

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MULTIFOLD INTERNATIONAL
INCORPORATED PTE. LTD.,
Plaintiff,

vs.

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

Civil Action No. 2:21-cv-371

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Multifold International Incorporated Pte. Ltd. (“MII”) files this complaint for patent infringement pursuant to 35 U.S.C. §§ 100 *et seq.* against Defendants Samsung Electronics Co., Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEA”) (collectively, “Samsung”), for infringement of U.S. Patent Nos. 8,836,842 (“the ‘842 Patent”), 8,881,053 (“the ‘053 Patent”), 9,134,756 (“the ‘756 Patent”), 9,310,834 (“the Selim ‘834 Patent”), 8,854,834 (“the O’Connor ‘834 Patent”), 9,665,126 (“the ‘126 Patent”), 8,842,080 (“the ‘080 Patent”), 9,727,205 (“the ‘205 Patent”), 9,058,153 (“the ‘153 Patent”), 10,203,848 (“the ‘848 Patent”), 8,875,050 (“the ‘050 Patent”), 9,792,007 (“the ‘007 Patent”), 9,141,135 (“the ‘135 Patent”), 8,832,577 (“the ‘577 Patent”), 9,146,589 (“the ‘589 Patent”), 9,158,494 (“the ‘494 Patent”), and 9,195,335 (“the ‘335 Patent”); collectively with the ‘842, ‘053, ‘756, Selim ‘834, O’Connor ‘834, ‘126, ‘080, ‘205, ‘153, ‘848, ‘050, ‘007, ‘135, ‘577, ‘589, and ‘494 Patents, “the Asserted Patents”) and alleges as follows:

I. THE PARTIES

1. MII is a corporation organized under the laws of Singapore, having a place of business at 160 Robinson Road, #24-09, SBF Center, Singapore, 068914.

2. MII is the sole and exclusive rightful owner of the Asserted Patents and holds, *inter alia*, the sole and exclusive right to sue and collect damages for past infringement.

3. Upon information and belief, SEC is a corporation organized under the laws of the Republic of Korea, having a place of business at 129 Samsung-ro, Maetan-3dong, Yeongtong-gu, Suwon-si, Gyeonggi-do, 16677, Republic of Korea. SEC may be served with process at least pursuant to Federal Rule of Civil Procedure 4(f)(1).

4. Upon information and belief, SEA is a corporation organized under the laws of New York, having a principal place of business at 85 Challenger Rd., Ridgefield Park, NJ 97660. SEA maintains a place of business in this District at 6625 Excellence Way, Plano, TX 75023. SEA may be served with process through its registered agent, CT Corporation System, 1999 Bryan St., Ste. 900, Dallas, TX 75201.

5. SEC designs, manufactures, and provides to the United States and other markets a wide variety of products and services, including consumer electronics, mobile phones, handheld devices, tablets, laptops and other personal computers, storage devices, televisions, and electronic devices.

6. Upon information and belief, SEA is a wholly-owned subsidiary of SEC and is responsible for domestic distribution of Samsung's consumer electronics products, including the products accused of infringement herein.

II. JURISDICTION AND VENUE

7. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. Each Defendant is subject to this Court's specific and general personal jurisdiction consistent with the principles of due process and/or the Texas Long Arm Statute.

9. This Court has personal jurisdiction over Samsung. Samsung has conducted and continues to regularly conduct business within the State of Texas and this District. Samsung has

purposefully and voluntarily availed itself of the privileges of conducting business in the United States, the State of Texas, and this District by continuously and systematically placing goods into the stream of commerce through an established distribution channel with the expectation that they will be purchased by consumers in this District. Samsung directly and/or through intermediaries (including distributors, sales agents, and others), ships, distributes, sells, offers to sell, imports, advertises, makes, and/or uses its products (including but not limited to the products accused of infringement herein) in the United States, the State of Texas, and this District. Samsung has committed and continues to commit, has contributed to and continues to contribute to, and has induced and continues to induce, acts of infringement of the Asserted Patents in this District. On information and belief, Samsung has previously submitted to the jurisdiction of this Court.

10. Venue is proper in this District as to SEC pursuant to 28 U.S.C. § 1391(c)(3) because it is not a resident of the United States and may therefore be sued in any judicial district.

11. Venue is proper in this District as to SEA pursuant to 28 U.S.C. § 1400(b) because SEA has committed acts of infringement in this District and has regular and established places of business in this District.

12. Joinder of SEC and SEA is proper because they are related entities that are either jointly and severally liable for infringement, or that make, use, sell, offer to sell, and/or import the same or similar products accused of infringement herein. Further, upon information and belief, SEC and SEA use the same underlying hardware and/or software in their infringing products and therefore the factual question of infringement will substantially overlap between SEC and SEA. MII anticipates there will be substantial overlap with respect to discovery.

III. THE PATENTS-IN-SUIT

13. The '842 Patent, entitled "CAPTURE MODE OUTWARD FACING MODES," was lawfully issued by the United States Patent and Trademark Office on September 16, 2014.

A true and correct copy of the '842 Patent is attached as **Exhibit A**.

14. The '842 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

15. MII is the owner, by assignment, of the '842 Patent.

16. The '053 Patent, entitled "MODAL LAUNCHING," was lawfully issued by the United States Patent and Trademark Office on November 4, 2014. A true and correct copy of the '053 Patent is attached as **Exhibit B**.

17. The '053 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

18. MII is the owner, by assignment, of the '053 Patent.

19. The '756 Patent, entitled "DUAL SCREEN APPLICATION VISUAL INDICATOR," was lawfully issued by the United States Patent and Trademark Office on September 15, 2015. A true and correct copy of the '756 Patent is attached as **Exhibit C**.

20. The '756 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

21. MII is the owner, by assignment, of the '756 Patent.

22. The Selim '834 Patent, entitled "FULL SCREEN MODE," was lawfully issued by the United States Patent and Trademark Office on April 12, 2016. A true and correct copy of the Selim '834 Patent is attached as **Exhibit D**.

23. The Selim '834 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

24. MII is the owner, by assignment, of the Selim '834 Patent.

25. The O'Connor '834 Patent, entitled "DUAL SCREEN FOLDING DISPLAY HINGE," was lawfully issued by the United States Patent and Trademark Office on October 7, 2014. A true and correct copy of the O'Connor '834 Patent is attached as **Exhibit E**.

26. The O'Connor '834 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

27. MII is the owner, by assignment, of the O'Connor '834 Patent.

28. The '126 Patent entitled "DUAL SCREEN FOLDING DISPLAY HINGE," was lawfully issued by the United States Patent and Trademark Office on May 30, 2017. A true and correct copy of the '126 Patent is attached as **Exhibit F**.

29. The '126 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

30. MII is the owner, by assignment, of the '126 Patent.

31. The '080 Patent, entitled "USER INTERFACE WITH SCREEN SPANNING ICON MORPHING," was lawfully issued by the United States Patent and Trademark Office on September 23, 2014. A true and correct copy of the '080 Patent is attached as **Exhibit G**.

32. The '080 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

33. MII is the owner, by assignment, of the '080 Patent.

34. The '205 Patent, entitled "USER INTERFACE WITH SCREEN SPANNING ICON MORPHING," was lawfully issued by the United States Patent and Trademark Office on August 8, 2017. A true and correct copy of the '205 Patent is attached as **Exhibit H**.

35. The '205 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

36. MII is the owner, by assignment, of the '205 Patent.

37. The '153 Patent, entitled "MINIMIZING APPLICATION WINDOWS," was lawfully issued by the United States Patent and Trademark Office on June 16, 2015. A true and correct copy of the '153 Patent is attached as **Exhibit I**.

38. The '153 Patent is valid, enforceable, and was duly issued in full compliance

with Title 35 of the United States Code.

39. MII is the owner, by assignment, of the '153 Patent.

40. The '848 Patent, entitled "SLEEP STATE FOR HIDDEN WINDOWS," was lawfully issued by the United States Patent and Trademark Office on February 12, 2019. A true and correct copy of the '848 Patent is attached as **Exhibit J**.

41. The '848 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

42. MII is the owner, by assignment, of the '848 Patent.

43. The '050 Patent, entitled "FOCUS CHANGE UPON APPLICATION LAUNCH," was lawfully issued by the United States Patent and Trademark Office on October 28, 2014. A true and correct copy of the '050 Patent is attached as **Exhibit K**.

44. The '050 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

45. MII is the owner, by assignment, of the '050 Patent.

46. The '007 Patent, entitled "FOCUS CHANGE UPON APPLICATION LAUNCH," was lawfully issued by the United States Patent and Trademark Office on October 17, 2017. A true and correct copy of the '007 Patent is attached as **Exhibit L**.

47. The '007 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

48. MII is the owner, by assignment, of the '007 Patent.

49. The '135 Patent, entitled "FULL-SCREEN ANNUNCIATOR," was lawfully issued by the United States Patent and Trademark Office on September 22, 2015. A true and correct copy of the '135 Patent is attached as **Exhibit M**.

50. The '135 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

51. MII is the owner, by assignment, of the '135 Patent.

52. The '577 Patent, entitled "UNIVERSAL CLIPBOARD," was lawfully issued by the United States Patent and Trademark Office on September 9, 2014. A true and correct copy of the '577 Patent is attached as **Exhibit N**.

53. The '577 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

54. MII is the owner, by assignment, of the '577 Patent.

55. The '589 Patent, entitled "IMAGE CAPTURE DURING DEVICE ROTATION," was lawfully issued by the United States Patent and Trademark Office on September 29, 2015. A true and correct copy of the '589 Patent is attached as **Exhibit O**.

56. The '589 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

57. MII is the owner, by assignment, of the '589 Patent.

58. The '494 Patent, entitled "MINIMIZING AND MAXIMIZING BETWEEN PORTRAIT DUAL DISPLAY AND PORTRAIT SINGLE DISPLAY," was lawfully issued by the United States Patent and Trademark Office on October 13, 2015. A true and correct copy of the '494 Patent is attached as **Exhibit P**.

59. The '494 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

60. MII is the owner, by assignment, of the '494 Patent.

61. The '335 Patent, entitled "MODAL LAUNCHING," was lawfully issued by the United States Patent and Trademark Office on November 24, 2015. A true and correct copy of the '335 Patent is attached as **Exhibit Q**.

62. The '335 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

63. MII is the owner, by assignment, of the '335 Patent.

64. MII asserts and alleges that Samsung has infringed and continues to infringe at least one claim of each of the '842, '050, '756, Selim '834, O'Connor '834, '126, '080, '205, '153, '848, '050, '007, '135, '577, '589, '494, and '335 Patents.

IV. FACTUAL ALLEGATIONS

Introduction

65. Flextronics International Ltd, now Flex Ltd, (collectively, "Flex") launched its Imerj project in 2009 to design an industry-first foldable smartphone.

66. The Imerj foldable-phone debuted in 2011 to positive press, and is now recognized as a pioneer in the foldable-phone industry.

67. Upon information and belief, Samsung was aware of the Imerj foldable-phone and the positive press that accompanied its launch.

68. Foldable-smartphones allow for multiple benefits over a normal non-folding smartphone. The most important improvement is that a user is able to use a much larger screen, while still enjoying the smaller size of a normal phone when the device is closed. Additionally, a user may be able to take advantage of multiple screens, including those on the inside of the phone when it is opened, and those on the outside when it is closed.

69. The larger screen size also allows for variations in the use and design of applications over a normal phone. For example, multiple full-sized applications can be shown at once over the screens, improving the ability to multitask.

70. Additionally, due to the larger size of the phone, extra space is available for larger batteries, more powerful processors, and other hardware components that would not be able to fit on a normal phone.

71. Stemming from the Imerj project, Flex applied for and was granted dozens of patents that relate to foldable-phone technologies and the benefits derived therein, including the

Asserted Patents.

72. Flex subsequently assigned the Asserted Patents to MII.

73. Upon information and belief, Samsung had actual knowledge of the '842, Selim '834, O'Connor '834, '053, '756, '126, '080, '205, '153, '848, '050, '007, '135, '577, '589, '335, and '494 Patents prior to the filing of this complaint.

74. Upon information and belief, Samsung was and is aware of Flex's patents arising from the Imerj project, and was or should have been aware of each of the Asserted Patents, at least because, upon information and belief, Samsung was both developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents.

75. Upon information and belief, in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the Asserted Patents.

76. For example, SEC cited to the '842, '053, '080, '153, '050, '577, '494, and '589 Patents on March 6, 2019 during prosecution of its U.S. Patent No. 10,386,890.

77. Upon information and belief, Samsung cited to the '335 Patent on August 9, 2018, during prosecution of SEC's U.S. Patent No. 10,866,694.

78. Upon information and belief, Samsung was made aware of the '848 Patent at least as of March 25, 2019, during prosecution of SEC's U.S. Patent No. 10,375,207, in which the USPTO examiner cited it as prior art.

79. Upon information and belief, Samsung was made aware of the '135 Patent at least as of July 27, 2016, during prosecution of SEC's U.S. Patent Application No. 14/473,341, in which the USPTO examiner cited it as prior art.

80. Samsung also cited to the '494 Patent on August 9, 2018, during prosecution of

SEC's U.S. Patent No. 10,866,694.

81. Additionally, upon information and belief, Samsung was made further aware of the '494 Patent during prosecution of SEC's U.S. Patent Nos. D752,606, D753,143, D753,142, D760,733, and 10,642,485, in which the USPTO examiner cited it as prior art.

82. Upon information and belief, Samsung was made further aware of the '577 Patent on March 25, 2015, during prosecution of SEC's U.S. Patent Application No. 13/935,687, in which the USPTO examiner cited it as prior art.

83. Upon information and belief, Samsung was also made further aware of the '335 Patent, which claims priority to the '053 Patent, on January 13, 2016, during prosecution of SEC's U.S. Design Patent No. D755,201, in which the USPTO examiner cited it as prior art.

84. Upon information and belief, Samsung was also made further aware of the '404 Patent, which claims priority to the '053 Patent and the '756 Patent, on July 23, 2020, during prosecution of SEC's U.S. Patent No. 10,866,694, in which the USPTO examiner cited it as prior art.

85. Upon information and belief, Samsung was aware of or should have been aware of the '205, '007, and '756 Patents, at least because they relate to the same field of subject matter as other Asserted Patents—including family members of each of the '205, '007, and '756 Patents—of which Samsung was aware and cited during prosecution of Samsung's patents, and because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '205, '007, and '756 Patents.

86. For example, upon information and belief, Samsung has also been aware of the '205 Patent at least as of August 9, 2018, after citing to the '080 Patent, to which the '205 Patent

claims priority, during prosecution of SEC's U.S. Patent No. 10,866,694.

87. Upon information and belief, Samsung has also been aware of the '007 Patent at least as of March 6, 2019, after citing to the '050 Patent, which the '007 Patent claims priority to, during prosecution of SEC's U.S. Patent No. 10,386,890.

88. Upon information and belief, Samsung has also been aware of the '756 Patent, at least as of July 23, 2020, when the USPTO examiner cited the '404 Patent, which claims priority to the '756 Patent, as prior art during prosecution of SEC's U.S. Patent No. 10,866,694.

89. Upon information and belief, Samsung was aware of or should have been aware of the Selim '834, O'Connor '834, and '126 Patents at least because they relate to the same field of subject matter as other Asserted Patents of which Samsung was aware and cited during prosecution of Samsung's patents, and because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the Selim '834, O'Connor '834, and '126 Patents.

The Accused Products

90. Upon information and belief, Samsung was one of the first smartphone producers to mass-market a foldable-phone in the United States. Upon information and belief, Samsung has now sold five different foldable-phone models in the United States—the Galaxy Fold, the Galaxy Z Flip, the Galaxy Z Fold2, the Galaxy Z Flip3, and the Galaxy Z Fold3—and is developing and intends to sell and market additional foldable-phone models in the United States (collectively, the "Accused Products").

91. Upon information and belief, Samsung entered the United States foldable-phone space on or about September 27, 2019 with the sale of the Galaxy Fold.

92. Below is a picture of the Galaxy Fold:



See <https://news.samsung.com/global/samsung-galaxy-fold-now-available>

93. Upon information and belief, Samsung later followed this up with the launch of the foldable Galaxy Z Flip on or about February 14, 2020 in the United States.

94. Below are pictures of the Galaxy Z Flip.



See <https://www.samsung.com/us/mobile/galaxy-z-flip/>

95. Upon information and belief, Samsung's Galaxy Z Fold2 was launched in the United States on or about September 18, 2020.

96. Below is a picture of the Galaxy Z Fold2:



See <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/>

97. Upon information and belief, Samsung launched the Galaxy Z Flip3 in the United States on or about August 27, 2021. Upon information and belief, Samsung allowed customers to pre-order the Galaxy Z Flip3 prior to its launch date.

98. Below is a picture of the Galaxy Z Flip3:



See <https://www.samsung.com/us/smartphones/galaxy-z-flip3-5g/>

99. Upon information and belief, Samsung launched the Galaxy Z Fold3 in the United States on or about August 27, 2021. Upon information and belief, Samsung allowed customers to pre-order the Galaxy Z Fold3 prior to its launch date.

100. Below is a picture of the Galaxy Z Fold3:



See <https://www.samsung.com/us/smartphones/galaxy-z-fold3-5g/>

Samsung's Acts of Infringement

101. Samsung has made, used, sold, offered to sell and/or imported infringing products, and continues to do so, including the Accused Products.

102. By doing so, Samsung has directly infringed the Asserted Patents.

103. Samsung has engaged and continues to engage in a pattern of conduct intended to induce and/or contribute to the infringement of others, such as its customers and end-users. These actions have included and include making, selling, offering to sell, and/or importing products that infringe the Asserted Patents.

104. Through its actions, Samsung induces and/or contributes to the infringement of the Asserted Patents, and thus indirectly infringes the Asserted Patents.

105. There is an actual, substantial, and continuing justiciable controversy between

MII and Samsung regarding Samsung's infringement of the Asserted Patents. Absent a judgment and injunction from this Court, Samsung will continue to infringe the Asserted Patents and continue to cause damage and irreparable harm to MII.

106. Despite being aware and having knowledge of MII's patents—including the Asserted Patents—and recognizing the value and benefits of MII's patented technology, Samsung has elected to infringe the Asserted Patents, including by incorporating MII's technology into at least the Accused Products.

107. Samsung's infringement of each Asserted Patent is willful. Samsung continues to commit acts of infringement despite awareness of the Asserted Patents and a high likelihood that its actions constitute infringement, and Samsung knew or should have known that its actions constituted an unjustifiably high risk of infringement, at least because of, upon information and belief, Samsung's familiarity with the Asserted Patents and the fields to which they relate (including the fields to which Samsung's Accused Products relate) as part of its development of the Accused Products, and its monitoring of the Imerj foldable-phone project, press related thereto, and patents issuing therefrom.

108. Samsung's acts of infringement have been willful as of the date it became aware of the patented technology/invention(s) and/or the Asserted Patents, and no later than the filing of this complaint for patent infringement and/or the date this complaint for patent infringement was served on Samsung.

V. COUNT ONE - (Infringement of U.S. Patent No. 8,836,842)

109. MII realleges and incorporates by reference each of the preceding paragraphs.

110. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '842 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing systems and methods protected thereby within the United States and within

this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '842 Patent by making and using the method and system of claims 1 and 11 to provide users with a foldable-phone with a changing image capture mode.

111. For example, with respect to Claim 11, on information and belief, the Accused Products have at least a first inner screen that includes a gesture capture region by which the device can sense or detect a user gesture. *See, e.g.*, <https://www.youtube.com/watch?v=RcKTBzfnNa0> at 0:22-0:25 (showing a user interacting with an inner screen that senses the user's gestures) (accessed July 21, 2021). The Accused Products also have a second outer screen that faces the opposite direction of the first inner screen when the device is closed, and an image capture (*i.e.*, camera) lens that is associated with the second screen. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing a second screen that faces the opposite direction of a first inner screen, and a camera that is associated with at least the second screen) (accessed July 21, 2021). The Accused Products also have a memory (*e.g.*, onboard RAM) and a processor, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2. *See, e.g.*, <https://www.samsung.com/global/galaxy/galaxy-z-fold2/specs/> (describing onboard memory for the Galaxy Z Fold2) (accessed July 21, 2021); <https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g> (identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). On information and belief, the processor enables the Accused Products to: (i) receive input from a user of the phone to open a camera application, (ii) determine a configuration for the camera application, the Accused Product's orientation (*e.g.*, in landscape or portrait), and the Accused Product's state (*e.g.*, open, closed, or folded), and (iii) based on one or more of these determinations, enter different camera application modes, wherein in each mode the camera application displays differently on the first

or second screen. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing camera application displaying differently on a first and second screen of a device based on the state of the device (*i.e.*, “[w]hen your phone is folded”)) (accessed July 21, 2021).

112. By way of further example, and again without limitation, Samsung has directly infringed the ‘842 Patent, and continues to do so, by providing a device that allows a user to perform the method of Claim 1. The Accused Products have a first and second screen, and allow a user to open a camera application. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting a plurality of screens and a camera application that can be opened by a user) (accessed July 21, 2021). On information and belief, the Accused Products can then (i) determine a configuration for the camera application, the Accused Product’s orientation (*e.g.*, in landscape or portrait), and the Accused Product’s state (*e.g.*, open, closed, or folded), and (ii) based on one or more of these determinations, enter different camera application modes, wherein in each mode the camera application displays differently on the first or second screen. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing camera application displaying differently on the first and second screen of a device based on the state of the device (*i.e.*, “[w]hen your phone is folded”)) (accessed July 21, 2021).

113. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the ‘842 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the ‘842 Patent at least because in the course of

developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '842 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the '842 Patent at least as of March 6, 2019, as SEC cited to the '842 Patent during prosecution of SEC's U.S. Patent No. 10,386,890. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '842 Patent.

114. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '842 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '842 Patent, that constitute a material part of the invention(s) claimed in the '842 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '842 Patent.

115. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '842 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

116. Upon information and belief, as set forth in detail above, Samsung's infringement of the '842 Patent has been willful.

VI. COUNT TWO - (Infringement of U.S. Patent No. 8,881,053)

117. MII realleges and incorporates by reference each of the preceding paragraphs.

118. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '053 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing systems and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '053 Patent by making and using the method and system of claims 1 and 11 to provide users with a foldable-phone that can launch a modal window that automatically minimizes a multi-screen application.

119. For example, with respect to Claim 11, on information and belief, the Accused Products have a non-transitory computer readable medium that stores computer executable instructions that are performed by at least one processor, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2. *See, e.g.,* <https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g> (identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). The executable instructions stored on the Accused Products allow the Accused Products to display a window of a multi-screen application on at least a portion of both a first and second display. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (displaying a window of a multi-screen application on a plurality of displays on the device) (accessed July 21, 2021). With the multi-screen application open, a user of the Accused Products can then launch a modal window (*i.e.*, a child window) of the multi-screen application. On information and belief, when the modal window is opened, the Accused Products can display the modal window on either the first screen or the second screen, and then automatically minimize the multi-screen window to the display that is not occupied by the modal window.

120. By way of further example, and again without limitation, Samsung has directly

infringed the '053 Patent, and continues to do so, by providing a device that allows a user to perform the method of Claim 1. The Accused Products can display a window of a multi-screen application on at least a portion of both a first display of a first screen, and a second display of a second screen. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (displaying a window of a multi-screen application on a plurality of displays on the device) (accessed July 21, 2021). With the multi-screen application open, a user of the Accused Products can then input to launch a modal window (*i.e.*, a child window) of the multi-screen application. On information and belief, when the modal window is opened, the Accused Products can display the modal window on either the first screen or the second screen, and then automatically minimize the multi-screen window to the screen that is not occupied by the modal window.

121. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the '053 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the '053 Patent at least because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '053 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the '053 Patent at least as of March 6, 2019, as SEC cited to the '053 Patent during prosecution of SEC's U.S. Patent No. 10,386,890. Samsung was also made further aware of MII's U.S. Patent No. 9,152,404, which claims priority to the '053 Patent,

on July 23, 2020, during prosecution of SEC's U.S. Patent No. 10,866,694, in which the USPTO examiner cited it as prior art. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '053 Patent.

122. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '053 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '053 Patent, that constitute a material part of the invention(s) claimed in the '053 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '053 Patent.

123. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '053 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

124. Upon information and belief, Samsung's infringement of the '053 Patent has been willful.

VII. COUNT THREE - (Infringement of U.S. Patent No. 9,134,756)

125. MII realleges and incorporates by reference each of the preceding paragraphs.

126. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '756 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing systems and methods protected thereby within the United States and within

this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '756 Patent by making and using the method and system of claims 1 and 7 to provide users with a foldable-phone which can maximize an application across both displays of the foldable-phone.

127. For example, with respect to Claim 7, on information and belief, the Accused Products have a non-transitory computer readable medium that stores instructions that are executed by a computing system. The Accused Products also have a first and second display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting a plurality of displays on a multi-display device) (accessed July 21, 2021). The executable instructions stored on the Accused Products allow the Accused Products to receive input from a user to open an application on a first display of a multi-display device, and to open a second application on a second display of a multi-display device. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting a first application on a first display and a second application on a second display on a multi-display device) (accessed July 21, 2021). On information and belief, the instructions can then allow a user to provide input to maximize either the first or second application across both the first and second displays. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting a single application maximized across both a first and second display on a multi-display device) (accessed July 21, 2021); *see also, e.g.*, <https://www.samsung.com/us/support/answer/ANS00082874/> (describing a user “touching and dragging the vertical divider in between the open apps” to “resize apps”).

128. By way of further example, and again without limitation, Samsung has directly infringed the '756 Patent, and continues to do so, by providing a device that allows a user to perform the method of Claim 1. On information and belief, the Accused Products have a

processor that can receive and execute input from a user of the Accused Products, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2. *See, e.g.*, <https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g> (identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). The Accused Products also have a first and second display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting a plurality of displays on a multi-display device) (accessed July 21, 2021). The processor can receive and execute a user's instruction to open an application on a first display, and to open a second application on a second display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting a first application on a first display and a second application on a second display on a multi-display device) (accessed July 21, 2021). On information and belief, once both applications are open, the user can then provide input to maximize either the first or second application, at which time the application will maximize across both displays of the Accused Product. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting a single application maximized across both a first and second display on a multi-display device) (accessed July 21, 2021); *see also, e.g.*, <https://www.samsung.com/us/support/answer/ANS00082874/> (describing a user "touching and dragging the vertical divider in between the open apps" to "resize apps").

129. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the '756 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the '756 Patent at least because it relates to the same

field of subject matter as other Asserted Patents of which Samsung was aware and cited during prosecution of Samsung's patents, and because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '756 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the '756 Patent at least as of July 23, 2020, after the USPTO examiner cited MII's U.S. Patent No. 9,152,404, which claims priority to the '756 Patent, during prosecution of SEC's U.S. Patent No. 10,866,694. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '756 Patent.

130. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '756 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '756 Patent, that constitute a material part of the invention(s) claimed in the '756 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '756 Patent.

131. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '756 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

132. Upon information and belief, as set forth in detail above, Samsung's

infringement of the '756 Patent has been willful.

VIII. COUNT FOUR - (Infringement of U.S. Patent No. 9,310,834)

133. MII realleges and incorporates by reference each of the preceding paragraphs.

134. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the Selim '834 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing systems and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the Selim '834 Patent by making and using the device and method of claims 1 and 15 to provide users with a foldable-phone which can selectively dismiss and reintroduce a status bar and an action bar.

135. For example, with respect to Claim 1, the Accused Products are portable handheld devices having at least a first and second touch sensitive screen that are connected to a hinge that allows them to rotate, allowing the device to be set into an open or closed position. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (depicting a plurality of touch sensitive screens connected to a “hideaway hinge”) (accessed July 21, 2021). When completely open, the first and second touch sensitive displays on the Accused Products form a single contiguous display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (depicting a single continuous display formed by the first and second touch sensitive screens when the device is set into an open position) (accessed July 21, 2021). On information and belief, the Accused Products have the ability to display an action bar, called a navigation bar on Samsung products, and a status bar, called both a status bar and a notification bar on Samsung products, on at least a portion of one of the first touch sensitive screen and the second touch sensitive screen, with the status bar including indicators of operation of the device

and information about the status of applications running on the device. . *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (depicting an action bar at the bottom of a portion of a touch sensitive screen and a status bar at the top of a portion of a touch sensitive screen) (accessed July 21, 2021). The Accused Products also contain a processing means, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2. *See, e.g.*, <https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g> (identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). This processing means can display media, such as an application or video, across at least one of the first touch sensitive screen, second touch sensitive screen, and the single contiguous display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting display of media, including applications and videos, across at least one of a plurality of touch sensitive screens and a single continuous display formed by those screens) (accessed July 21, 2021). On information and belief, in response to user input, the processor is configured to dismiss the action and status bars, and thereby maximize the displayed media across the entirety of at least one of the first touch sensitive screen, second touch sensitive screen, and the single contiguous display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting media, such as an application, displayed across the entirety of a single continuous display without the Samsung action bar or status bar) (accessed July 21, 2021). On information and belief, the processor means can display an overlay control on at least one of the first touch sensitive screen, second touch sensitive screen, and the single contiguous display, which when pressed by a user, will cause the processing means to dismiss the full-screened media and re-display the action and status bars while the media is still displayed across the entirety of the first touch sensitive screen and the entirety of the second touch sensitive screen as the single contiguous display. *See, e.g.*,

z-fold2-5g/experience/ (depicting media, such as an application, displayed across the entirety of a single contiguous display with a Samsung action bar and status bar) (accessed July 21, 2021).

136. By way of further example, and again without limitation, Samsung has directly infringed the Selim '834 Patent, and continues to do so, by providing a device that allows a user to perform the method of Claim 15. The Accused Products have at least two touch sensitive screens that form a contiguous touch sensitive display when the device is open. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (depicting a single continuous display formed by the first and second touch sensitive screens when the device is set into an open position) (accessed July 21, 2021). On information and belief, the Accused Products can selectively display media, such as an application or video, an action bar, called a navigation bar on Samsung products, and a status bar, called both a status bar and a notification bar on Samsung products, across at least one of the first display, second display, and the contiguous display, with the status bar including indicators of operation of the device and information about the status of applications running on the device. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (depicting an action bar at the bottom of a portion of a touch sensitive screen and a status bar at the top of a portion of a touch sensitive screen) (accessed July 21, 2021). On information and belief, the user can provide input to dismiss the status and action bar, such that the media is then maximized across the entirety of at least one of the first touch sensitive screen, second touch sensitive screen, and the single contiguous display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting media, such as an application, displayed across the entirety of a single continuous display without the Samsung action bar or status bar) (accessed July 21, 2021). On information and belief, an overlay control can be displayed by the device, which when pressed by a user, will dismiss the full-screened media and re-display the action and status bars while the media is still displayed across the entirety of the first touch sensitive screen and the entirety

of the second touch sensitive screen as the single contiguous display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting media, such as an application, displayed across the entirety of a single continuous display with a Samsung action bar and status bar) (accessed July 21, 2021).

137. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the Selim '834 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the Selim '834 Patent prior to the filing of this complaint at least because it relates to the same field of subject matter as other Asserted Patents of which Samsung was aware and cited during prosecution of Samsung's patents, and because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the Selim '834 Patent. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the Selim '834 Patent.

138. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the Selim '834 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the Selim '834 Patent, that constitute a material

part of the invention(s) claimed in the Selim '834 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the Selim '834 Patent.

139. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the Selim '834 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

140. Upon information and belief, as set forth in detail above, Samsung's infringement of the Selim '834 Patent has been willful.

IX. COUNT FIVE - (Infringement of U.S. Patent No. 8,854,834)

141. MII realleges and incorporates by reference each of the preceding paragraphs.

142. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the O'Connor '834 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing systems protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the O'Connor '834 Patent by making the device of claims 1 and 13 to provide users with a foldable-phone that is formed by the joining of multiple screens using a hinge.

143. For example, with respect to Claim 1, the Accused Products have a core member, which Samsung calls a "hinge" for their Accused Products, and both a first and second moveable member comprised of a surface (*i.e.*, a display screen) and an inner recess that can connect to the core member. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (depicting a "hideaway hinge" between two members comprising at least a touch sensitive display screen and an inner recess that connects the members to the hinge, with the

members able to rotate around the hinge to open and close the device) (accessed July 21, 2021). On information and belief, the two moveable members are connected to the core member using at least one detaining member, which is made of at least one elastic member (*i.e.*, a spring) and at least one cam, that is positioned through the hinge such that the one or more cams are adjacent to the first and second inner recesses of the moveable members. The detaining member of the Accused Product, along with the hinge, can selectively detain the moveable members, comprising at least a touch sensitive display screen, at pre-defined locations, allowing a user to place the screens at specific angles relative to each other and around the hinge. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (depicting devices with two moveable members comprising inner screens in a variety of fixed positions, including fully open, fully closed, and partially folded) (accessed July 21, 2021). When the Accused Products are completely open, and the two screens are parallel to one another, they form a single contiguous display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (describing and depicting a single contiguous display, referred to as a “main screen,” formed when the device is fully open and the two inner screens are parallel to one another with an edge of the first screen adjacent to the edge of the second screen) (accessed July 21, 2021).

144. By way of further example, and again without limitation, Samsung has directly infringed the O’Connor ‘834 Patent, and continues to do so, by making and selling a device that infringes Claim 13. The Accused Products have a body that includes what Samsung calls a “hinge” for their Accused Products, along with a first and second bracket coupled to the body in a manner allowing them to rotate around the body, with those brackets comprised of a surface (*i.e.*, a display screen) and an inner recess that can connect to the body. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (depicting a “hideaway hinge” between two parts comprising at least a touch sensitive display screen and an inner recess that connects the members to the hinge, with the parts able to rotate around the hinge to open

and close the device) (accessed July 21, 2021). These brackets also have a surface (*i.e.*, a display screen) disposed on them. On information and belief, the Accused Products include at least one detaining member, which is made of at least one elastic member (*i.e.*, a spring) and at least one cam, that is positioned through the hinge such that the one or more cams are adjacent to the first and second inner recesses of the brackets. The detaining member of the Accused Product, along with the hinge, can selectively detain the brackets, comprising at least a touch sensitive display screen, at pre-defined locations, allowing a user to place the screens at specific angles relative to each other and around the hinge. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (depicting devices with two brackets comprising inner screens in a variety of fixed positions, including fully open, fully closed, and partially folded) (accessed July 21, 2021). When the Accused Products are completely open, and the two screens are parallel to one another, they form a single contiguous display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (describing and depicting a single contiguous display, referred to as a “main screen,” formed when the device is fully open and the two inner screens are parallel to one another with an edge of the first screen adjacent to the edge of the second screen) (accessed July 21, 2021).

145. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the O’Connor ‘834 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the O’Connor ‘834 Patent prior to the filing of this complaint at least because it relates to the same field of subject matter as other Asserted Patents of which Samsung was aware and cited during prosecution of Samsung’s

patents, and because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the O'Connor '834 Patent. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the O'Connor '834 Patent.

146. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the O'Connor '834 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the O'Connor '834 Patent, that constitute a material part of the invention(s) claimed in the O'Connor '834 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the O'Connor '834 Patent.

147. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the O'Connor '834 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

148. Upon information and belief, as set forth in detail above, Samsung's infringement of the O'Connor '834 Patent has been willful.

X. COUNT SIX - (Infringement of U.S. Patent No. 9,665,126)

149. MII realleges and incorporates by reference each of the preceding paragraphs.

150. Samsung, by itself and/or through its subsidiaries, agents, and/or business

partners, has directly infringed, literally or under the doctrine of equivalents, claims of the ‘126 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the ‘126 Patent by using the method of claim 1 to form a joined screen display using two screens and a hinge.

151. For example, with respect to Claim 1, on information and belief, the Accused Products can form a joined screen display by rotatably moving two screens around an inner hinge. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (describing and depicting a single contiguous display, referred to as a “main screen,” formed when the inner screens are rotated such that the device is fully open) (accessed July 21, 2021). Specifically, the Accused Products are created by forming a body comprised of a first and second rotatable member that include a touch sensitive display screen. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (showing first and second members with screens that rotate around a hinge) (accessed July 21, 2021). On information and belief, these rotatable members also have inner recesses which are connected to a detaining member, that is comprised of at least one elastic element (*i.e.*, a spring) and one or more cams, and which is placed through a core member, called a “hinge” by Samsung. The detaining member of the Accused Product, along with the hinge, can selectively detain the rotatable members, comprising at least a touch sensitive display screen, at pre-defined locations, allowing a user to place the screens at specific angles relative to each other and around the hinge. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (depicting devices with two brackets comprising inner screens in a variety of fixed positions, including fully open, fully closed, and partially folded) (accessed July 21, 2021). When the device is fully

opened, and the two screens are substantially parallel to one another, a substantially continuous display is formed. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/design/> (describing and depicting a single continuous display, referred to as a “main screen,” formed when the device is fully open and the two inner screens are parallel to one another) (accessed July 21, 2021).

152. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the ‘126 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the ‘126 Patent prior to the filing of this complaint at least because it relates to the same field of subject matter as other Asserted Patents of which Samsung was aware and cited during prosecution of Samsung’s patents, and because in the course of developing technology and applying for patents in the same fields as Imerj’s foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj’s foldable-phone and the positive press associated with the same, including the ‘126 Patent. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the ‘126 Patent.

153. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the ‘126 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products

used to practice one or more claims of the '126 Patent, that constitute a material part of the invention(s) claimed in the '126 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '126 Patent.

154. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '126 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

155. Upon information and belief, as set forth in detail above, Samsung's infringement of the '126 Patent has been willful.

XI. COUNT SEVEN - (Infringement of U.S. Patent No. 8,842,080)

156. MII realleges and incorporates by reference each of the preceding paragraphs.

157. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '080 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing devices and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '080 Patent by using the method of claim 1 to provide users with a dual-screen foldable-phone that can rearrange the size of a displayed application along with an icon that indicates what state the application is in.

158. For example, with respect to Claim 1, on information and belief, the Accused Products can display a first screen of an application in a first display condition, including showing an icon that corresponds to the display condition the application is in. For example, on information and belief, if an application is shown only on one of the device's displays (*i.e.*, a

particular display condition), the application will show an icon that shows the application can be maximized. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting a screen of an application shown on only one display of the device along with an indicator denoting that the screen can be maximized) (accessed July 21, 2021). On information and belief, the Accused Products can receive user inputs such as gestures to modify how the application is displayed and change the application to a second display condition, resulting in the icon changing (*e.g.*, in size and shape) to indicate that the application has changed. For example, if the application previously shown on only one display was maximized to be displayed on both screens, the icon indicating the application can be maximized will change to indicate that the application can now be minimized.

159. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the '080 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the '080 Patent at least because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '080 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the '080 Patent at least as of August 9, 2018, after SEC cited to it during prosecution of SEC's U.S. Patent No. 10,866,694. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '080 Patent.

160. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '080 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '080 Patent, that constitute a material part of the invention(s) claimed in the '080 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '080 Patent.

161. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '080 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

162. Upon information and belief, as set forth in detail above, Samsung's infringement of the '080 Patent has been willful.

XII. COUNT EIGHT - (Infringement of U.S. Patent No. 9,727,205)

163. MII realleges and incorporates by reference each of the preceding paragraphs.

164. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '205 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing devices and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '205 Patent by making and using the device and method of claims 1 and 15 to provide users with a dual-screen foldable-phone that can rearrange the size of a displayed

application along with an icon that indicates what state the application is in.

165. For example, with respect to Claim 1, on information and belief, the Accused Products are handheld devices that have a first and second display, both of which are viewable by a user, when the device is open. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting handheld devices with two inner displays that are viewable by a user when the device is open) (accessed July 21, 2021). The Accused Products can display a first screen of an application and an icon associated with the application (such as a resizing button) on the first display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting a screen of an application shown on only one display of the device along with an indicator denoting that the screen can be maximized) (accessed July 21, 2021). On information and belief, the Accused Products can then receive an instruction to maximize the application over both displays (*e.g.*, a user pressing the resizing button), and after doing so, will indicate that the application has been maximized by changing the size of the icon associated with the application that is displayed in the first screen.

166. By way of further example, and again without limitation, Samsung has directly infringed the '205 Patent, and continues to do so, by providing a device that infringes Claim 15. The Accused Products are handheld computing devices that have a processor, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2. *See, e.g.*, <https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g> (identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). The Accused Products also have a first and second display in communication with the processor. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing devices with a plurality of displays) (accessed July 21, 2021). On information and belief, the processor can open an application to display on both the first and second display along with an icon

associated with the application (*e.g.*, a resizing button). On information and belief, the Accused Products can receive an input to minimize the application to only the first display and, as a result, the processor will minimize and display the application on only the first display, and will also change one of the size and shape of the icon associated with the application.

167. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the '205 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the '205 Patent at least because it relates to the same field of subject matter as other Asserted Patents of which Samsung was aware and cited during prosecution of Samsung's patents, and because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '205 Patent. Additionally, upon information and belief, Samsung has had or should have had actual knowledge of the '205 Patent at least as of August 9, 2018, after SEC cited to the '080 Patent, which the '205 Patent claims priority to, during prosecution of SEC's U.S. Patent No. 10,866,694. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '205 Patent.

168. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '205 Patent (including, without limitation, the claims addressed above) pursuant

to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '205 Patent, that constitute a material part of the invention(s) claimed in the '205 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '205 Patent.

169. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '205 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

170. Upon information and belief, as set forth in detail above, Samsung's infringement of the '205 Patent has been willful.

XIII. COUNT NINE - (Infringement of U.S. Patent No. 9,058,153)

171. MII realleges and incorporates by reference each of the preceding paragraphs.

172. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '153 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing devices and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '153 Patent by making and using the device and method of claims 1 and 17 to provide users with a dual-display foldable-phone that can automatically minimize an application being displayed on both displays of the phone after a second application is launched.

173. For example, with respect to Claim 1, the Accused Products have a first and second display. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2->

5g/experience/ (showing devices with a plurality of displays) (accessed July 21, 2021). On information and belief, the Accused Products can open a multi-display application to be displayed on both the first and second display. *See, e.g.*, <https://www.youtube.com/watch?v=RcKTBzfnNa0> at 0:23-0:25 (showing an application opened to be displayed on both the first and second display). A user can then launch a second application, at which time the first application will automatically be minimized to the first display, and the second application will be displayed on the second display. *See, e.g.*, <https://www.youtube.com/watch?v=RcKTBzfnNa0> at 0:27-0:29 (showing a second application being launched resulting in the first application being minimized to one display and the second application being displayed on another display).

174. By way of further example, and again without limitation, Samsung has directly infringed the '153 Patent, and continues to do so, by providing a device that infringes Claim 17. The Accused Products are dual screen communication devices that have a first and second display, and a non-transitory computer readable medium that can store instructions to be executed by a processor, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing devices with a plurality of displays) (accessed July 21, 2021); <https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g> (identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). On information and belief, the Accused Products can open a multi-screen application to be displayed on both the first and second display. *See, e.g.*, <https://www.youtube.com/watch?v=RcKTBzfnNa0> at 0:23-0:25 (showing an application opened to be displayed on both the first and second display). A user can then provide input to the first touch sensitive display to launch a second application, at which time the first application will automatically be minimized to the second display, and the

second application will be displayed on the first display. *See, e.g.*, <https://www.youtube.com/watch?v=RcKTBzfnNa0> at 0:27-0:29 (showing a second application being launched resulting in the first application being minimized to one display and the second application being displayed on another display).

175. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the ‘153 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the ‘153 Patent at least because in the course of developing technology and applying for patents in the same fields as Imerj’s foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj’s foldable-phone and the positive press associated with the same, including the ‘153 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the ‘153 Patent at least as of August 9, 2018, after SEC cited to it during prosecution of SEC’s U.S. Patent No. 10,866,694. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the ‘153 Patent.

176. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the ‘153 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the ‘153 Patent, that constitute a material part of the

invention(s) claimed in the '153 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '153 Patent.

177. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '153 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

178. Upon information and belief, as set forth in detail above, Samsung's infringement of the '153 Patent has been willful.

XIV. COUNT TEN - (Infringement of U.S. Patent No. 10,203,848)

179. MII realleges and incorporates by reference each of the preceding paragraphs.

180. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '848 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing devices and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '848 Patent by making and using the device and method of claims 11 and 16 to provide users with a dual-display foldable-phone that can automatically put to sleep two applications displayed on both screens of the dual-display phone after a third application is placed over them.

181. For example, with respect to Claim 11, on information and belief, the Accused Products have a first and second display disposed on a first and second screen, a memory, and a processor, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2, in communication with the memory and

the displays. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing devices with a plurality of displays) (accessed July 21, 2021); <https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g> (identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). The Accused Products can show a first application on the first display, and a second application on the second display. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing two different applications on two different displays) (accessed July 21, 2021). On information and belief, a user can then drag a third application, such as one that has been previously put to sleep, over both displays and over the first and second applications. On information and belief, after the third application has been dragged over the first and second application, the processor can determine that the first application and second application have been covered by the third application and, after a set period of time, the processor will place the first and second applications into an inactive state (*e.g.*, a sleep state) at approximately the same time. On information and belief, as a result, the third application will be shown on both displays, and the first and second applications will be minimized and become inactive.

182. By way of further example, and again without limitation, with respect to claim 16, on information and belief, the Accused Products allow changing a user interface involving receiving user input to drag a third application, such as one that has been previously put to sleep, over both displays in a dual display device and over first and second applications. On information and belief, after the third application has been dragged over the first and second application, the Accused Products determine that the first application and second application have been covered by the third application and, after a set period of time, place the first and second applications into an inactive state (*e.g.*, a sleep state) at approximately the same time. On information and belief, as a result, the third application will be shown on both displays, and the first and second applications will be minimized and become inactive.

183. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the '848 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the '848 Patent at least because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '848 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the '848 Patent at least as of March 25, 2019, after the USPTO examiner prosecuting SEC's U.S. Patent No. 10,375,207, cited the '848 Patent as prior art. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '848 Patent.

184. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '848 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '848 Patent, that constitute a material part of the invention(s) claimed in the '848 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '848 Patent.

185. As a consequence of each of Samsung's direct infringement, inducement and

contributory infringement, both literal and under the doctrine of equivalents, of the '848 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

186. Upon information and belief, as set forth in detail above, Samsung's infringement of the '848 Patent has been willful.

XV. COUNT ELEVEN - (Infringement of U.S. Patent No. 8,875,050)

187. MII realleges and incorporates by reference each of the preceding paragraphs.

188. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '050 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing devices and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '050 Patent by making and using the device and method of claims 1 and 17 to provide users with a dual-screen foldable-phone that can change focus between applications when a second application is opened.

189. For example, with respect to Claim 1, the Accused Products can display a first image of a first application on a first display on a first screen and a second image of a second application on a second display on a second screen. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting devices displaying images from one application on one screen and images from another application on another screen) (accessed July 21, 2021). On information and belief, the Accused Products can show and give focus to (such as highlighting) an application on the first display, along with showing input options in a configurable area of the first display (*e.g.*, navigation bar), such as input options to control the application. At the same time, no input options are shown in a configurable area of a second

screen and no focus is given to the second screen. On information and belief, a user can provide input to launch and display a second application on the second display, at which time focus will shift to the second display, input options for the second application will be shown, and the input options for the first application in the first configurable area are hidden.

190. By way of further example, and again without limitation, Samsung has directly infringed the '050 Patent, and continues to do so, by providing a device that infringes Claim 17. The Accused Products are dual screen communication devices that have at least two touch sensitive displays, as well as a first and second configurable area (*e.g.*, navigation bars) on a first and second screen. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting devices with a plurality of touch sensitive displays with a first and second configurable area on a first and second screen) (accessed July 21, 2021). The Accused Products also have a computer readable medium that stores computer executable instruction to be performed by at least one processor, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2. *See, e.g.*, <https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g> (identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). On information and belief, the Accused Products can show and give focus to (such as highlighting) an application on the first display, along with showing input options in a configurable area of the first display, such as input options to control the application. At the same time, no input options are shown and no focus is given to the second screen. On information and belief, a user can provide input to launch and display a second application on the second display, at which time focus will shift to the second display, input options for the second application will be shown, and the input options for the first application are hidden.

191. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the '050 Patent

by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the '050 Patent at least because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '050 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the '050 Patent at least as of March 6, 2019, when SEC cited to it during prosecution of SEC's U.S. Patent No. 10,386,890. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '050 Patent.

192. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '050 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '050 Patent, that constitute a material part of the invention(s) claimed in the '050 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '050 Patent.

193. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '050 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages

pursuant to 35 U.S.C. § 284.

194. Upon information and belief, as set forth in detail above, Samsung's infringement of the '050 Patent has been willful.

XVI. COUNT TWELVE - (Infringement of U.S. Patent No. 9,792,007)

195. MII realleges and incorporates by reference each of the preceding paragraphs.

196. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '007 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing devices and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '007 Patent by making and using the device and method of claims 1 and 17 to provide users with a dual-display foldable-phone that can change focus between applications when a second application is opened.

197. For example, with respect to Claim 1, the Accused Products can display a first image of a first application on a first display and a second image of a second application on a second display. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting devices displaying images from one application on one screen and images from another application on another screen) (accessed July 21, 2021). On information and belief, the Accused Products can show and give focus to (such as highlighting) an application on the first display, along with showing input options in a configurable area of the first display (*e.g.*, navigation bar), such as input options to control the application. On information and belief, this first configurable area does not display content or media from an application. At the same time, no input options are shown in a second configurable area and no focus is given to the second screen. On information and belief, this second configurable area

does not display content or media from an application. On information and belief, a user can provide input to launch and display a second application on the second display, at which time focus will shift to the second display, input options for the second application will be shown, and the input options for the first application in the first configurable area are hidden.

198. By way of further example, and again without limitation, Samsung has directly infringed the '007 Patent, and continues to do so, by providing a device that infringes Claim 17. The Accused Products are communication devices that have at least two touch sensitive displays, as well as a first and second configurable area (*e.g.*, navigation bars). *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting devices with a plurality of touch sensitive displays with a first and second configurable area) (accessed July 21, 2021). The Accused Products also have a computer readable medium that stores computer executable instruction to be performed by at least one processor, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2. *See, e.g.*, <https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g> (identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). On information and belief, the Accused Products can show and give focus to (such as highlighting) an application on the first display, along with showing input options in a configurable area of the first display, such as input options to control the application. On information and belief, this first configurable area does not display content or media from an application. At the same time, no input options are shown in a second configurable area and no focus is given to the second screen. On information and belief, this second configurable area does not display content or media from an application. On information and belief, a user can provide input to launch and display a second application on the second display, at which time focus will shift to the second display, input options for the second application will be shown, and the input options for the first application in the first configurable area are hidden.

199. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the '007 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the '007 Patent at least because it relates to the same field of subject matter as other Asserted Patents of which Samsung was aware and cited during prosecution of Samsung's patents, and because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '007 Patent. Additionally, upon information and belief, Samsung has had or should have had actual knowledge of the '007 Patent at least as of March 6, 2019, when SEC cited to the '050 Patent, which the '007 Patent claims priority to, during prosecution of SEC's U.S. Patent No. 10,386,890. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '007 Patent.

200. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '007 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '007 Patent, that constitute a material part of the invention(s) claimed in the '007 Patent, and that have no substantial non-infringing use, with

knowledge that such components are especially made or adapted for use in infringing the '007 Patent.

201. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '007 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

202. Upon information and belief, as set forth in detail above, Samsung's infringement of the '007 Patent has been willful.

XVII. COUNT THIRTEEN - (Infringement of U.S. Patent No. 9,141,135)

203. MII realleges and incorporates by reference each of the preceding paragraphs.

204. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '135 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing devices and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '135 Patent by making and using the device and method of claims 1 and 10 to provide users with a dual-display foldable-phone that can display a separate application on each display of the device, along with an annunciator bar across the top of both displays.

205. For example, with respect to Claim 1, the Accused Products have a first and second display facing the same direction, and a processor, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting devices with two inner displays that face the same direction when the device is in an open state) (accessed July 21, 2021); <https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g>

(identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). The Accused Products can show a first application on the first display, and a second application on the second display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing two different applications on two different inner displays) (accessed July 21, 2021). On information and belief, the Accused Products, at the same time as displaying the two applications on the two displays, can display an annunciator window, called both a status bar and a notification bar on Samsung devices, across the top of both displays without obscuring information displayed by the applications. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing status bar displayed across the top of both inner displays) (accessed July 21, 2021). This annunciator bar can display information relating to at least one of a device status (such as battery life), connectivity status (such as Wi-Fi or 4G service), and messaging status (such as for emails or texts). *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing status bar that provides information about, *inter alia*, battery life and network connectivity) (accessed July 21, 2021). On information and belief, the annunciator bar can then change its display based on the change of at least one of the device, connectivity, and messaging statuses.

206. By way of further example, and again without limitation, Samsung has directly infringed the '135 Patent, and continues to do so, by providing a device that infringes Claim 10. The Accused Products are mobile multi-display devices that have a first and second display, a first and second user input gesture area (such as the volume rocker buttons and the Bixby button), a processor, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2, and computer-readable medium having instructions stored thereon. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting devices with a plurality of displays) (accessed July 21, 2021);

<https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g> (identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). The instructions allow the Accused Products to show a first application on the first display, and a second application on the second display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing two different applications on two different inner displays) (accessed July 21, 2021). On information and belief, the Accused Products, at the same time as displaying the two applications on the two displays, can display an annunciator window, called both a status bar and a notification bar on Samsung devices, across the top of both displays without obscuring information displayed by the applications. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing status bar displayed across the top of both inner displays) (accessed July 21, 2021). This annunciator bar can display information relating to at least one of a device status (such as battery life), connectivity status (such as Wi-Fi or 4G service), and messaging status (such as for emails or texts). *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing status bar that provides information about, *inter alia*, battery life and network connectivity) (accessed July 21, 2021). On information and belief, the annunciator bar can then change its display based on the change of at least one of the device, connectivity, and messaging statuses.

207. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the '135 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the '135 Patent at least because in the course of

developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '135 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the '135 Patent at least as of July 27, 2016, when the USPTO examiner prosecuting SEC's U.S. Patent Application No. 14/473,341, cited the '135 Patent as prior art. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '135 Patent.

208. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '135 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '135 Patent, that constitute a material part of the invention(s) claimed in the '135 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '135 Patent.

209. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '135 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

210. Upon information and belief, as set forth in detail above, Samsung's infringement of the '135 Patent has been willful.

XVIII. COUNT FOURTEEN - (Infringement of U.S. Patent No. 8,832,577)

211. MII realleges and incorporates by reference each of the preceding paragraphs.

212. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '577 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing devices and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '577 Patent by making and using the device and method of claims 1 and 17 to provide users with a multi-screen foldable-phone that can execute a universal clipboard application to display and copy information from another application displayed on another screen of the device, and paste the information into a third application.

213. For example, with respect to Claim 1, on information and belief, the Accused Products can, in response to user input, copy various information from an application presented on the device, such as pictures or text. On information and belief, the Accused Products can then open a clipboard application on the second screen of the device, where the copied information will be displayed on the clipboard application. *See, e.g.,* <https://ss7.vzw.com/is/content/VerizonWireless/Catalog%20Assets/Devices/Samsung/Samsung%20Galaxy%20Z%20Fold2%205G/UG/samsung-galaxy-z-fold2-5g-english-09012020-ug.pdf> (user manual for Galaxy Z Fold2 referring to a clipboard application) (accessed July 21, 2021). On information and belief, a clipboard application of the Accused Products can store copied information from a plurality of applications. A user can then select which information from the clipboard application to paste, and paste the information in a second application that was different from the application from which the information was copied, that is displayed on the first screen of the device.

214. By way of further example, and again without limitation, Samsung has directly infringed the ‘577 Patent, and continues to do so, by providing a device that infringes Claim 17. The Accused Products have a first and second screen with display areas, and computer-readable medium having instructions stored thereon. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting devices with a plurality of screens) (accessed July 21, 2021). These instructions can allow a user of the Accused Products to provide input to copy various information from an application presented on the device, such as pictures or text. On information and belief, the Accused Products can then open a clipboard application on the second screen of the device, where the copied information will be displayed on the clipboard application. *See, e.g.,* <https://ss7.vzw.com/is/content/VerizonWireless/Catalog%20Assets/Devices/Samsung/Samsung%20Galaxy%20Z%20Fold2%205G/UG/samsung-galaxy-z-fold2-5g-english-09012020-ug.pdf> (user manual for Galaxy Z Fold2 referring to a clipboard application) (accessed July 21, 2021). On information and belief, a clipboard application of the Accused Products can store copied information from a plurality of applications. A user can then select which information from the clipboard application to paste, and paste the information in a second application that was different from the application from which the information was copied, that is displayed on the first screen of the device.

215. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the ‘577 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the ‘577 Patent at least because in the course of

developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '577 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the '577 Patent at least as of March 25, 2015, the date on which the USPTO examiner cited it as prior art during prosecution of SEC's U.S. Patent Application No. 13/935,687. SEC also cited to the '577 Patent on March 6, 2019, during prosecution of SEC's U.S. Patent No. 10,386,890. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '577 Patent.

216. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '577 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '577 Patent, that constitute a material part of the invention(s) claimed in the '577 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '577 Patent.

217. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '577 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

218. Upon information and belief, as set forth in detail above, Samsung's infringement of the '577 Patent has been willful.

XIX. COUNT FIFTEEN - (Infringement of U.S. Patent No. 9,146,589)

219. MII realleges and incorporates by reference each of the preceding paragraphs.

220. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '589 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing devices and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '589 Patent by using the method of claim 1 to provide users with a multi-screen foldable-phone that can change the mode of its camera application based on the rotation of the device.

221. For example, with respect to Claim 1, the Accused Products have at least a first and second screen. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting devices with a plurality of screens) (accessed July 21, 2021). A user can provide input to open an image capture function, such as the camera application. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (showing a camera application on the device) (accessed July 21, 2021). On information and belief, a first display for the camera application is then shown based on the physical device state (such as whether it is open, closed, or in-between), a display mode (such as displaying the application on both screens in portrait mode, or one screen in portrait mode), and a device orientation (such as whether the phone is in portrait or landscape). *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting different displays of the camera application based on the physical device state, display mode, and device orientation) (accessed July 21, 2021). On information and belief, a user can then rotate the Accused Products to change their orientations, at which time the camera application will change

its display on the first and second screens.

222. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the '589 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the '589 Patent at least because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '589 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the '589 Patent at least as of March 6, 2019, when SEC cited the '589 Patent as prior art during prosecution of SEC's U.S. Patent No. 10,386,890. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '589 Patent.

223. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '589 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '589 Patent, that constitute a material part of the invention(s) claimed in the '589 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '589 Patent.

224. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '589 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

225. Upon information and belief, as set forth in detail above, Samsung's infringement of the '589 Patent has been willful.

XX. COUNT SIXTEEN - (Infringement of U.S. Patent No. 9,158,494)

226. MII realleges and incorporates by reference each of the preceding paragraphs.

227. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '494 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing devices and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '494 Patent by using the method of claim 1 to provide users with a multi-display foldable-phone that can selectively display and minimize a child and parent page of an application.

228. For example, with respect to Claim 1, the Accused Products have a first and second display. *See, e.g.,* <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting devices with a plurality of displays) (accessed July 21, 2021). On information and belief, the Accused Products are able to present a first auxiliary page of an application on the first display of the device, and present a second primary page, which is different from the first auxiliary page, on the second display of the device. The first auxiliary page presented on the first display is a child of the second primary page presented on the second display. On information and belief, after receiving input from a user to minimize the application

to only one screen of the device, the Accused Products can dismiss the auxiliary screen, and display only the primary page on one of the displays of the device.

229. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the '494 Patent by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the '494 Patent at least because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '494 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the '494 Patent at least as of March 6, 2019, when SEC cited the '494 Patent as prior art during prosecution of SEC's U.S. Patent No. 10,386,890. Additionally, Samsung was made further aware of the '494 Patent during prosecution of SEC's U.S. Patent Nos. D752,606, D753,143, D753,142, D760,733, and 10,642,485, in which the USPTO examiner cited it as prior art. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '494 Patent.

230. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '494 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products

used to practice one or more claims of the '494 Patent, that constitute a material part of the invention(s) claimed in the '494 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '494 Patent.

231. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '494 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages pursuant to 35 U.S.C. § 284.

232. Upon information and belief, as set forth in detail above, Samsung's infringement of the '494 Patent has been willful.

XXI. COUNT SEVENTEEN - (Infringement of U.S. Patent No. 9,195,335)

233. MII realleges and incorporates by reference each of the preceding paragraphs.

234. Samsung, by itself and/or through its subsidiaries, agents, and/or business partners, has directly infringed, literally or under the doctrine of equivalents, claims of the '335 Patent pursuant to 35 U.S.C. § 271(a) by making, having made, using, selling, offering for sale, and/or importing systems and methods protected thereby within the United States and within this district. Samsung has been engaged in direct infringement activities with respect to at least the Accused Products. By way of example, and without limitation, Samsung has directly infringed the '335 Patent by making and using the method and device of claims 1 and 13 to provide users with a multi-display foldable-phone that can launch a modal window that automatically minimizes a multi-display application.

235. For example, with respect to Claim 13, the Accused Products have a non-transitory computer readable medium that stores computer executable instructions that are performed by at least one processor, such as the Qualcomm Snapdragon 855 for the Galaxy Fold and Z Flip, and the Qualcomm Snapdragon 865 for the Galaxy Z Fold2.

<https://www.qualcomm.com/snapdragon/samsung-galaxy-z-fold2-5g> (identifying Qualcomm Snapdragon 865 as the processor for the Galaxy Z Fold2) (accessed July 21, 2021). The executable instructions stored on the Accused Products allow the Accused Products to display a window of a multi-display application on at least a portion of both a first and second display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting a window of a multi-display application presented on portions of two different displays on the device) (accessed July 21, 2021). With the multi-display application open, a user of the Accused Products can then launch a modal window (*i.e.*, a child window) of the multi-display application. On information and belief, when the modal window is opened, the Accused Products can display the modal window on either the first display or the second display, and then automatically minimize the multi-display window to the display that is not occupied by the modal window.

236. By way of further example, and again without limitation, Samsung has directly infringed the '335 Patent, and continues to do so, by providing a device that allows a user to perform the method of Claim 1. The Accused Products have a first and second display, and can display a window of a multi-display application on at least a portion of both the first display and the second display. *See, e.g.*, <https://www.samsung.com/us/smartphones/galaxy-z-fold2-5g/experience/> (depicting a window of a multi-display application presented on portions of two different displays on the device) (accessed July 21, 2021). With the multi-display application open, a user of the Accused Products can then input to launch a modal window (*i.e.*, a child window) of the multi-display application. On information and belief, when the modal window is opened, the Accused Products can display the modal window on either the first display or the second display, and then automatically minimize the multi-display window to the display that is not occupied by the modal window.

237. Upon information and belief, Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has induced the direct infringement of the '335 Patent

by users of the Accused Products pursuant to 35 U.S.C. § 271(b) in the United States and within this District at least by one or more of: making, selling, offering to sell, and importing the Accused Products, and though activities relating to selling, marketing, advertising, promotion, support, and distribution of the Accused Products. Upon information and belief, Samsung had or should have had actual knowledge of the '335 Patent at least because in the course of developing technology and applying for patents in the same fields as Imerj's foldable-phone and the Asserted Patents, Samsung routinely monitored patents, patent applications, and non-patent literature related to those fields and related to Imerj's foldable-phone and the positive press associated with the same, including the '335 Patent. Additionally, upon information and belief, Samsung has had actual knowledge of the '335 Patent at least as of January 13, 2016, after the Examiner cited to it during prosecution of SEC's United States Patent No. D755,201. On information and belief, Samsung has engaged in these activities with knowledge and intent that such activities would cause and/or encourage direct infringement of the '335 Patent.

238. Samsung, by itself and/or through its subsidiaries, affiliates, agents, and/or business partners, has contributed to the direct infringement by users of the Accused Products of claims of the '335 Patent (including, without limitation, the claims addressed above) pursuant to 35 U.S.C. § 271(c) in the United States and within this District at least by making, selling, offering to sell, and/or importing or exporting one or more components of the Accused Products used to practice one or more claims of the '335 Patent, that constitute a material part of the invention(s) claimed in the '335 Patent, and that have no substantial non-infringing use, with knowledge that such components are especially made or adapted for use in infringing the '335 Patent.

239. As a consequence of each of Samsung's direct infringement, inducement and contributory infringement, both literal and under the doctrine of equivalents, of the '335 Patent, MII has been damaged in an amount not yet determined and is entitled to recover damages

pursuant to 35 U.S.C. § 284.

240. Upon information and belief, as set forth in detail above, Samsung's infringement of the '335 Patent has been willful.

JURY DEMAND

241. MII requests a trial by jury for all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, MII respectfully requests that the Court enter judgment against Samsung:

- A. Determining that Samsung has infringed one or more claims of the '842 Patent;
- B. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '842 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- C. Declaring that Samsung's infringement of the '842 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- D. Determining that Samsung has infringed one or more claims of the '053 Patent;
- E. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '053 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- F. Declaring that Samsung's infringement of the '053 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- G. Determining that Samsung has infringed one or more claims of the '756 Patent;
- H. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '756 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- I. Declaring that Samsung's infringement of the '756 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;

- J. Determining that Samsung has infringed one or more claims of the Selim '834 Patent;
- K. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the Selim '834 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- L. Declaring that Samsung's infringement of the Selim '834 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- M. Determining that Samsung has infringed one or more claims of the O'Connor '834 Patent;
- N. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the O'Connor '834 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- O. Declaring that Samsung's infringement of the O'Connor '834 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- P. Determining that Samsung has infringed one or more claims of the '126 Patent;
- Q. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '126 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- R. Declaring that Samsung's infringement of the '126 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- S. Determining that Samsung has infringed one or more claims of the '080 Patent;
- T. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '080 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- U. Declaring that Samsung's infringement of the '080 Patent was and is willful and

- trebling MII's damages under 35 U.S.C. § 284 on that ground;
- V. Determining that Samsung has infringed one or more claims of the '205 Patent;
- W. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '205 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- X. Declaring that Samsung's infringement of the '205 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- Y. Determining that Samsung has infringed one or more claims of the '153 Patent;
- Z. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '153 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- AA. Declaring that Samsung's infringement of the '153 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- BB. Determining that Samsung has infringed one or more claims of the '848 Patent;
- CC. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '848 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- DD. Declaring that Samsung's infringement of the '848 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- EE. Determining that Samsung has infringed one or more claims of the '050 Patent;
- FF. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '050 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- GG. Declaring that Samsung's infringement of the '050 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;

- HH. Determining that Samsung has infringed one or more claims of the '007 Patent;
- II. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '007 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- JJ. Declaring that Samsung's infringement of the '007 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- KK. Determining that Samsung has infringed one or more claims of the '135 Patent;
- LL. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '135 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- MM. Declaring that Samsung's infringement of the '135 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- NN. Determining that Samsung has infringed one or more claims of the '577 Patent;
- OO. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '577 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- PP. Declaring that Samsung's infringement of the '577 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- QQ. Determining that Samsung has infringed one or more claims of the '589 Patent;
- RR. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '589 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- SS. Declaring that Samsung's infringement of the '589 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- TT. Determining that Samsung has infringed one or more claims of the '494 Patent;

- UU. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '494 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- VV. Declaring that Samsung's infringement of the '494 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- WW. Determining that Samsung has infringed one or more claims of the '335 Patent;
- XX. Ordering Samsung to account for and pay to MII all damages suffered by MII as a consequence of Samsung's infringement of the '335 Patent, together with pre- and post-judgment interest and costs as fixed by the Court;
- YY. Declaring that Samsung's infringement of the '335 Patent was and is willful and trebling MII's damages under 35 U.S.C. § 284 on that ground;
- ZZ. Ordering that Samsung be ordered to pay supplemental damages to MII, including interest, with an accounting, as needed, of all infringements and/or damages not presented at trial;
- AAA. Declaring that this case is exceptional and awarding MII its costs and attorney's fees in accordance with 35 U.S.C. § 285;
- BBB. Ordering a permanent injunction prohibiting Samsung from further acts of infringement; and
- CCC. Granting MII such other and further relief as the Court may deem just and proper.

Dated: September 29, 2021

Respectfully submitted,

/s/Robert Christopher Bunt

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