

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION**

**VENADIUM LLC,**

**Plaintiff,**

**v.**

**SAMSUNG ELECTRONICS AMERICA,  
INC. AND SAMSUNG  
TELECOMMUNICATIONS AMERICA  
LLC,**

**Defendants.**

**Civil Action No. 5:15-cv-\_\_\_\_**

**JURY TRIAL DEMANDED**

**ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Venadium LLC files its Original Complaint for Patent Infringement based on its knowledge as to itself and based on information and belief as to all other matters as follows:

**THE PARTIES**

1. Venadium LLC is a Texas limited liability company with a principal office at 3000 Custer Road, Suite 270-219, Plano, Texas 75075.
2. On information and belief, Defendant Samsung Electronics America Inc. (“Samsung Electronics”) is a New York corporation with a principal office at 85 Challenger Road, Ridgefield Park, New Jersey 07660. Samsung Electronics’ registered agent for service of process is CT Corporation System, 111 Eight Avenue, New York, New York, 10011.
3. On information and belief, Defendant Samsung Telecommunications America LLC (“Samsung Telecommunications”), wholly owned by Samsung Electronics, is a Delaware limited liability company with a principal office at 1301 E. Lookout Dr. Richardson, Texas 75082. Samsung Telecommunications’ registered agent for service of process is Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808.
4. Samsung Electronics and Samsung Telecommunications are collectively referred to as “Defendants”.

**JURISDICTION AND VENUE**

3. This action arises under the Patent Act, 35 U.S.C. § 1, *et seq.*

4. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.

5. This Court has personal jurisdiction over Defendants because at least a portion of the infringements alleged herein occurred in this District, and Defendants regularly do or solicit business, engages in other persistent courses of conduct, or derives revenue from goods and services provided to individuals in this District.

6. Venue is proper in this District under §§ 1391(b), (c), and 1400(b).

**THE PATENT-IN-SUIT**

7. On December 11, 2001, the U.S. Patent and Trademark Office duly and lawfully issued U.S. Patent No. 6,330,549 (the “549 patent”), entitled “Protected Shareware.” *See* Exhibit A.

8. Venadium is the owner and assignee of all right, title, and interest in and to the 549 patent.

**COUNT I**

**DIRECT INFRINGEMENT OF U.S. PATENT NO. 6,330,549 UNDER 35 U.S.C. § 271(a)**

9. Venadium incorporates by reference each of its allegations in paragraphs 1 to 8.

10. Without license or authorization, Defendants have directly infringed and continues to directly infringe, literally or under the doctrine of equivalents, one or more claims of the 549 patent under 35 U.S.C. § 271(a) by, among other things, making, using, offering for sale, or selling products that use the Bluetooth 4.0 standard within this District and elsewhere in the United States that perform at least a method for protecting a computer program from unauthorized use independently of any methodology for distributing the computer program to prospective users, the computer program including an embedded protective code, the method comprising the steps of: (a) inhibiting via the embedded protective code at least one functional feature of the computer program from running on a user computer until the user computer

receives an authorization message that is digitally signed by an authorized party using a secret signing key, the secret signing key being associated with a public checking key;

(b) providing the embedded protective code with access to the public checking key; (c) running an integrity self-check over the computer program to confirm that the computer program is in an anticipated state, the integrity self-check being embedded in the computer program;

(d) communicating the authorization message to the user computer; (e) applying the public checking key to the authorization message for authenticating it; and (f) enabling said functional feature to run on the user computer if the authorization message is authenticated and if the integrity self-check result confirms that the computer program is in the anticipated state.

9. The Bluetooth 4.0 standard and the accused method is an integral part of Defendants' products:

- ATIV Book 9
- ATIV Book 9 2014 Edition
- ATIV Book 9 Plus
- ATIV One 7 Curved
- Samsung ATIV Tab
- Samsung ATIV Tab 5
- Samsung ATIV Tab 7
- Samsung Chrome Book 2
- Samsung Galaxy A3
- Samsung Galaxy A5
- Samsung Galaxy A7
- Samsung Galaxy Ace 3
- Samsung Galaxy Ace 4
- Samsung Galaxy Ace NXT
- Samsung Galaxy Ace Style
- Samsung Galaxy Alpha
- Samsung Galaxy Avant
- Samsung Galaxy Axiom
- Samsung Galaxy Beam 2
- Samsung Galaxy Core 2
- Samsung Galaxy Core Advance
- Samsung Galaxy Core LTE
- Samsung Galaxy Core Plus
- Samsung Galaxy Core Prime
- Samsung Galaxy E5

Samsung Galaxy E7  
Samsung Galaxy Express  
Samsung Galaxy Express 2  
Samsung Galaxy Express I437  
Samsung Galaxy Fame  
Samsung Galaxy Fame Lite Duos  
Samsung Galaxy Golden  
Samsung Galaxy Grand  
Samsung Galaxy Grand 2  
Samsung Galaxy Grand Max  
Samsung Galaxy Grand Neo  
Samsung Galaxy Grand Neo Plus  
Samsung Galaxy Grand Prime  
Samsung Galaxy J1  
Samsung Galaxy K zoom  
Samsung Galaxy Mega 2  
Samsung Galaxy Mega 5.8  
Samsung Galaxy Mega 6.3  
Samsung GALAXY Note 10.1 (2014 Edition)  
Samsung GALAXY Note 10.1 LTE  
Samsung Galaxy Note 3  
Samsung Galaxy Note 3 Neo  
Samsung Galaxy Note 4  
Samsung Galaxy Note 8.0  
Samsung Galaxy Note Edge  
Samsung GALAXY Note II  
Samsung Galaxy NotePRO 12.2  
Samsung Galaxy Pocket  
Samsung Galaxy Pocket 2  
Samsung Galaxy Pocket Neo  
Samsung Galaxy Premier  
Samsung Galaxy Prevail 2  
Samsung Galaxy Reverb  
Samsung Galaxy Ring  
Samsung Galaxy Round  
Samsung Galaxy Rugby Pro  
Samsung Galaxy Rush  
Samsung Galaxy S Duos 3  
Samsung Galaxy S III Cricket  
Samsung Galaxy S III mini  
Samsung Galaxy S Relay 4G  
Samsung Galaxy S3 Neo  
Samsung Galaxy S3 Slim  
Samsung Galaxy S4  
Samsung Galaxy S4 Active

Samsung Galaxy S4 mini  
Samsung Galaxy S4 Value Edition  
Samsung Galaxy S4 Zoom  
Samsung Galaxy S5  
Samsung Galaxy S5 Active  
Samsung Galaxy S5 LTE-A  
Samsung Galaxy S5 mini  
Samsung Galaxy S5 Plus  
Samsung Galaxy S5 Sport  
Samsung Galaxy S6  
Samsung Galaxy S6 Active  
Samsung Galaxy S6 edge  
Samsung GALAXY Star  
Samsung Galaxy Star 2  
Samsung Galaxy Star Pro  
Samsung Galaxy Stellar  
Samsung Galaxy Stratosphere II  
Samsung GALAXY Tab 2 (7.0) LTE  
Samsung Galaxy Tab 2 10.1  
Samsung Galaxy Tab 3 10.1-inch  
Samsung Galaxy Tab 3 8-inch  
Samsung Galaxy Tab 3 Lite  
Samsung Galaxy Tab 3 V  
Samsung Galaxy Tab 4 10.1  
Samsung Galaxy Tab 4 7.0  
Samsung Galaxy Tab 4 8.0  
Samsung Galaxy Tab A 8.0  
Samsung Galaxy Tab A 9.7  
Samsung Galaxy Tab Active  
Samsung Galaxy Tab E  
Samsung Galaxy Tab Pro 10.1  
Samsung Galaxy Tab Pro 12.2  
Samsung Galaxy Tab Pro 8.4  
Samsung Galaxy Tab S 10.5  
Samsung Galaxy Tab S 8.4  
Samsung Galaxy Trend Lite  
Samsung Galaxy V  
Samsung Galaxy Victory 4G LTE  
Samsung Galaxy Xcover 2  
Samsung Galaxy XCover 3  
Samsung Galaxy Young 2  
Samsung Galazt NX  
Samsung Gear 2  
Samsung Gear Fit  
Samsung Gear Live

Samsung Gear S  
Samsung Z1

**PRAYER FOR RELIEF**

Venadium seeks the following relief from this Court:

- A. Judgment that Defendants have directly infringed the 549 patent literally or under the doctrine of equivalents;
- B. An accounting of sales of all infringing products through the time of judgment;
- C. An award of damages in the form of at least a reasonable royalty for Defendants' past and future infringement of the 549 patent through the time of judgment, together with pre- and post-judgment interest and costs under 35 U.S.C. § 284;
- D. Judgement that this case is exceptional and an award of Venadium's reasonable attorneys' fees and costs under 35 U.S.C. § 285; and
- E. An award to Venadium of such further relief at law or in equity that this Court deems just and proper.

**JURY TRIAL DEMAND**

Plaintiff Venadium demands a trial by jury on all claims and issues so triable.

Dated: July 16, 2015

Respectfully submitted,



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Peter J. Corcoran, III – Lead Attorney  
Texas State Bar No. 24080038  
**CORCORAN IP LAW, PLLC**  
2509 Richmond Road, Suite 380  
Texarkana, Texas 75503  
Tel: (903) 701-2481  
Fax: (844) 362-3291  
Email: peter@corcoranip.com

*Counsel for Plaintiff*  
*Venadium LLC*