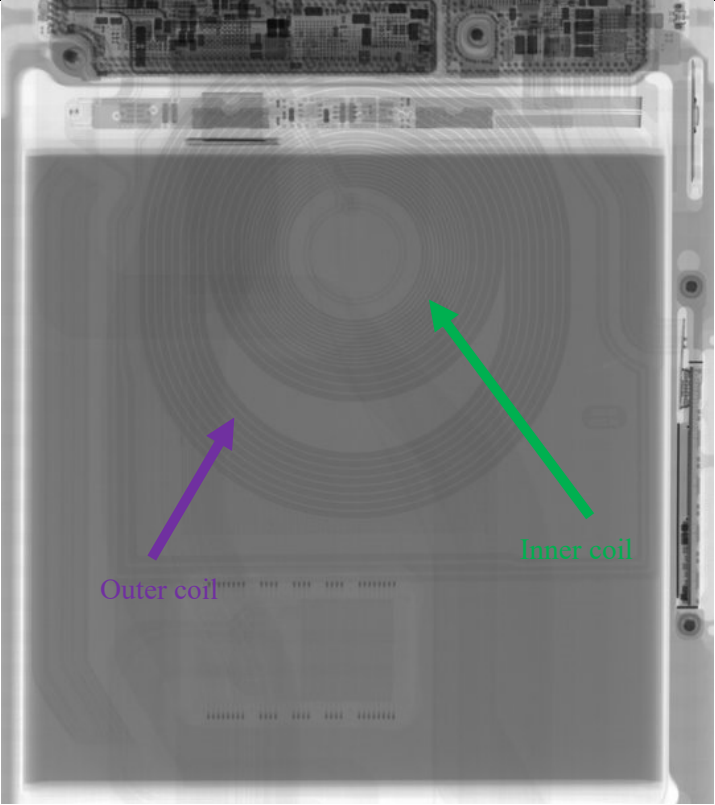
Claim	Samsung Accused Products
	 <p data-bbox="558 1052 1856 1127">https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p data-bbox="558 1182 1892 1386">Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>

Exhibit B

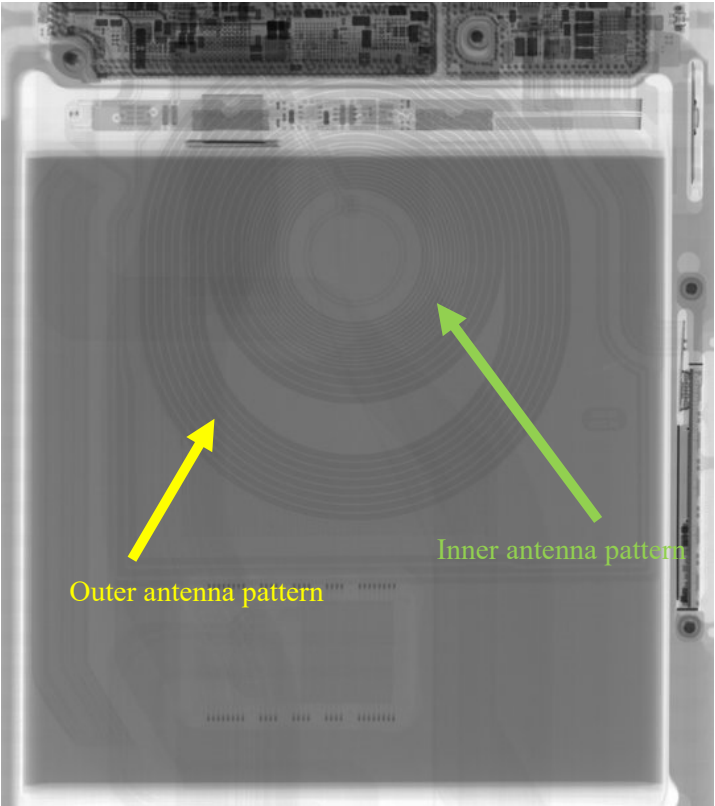
Claim	Samsung Accused Products
<p>c. a second antenna pattern formed on the second major surface and comprising an inner antenna pattern and an outer antenna pattern;</p>	<p>The second antenna pattern is formed on the second major surface and comprises an inner antenna pattern and an outer antenna pattern.</p>  <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional</p>

Exhibit B

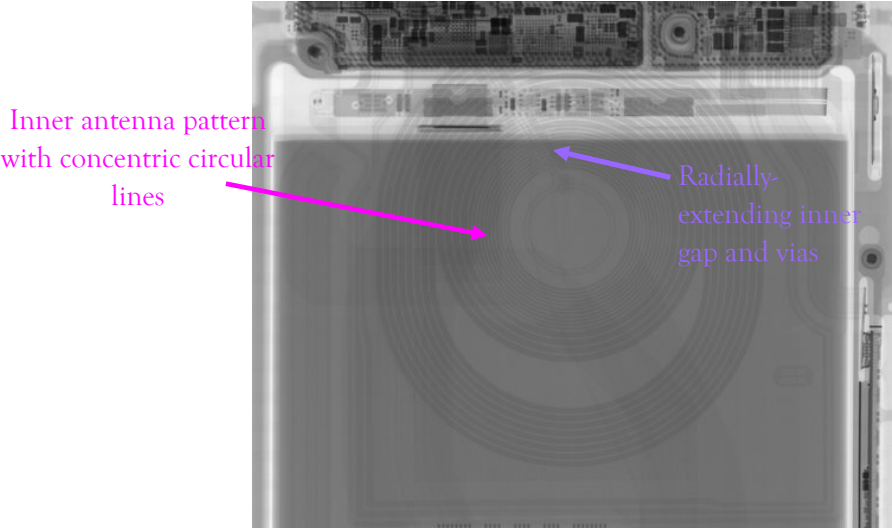
Claim	Samsung Accused Products
	information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.
d. the inner antenna pattern comprising a plurality of concentric circular lines and defining a radially-extending inner gap into which the plurality of concentric circular lines of the inner antenna pattern does not extend, wherein at least part of the concentric circular lines of the inner antenna pattern overlaps the inner coil formed on the first major surface and is connected to the inner coil through vias;	<p>The inner antenna pattern comprises a plurality of concentric circular lines forming a radially extending inner gap into which the plurality of concentric circular lines of the inner antenna pattern does not extend, wherein at least part of the concentric circular lines of the inner antenna pattern overlaps the inner coil formed on the first major surface (m2) and is connected to the inner coil through vias.</p>  <p>Inner antenna pattern with concentric circular lines</p> <p>Radially-extending inner gap and vias</p>

Exhibit B

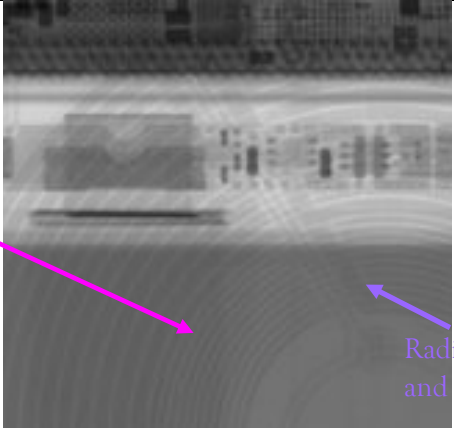
Claim	Samsung Accused Products
	<div data-bbox="756 381 1039 487" style="color: magenta;"> <p>Inner antenna pattern with concentric circular lines</p> </div>  <div data-bbox="1438 568 1785 641" style="color: purple;"> <p>Radially-extending inner gap and vias</p> </div> <p data-bbox="556 673 1858 755">https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p data-bbox="556 803 1890 1015">Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>e. the outer antenna pattern comprising a plurality of concentric circular lines and defining a radially-extending outer gap into which the plurality of concentric circular lines of the outer antenna pattern does not</p>	<p>The outer antenna pattern comprises a plurality of concentric C-shaped lines forming a radially-extending outer gap on the second outer ring portion.</p>

Exhibit B

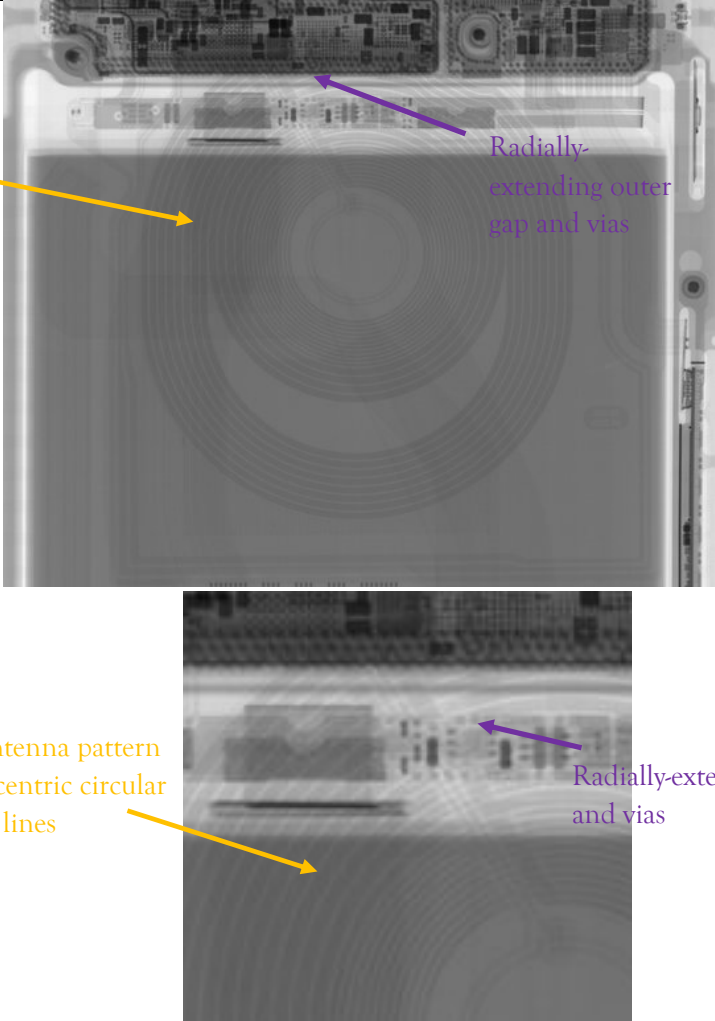
Claim	Samsung Accused Products
<p>extend, wherein at least part of the concentric circular lines of the outer antenna pattern overlaps the outer coil formed on the first major surface and is connected to the outer coil through vias;</p>	 <p>The image contains two X-ray photographs of a Samsung phone's back cover. The top photograph shows the entire back cover with a yellow arrow pointing to concentric circular lines and a purple arrow pointing to radially extending lines. The bottom photograph is a magnified view of the same area, with a yellow arrow pointing to the concentric circular lines and a purple arrow pointing to the radially extending lines. The labels are: 'Outer antenna pattern with concentric circular lines' (yellow text) and 'Radially-extending outer gap and vias' (purple text).</p> <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p>

Exhibit B

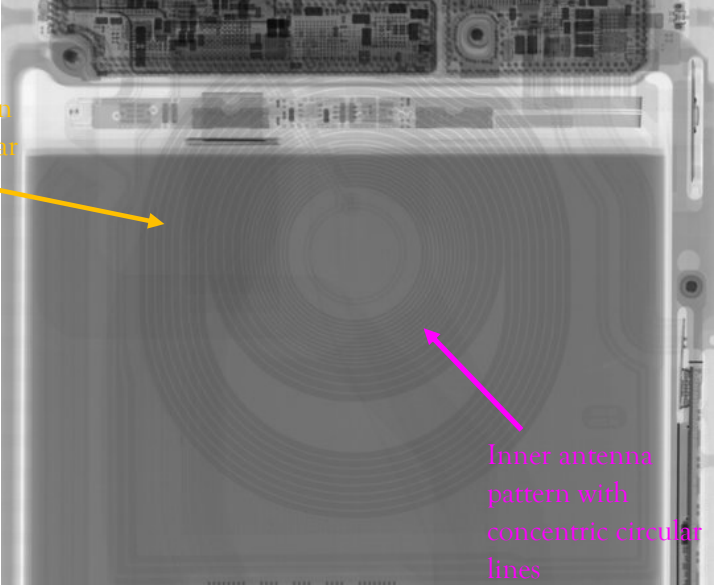
Claim	Samsung Accused Products
	<p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>f. wherein at least part of the concentric circular lines of the outer antenna pattern generally surround at least part of the concentric circular lines of the inner antenna pattern;</p>	<p>The concentric circular lines of the outer antenna pattern surround the concentric circular lines of the inner antenna pattern.</p> <div data-bbox="617 594 1583 1175"><p>Outer antenna pattern with concentric circular lines</p><p>Inner antenna pattern with concentric circular lines</p></div> <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that</p>

Exhibit B

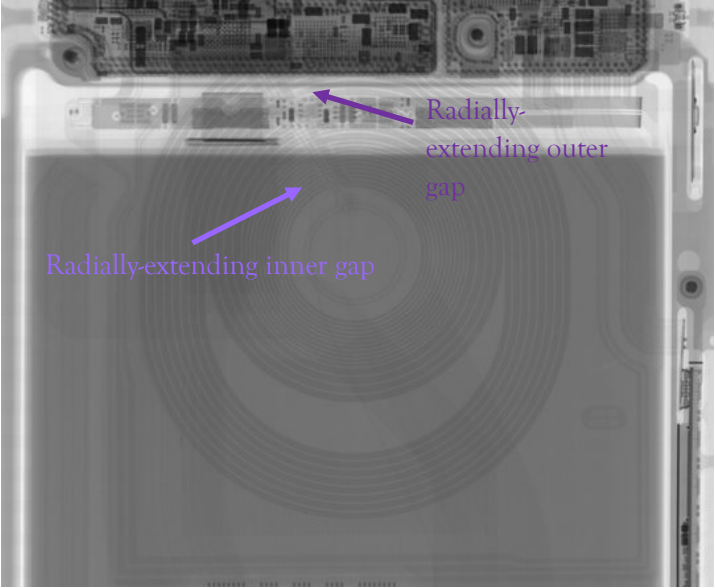
Claim	Samsung Accused Products
	the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.
g. wherein the radially-extending outer gap and the radially-extending inner gap are connected and aligned in a radial direction;	<p>The radially-extending outer gap and the radially-extending inner gap are connected and aligned in a radial direction.</p>  <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional</p>

Exhibit B

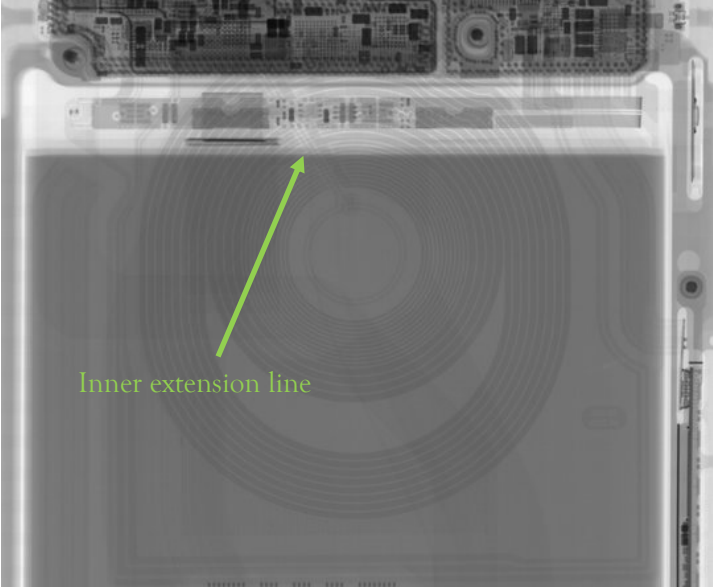
Claim	Samsung Accused Products
	information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.
h. an inner extension line formed on the second major surface and extending through the radially-extending outer gap and further through at least part of the radially-extending inner gap;	<p>The inner extension line is formed on the second major surface (m1), and it extends along the radial direction through the radially-extending outer gap and the radially-extending inner gap.</p>  <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>

Exhibit B

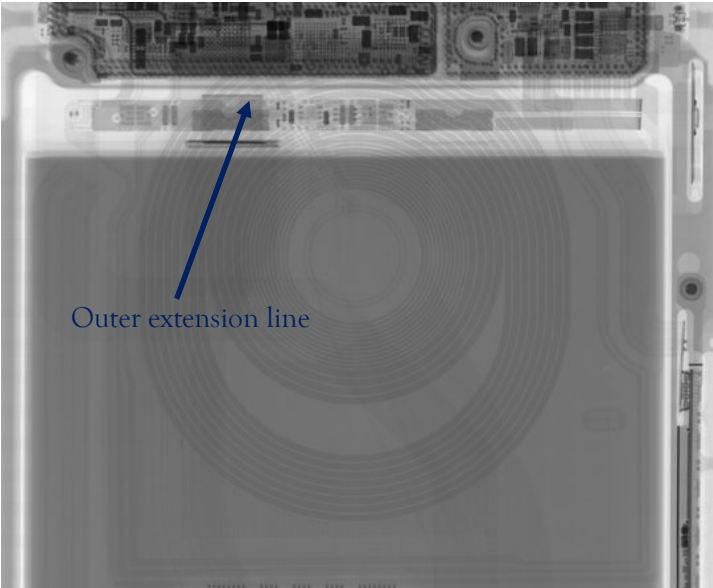
Claim	Samsung Accused Products
<p>i. an outer extension line formed on the second major surface and extending through at least part of the radially-extending outer gap;</p>	<p>The outer extension line is formed on the second major surface (m1) and extends along a radial direction through the radially-extending outer gap.</p>  <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>j. two additional extension lines formed on</p>	<p>Two additional extension lines are formed on the second major surface (m1) and extend through both the radially-extending inner gap and the radially-extending outer gap.</p>

Exhibit B

Claim	Samsung Accused Products
<p>the second major surface and extending through both the radially-extending inner gap and the radially extending outer gap;</p>	<div data-bbox="871 284 1585 868" data-label="Image"> </div> <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>k. wherein the inner extension line, the outer extension line, and the two additional extension</p>	<p>The inner extension line (yellow-green), the outer extension line (blue), and the two additional antenna extension lines (cyan) extend generally in parallel.</p>

Exhibit B

Claim	Samsung Accused Products
<p>lines are extending generally in parallel;</p>	<div data-bbox="869 240 1583 824" data-label="Image"> </div> <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>m. wherein each of the inner extension line, the outer extension line, and the two additional extension lines formed on</p>	<p>The inner extension line (yellow-green), the outer extension line (blue), and the two additional extension lines (cyan) are formed on the second major surface (m1) and overlap with the outer coil (purple) formed on the first outer ring portion of the first major surface (m2).</p>

Exhibit B

Claim	Samsung Accused Products
<p>the second major surface overlaps the outer coil formed on the first outer ring portion of the first major surface;</p>	<div data-bbox="871 240 1581 824" data-label="Image"> <p>The image shows an X-ray view of the antenna module. A purple arrow points to the 'Outer coil' at the top. A green arrow points to the 'Inner extension line' below it. A blue arrow points to the 'Outer extension line' on the left. Two cyan arrows point to 'Two additional extension lines' in the center. The antenna pattern consists of concentric circular lines.</p> </div> <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>2. The smartphone antenna module of claim 1, wherein the inner extension line is</p>	<p>The inner extension line is electrically connected to a terminal of the inner coil, and the concentric circular lines of the inner antenna pattern are in a C shape.</p>

Exhibit B

Claim	Samsung Accused Products
<p>electrically connected to a terminal of the inner coil, wherein at least part of the concentric circular lines of the inner antenna pattern is in a C shape.</p>	<div data-bbox="871 240 1581 824" data-label="Image"> </div> <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>3. The smartphone antenna module of claim 1, wherein the outer extension line is</p>	<p>The outer extension line is electrically connected to a terminal of the outer coil, and the concentric circular lines of the outer antenna pattern are in a C shape.</p>

Exhibit B

Claim	Samsung Accused Products
<p>electrically connected to a terminal of the outer coil, wherein at least part of the concentric circular lines of the outer antenna pattern is in a C shape.</p>	<div data-bbox="772 240 1583 824" data-label="Image"> </div> <p data-bbox="562 834 1856 909">https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p data-bbox="562 967 1892 1175">Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>4. The smartphone antenna module of claim 1, wherein the second antenna pattern formed</p>	<p>The second antenna pattern formed on the second major surface (m1) comprises a third antenna pattern generally surrounded by the inner antenna pattern, wherein each of the two additional extension lines is electrically connected to a terminal of the third antenna pattern.</p>

Exhibit B

Claim	Samsung Accused Products
<p>on the second major surface comprises a third antenna pattern generally surrounded by the inner antenna pattern, wherein each of the two additional extension lines is electrically connected to a terminal of the third antenna pattern.</p>	<div data-bbox="871 240 1581 824" data-label="Image"> </div> <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>5. The smartphone antenna module of claim 1, wherein the second antenna pattern formed</p>	<p>The second antenna pattern formed on the second major surface (m1) comprises a third antenna pattern generally surrounded by the inner antenna pattern, wherein at least one of the two (below, both) additional extension lines contacts the third antenna pattern on the second major surface.</p>

Exhibit B

Claim	Samsung Accused Products
<p>on the second major surface comprises a third antenna pattern generally surrounded by the inner antenna patterns, wherein at least one of the two additional extension lines contacts the third antenna pattern on the second major surface.</p>	<div data-bbox="871 240 1581 824" style="text-align: center;"> </div> <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>6. The smartphone antenna module of claim 1, wherein the inner coil and the outer coil are</p>	<p>In the smartphone antenna module of the Samsung Accused Products, the inner coil and outer coil are electrically connected in parallel. Specifically, the inner and outer coils are wired to form a parallel connection that occurs either directly within the smartphone antenna module, or the parallel connection is formed by wiring after connection to the smartphone. For example, the inner coil and outer coil both</p>

Exhibit B

Claim	Samsung Accused Products
electrically connected in parallel.	<p>have two extension lines connected to either end, which is necessary for forming a parallel connection, as opposed to a serial connection which only requires a single extension line for each.</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
7. The smartphone antenna module of claim 1, wherein at least one of the inner extension line, the outer extension line, and the additional extension lines is electrically connected to the first antenna pattern formed on the first major surface through at least one via.	<p>At least one of the inner extension line (yellow-green), the outer extension line (blue), and the two additional extension lines (cyan) are electrically connected (yellow) to the first antenna pattern (purple) formed on the first major surface (m2) through at least one via (teal).</p>

Exhibit B

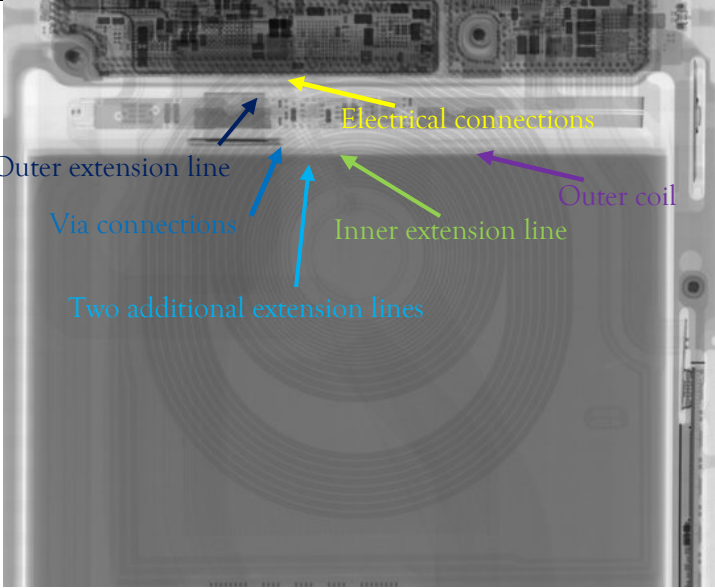
Claim	Samsung Accused Products
	 <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>8. The smartphone antenna module of claim 1, wherein the inner extension line is referred</p>	<p>The second inner extension line is formed on the second major surface (m1), and it extends along the radial direction through the radially-extending outer gap.</p>

Exhibit B

Claim	Samsung Accused Products
<p>to as a first inner extension line, wherein the smartphone antenna module further comprises a second inner extension line formed on the second major surface, wherein the second inner extension is electrically connected to a second terminal of the inner coil and extends through at least part of the radially-extending outer gap.</p>	<div data-bbox="873 240 1583 824" data-label="Image"> </div> <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>9. The smartphone antenna module of claim 1, wherein the inner coil includes a wire having a</p>	<p>The width of the wire of the inner coil is different than the width of the wire of the outer coil.</p>

Exhibit B

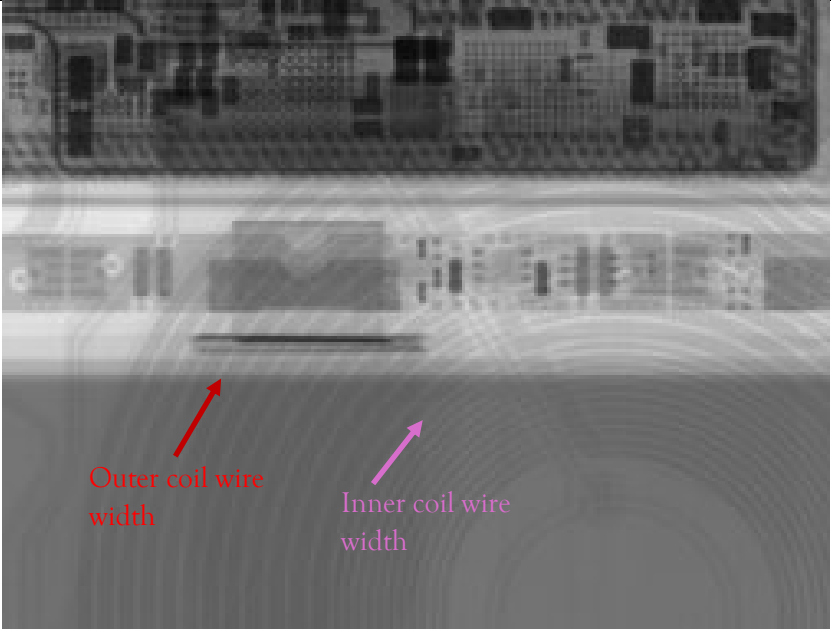
Claim	Samsung Accused Products
<p>width different from that of a wire line of the outer coil.</p>	 <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>11. A smartphone comprising:</p>	<p>Accused infringer Samsung Electronics America, LLC and Samsung Electronics Co. Ltd. (together “Samsung”) manufacture, distribute, and sell products that contain a smartphone antenna module. Specifically, Samsung manufactures, distributes, and sells Samsung Galaxy smartphones including at least</p>

Exhibit B


Claim	Samsung Accused Products
	the Galaxy S21, S21+, S21 Ultra, S21 FE, Z Fold 3, Z Flip 3, S22, S22+, S22 Ultra, Z Fold 4, Z Flip 4, S23, S23+, S23 Ultra, S23 FE, Z Fold 5, Z Flip 5, S24, S24+, S24 Ultra, Z Fold 6, and Z Flip 6.
a. a display module comprising a display surface;	<p>The smartphones include a display module comprising a display surface.</p>  <p>The image shows a Samsung Galaxy S21 Ultra smartphone. On the left, the back of the phone is visible, featuring a camera module with three lenses and a flash. The text "Samsung Galaxy S21 Ultra" is displayed in large, bold, black font. On the right, the front of the phone is shown, displaying a colorful abstract wallpaper. A red arrow points to the display surface, which is labeled "Display surface" in red text. The Samsung logo is visible at the bottom of the back of the phone.</p> <p>https://www.ifixit.com/Teardown/Samsung+Galaxy+S21+Ultra+Teardown/141188</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that</p>

Exhibit B

Claim	Samsung Accused Products
	the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.
b. a rear cover comprising a rear surface facing away from the display surface;	<p>The smartphones include a rear cover comprising a rear surface facing away from the display surface.</p>  <p>https://www.youtube.com/watch?v=cU3QXPoFOUI</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that</p>

Exhibit B

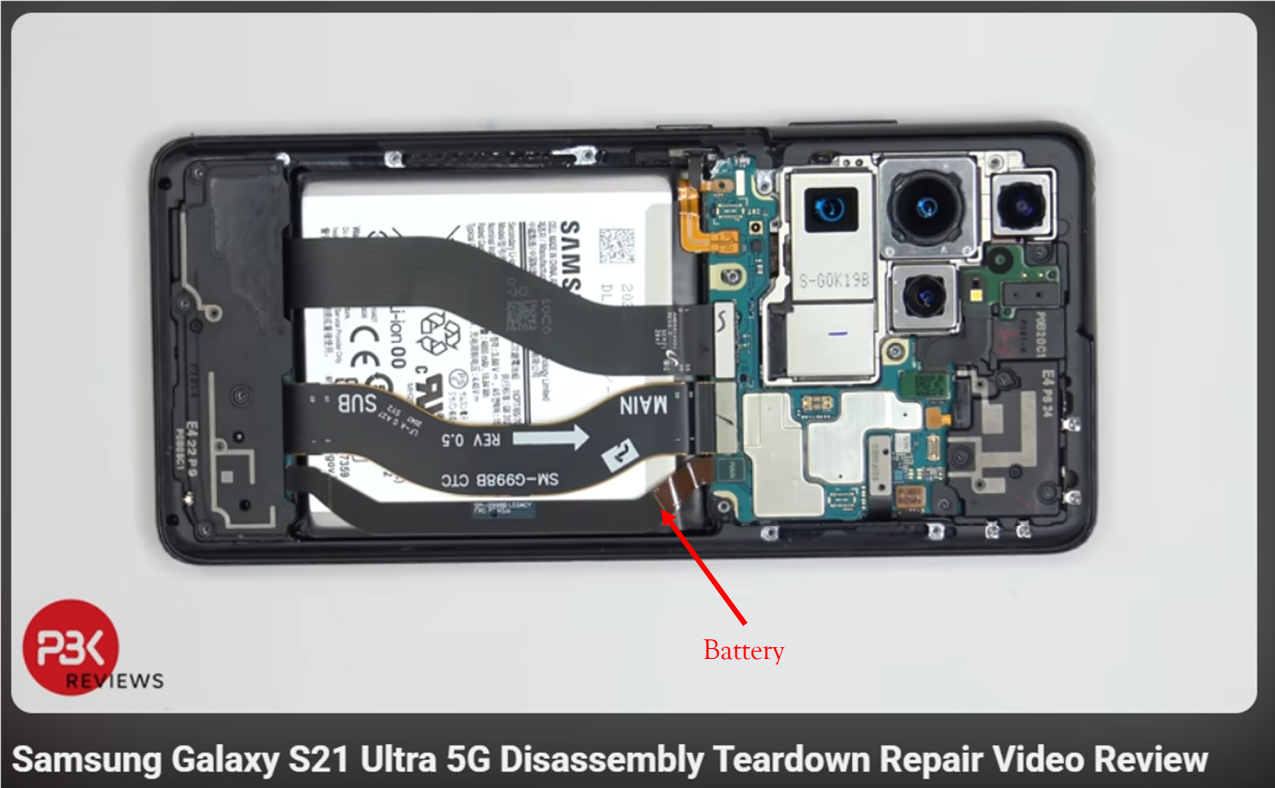
Claim	Samsung Accused Products
	the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.
c. a battery placed between the display module and the rear cover; and	<p>The smartphones have a battery placed between the display module and the rear cover.</p>  <p>Samsung Galaxy S21 Ultra 5G Disassembly Teardown Repair Video Review</p> <p>https://www.youtube.com/watch?v=cU3QXPoFOUI</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that</p>

Exhibit B

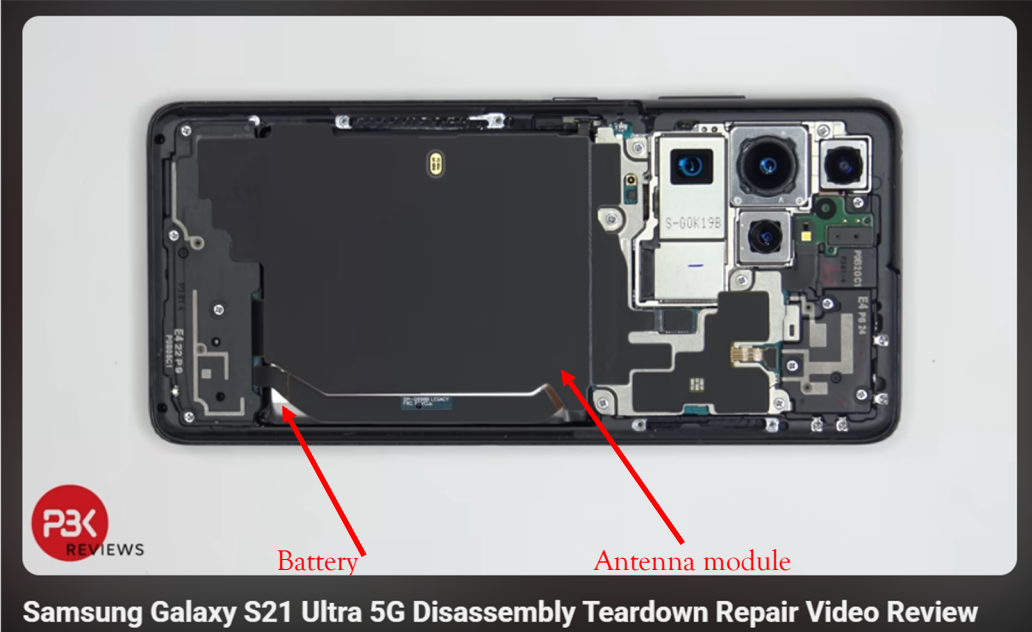
Claim	Samsung Accused Products
	the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.
d. the smartphone antenna module of claim 1 placed between the battery and the rear cover, wherein at least one of the inner coil and the outer coil are configured for wireless battery charging.	<p>The smartphone antenna is placed between the battery and the rear cover, wherein at least one of the inner coil and the outer coil are configured for wireless battery charging.</p>  <p>https://www.youtube.com/watch?v=cU3QXPoFOUI</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>

Exhibit B

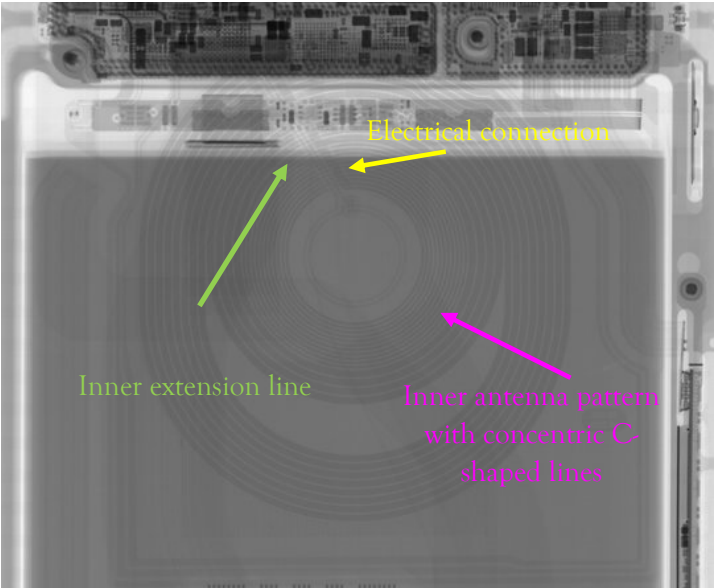
Claim	Samsung Accused Products
<p>12. The smartphone antenna module of claim 11, wherein the inner extension line is electrically connected to a terminal of the inner coil, wherein at least part of the concentric circular lines of the inner antenna pattern is in a C shape.</p>	<p>The inner extension line is electrically connected to a terminal of the inner coil, and the concentric circular lines of the inner antenna pattern are in a C shape.</p>  <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>

Exhibit B

Claim	Samsung Accused Products
<p>13. The smartphone antenna module of claim 11, wherein the outer extension line is electrically connected to a terminal of the outer coil, wherein at least part of the concentric circular lines of the outer antenna pattern is in a C shape.</p>	<p>The outer extension line is electrically connected to a terminal of the outer coil, and the concentric circular lines of the outer antenna pattern are in a C shape.</p> <div data-bbox="772 418 1583 998" data-label="Image"> </div> <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>

Exhibit B

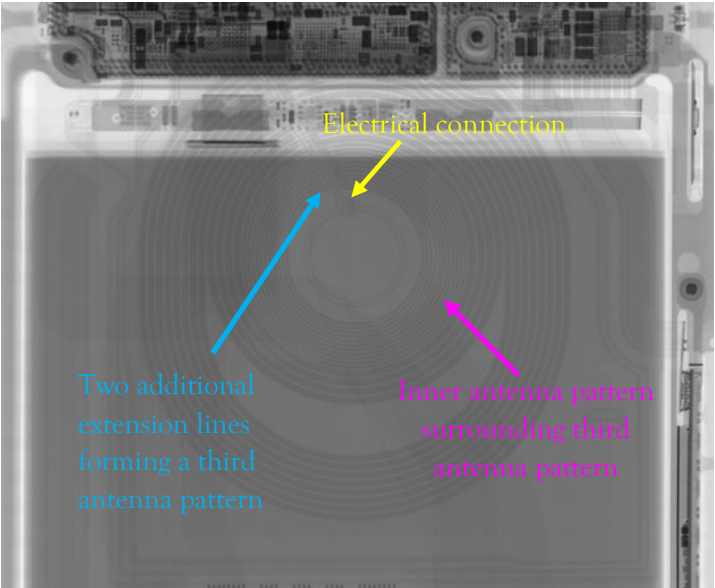
Claim	Samsung Accused Products
<p>14. The smartphone antenna module of claim 11, wherein the second antenna pattern formed on the second major surface comprises a third antenna pattern generally surrounded by the inner antenna pattern, wherein each of the two additional extension lines is electrically connected to a terminal of the third antenna pattern.</p>	<p>The second antenna pattern formed on the second major surface (m1) comprises a third antenna pattern generally surrounded by the inner antenna pattern, wherein each of the two additional extension lines is electrically connected to a terminal of the third antenna pattern.</p>  <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>

Exhibit B

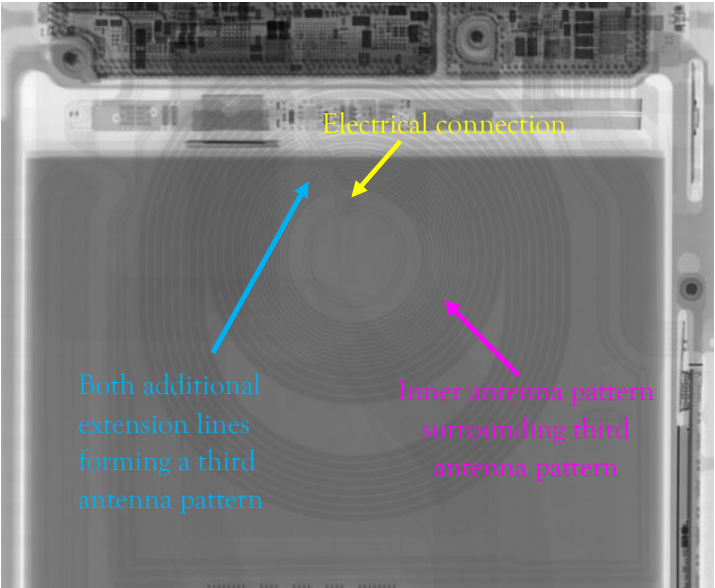
Claim	Samsung Accused Products
<p>15. The smartphone antenna module of claim 11, wherein the second antenna pattern formed on the second major surface comprises a third antenna pattern generally surrounded by the inner antenna patterns, wherein at least one of the two additional extension lines contacts the third antenna pattern on the second major surface.</p>	<p>The second antenna pattern formed on the second major surface (m1) comprises a third antenna pattern generally surrounded by the inner antenna pattern, wherein at least one of the two (below, both) additional extension lines contacts the third antenna pattern on the second major surface.</p>  <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>

Exhibit B

Claim	Samsung Accused Products
<p>16. The smartphone of claim 11, wherein the inner coil and the outer coil are electrically connected in parallel.</p>	<p>In the smartphone antenna module of the Samsung Accused Products, the inner coil and outer coil are electrically connected in parallel. Specifically, the inner and outer coils are wired to form a parallel connection that occurs either directly within the smartphone antenna module, or the parallel connection is formed by wiring after connection to the smartphone. For example, the inner coil and outer coil both have two extension lines connected to either end, which is necessary for forming a parallel connection, as opposed to a serial connection which only requires a single extension line for each.</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>17. The smartphone antenna module of claim 11, wherein at least one of the inner extension line, the outer extension line, and the additional extension lines is electrically connected to the first antenna pattern formed on the first major surface through at least one via.</p>	<p>At least one of the inner extension line (yellow-green), the outer extension line (blue), and the two additional extension lines (cyan) are electrically connected (yellow) to the first antenna pattern (purple) formed on the first major surface (m2) through at least one via (teal).</p>

Exhibit B

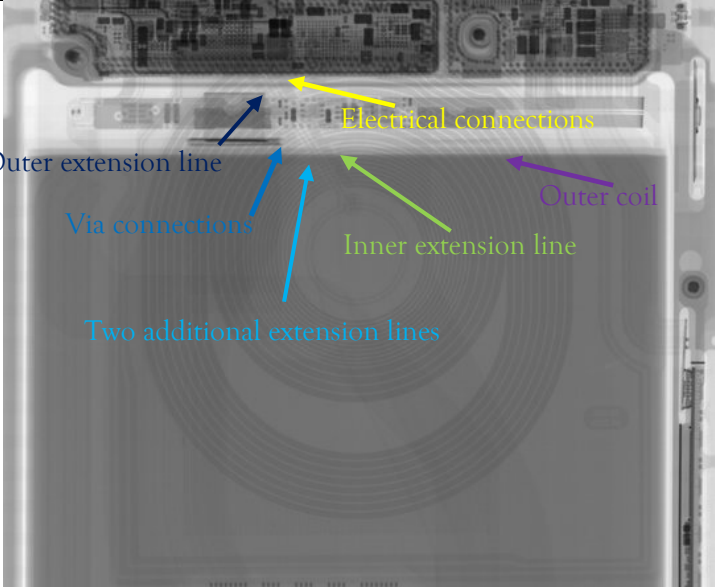
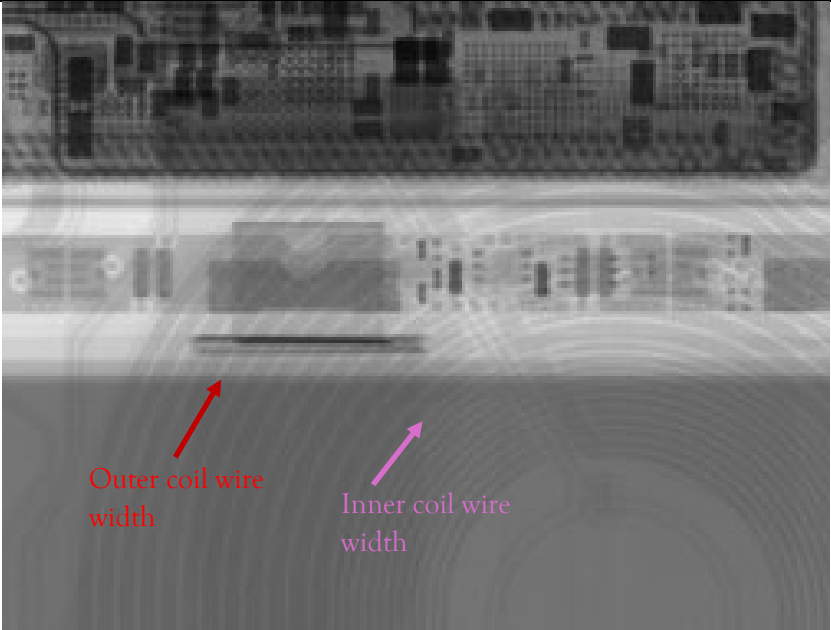
Claim	Samsung Accused Products
	 <p data-bbox="558 833 1856 911">https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p data-bbox="558 964 1892 1174">Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p data-bbox="201 1230 527 1393">18. The smartphone antenna module of claim 11, wherein the inner extension line is referred</p>	<p data-bbox="558 1230 1839 1308">The second inner extension line is formed on the second major surface (m1), and it extends along the radial direction through the radially-extending outer gap.</p>

Exhibit B

Claim	Samsung Accused Products
<p>to as a first inner extension line, wherein the smartphone antenna module further comprises a second inner extension line formed on the second major surface, wherein the second inner extension is electrically connected to a second terminal of the inner coil and extends through at least part of the radially-extending outer gap.</p>	<div data-bbox="873 240 1583 824" data-label="Image"> </div> <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>
<p>19. The smartphone antenna module of claim 11, wherein the inner coil includes a wire having a</p>	<p>The width of the wire of the inner coil is different than the width of the wire of the outer coil.</p>

Exhibit B

Claim	Samsung Accused Products
<p>width different from that of a wire line of the outer coil.</p>	 <p>https://www.ifixit.com/News/49419/samsung-galaxy-s21-ultra-teardown-x-ray-wallpapers-for-the-phone-that-has-it-all</p> <p>Discovery will provide detailed information regarding the implementation and identification of specific components of the Samsung Accused Products. Publicly available documentation makes it evident that the Samsung Accused Products are configured in the way set forth in the asserted claims. As additional information is obtained through discovery related to the Samsung Accused Products, AQ will supplement these contentions.</p>