

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

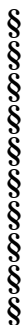
PAPST LICENSING GMBH & CO. KG,

Plaintiff,

v.

**SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.**

Defendants.



Civil Action No. 2:23-cv-00322

Jury Trial Demanded

COMPLAINT

Plaintiff Papst Licensing GmbH & Co., KG (“Papst Licensing” or “Plaintiff”) files this Original Complaint against Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung” or “Defendant”) for infringement of U.S. Patent Nos. 9,871,962 (the “’962 Patent”) and 10,542,205 (the “’205 Patent”) (collectively, the “Patents”).

I. THE PATENTS

1. This is a patent infringement action to end Samsung’s unauthorized and infringing manufacture, use, sale, offering for sale, and/or importation of methods and products incorporating the patented inventions.

2. Papst Licensing is the owner of all right, title, and interest in and to the ’962 Patent, issued on January 16, 2018 for “Movable User Interface Shutter Button for Camera.” *See* Ex. 1.

3. Papst Licensing is the owner of all right, title, and interest in and to the ’205 Patent, issued on January 21, 2020 for “Movable User Interface Shutter Button for Camera.” *See* Ex. 2.

4. The Patents are generally directed towards methods and systems for gesture-based access to a movable shutter button for a camera on electronic devices and, more specifically an electronic device with touch-sensitive display and a camera controlled by a camera application,

where the shutter button of the camera application is movable, allowing the user to position the shutter button at a location on the touch-sensitive display that makes it easier for the user to reach and activate the shutter button.

II. THE PARTIES

5. Plaintiff Papst Licensing GmbH & Co., KG is a company existing under the laws of the Federal Republic of Germany, with its principal place of business located at Bahnhofstrasse 33, 78112 St. Georgen, Germany.

6. Upon information and belief, Samsung Electronics Co., Ltd. (individually, “SEC”), is a corporation organized under the laws of Korea, with its principal place of business located at 129 Samsung-Ro, Maetan-3dong, Yeongtong-Gu, Suwon-si, Gyeonggi-do, 16677, Rep. of Korea, where it can be served with process. Upon information and belief, SEC is authorized to do business in Texas. On information and belief, SEC is South Korea’s largest company and one of Asia’s largest electronics companies. SEC designs, manufactures, and provides to the U.S. and world markets a wide range of products, including consumer electronics, computer components, and myriad mobile and entertainment products.

7. Upon information and belief, Samsung Electronics America, Inc. (individually, “SEA”), is a corporation organized under the laws of the State of New York with its principal place of business at 85 Challenger Road, Ridgefield Park, New Jersey 07660. Upon information and belief, SEA is authorized to do business in Texas and has business locations in this District at 6625 Excellence Way, Plano, Texas 75023; 2601 Preston Road, Frisco, Texas 75034; and 3580 Preston Road, Suite 100, Frisco, Texas 75034. SEA may be served by serving its registered agent CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136. On information and belief, SEA was formed in 1977 as a subsidiary of SEC and markets, sells, and/or offers for

sale a variety of consumer electronics, including televisions, digital cameras, cell phones, storage devices, home appliances, security systems, smartwatches, and computer products.

III. JURISDICTION AND VENUE

8. This is an action for patent infringement which arises under 35 U.S.C. §§ 271, 281, 284 and 285. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§1331 and 1338(a).

9. This Court has personal jurisdiction over Samsung because, among other things, Samsung has established minimum contacts within the forum such that the exercise of jurisdiction over Samsung will not offend traditional notions of fair play and substantial justice. For example, Samsung has placed products that practice and/or embody the claimed inventions of the Patents into the stream of commerce with the reasonable expectation and/or knowledge that purchasers and users of such products were located within this district. In addition, Samsung has sold, advertised, marketed, and distributed products in this district that practice the claimed inventions of the Patents. Samsung derives substantial revenue from the sale of infringing products distributed within the district, and/or expects or should reasonably expect its actions to have consequences within the district, and derives substantial revenue from interstate and international commerce.

10. Venue in the Eastern District of Texas with respect to Defendant SEC is proper pursuant to 28 U.S.C. §§ 1391(c)(3) which provides that “a defendant not resident in the United States may be sued in any judicial district, and the joinder of such a defendant shall be disregarded in determining where the action may be brought with respect to other defendants.”

11. Venue in the Eastern District of Texas with respect to Defendant SEA is proper pursuant to 28 U.S.C. §§ 1391(b), 1391(c), and 1400(b) because SEA has regular and established

places of business in this District; has transacted business in this District; and has committed and/or induced acts of patent infringement in this District.

IV. NOTICE RECEIVED BY SAMSUNG

12. Samsung has received actual and/or constructive knowledge of the Patents and the infringing conduct by way of Samsung's own prosecution activities.

13. Specifically, U.S. Patent Nos. 11,159,731 and 10,986,287 (the "Samsung Patents"), both of which were assigned to Samsung Electronics Co. Ltd., cite to the '962 Patent or its application.

14. In several instances, Samsung identified the '962 Patent or its applications as material prior art to Samsung's subsequent claimed inventions described in the Samsung Patents.

15. As part of its own patent applications, Samsung learned of the '962 Patent no later than March 8, 2019.

16. Given Samsung's knowledge of the '962 Patent, its citation of the '962 Patent in its own patent applications in this field, and its knowledge of the functionality of the Floating Camera Button Feature (as defined herein) in the Accused Products, as outlined below, Samsung knew or was willfully blind to the fact that its products infringed the Patents.

17. In the alternative, Samsung learned of the Patents no later than the date this Complaint was served. Because Samsung's knowledge of the functionality of the Floating Camera Button Feature (as defined herein) in the Accused Products, as outlined below, Samsung knew or was willfully blind to the fact that its products infringed the Patents after service of the Complaint.

V. SAMSUNG'S CONDUCT

18. Certain Samsung products contain a feature that allows for the addition of an extra camera button that can be moved anywhere on the screen (the "Floating Camera Button Feature").

Samsung products, including but not limited to Samsung’s smartphone, mobile phone, tablet, and media player products, that contain, include, or use the Floating Camera Button Feature, as well as any other products operating in a substantially similar manner (“Infringing Products”), infringe the Patents.

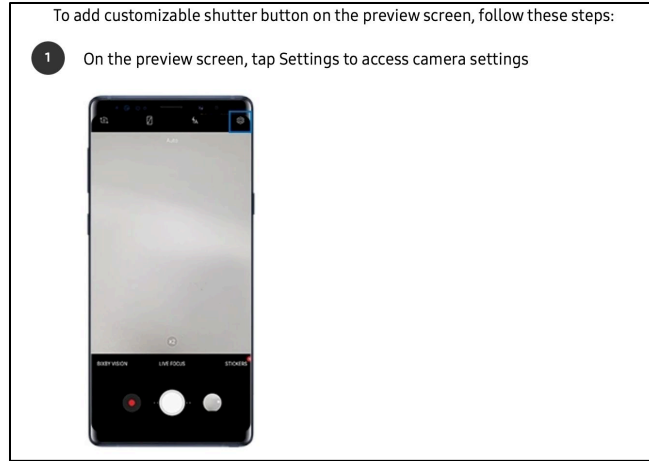
19. By way of example, the Samsung Galaxy S9 and the Samsung Galaxy S22 (the “Exemplary Infringing Products”) have the Floating Camera Button Feature and infringe the Patents.

20. Samsung has directly infringed and continues to directly infringe the Patents by making, using selling, offering for sale, and importing the Infringing Products in the United States.

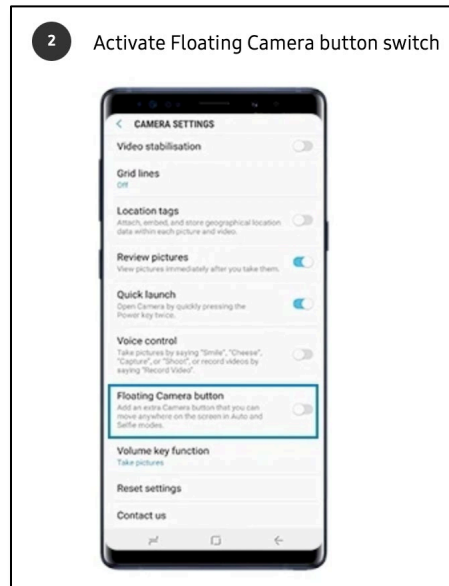
21. Samsung induces its customers to infringe the Patents by providing its customers with the Infringing Products and instructing its customers to use the Infringing Products in an infringing manner, including through its website at <https://www.samsung.com/sg/support/mobile-devices/how-to-set-floating-camera-button-on-preview-screen-of-samsung-mobile-device/>.

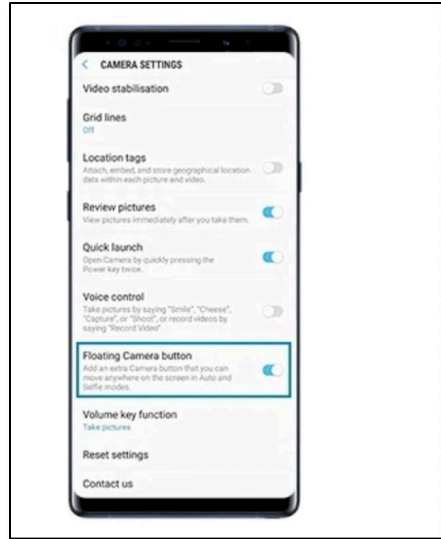
22. Samsung instructs its users to follow certain steps to engage the Floating Camera Button Feature. Samsung’s website at <https://www.samsung.com/sg/support/mobile-devices/how-to-set-floating-camera-button-on-preview-screen-of-samsung-mobile-device/>, updated as of July 28, 2022, is titled “How to set Floating Camera button on Samsung Mobile?”

23. To engage the Floating Camera Button Feature, Samsung instructs its users to go to the preview screen and “tap Settings to access camera settings.”

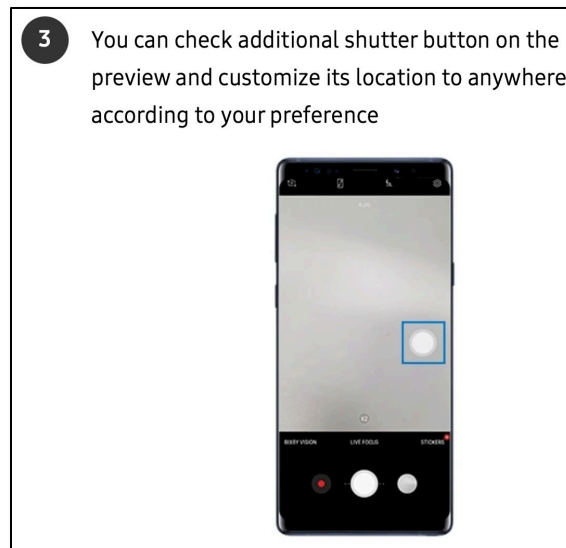


24. Samsung instructs its users to activate the floating camera button switch.



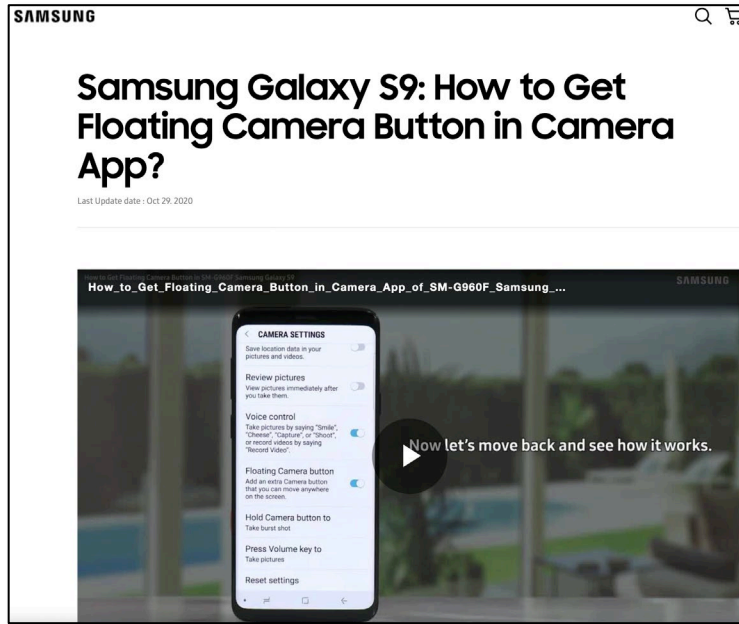


25. Samsung further instructs its customers to “check additional shutter button on the preview and customize its location to anywhere according to your preference.”

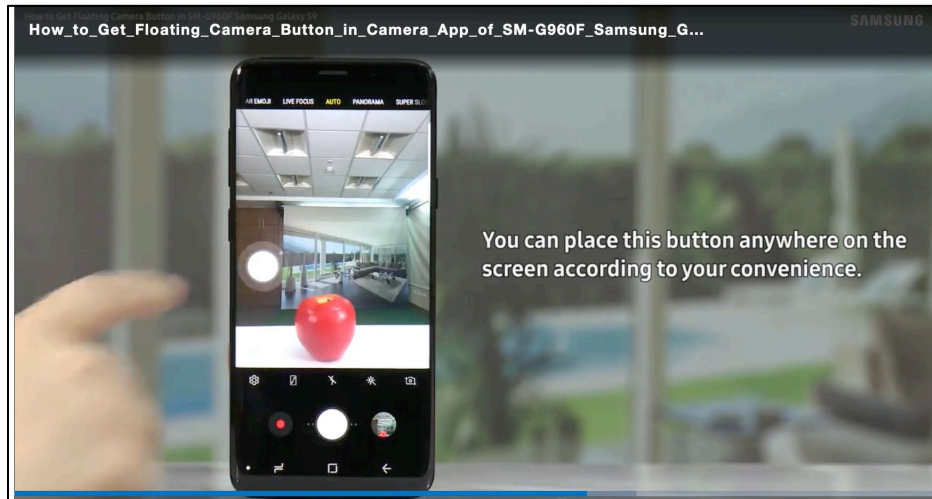


<https://www.samsung.com/sg/support/mobile-devices/how-to-set-floating-camera-button-on-preview-screen-of-samsung-mobile-device/> (collectively, the “Floating Camera Button Instructions.”)

26. Samsung provides instructions on “How to Get Floating Camera Button in Camera App” for the Samsung Galaxy S9 Exemplary Infringing Product:



<https://www.samsung.com/in/support/mobile-devices/samsung-galaxy-s9-how-to-get-floating-camera-button-in-camera-app/>



<https://www.samsung.com/in/support/mobile-devices/samsung-galaxy-s9-how-to-get-floating-camera-button-in-camera-app/>

27. Samsung provides instructions on “how to configure your cameras settings” to “[a]dd an extra shutter button that you can move anywhere on the screen” for the Samsung Galaxy S22 Exemplary Product:

Camera settings

Use the icons on the main camera screen and the settings menu to configure your camera's settings.

- From  **Camera**, tap  **Settings** for the following options:

General

- **Shooting methods:**
 - **Press Volume keys to:** Use the Volume keys to take pictures, record video, zoom, or control system volume.
 - **Voice commands:** Take pictures speaking key words.
 - **Floating shutter button:** Add an extra shutter button that you can move anywhere on the screen.

28. In addition, Samsung knowingly, actively induced and continues to knowingly actively induce (or is willfully blind to the) infringement of one or more of the Patents within this district by making, using, offering for sale, and selling Infringing Products, as well as by contracting with others to use, market, sell, and offer to sell Infringing Products, all with knowledge of the asserted Patents, and their claims, with knowledge that their customers will use, market, sell, and offer to sell Infringing Products in this District and elsewhere in the United States, and with the knowledge and specific intent to encourage and facilitate infringing sales and use of the Products by others within this District and the United States by creating and disseminating promotional and marketing materials, instructional materials, product manuals, and technical materials related to the Infringing Products.

29. Moreover, Samsung knowingly contributed to the infringement of one or more of the Patents by others in this District, and continues to contribute to the infringement of one or more

of the Patents by others in this District by selling or offering to sell components of Infringing Products in this District, which components constitute a material part of the inventions of the Patents, knowing of the Patents and their claims, knowing those components to be especially made or especially adapted for use to infringe one or more of the Patents, and knowing that those components are not staple articles or commodities of commerce suitable for substantial non-infringing use.

30. The limitations of claims in the Patents may be satisfied by hardware, software, and/or firmware, or any combination thereof, including without limitation: a front facing and rear facing camera; a touch-sensitive display configured to display images received by the cameras; memory for storing computerized instructions to operate the device as well as store images captured by the cameras; one or more processors coupled to both the touch-sensitive display and memory, configured to execute the computerized instructions such that the Accused Products:

display a shutter button at a first location on the touch-sensitive display;

detect a touch event to the first shutter button, determine that the touch event indicates an input to move the shutter button to a second location, create a second shutter button, display the second shutter button the touch-sensitive display and move the second shutter button to the second location;

while the second shutter button is displayed, receive a drag event at the second shutter button on the touch-sensitive display and move the second shutter button to a user selected second location at an end of the drag event;

display an image received from the camera such that the second shutter button is displayed over the displayed image;

receive and detect a second touch event to the second shutter button, determine the second touch event indicates an input to active the second shutter button, and respond to the second touch event by capturing at least one image with the camera. (“Components”).

VI. PATENT INFRINGEMENT

COUNT I — INFRINGEMENT OF U.S. PATENT NO. 9,871,962

31. Papst Licensing realleges and incorporates preceding paragraphs herein.

32. Papst Licensing is the assignee of the '962 Patent and holds all substantial rights in the same. Among other rights, Papst Licensing maintains the exclusive right to exclude others, the exclusive right to enforce, sue, and recover damages for past and future infringements, and the exclusive right to settle any claims of infringement.

33. The '962 Patent is valid and enforceable.

34. Claim 32 of the '962 Patent states as follows:

An electronic device, comprising:

a front facing camera and a rear facing camera;

a touch-sensitive display configured to display images received by the cameras;

a memory coupled to the touch-sensitive display; and

one or more processors coupled to the touch-sensitive display and the memory, one or more modules stored in the memory and configured for execution by the one or more processors to perform the operations comprising:

displaying a first shutter button of a camera application at a first location on the touch-sensitive display;

while the first shutter button is displayed, detecting a first touch event to the first shutter button on the touch-sensitive display;

determining that the first touch event indicates an input to move the first shutter button to a user selected second location on the touch-screen display;

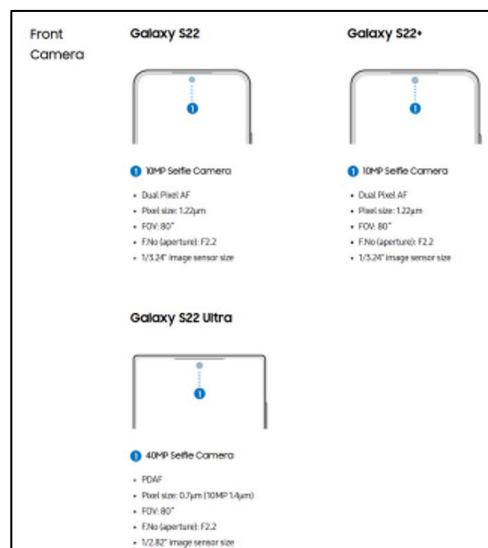
creating a second shutter button and moving the second shutter button of the camera application to the second location;

while the second shutter button is displayed at the second location and the first shutter button is displayed at the first location, displaying an image received from the camera, such that the second shutter button is displayed over the displayed image;

while the second shutter button is displayed at the second location and the first shutter button is displayed at the first location, detecting a second touch event to the second shutter button; and

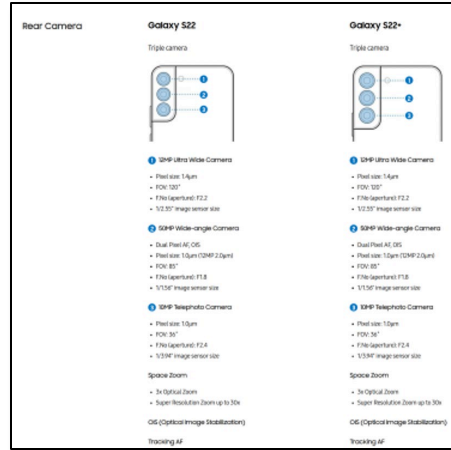
responsive to determining that the second touch event indicates an input to activate the second shutter button, capturing at least one image with the camera.

35. The Infringing Products infringe at least claim 32 the '962 Patent, among other claims of the '962 Patent. For example, each of the Infringing Products, including the Samsung Galaxy S9 and S22 Exemplary Products, is an electronic device with front- and rear-facing cameras and a touch screen display that displays images taken by the cameras. Below is an image of the front-facing camera on the Samsung Galaxy S22.



Product Specs (available from <https://www.samsung.com/global/galaxy/galaxy-s22-ultra/specs/>).

Below is an image of the rear-facing cameras on the Samsung Galaxy S22.



Id.

36. The Infringing Products have memory and processors coupled to the touch screen display, the memory storing modules that are executed by the processors to operate the device. Evidence of the memory and processors on the Samsung Galaxy S22 follows:

Memory	Galaxy S22	Galaxy S22+
	8GB RAM (LPDDR5) with 256GB internal storage	8GB RAM (LPDDR5) with 256GB internal storage
	8GB RAM (LPDDR5) with 128GB internal storage	8GB RAM (LPDDR5) with 128GB internal storage
	Galaxy S22 Ultra	
	12GB RAM (LPDDR5) with 1TB internal storage	
	12GB RAM (LPDDR5) with 512GB internal storage	
	12GB RAM (LPDDR5) with 256GB internal storage	
	8GB RAM (LPDDR5) with 128GB internal storage	

Product Specs (<https://www.samsung.com/global/galaxy/galaxy-s22-ultra/specs/>).

PLATFORM	OS	Android 12, upgradable to Android 13, One UI 5.1
	Chipset	Exynos 2200 (4 nm) - Europe Qualcomm SM8450 Snapdragon 8 Gen 1 (4 nm) - ROW
CPU		Octa-core (1x2.8 GHz Cortex-X2 & 3x2.50 GHz Cortex-A710 & 4x1.8 GHz Cortex-A510) - Europe
		Octa-core (1x3.00 GHz Cortex-X2 & 3x2.50 GHz Cortex-A710 & 4x1.80 GHz Cortex-A510) - ROW

GSMarena.com Device Specs (https://www.gsmarena.com/samsung_galaxy_s22_5g-11253.php)

37. The Infringing Products' display shows a shutter button of a camera application at a first location. When the display detects a touch that indicates movement of the shutter button to a second location, the device creates a second shutter button and moves it to the second location (as indicated by the blue box below), displaying the second shutter button over the camera image while still displaying the first shutter button at the first location.



How to set Floating Camera button on Samsung Mobile? (available from <https://www.samsung.com/sg/support/mobile-devices/how-to-set-floating-camera-button-on-preview-screen-of-samsung-mobile-device/>).

38. Thereafter, when the display detects a touch that indicates activation (i.e. pressing) of the second shutter button, the device captures an image with one of the cameras.



<https://www.youtube.com/watch?v=bztuFC-9bjg> at 0:44.

39. Samsung has directly infringed and continues to infringe one or more claims of the '962 Patent in this District and elsewhere in the United States by, among other things, making, having made, importing, using, offering for sale, and/or selling the Infringing Products. Each and every element of the '962 Patent is literally present in the '962 Infringing Products.

40. To the extent not literally present, Papst Licensing reserves the right to proceed under the doctrine of equivalents.

41. Samsung has indirectly infringed and continues to indirectly infringe the '962 Patent by inducing the infringement of the '962 Patent by third parties, including without limitation Samsung's customers, manufacturers, resellers, and/or end users, in this District and elsewhere throughout the United States. With knowledge of the '962 Patent, Samsung directs and aids its customers in using the Infringing Products by the provision of its products, software, and related equipment and the provision of instructions (including, by way of example, websites, tutorials, user guides, product guides, and other documentation) to customers, as well as through functionality embedded in or loaded onto the Infringing Products (including firmware, applications, software and source code), with knowledge that the induced acts constitute patent infringement. For example, Samsung instructs users to implement the infringing functionality in the Floating Camera Button Instructions.

42. Samsung has contributed to the infringement of, and continues to contribute to the infringement of, one or more claims of the '962 Patent under 35 U.S.C. § 271(c) and/or 271(f), either literally and/or under the doctrine of equivalents, by selling, offering for sale, and/or importing into the United States, the Infringing Products. Samsung knows that the Components of the Infringing Products: constitute a material part of the inventions claimed in the '962 Patent; are especially made or adapted to infringe the '962 Patent; and are not staple articles or commodities

of commerce suitable for non-infringing use, but rather the Components are used for or in systems that infringe one or more claims of the '962 Patent. The hardware and/or software Components are not a staple article or commodity of commerce because they are specifically designed to perform the claimed functionality. Any other use of the hardware and/or software Components would be unusual, far-fetched, illusory, impractical, occasional, aberrant, or experimental.

43. At least since the date upon which Samsung learned of the '962 Patent and its infringement of the '962 Patent, Samsung has willfully infringed the '962 Patent by deliberately or intentionally engaging in acts of infringement on an ongoing basis with knowledge of the '962 Patent.

44. Papst Licensing has been damaged as a result of Samsung's infringing conduct. Samsung is thus liable to Papst Licensing in an amount that adequately compensates it for Samsung's infringements, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II — INFRINGEMENT OF U.S. PATENT NO. 10,542,205

45. Papst Licensing realleges and incorporates preceding paragraphs herein.

46. Papst Licensing is the assignee of the '205 Patent and holds all substantial rights in the same. Among other rights, Papst Licensing maintains the exclusive right to exclude others, the exclusive right to enforce, sue and recover damages for past and future infringements, and the exclusive right to settle any claims of infringement.

47. The '205 Patent is valid and enforceable.

48. Claim 4 of the '205 Patent states as follows:

An electronic device, comprising:

a front facing camera and a rear facing camera;

a touch-sensitive display configured to display images received by the cameras;

a memory coupled to the touch-sensitive display; and

one or more processors coupled to the touch-sensitive display and the memory,

one or more program modules of a camera application stored in the memory and configured for execution by the one or more processors to perform the operations comprising:

displaying a first shutter button at a first location on the touch-sensitive display;

displaying a second shutter button on the touch-sensitive display;

while the second shutter button is displayed, receiving a drag event at the second shutter button on the touch-sensitive display;

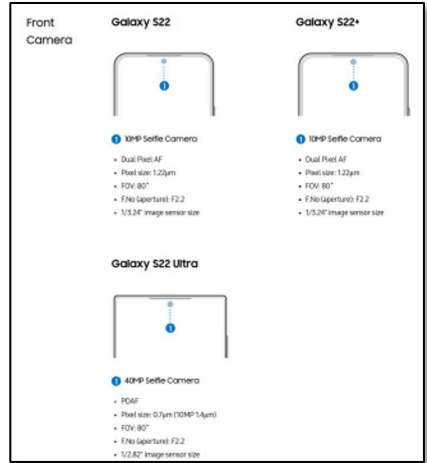
moving the second shutter button to a user selected second location at an end of the drag event;

while the second shutter button is displayed at the second location and the first shutter button is displayed at the first location, displaying an image received from the camera, such that the second shutter button is displayed over the displayed image;

while the second shutter button is displayed at the second location and the first shutter button is displayed at the first location, receiving a touch event at the second shutter button; and

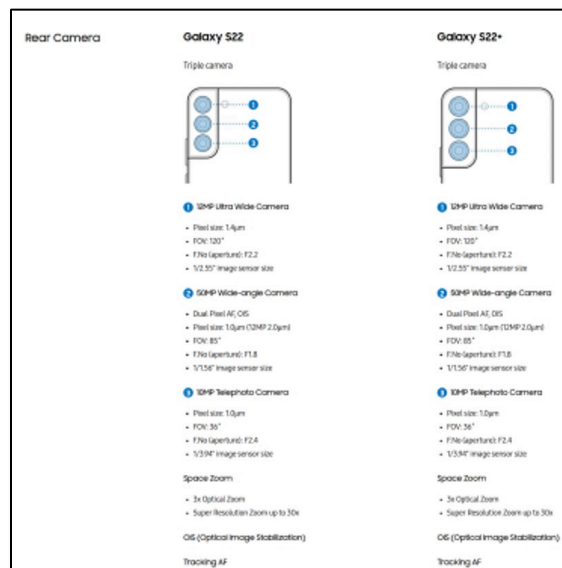
capturing at least one image with at least one of the cameras in response to the second touch event.

49. The Infringing Products meet each and every claim limitation of at least claim 4 of the '205 Patent, among other claims of the '205 Patent. For example, each of the Infringing Products, including the Samsung Galaxy S9 and S22 Exemplary Products, is an electronic device with front and rear-facing cameras and a touch screen display that displays images taken by the cameras. Below is an image of the front-facing camera on the Samsung Galaxy S22.



Product Specs (available from <https://www.samsung.com/global/galaxy/galaxy-s22-ultra/specs/>).

Below is an image showing the rear-facing cameras on the Samsung Galaxy S22.



Id.

50. The Infringing Products have memory and processors coupled to the touch screen display, the memory storing modules of a camera application that are executed by the processors to operate the device.

51. The Samsung Galaxy S22 has memory and processors:

Memory	Galaxy S22	Galaxy S22+
	8GB RAM (LPDDR5) with 256GB internal storage	8GB RAM (LPDDR5) with 256GB internal storage
	8GB RAM (LPDDR5) with 128GB internal storage	8GB RAM (LPDDR5) with 128GB internal storage
	Galaxy S22 Ultra	
	12GB RAM (LPDDR5) with 1TB internal storage	
	12GB RAM (LPDDR5) with 512GB internal storage	
	12GB RAM (LPDDR5) with 256GB internal storage	
	8GB RAM (LPDDR5) with 128GB internal storage	

Product Specs (<https://www.samsung.com/global/galaxy/galaxy-s22-ultra/specs/>).

PLATFORM	OS	Android 12, upgradable to Android 13, One UI 5.1
	Chipset	Exynos 2200 (4 nm) - Europe Qualcomm SM8450 Snapdragon 8 Gen 1 (4 nm) - ROW
	CPU	Octa-core (1x2.8 GHz Cortex-X2 & 3x2.50 GHz Cortex-A710 & 4x1.8 GHz Cortex-A510) - Europe Octa-core (1x3.00 GHz Cortex-X2 & 3x2.50 GHz Cortex-A710 & 4x1.80 GHz Cortex-A510) - ROW

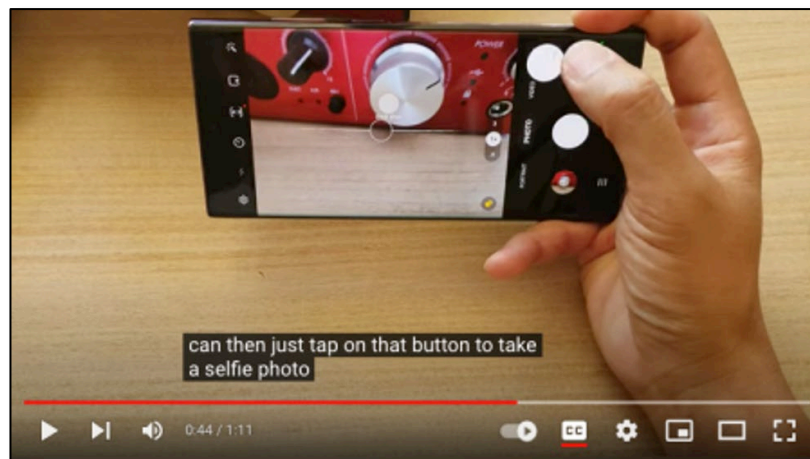
GSMarena.com Device Specs (https://www.gsmarena.com/samsung_galaxy_s22_5g-11253.php).

52. The Infringing Products’ display shows the first shutter button of a camera application at a first location and a second shutter button. When the display detects dragging of the second shutter button by the user, the device moves the second shutter button to the user-selected second location at the end of the drag, displaying the second shutter button over the camera image while still displaying the first shutter button at the first location.



How to set Floating Camera button on Samsung Mobile? (available from <https://www.samsung.com/sg/support/mobile-devices/how-to-set-floating-camera-button-on-preview-screen-of-samsung-mobile-device/>).

53. Thereafter, when the display detects a touch (i.e. pressing) of the second shutter button, the device captures an image with one of the cameras.



<https://www.youtube.com/watch?v=bztuFC-9bjg> at 0:44.

54. Samsung has directly infringed and continues to infringe one or more claims of the '205 Patent in this District and elsewhere in the United States by, among other things, making, having made, importing, using, offering for sale, and/or selling the Infringing Products. Each and every element of the '205 Patent is literally present in the '205 Infringing Products.

55. To the extent not literally present, Papst Licensing reserves the right to proceed under the doctrine of equivalents.

56. Samsung has indirectly infringed and continues to indirectly infringe the '205 Patent by inducing the infringement of the '205 Patent by third parties, including without limitation Samsung's customers, manufacturers, resellers, and/or end users, in this District and elsewhere throughout the United States. With knowledge of the '205 Patent, Samsung directs and aids its customers in using the Infringing Products by the provision of its products, software, and related equipment and the provision of instructions (including, by way of example, websites, tutorials, user guides, product guides, and other documentation) to customers, as well as through functionality embedded in or loaded onto the Infringing Products (including firmware, applications, software and source code) with knowledge that the induced acts constitute patent infringement. For example, Samsung instructs users to implement the infringing functionality in the Floating Camera Button Instructions.

57. Samsung has contributed to the infringement of, and continues to contribute to the infringement of, one or more claims of the '205 Patent under 35 U.S.C. § 271(c) and/or 271(f), either literally and/or under the doctrine of equivalents, by selling, offering for sale, and/or importing into the United States, the Infringing Products. Samsung knows that the Components of the Infringing Products: constitute a material part of the inventions claimed in the '205 Patent; are especially made or adapted to infringe the '205 Patent; and are not staple articles or commodities of commerce suitable for non-infringing use, but rather the Components are used for or in systems that infringe one or more claims of the '205 Patent. The hardware and/or software Components are not a staple article or commodity of commerce because they are specifically designed to

perform the claimed functionality. Any other use of the hardware and/or software Components would be unusual, far-fetched, illusory, impractical, occasional, aberrant, or experimental.

58. At least since the date of service of this Complaint, upon which Samsung learned of the '205 Patent and its infringement of the '205 Patent, Samsung has willfully infringed the '205 Patent by deliberately or intentionally engaging in acts of infringement on an ongoing basis with knowledge of the '205 Patent.

59. Papst Licensing has been damaged as a result of Samsung's infringing conduct. Samsung is thus liable to Papst Licensing in an amount that adequately compensates it for Samsung's infringements, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

VII. JURY DEMAND

60. Papst Licensing demands a trial by jury of all matters to which it is entitled to trial by jury, pursuant to FED. R. CIV. P. 38.

VIII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Papst Licensing prays for judgment and seeks relief against Samsung as follows:

- a. Judgment that one or more claims of U.S. Patent Nos. 9,871,962 and 10,542,205 have been infringed, either literally and/or under the doctrine of equivalents, by Samsung;
- b. Award Plaintiff past and future damages together with prejudgment and post-judgment interest to compensate for the infringement by Samsung of the Patents in accordance with 35 U.S.C. §284, and increase such award by up to three times the amount found or assessed in accordance with 35 U.S.C. §284;

- c. That the Court declare this an exceptional case and award Plaintiff its reasonable attorney's fees and costs in accordance with 35 U.S.C. § 285; and
- d. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

Dated: July 12, 2023

Respectfully submitted,

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