No. 21-___

UNITED STATES COURT OF APPEALS FOR THE FEDERAL CIRCUIT

IN RE SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.

Petitioners

On Petition for a Writ of Mandamus to the
United States District Court for the Western District of Texas,
No. 6:20-cv-00259-ADA
Hon. Alan D. Albright

**SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.'S
PETITION FOR WRIT OF MANDAMUS**

Nicholas J. Whilt
Jeffrey G. Lau
O'MELVENY & MYERS LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90071
Telephone: (213) 430–6000

Bradley N. Garcia
O'MELVENY & MYERS LLP
1625 Eye Street, NW
Washington, DC 20006-4061
Telephone: (202) 383–5300

Darin W. Snyder
David S. Almeling
Daniel A. Silverman
O'MELVENY & MYERS LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111-3823
Telephone: (415) 984–8700

Counsel for Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.

April 6, 2021

FORM 9. Certificate of Interest

<div align="right">

Form 9 (p. 1)
July 2020

</div>

UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT

<u>CERTIFICATE OF INTEREST</u>

Case Number	21-
Short Case Caption	In re Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.
Filing Party/Entity	Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.

Instructions: Complete each section of the form. In answering items 2 and 3, be specific as to which represented entities the answers apply; lack of specificity may result in non-compliance. **Please enter only one item per box; attach additional pages as needed and check the relevant box**. Counsel must immediately file an amended Certificate of Interest if information changes. Fed. Cir. R. 47.4(b).

I certify the following information and any attached sheets are accurate and complete to the best of my knowledge.

Date: 04/06/2021

Signature: /s/ Bradley N. Garcia

Name: Bradley N. Garcia

<div align="center">

i

</div>

1. Represented Entities. Fed. Cir. R. 47.4(a)(1).	2. Real Party in Interest. Fed. Cir. R. 47.4(a)(2).	3. Parent Corporations and Stockholders. Fed. Cir. R. 47.4(a)(3).
Provide the full names of all entities represented by undersigned counsel in this case.	Provide the full names of all real parties in interest for the entities. Do not list the real parties if they are the same as the entities. ☐ None/Not Applicable	Provide the full names of all parent corporations for the entities and all publicly held companies that own 10% or more stock in the entities. ☐ None/Not Applicable
Samsung Electronics Co., Ltd.		None
Samsung Electronics America, Inc.		Samsung Electronics Co., Ltd.
	Google LLC	XXVI Holdings Inc.; Alphabet Inc.

☐   Additional pages attached

4. Legal Representatives. List all law firms, partners, and associates that (a) appeared for the entities in the originating court or agency or (b) are expected to appear in this court for the entities. Do not include those who have already entered an appearance in this court. Fed. Cir. R. 47.4(a)(4).

☐   None/Not Applicable   ☐   Additional pages attached

Jeffrey G. Lau	Mann Tindel Thompson	J. Mark Mann
G. Blake Thompson		

5. Related Cases. Provide the case titles and numbers of any case known to be pending in this court or any other court or agency that will directly affect or be directly affected by this court's decision in the pending appeal. Do not include the originating case number(s) for this case. Fed. Cir. R. 47.4(a)(5). See also Fed. Cir. R. 47.5(b).

☐   None/Not Applicable   ☐   Additional pages attached

Ikorongo Texas LLC v. LG Electronics Inc., No. 6:20-cv-0257-ADA (W.D. Tex.)	Ikorongo Texas LLC v. Lyft, Inc., No. 6:20-cv-00258-ADA (W.D. Tex.)	Ikorongo Texas LLC v. Uber Technologies, Inc., No. 6:20-cv-00843-ADA (W.D. Tex.)

6. Organizational Victims and Bankruptcy Cases. Provide any information required under Fed. R. App. P. 26.1(b) (organizational victims in criminal cases) and 26.1(c) (bankruptcy case debtors and trustees). Fed. Cir. R. 47.4(a)(6).

☑   None/Not Applicable   ☐   Additional pages attached

TABLE OF CONTENTS

TABLE OF CONTENTS
(continued)

v

TABLE OF AUTHORITIES

Page(s)

CASES

TABLE OF AUTHORITIES
(continued)

Page(s)

TABLE OF AUTHORITIES
(continued)

Page(s)

STATEMENT OF RELATED CASES

There are related district court cases, but none are consolidated for pre-trial

purposes. In the action giving rise to this petition ("the Samsung action"), Plaintiff

Ikorongo Texas LLC ("Ikorongo Texas") sued Samsung Electronics Co., Ltd. and

Samsung Electronics America, Inc., on March 31, 2020, for alleged infringement

of U.S. Patent Nos. RE 41,450, RE 45,543, RE 47,704, and 8,874,554. *Ikorongo*

Texas LLC v. Samsung Electronics Co., No. 6:20-cv-00259-ADA, Dkt. 1 (W.D.

Tex.). The next day, an amended complaint was filed adding Plaintiff Ikorongo

Technology LLC ("Ikorongo Technology") (and together with Ikorongo Texas,

"Plaintiffs"). *Id.*, Dkt. 2.

On March 31, 2020, Ikorongo Texas also filed separate suits alleging

infringement of some or all of the same patents against (1) LG Electronics Inc. and

LG Electronics U.S.A., Inc., (2) Bumble Trading Inc., and (3) Lyft Inc. *Ikorongo*

Texas LLC v. LG Electronics Inc., No. 6:20-cv-00257-ADA, Dkts. 1, 2 (W.D.

Tex.); *Ikorongo Texas LLC v. Bumble Trading Inc.*, No. 6:20-cv-00256-ADA,

Dkts. 1, 2 (W.D. Tex.); *Ikorongo Texas LLC v. Lyft, Inc.*, No. 6:20-cv-00258-

ADA, Dkts. 1, 2 (W.D. Tex.). In each suit, as in this one, the next day an

Amended Complaint was filed adding Plaintiff Ikorongo Technology. The

defendants in each suit moved to transfer the actions to the Northern District of

California, but Bumble withdrew its motion to transfer. *Bumble*, No. 20-cv-00258,

Dkts. 29, 39. The district court denied transfer in each of the remaining actions on March 1, 2021. *LG*, No. 20-cv-00257, Dkt. 76; *Samsung*, No. 20-cv-00259, Dkt. 67; *Lyft*, No. 20-cv-00258, Dkt. 68. The district court entered essentially identical orders denying Petitioners' motion to transfer in this case and the LG defendants' motion to transfer in that case. *LG*, No. 20-cv-00257, Dkt. 76; *Samsung*, No. 20-cv-00259, Dkt. 67.

Similarly, on September 15, 2020, Ikorongo Texas filed another separate suit alleging infringement of some of the same patents against Uber Technologies, Inc. *Ikorongo Texas LLC v. Uber Technologies, Inc.*, No. 6:20-cv-00843-ADA, Dkts. 1, 2 (W.D. Tex.). There, as in this case, the next day an Amended Complaint was filed adding Ikorongo Technology. Uber moved to transfer the action to the Northern District of California, and that motion is currently pending. *Id.* Dkt. 26.

This petition challenges the district court's order denying transfer in the Samsung action, *Samsung*, No. 20-cv-00259, Dkt. 67. There have been no other appeals or writ proceedings arising from the Samsung action.

CIRCUIT RULE 28(j) CERTIFICATION

Pursuant to Circuit Rule 28(j), Petitioners state that the body of this petition is identical—except for record citations and references to Petitioners—to the body of a petition filed this same day by LG Electronics Inc. and LG Electronics U.S.A.,

x

Inc., who are represented by the same counsel and challenge a materially identical

order issued by the same district court.

INTRODUCTION

Venue rules are intended "to allocate suits to the most appropriate or convenient federal forum," *In re HTC Corp.*, 889 F.3d 1349, 1356 (Fed. Cir. 2018), and to prevent both "the waste of time, energy and money" and "unnecessary inconvenience" to "litigants, witnesses and the public" that arise when litigation is conducted in an inconvenient forum, *Van Dusen v. Barrack*, 376 U.S. 612, 616 (1964). Plaintiffs here concocted a novel scheme that flouts those important public policies and long-established case law by seeking—through various pre-filing maneuvers—to effectively confine their suit to their chosen district no matter how inconvenient that forum is. The district court denied Petitioners' motion to transfer on two alternative grounds, both of which turned, either completely or in part, on Plaintiffs' pre-filing maneuvering. This Court should issue a writ of mandamus to correct those errors and require this case to be transferred.

Plaintiffs seek nationwide damages for alleged infringement of four patents. Until 11 days before this suit was filed, the sole owner of the asserted patents, Ikorongo Technology, had full rights to assert the patents anywhere in the country, and could have sued Petitioners in the Northern District of California ("NDCA"). But Ikorongo Technology then assigned to Ikorongo Texas—a related entity created approximately one month before suit was filed—the exclusive rights to the

1

asserted patents in carefully chosen geographic locations: all but one county in each of the Eastern District of Texas ("EDTX") and Western District of Texas ("WDTX"). Ikorongo Texas then filed suit in the WDTX, and Ikorongo Technology was added as a co-plaintiff in an Amended Complaint the next day.

This suit, however, has no meaningful connection to the WDTX; not a single relevant document or witness is located there. The vast majority of both are instead located in the NDCA, where most of the allegedly infringing technology was developed. When Petitioners moved under 28 U.S.C. § 1404(a) to transfer the suit to the NDCA, Plaintiffs argued that their pre-filing maneuvers categorically defeated that motion. In patent infringement actions, proper venue under 28 U.S.C. § 1400(b) turns on, among other things, "where the defendant has committed acts of infringement." According to Plaintiffs, because their "Texas" entity had rights to the asserted patents only in specified parts of Texas, any "acts of infringement" *as to that entity* could have occurred *only* in those carefully chosen districts in Texas. The district court accepted that argument and held that Petitioners could not show that the suit "might have been brought" in the NDCA by Ikorongo Texas as § 1404(a) requires.

That ruling was incorrect and will have far-reaching consequences if not reversed. Plaintiffs' pre-filing contractual maneuvers had no plausible purpose except to defeat transfer under § 1404(a) and confine this suit to their chosen

2

venue. This Court and the Supreme Court have repeatedly rejected similar efforts to manipulate venue rules. And although Plaintiffs' effort here appears to be novel, it provides a roadmap for other plaintiffs to file suits for nationwide damages in a preferred forum while effectively foreclosing the possibility of a transfer to more convenient locations: Just create a related entity, assign strategically chosen geographic patent rights to that entity, have that entity sue first, and then join the original entity in the same suit. The district court's rationale overlooks that § 1400(b) is intended to protect *defendants* from suit in inconvenient forums, not provide plaintiffs an artificial hook to limit the jurisdictions to which their suit might be transferred. There is no reason to read § 1400(b)'s focus on "where the defendant has committed acts of infringement" to turn on the type of pre-filing contractual maneuvering that Plaintiffs engaged in here.

The district court alternatively ruled that transfer was not warranted even if the suit could have been brought in the NDCA. That ruling was a clear abuse of discretion and was impacted in multiple respects by Plaintiffs' improper pre-filing maneuvering. The relevant documents and majority of potential third-party witnesses are located in the NDCA, where the allegedly infringing applications were developed. No documents and no relevant witnesses are located in the WDTX. The district court nevertheless minimized the importance of those crucial

3

factors and relied exclusively on its belief that judicial economy would be promoted by retaining this case in the WDTX because Plaintiffs filed other suits involving the same patent family in the WDTX. Especially because those suits were part and parcel of Plaintiffs' improper scheme to defeat a transfer motion, that consideration cannot outweigh the undisputed evidence showing that the NDCA is clearly a more convenient forum for the parties and witnesses.

RELIEF SOUGHT

Petitioners respectfully petition for a writ of mandamus directing the district court to vacate its March 1, 2021 order denying transfer of this action and to transfer this action to the NDCA.

ISSUES PRESENTED

1.   Whether the district court erred by holding that Plaintiffs' pre-filing assignment of geographically limited patent rights to a newly minted related entity precluded transfer regardless of the convenience of parties and witnesses.

2.   Whether the district court clearly abused its discretion by denying Petitioners' motion to transfer where the most important factors—sources of proof, the availability of compulsory process, and the convenience of witnesses—clearly favor the NDCA, and the only record-supported reasons weighing against transfer are speculation about court congestion and the fact that Plaintiffs filed similar suits against other defendants in the WDTX.

STATEMENT OF FACTS

I.   The Parties And Plaintiffs' Claims

Petitioners are Samsung Electronics Co., Ltd. ("SEC") and Samsung

Electronics America, Inc. ("SEA"). SEC is a Korean-chartered corporation with

its principal place of business in Korea. Appx136 ¶ 6. SEC designed, engineered,

and manufactured the accused Samsung devices outside the United States, mostly

in Korea. Appx137 ¶¶13, 14.

SEA is a corporation founded under the laws of New York with its principal

place of business in Ridgefield Park, New Jersey. Appx141 ¶7. SEA has offices

in various states, including California, New York, New Jersey, Washington,

Kansas, Georgia, and Texas. *Id.* SEA has over 300 employees in the Northern

District of California. Appx142 ¶12.

Plaintiffs are Ikorongo Texas and Ikorongo Technology. Both have the

same address in Chapel Hill, North Carolina. Appx26 ¶¶1-2. Neither entity

appears to conduct any non-litigation business in Texas.

II.   The Asserted Patents, Accused Applications, And Relevant Third Parties

Plaintiffs allege that Petitioners' smartphones and tablets infringe four

patents—U.S. Patent Nos. RE41,450; RE45,543; RE47,704; and 8,874,554

(collectively, the "Asserted Patents"). The three reissue patents are directed to

users sharing geographic location data with a group of other users using mobile

5

devices. Appx30 ¶21; Appx32 ¶31; Appx34 ¶41; Appx63-67 ¶¶2.a, 3.a, 4.a. The

'554 patent is directed to providing location-based media recommendations.

Appx36 ¶51; Appx61-62 ¶1.a.

Plaintiffs' infringement contentions are directed at functionality found in the

Google Maps, Google+, Google Play Music, YouTube Music, and AT&T Secure

Family applications (collectively, the "Accused Applications") running on

products sold by Petitioners. Appx61; Appx63-64; Appx66.

No employees of any Samsung entity control the design and development of

any features of the Accused Applications. Appx136 ¶¶8. Instead, the Accused

Applications were developed by third parties. Third-party Google LLC is a

Delaware limited liability company with its principal place of business in

Mountain View in the NDCA. Appx143 ¶2. Google's Mountain View

headquarters and nearby offices in the NDCA are the strategic center of Google's

business. *Id.* Google's employees knowledgeable about the accused Google Maps

and Google+ features are based in the NDCA. Appx144-145 ¶¶4-8. The teams

who worked on location-sharing for Google Maps, Android location infrastructure,

and the accused Google+ features are all located in Mountain View. Appx144-145

¶¶5, 7-8. Google is unaware of any employees located in the WDTX who have

worked on the accused Google Maps and Google+ functionality. Appx144-145

¶¶5, 8. Google's employees knowledgeable about the accused Google Play Music

and YouTube Music features are located primarily in New York City, with team

members also located in Seattle and Mountain View. Appx145-146 ¶¶9-10.

The remaining Accused Application, AT&T Secure Family, was researched,

designed, and developed by a team of 30 engineers at third-party Location Labs at

its headquarters in Emeryville, California within the NDCA. Appx101-120;

Appx122-123; Appx125-127; Appx200-205. Location Labs was later acquired by

Avast Software s.r.o. ("Avast"). Appx125-127. Avast currently has four U.S.

offices, two of which (the Silicon Valley and Emeryville offices) are in NDCA.

Appx129-132. Avast does not have any offices in Texas. *Id.* Although AT&T is

headquartered in Dallas, Texas, it did not develop Secure Family.

III.   Procedural Background

A.   Plaintiffs' Pre-Filing Maneuvers

Ikorongo Texas initiated this suit on March 31, 2020, alleging infringement

of the Asserted Patents. Appx12. Ikorongo never served that complaint on

Petitioners. Appx4. The next day, Ikorongo Technology was added as a co-

plaintiff in an amended complaint. Appx26. On those same days, in the same

sequence, Plaintiffs filed three similar suits against other defendants in the WDTX

alleging infringement of some or all of the Asserted Patents. *See supra* at ix-x

(statement of related cases). They did the same in a similar suit against Uber six

months later. *Id.*

Plaintiffs allege that Ikorongo Texas owns exclusive rights to the Asserted Patents, including the rights to sue for infringement and collect damages, but only in "a specified part of the United States … that includes specific counties within the" WDTX. Appx28 ¶9. Plaintiffs allege that Ikorongo Technology owns the exclusive rights to the Asserted Patents everywhere else, which includes "at least one county within the" WDTX. Appx28 ¶10. The Amended Complaint seeks nationwide damages. Appx28 ¶11; Appx38.

The record developed in litigating Petitioners' motion to transfer paints a fuller picture of Plaintiffs' efforts to manipulate their corporate structure in an effort to anchor the cases in the WDTX. Until one month before this suit was filed, Ikorongo Texas did not exist and Ikorongo Technology owned the exclusive, geographically unlimited rights to the Asserted Patents. Appx171. Approximately one month before the suit was filed, Ikorongo Texas was formed. Appx134. Then, on March 20, 2020—just 11 days before the suit was filed—Ikorongo Technology assigned to Ikorongo Texas, through various individuals, the geographically limited rights described above. Appx168-191. Ikorongo Technology retained exclusive rights to the Asserted Patents in the rest of the country, including one county in each of the WDTX and the EDTX. Appx28 ¶11; Appx179.

The same person—Hugh Svendsen—signed the relevant assignment documents on behalf of both Plaintiffs. He signed the initial transfer from

8

Ikorongo Technology, as its manager, to various individuals. Appx173. And he signed the later assignment from those various individuals to Ikorongo Texas as its manager. Appx185. Both entities share the same North Carolina address. Appx26 ¶¶1, 2.

B.   Petitioners' Motion To Transfer And The District Court's Ruling

On September 11, 2020, Petitioners moved to transfer this suit to the NDCA under 28 U.S.C. § 1404(a). Petitioners emphasized, among other things, that every relevant document is accessible from and many potential witnesses are located in the NDCA, while no relevant documents or witnesses are located in the WDTX.

In opposing Petitioners' motion, Plaintiffs made a novel argument: transfer was impossible because Ikorongo Texas's carefully circumscribed geographic rights in the Asserted Patents meant Petitioners committed no "acts of infringement" in the NDCA *as to that entity* under § 1400(b), as required for transfer under § 1404(a). Appx155. In reply, Petitioners countered on multiple grounds, including that if this pre-filing maneuvering prevented transfer "regardless of convenience," any patent holder could defeat the purpose of § 1404(a) simply by "incorporating a new company and assigning to that company the right to sue only in a particular district." Appx194. The district court agreed with Plaintiffs' argument, however, holding that Ikorongo Texas could not have

9

sued in the NDCA because "acts of infringement as to Ikorongo Texas" under

§ 1400(b) could occur only in the WDTX or the EDTX. Appx210.

The court also held that transfer was unwarranted under § 1404(a) "even

assuming" Petitioners had "met the threshold issue as to Ikorongo Texas."

Appx211. As detailed *infra* Part III, the district court discounted the importance of

the many witnesses in the NDCA and relied heavily on (1) its estimation that its

time-to-trial would be faster than in the NDCA and (2) the fact that the defendant

in one of the simultaneously filed suits involving only a subset of the Asserted

Patents and different accused products had withdrawn its motion to transfer.

Appx211-218.

STATEMENT OF REASONS WHY THE WRIT SHOULD ISSUE

The district court erred by allowing Plaintiffs to defeat Petitioners' transfer

motion by strategically dividing geographic rights to the Asserted Patents. This

Court and the Supreme Court have long warned against artificial venue

manipulation, and such manipulation contravenes the purpose of §§ 1400(b) and

1404(a). If this Court does not intervene, others will surely imitate Plaintiffs'

tactic, which will only further undermine those statutes. The district court also

clearly abused its discretion in its alternative ruling finding that the balance of

convenience factors did not warrant transfer. A writ of mandamus is warranted.

I.   Governing Legal Standards

Fifth Circuit law applies to this Court's review of § 1404(a) rulings. *In re TS Tech USA Corp.*, 551 F.3d 1315, 1319 (Fed. Cir. 2008). Under Fifth Circuit law, a petitioner seeking mandamus relief must (1) show a "clear and indisputable" right to the writ; (2) have "no other adequate means to attain the relief he desires"; and (3) demonstrate that "the writ is appropriate under the circumstances." *In re Volkswagen of Am., Inc.*, 545 F.3d 304, 311 (5th Cir. 2008) (en banc) (citation omitted). This Court has repeatedly recognized that, under Fifth Circuit law, mandamus is appropriate to correct transfer denials that are "clear abuses of discretion." *In re Toyota Motor Corp.*, 747 F.3d 1338, 1339 (Fed. Cir. 2014) (collecting cases).

The § 1404(a) analysis proceeds in two steps. First, the court asks whether the "action 'might have been brought' in the destination venue." *In re Volkswagen*, 545 F.3d at 312 (quoting 28 U.S.C. § 1404(a)). A patent infringement case may be brought in "the judicial district where the defendant resides, or where the defendant has committed acts of infringement and has a regular and established place of business." 28 U.S.C. § 1400(b). Second, a court must assess whether transfer is warranted based on a number of factors concerning "the convenience of parties and witnesses" and "the proper administration of justice." *In re Microsoft Corp.*, 630 F.3d 1361, 1363 (Fed. Cir. 2011).

II.   This Action Could Have Been Brought In The Northern District Of California Under § 1400(b)

The district court's holding that Petitioners could not show the action "might have been brought" in the NDCA turned entirely on Ikorongo Texas's strategically limited geographic rights to the Asserted Patents. Appx210. Under a long line of precedent examining similar pre-filing attempts to manipulate venue, the district court should have disregarded Plaintiffs' pre-filing maneuvering and treated this action as what it is: a nationwide suit for infringement of the Asserted Patents. Moreover, even if Plaintiffs' pre-filing maneuvering is not ignored, the district court also erred in interpreting § 1400(b) to turn on a plaintiff's contractual rights rather than a plain reading of where "the defendant [allegedly] has committed acts of infringement" as the statute requires.

A.   This Court And The Supreme Court Have Repeatedly Rejected Attempts By Plaintiffs To Manipulate Venue And Jurisdiction

In *Van Dusen v. Barrack*, 376 U.S. 612 (1964), the Supreme Court held that § 1404(a) "should be construed to prevent parties who are opposed to a change of venue from defeating a transfer which, but for their own deliberate acts or omissions, would be proper, convenient and just." *Id.* at 625. Crediting Plaintiffs' pre-filing maneuvering in this case contravenes that principle. And although Plaintiffs' specific scheme here appears to be novel, this Court and the Supreme

12

Court have repeatedly rejected similar efforts to manipulate venue and jurisdictional laws.

For example, in *In re Microsoft*, the plaintiff had opened an office in the EDTX that "staffed no employees," transferred documents to that in-district office, and reincorporated under the laws of Texas sixteen days before filing suit. 630 F.3d at 1364-65. The plaintiff then cited those connections to its preferred district in opposing transfer, and the district court credited those maneuvers "without scrutiny." *Id.* at 1364.

This Court disagreed and issued a writ ordering transfer, explaining that the "Supreme Court has long urged courts to ensure that the purposes of jurisdictional and venue laws are not frustrated by a party's attempt at manipulation." *Id.* The Court therefore concluded that it need not "honor" the connections that plaintiff made to its preferred forum "in anticipation of litigation and for the likely purpose of making that forum appear convenient." *Id.* As the Court put it, those steps "were recent, ephemeral, and a construct for litigation and appeared to exist for no other purpose than to manipulate venue." *Id.* at 1365.

Similarly, in *In re Zimmer Holdings Inc.*, 609 F.3d 1378 (Fed. Cir. 2010), the plaintiff claimed that the EDTX was its "principal place of business." *Id.* at 1381. But this Court looked to "the realities" of the case—that the claimed location was essentially empty "office space" shared with the plaintiff's lawyer's

13

other clients—and concluded that "the plaintiff is attempting to game the system

by artificially seeking to establish venue[.]" *Id.* And in *In re Hoffmann-La Roche*

Inc., 587 F.3d 1333 (Fed. Cir. 2009), the plaintiff transferred 75,000 pages of

documents relevant to the suit to its chosen district "in anticipation of litigation."

Id. at 1336. This Court again concluded that the "assertion that these documents

are 'Texas' documents is a fiction which appears to … have been created to

manipulate the propriety of venue." *Id.* at 1336-37. In both cases, this Court

granted writs directing transfer.

 Those decisions are supported by broader jurisprudence condemning

manipulation of venue and jurisdictional rules. Both *In re Microsoft* and *In re*

Zimmer Holdings drew on *Hertz Corp. v. Friend*, 559 U.S. 77 (2010), which

cautioned against efforts to manipulate diversity of citizenship jurisdiction. The

Supreme Court instructed courts to disregard a corporation's claimed "principal

place of business" when assessing diversity of citizenship under 28 U.S.C.

§ 1332(c)(1) "if the record reveals attempts at manipulation—for example, that the

alleged [principal place of business] is nothing more than a mail drop box, a bare

office with a computer, or the location of an annual executive retreat." *Id.* at 97.

 In re Microsoft also relied on *Miller & Lux, Inc. v. East Side Canal &*

Irrigation Co., 211 U.S. 293 (1908), and *Lehigh Min. & Mfg. Co. v. Kelly*, 160

U.S. 327 (1895), in which the "Supreme Court held that a corporation could not

14

create federal diversity jurisdiction by merely assigning its claim to an otherwise fictitious subsidiary for just that purpose" or by transferring property to a related entity. *In re Microsoft*, 630 F.3d at 1364. In both cases a party attempted to create diversity jurisdiction by assigning rights to a related entity. But in both cases the Supreme Court disregarded the effort because it was "only a device" to manipulate jurisdiction. *Miller*, 211 U.S. at 303.

This Court has also rejected efforts to manipulate personal jurisdiction rules. In *Dainippon Screen Mfg. Co. v. CFMT, Inc.*, 142 F.3d 1266 (Fed. Cir. 1998), a parent corporation that sold products throughout the country and thus could be subject to personal jurisdiction in many jurisdictions assigned its patent rights to a "holding company" and then licensed the patents back to itself. The goal was to allow the parent company to "threaten its competitors with infringement" suits but then argue in any declaratory judgment action seeking to invalidate the patents that the holding company was a necessary party and was subject to personal jurisdiction only in its state of incorporation. *Id.* at 1271. This Court gave the plaintiff a "'chutzpah' award" and deemed the holding company subject to personal jurisdiction elsewhere. *Id.*

In short, this Court and the Supreme Court have consistently rejected a range of creative attempts by plaintiffs to manipulate venue and jurisdictional rules in anticipation of litigation.

15

B. Under Those Established Principles, Plaintiffs' Maneuvers Should Be Disregarded

Those settled principles require ignoring Plaintiffs' blatant attempt to manipulate the applicable venue rules and effectively confine their suit to the WDTX, no matter how inconvenient that forum is for Petitioners and third parties. As in the foregoing cases, Plaintiffs plainly took every step of their pre-filing efforts in anticipation of opposing transfer on the basis the district court allowed.

As detailed *supra* at 7-9, one month before this suit was filed, Ikorongo Technology formed Ikorongo Texas, an "otherwise fictitious subsidiary." And just 11 days before the suit was filed, Ikorongo Technology assigned to Ikorongo Texas carefully curated geographic rights to the Asserted Patents, i.e., exclusive rights in some, but not all, counties within the WDTX and EDTX. The same manager even signed the requisite assignments on behalf of both entities, and the entities share the same North Carolina address. Ikorongo Texas then filed this suit and three others in the WDTX, but did not even bother to serve Petitioners with that complaint. Ikorongo Technology joined the suits via an Amended Complaint the very next day. *See supra* at ix-x, 7-8 (collecting record citations).

This is exactly the type of tactic the Supreme Court warned against in *Van Dusen*, and that this Court has accordingly disregarded as improper "attempt[s] at manipulation" "made in anticipation of litigation." *In re Microsoft*, 630 F.3d at 1364; *see supra* Part II.A. There is no basis to conclude Ikorongo

16

Texas was created and given these specified geographic rights for any purpose except specifically in anticipation of opposing Petitioners' transfer motion from Texas to a more convenient forum. *In re Microsoft*, 630 F.3d at 1364.

This Court therefore need not "honor" Plaintiffs' strategic maneuvers. *Id.* Instead, the Court should treat this case as what it is: a suit for nationwide damages for alleged infringement of the Asserted Patents by the owners of those patents. That suit plainly "might have been brought" in the NDCA as § 1404(a) requires. SEC is subject to suit in any judicial district under the alien-venue rule of § 1391(c)(3). *See In re HTC Corp.*, 889 F.3d 1349 (Fed. Cir. 2018). As for SEA, neither Plaintiffs nor the district court doubted that Ikorongo Technology—which owned the complete and exclusive rights to the Asserted Patents until 11 days before this suit was initiated—could have brought suit in the NDCA because "acts of infringement" *as to its rights* occurred in that district and SEA has offices there. Appx209 n.1.

C.   **The District Court's Ruling Would Lead To Results Contrary To The Purposes Of The Venue Statutes**

The district court's contrary approach will encourage copycat efforts and lead to problematic results. Using Plaintiffs' scheme, any patent holder could preemptively defeat a § 1404(a) motion by merely incorporating a new company and assigning to that new company rights to the patent only in a portion of a particular judicial district, and first suing with that new company. The original

patent holder could then join that same action and, together with the new company,

seek nationwide damages. The prospect for transfer out of the chosen district

would be all but foreclosed, even if another district is plainly more convenient.

That is precisely what Ikorongo Technology accomplished here.

The district court identified one theoretically possible way to defeat

Plaintiffs' scheme: § 1400(b) provides for venue where an entity resides, so a

domestic corporate defendant could move to transfer to its state of incorporation.

TC Heartland LLC v. Kraft Foods Grp. Brands LLC, 137 S. Ct. 1514 (2017);

Appx210-211. But where an entity is incorporated (e.g., Delaware) bears no

necessary relation (and frequently no relation at all) to the district that would be

most convenient under the "individualized, case-by-case consideration of

convenience and fairness" inquiry that § 1404(a) requires. *In re Genentech, Inc.*,

566 F.3d 1338, 1346 (Fed. Cir. 2009) (quoting *Van Dusen*, 376 U.S. at 622). In

most cases, Plaintiffs' scheme will allow a patent holder to sue a domestic entity

for nationwide damages in the patent holder's chosen forum and leave the

defendant with no recourse under § 1404(a). Allowing plaintiffs to arbitrarily

confine a suit for nationwide damages to this extent is contrary to the recognized

purpose of § 1404(a): to "prevent the waste of time, energy, and money and to

protect litigants, witnesses and the public against unnecessary inconvenience and

expense" that results "when defendants are forced to expend resources litigating

18

substantive matters in an inconvenient venue." *In re Google Inc.*, 2015 WL 5294800, at *1 (Fed. Cir. July 16, 2015) (quoting *Van Dusen*, 376 U.S. at 616 (internal quotation marks omitted)).

D.   "Where the Defendant Has Committed Acts of Infringement" Under 28 U.S.C. § 1400(b) Focuses On Where the Defendant's Conduct Occurred

Even if the Court does not conclude that Ikorongo Texas and its geographically limited rights should be disregarded entirely, the district court was still incorrect to conclude that Ikorongo Texas could not have brought its suit in the NDCA.

As noted, Ikorongo Texas could have sued SEC in the NDCA because foreign defendants may be sued in any district. 28 U.S.C. § 1391(c)(3). As for SEA, 28 U.S.C. § 1400(b) provides that an "action for patent infringement may be brought … where the defendant has committed acts of infringement and has a regular and established place of business." SEA has offices in the NDCA and is accused of committing "acts of infringement" in that district because it has allegedly been "selling" and "offering for sale" the accused products throughout the country. Appx30 ¶21; Appx32 ¶31; Appx34 ¶41; Appx36 ¶51.

The district court was not persuaded by that straightforward analysis, reasoning that Petitioners could not show that they are alleged to have committed any "acts of infringement *as to Ikorongo Texas*" in the NDCA. Appx210.

19

Infringement of Ikorongo Texas's contractually defined right in the patents, the

court posited, "could have only occurred" within specified regions of Texas. *Id.*

Although this Court has never addressed that issue, the district court was

wrong as a matter of law to conclude that Plaintiffs' contractual arrangements limit

where venue is proper in this case under § 1400(b).

The statute says simply that venue is proper where "*the defendant has

committed* acts of infringement." 28 U.S.C. § 1400(b) (emphasis added). The

statute does not say that venue is proper only where "acts of infringement *as to

each plaintiff*" occurred. Again, both Petitioners are alleged to have infringed the

Asserted Patents nationwide, including in the NDCA, and nothing in the text of the

statute suggests that Plaintiffs' peculiar contracts with each other should have any

relevance to the analysis.

The statute's purpose also undermines the district court's conclusion. Venue

rules are meant to protect *defendants*. *See, e.g.*, *In re Cray Inc.*, 871 F.3d 1355

(Fed. Cir. 2017) (explaining that § 1400(b) "was a restrictive measure, limiting a

prior, broader venue" rule). That purpose is inconsistent with a reading that would

allow a plaintiff to artificially limit the districts to which a suit may be transferred

merely by artificially limiting its own rights. *See Van Dusen*, 376 U.S. at 621

(citing the purposes of § 1404(a) and declining to read phrase "might have been

brought" in a way that "would grant personal representatives bringing wrongful-

20

death actions the power unilaterally to reduce the number of permissible federal

forums simply by refraining from qualifying as representatives in States other than

the one in which they wished to litigate"); *Atl. Marine Constr. Co. v. U.S. Dist.*

Court for W. Dist. of Tex., 571 U.S. 49 (2013) (holding contractual forum-selection

clause does not render forum improper if it is otherwise proper under federal venue

laws).

Focusing on the *defendant's* contacts with the proposed forum also conforms

to this Court's precedent under §§ 1400(b) and 1404(a). For example, *In re*

Genentech, Inc., 566 F.3d 1338 (Fed. Cir. 2009), held it was clear error for a

district court to conclude that the transferee forum's lack of jurisdiction over a

plaintiff heavily disfavored transfer. *Id.* at 1346. This Court explained that

"[t]here is no requirement under § 1404(a) that a transferee court have jurisdiction

over the plaintiff or that there be sufficient minimum contacts with the plaintiff;

there is only a requirement that the transferee court have jurisdiction over the

defendants in the transferred complaint." *Id.* The patent venue rules focus on a

defendant's activities in the forum; they do not turn on anything about the

plaintiffs.

Finally, the practical reality of this case bears repeating. Although Plaintiffs

argued below—without support—that their artifice of filing an initial complaint

with just Ikorongo Texas the day before filing an Amended Complaint with both

21

entities should affect the analysis, the Amended Complaint is the operative complaint. *See, e.g.*, *Eason v. Holt*, 73 F.3d 600, 603 (5th Cir. 1996) ("[T]he amended complaint ... supersede[s] the original complaint under the well-settled law of this circuit."); Fed. R. Civ. P. 15(c). And that complaint seeks nationwide damages on behalf of two entities that together own the entire rights to the Asserted Patents. Furthermore, it is undisputed that Ikorongo Technology could have sued Petitioners in the NDCA and even Ikorongo Texas could have sued SEC in the NDCA under the alien-venue rule of § 1391(c)(3). Section 1400(b) governs where the "action" may be brought. Even if infringement in the NDCA does not technically infringe Ikorongo Texas's carefully limited rights, Petitioners are alleged in this "action" to have committed "acts of infringement" in the NDCA within the meaning of § 1400(b).

III. The Private and Public Interest Factors Clearly Weigh In Favor of Transfer

This Court should also overrule the district court's convenience analysis and order that the case be transferred to the NDCA. In cases arising from the Fifth Circuit, this Court "has granted writs of mandamus to correct denials of transfer that were clear abuses of discretion under governing legal standards." *In re Toyota*, 747 F.3d at 1339. This is such a case.

"The determination of 'convenience' turns on a number of public and private interest factors, none of which can be said to be of dispositive weight." *Action*

22

Indus., Inc. v. U.S. Fid. & Guar. Co., 358 F.3d 337, 340 (5th Cir. 2004). The

private factors include: "(1) the relative ease of access to sources of proof; (2) the

availability of compulsory process to secure the attendance of witnesses; (3) the

cost of attendance for willing witnesses; and (4) all other practical problems that

make trial of a case easy, expeditious and inexpensive." *In re Volkswagen*, 545

F.3d at 315 (quotation omitted). The public factors include: "(1) the administrative

difficulties flowing from court congestion; (2) the local interest in having localized

interests decided at home; (3) the familiarity of the forum with the law that will

govern the case; and (4) the avoidance of unnecessary problems of conflict of laws

of the application of foreign law." *Id.*

The district court clearly abused its discretion in weighing those factors here.

There are no relevant documents or witnesses in the WDTX, and many of both are

in the NDCA. The district court made clearly erroneous factual findings and legal

errors in discounting the witness-related factors, which under governing law are

the driving force in the transfer analysis. The only factors the district court

identified as disfavoring transfer—"practical problems" and "administrative

difficulties"—are secondary, and in any event they do not weigh against transfer

here.

23

A.   The Private Interest Factors Favor Transfer

1.   Sources of proof are more readily accessible in the NDCA than the WDTX.

Ease of access to sources of proof is a "meaningful factor" in the convenience analysis. *In re Volkswagen*, 545 F.3d at 316. Here, nearly all documents related to the development or operation of the Google Accused Applications, including the source code, and technical documents related to the accused AT&T Secure Family application are either physically present in or electronically accessible from the NDCA. Appx144-145 ¶¶4-8; Appx200-205. Ikorongo has not identified any documents or evidence located in the WDTX. The district court properly found that this factor "tilts" toward transfer, but noted its disagreement with Fifth Circuit precedent requiring it to consider the location of documents. Appx214 & n.2.

2.   Compulsory process for relevant witnesses is available in the NDCA, not the WDTX.

Petitioners identified more than a dozen potential third-party witnesses in the NDCA that have knowledge of material facts relevant to this litigation—in particular, the Google engineers who developed the accused functionality in Google Maps and Google Plus and the Avast engineers who developed the accused AT&T Secure Family application. Appx144-146 ¶¶5, 8, 10; Appx200-205. Moreover, named inventors of two of the Asserted Patents live in the NDCA. Appx56-57 ¶8. These potential third-party witnesses are subject to compulsory

process in the NDCA. By contrast, Plaintiffs did not identify a single relevant

third-party witness in the WDTX. Plaintiffs pointed to unnamed "end users" of

Samsung phones, but such users are present in every judicial district. Appx214-

215. The district court—appropriately—did not rely on those end users in its

analysis. *Id.* The factor thus weighs heavily in favor of transfer.

Nevertheless, the district court concluded this factor was "neutral."

Appx215. That conclusion was based on two clear legal errors. First, the district

court discounted the location of third-party engineers not within the WDTX's

subpoena power by stating that it had "previously held that certain third parties

with locations within this District and their employees do fall within the Court's

subpoena power." Appx215. That assertion—that the WDTX court has the power

to subpoena a third party in the NDCA because her employer has an office in the

WDTX—is clearly incorrect. Federal Rule of Civil Procedure 45(c) speaks in

terms of where a *person* is located, not all the locations of his or her employer. *See*

Fed. R. Civ. P. 45 ("within 100 miles of where the person resides, is employed, or

regularly transacts business in person").

Second, the district court put the burden on Petitioners to show that the

potential third-party witnesses were in fact "unwilling to testify." Appx215.

Neither the Fifth Circuit nor this Court has imposed an affirmative obligation on

movants to show that potential third-party witnesses are *in fact* unwilling to testify.

25

Instead, this Court, applying Fifth Circuit law, has presumed unwillingness and held that this "factor will weigh heavily in favor of transfer when more third-party witnesses reside within the transferee venue than reside in the transferor venue"—full stop. *In re Apple Inc.*, 581 F. App'x 886, 889 (Fed. Cir. 2014). That approach makes sense: any showing that a potential third-party witness would be *unwilling* to attend a *future* trial is inherently speculative and would require time-consuming consultation with each individual potential witness before a transfer motion could be filed. That is contrary to the principle that "[p]arties seeking a change of venue should act with reasonable promptness." *Peteet v. Dow Chem. Co.*, 868 F.2d 1428, 1436 (5th Cir. 1989) (internal quotations omitted). The factor, after all, is the "*availability* of compulsory process," *In re Volkswagen*, 545 F.3d at 316 (emphasis added), and it is the *availability* of subpoena power that guards against the possibility that third-party witnesses will be unwilling. Given the number of NDCA third-party witnesses who will potentially testify, this factor clearly weighs heavily in favor of transfer.

The district court relied on a Sixth Circuit case for the contrary approach, but even that case held only that absent a showing of unwillingness this factor should not be given "much weight." *Duha v. Agrium, Inc.*, 448 F.3d 867, 877 (6th Cir. 2006). The district court clearly erred by disregarding the non-party witnesses in the NDCA and deeming this factor "neutral." Appx215.

26

3. Many relevant witnesses are in the NDCA; contrary to the district court, none are in the WDTX.

The convenience of witnesses is "probably the single most important factor in a transfer analysis." *In re Genentech*, 566 F.3d at 1343). This factor also weighs heavily in favor of transfer. As discussed above, Petitioners have identified more than a dozen third-party Google and Avast engineers located in the NDCA who are likely to testify, and Ikorongo has not identified a single likely witness in the WDTX.

The district court nevertheless concluded that this crucial factor "weighs only very slightly in favor of transfer." Appx217. The district court again clearly erred. Most prominently, the district court stated that "Samsung has established that Google and Avast would have *few* potential witnesses in this District." Appx218. In fact, there is no evidence Google and Avast have *any* witnesses in the WDTX; Ikorongo did not even suggest otherwise. The district court also reasoned that although Petitioners identified many potential witnesses in the NDCA, "few party witnesses and even fewer non-party witnesses will likely testify at trial." *Id*. That assertion was not based on any evidence, and it is particularly inapt in this case because, given the nature of Plaintiffs' claims, the Google and Avast engineers in the NDCA are the *most* likely to testify. *See* Appx61-67 ¶¶1.a, 2.a, 3.a, 4.a. Google and Avast engineers in the NDCA designed and developed the Google Maps, Google Plus, and AT&T Secure Family applications at the core of

27

Ikorongo's infringement allegations. Appx144-146 ¶¶5, 8, 10; Appx200-205.

Moreover, two of the Asserted Patents' inventors, who may also testify at trial, live

in the NDCA. Appx56-57 ¶8.

Finally, the district court stated that the relative food and lodging costs in the

two districts and the fact that Ikorongo "expressed a willingness to cover those

expenses for non-party witnesses" were "not insignificant" factors weighing

against transfer. Appx218. The district court cited no precedent supporting that

rationale, and giving weight to the latter fact improperly allows a plaintiff to pay its

way toward keeping a case in its preferred venue. Moreover, the "convenience of

witnesses" is not purely about dollars and cents: "[w]itnesses not only suffer

monetary costs, but also personal costs associated with being away from work,

family, and community." *In re Volkswagen*, 545 F.3d at 317; *see In re Apple Inc.*,

979 F.3d 1332, 1342 (Fed. Cir. 2020).

At bottom, the evidence clearly established that there are numerous likely

witnesses in NDCA and *zero* in WDTX. The district court's conclusion that this

factor weighed "only very slightly" in favor of transfer was an abuse of discretion.

See, e.g., *In re Acer Am. Corp.*, 626 F.3d 1252, 1255 (Fed. Cir. 2010) (this factor

"clearly favors transfer" where a substantial number of party witnesses and third

parties reside in or close to the NDCA, and the number of witnesses in EDTX is

"insignificant" in comparison); *In re Genentech*, 566 F.3d at 1344-45 (this factor

weighed "substantially in favor of transfer" where a "substantial number of material witnesses reside within the transferee venue and the state of California, and no witnesses reside in the [EDTX]").

> **4.   The district court clearly erred by treating co-pending litigation as the dominant factor in the private interest factor analysis.**

The district court emphasized that Bumble, a defendant in another case that is accused of infringing only two of the four patents asserted here withdrew its transfer motion. The court therefore reasoned that "judicial economy and the possibility of inconsistent rulings … weigh[] against transfer." Appx220.

That rationale is improper under this Court's precedent, which holds that the "mere co-pendency of related suits in a particular district" does not "automatically" tip this factor against transfer. *In re Google*, 2017 WL 977038, at *2 (Fed. Cir. Feb. 23, 2017). Indeed, this Court has ordered transfer in several cases despite co-pending suits involving the patents at issue. *Id.*; *see also, e.g.*, *In re Toyota*, 747 F.3d at 1340-41. This Court has also specifically held that "substantial weight" should not be given to a co-pending suit when the suits, despite involving somewhat overlapping patents, involve different products and defendants. *In re Zimmer Holdings*, 609 F.3d at 1382.

That is the case here. Of the four Asserted Patents, only the '543 and '704 Patents are asserted in *Bumble*; the '450 and '554 Patents are not. And the subject

matter of the '554 Patent—providing location-specific media recommendations—is quite different from the technology of the '543 and '704 Patents, which relate to sharing a user's location. *See supra* at 5-6. In addition, the Accused Applications in Petitioners' accused products—Google Maps, Google Play, Google Play Music, YouTube Music, and AT&T Secure Family—are very different from the accused Bumble application, a social media dating application. Given these differences, gains in judicial economy by keeping both cases in the WDTX are minimal to non-existent.

The district court failed to assess the degree of relation between this suit and *Bumble*. Instead, it held that because some of the patents overlap, the risk of "potentially inconsistent rulings" weighed against transfer. But that will be true in *any* case where there is another pending case involving at least one patent. The district court's rationale would therefore "automatically tip" this factor against transfer whenever a plaintiff files multiple suits in the same district. *In re Google*, 2017 WL 977038, at *2. Indeed, because this was the *only* factor—apart from court congestion, discussed *infra*—that the court found weighed against transfer, it is clear that the district court accorded almost dispositive weight to this factor. The district court erred by "allowing the co-pending litigation to dominate the analysis" while minimizing the other private interest factors, which, when properly considered, strongly weigh in favor of transfer. *In re Google*, 2017 WL 977038, at

*2; *see also Oyster Optics, LLC v. Coriant Am. Inc.*, 2017 WL 4225202, at *7

(E.D. Tex. Sept. 22, 2017) (ordering transfer despite five co-pending cases and

noting "that, while judicial economy may 'play a significant role' in a court's

transfer analysis, it may not 'dominate' the analysis when other factors of note are

present"); *Signal IP, Inc. v. Ford Motor Co.*, 2014 WL 4783537, at *6 (C.D. Cal.

Sept. 25, 2014) (similar).

B.   The Public Interest Factors Favor Transfer

The parties and the district court agreed that public factors (3) and (4) are

neutral. Appx223. Taken together, the other two public factors support transfer.

1.   The district court erred in finding the local interest factor neutral.

The district court erroneously found the local interest factor neutral.

Appx222. Three of the five Accused Applications were designed and developed in

the NDCA—Google Maps, Google Plus, and AT&T Secure Family. Appx144-145

¶¶4-8; Appx200-205. The district court recognized that the NDCA therefore had a

"localized interest" because the suit "calls into question the work and reputation of

several individuals residing" in the NDCA. Appx223 (quoting *In re Hoffmann-La

Roche*, 587 F.3d at 1338).

On the other side of the ledger, the district court noted only that Ikorongo

Texas's claims "specifically relate to infringement in this District." Appx223.

That rationale not only improperly credits Plaintiffs' improper pre-filing

31

maneuvering, but also ignores that the suit as a whole seeks damages for

infringement throughout the country. It was a clear abuse of discretion to conclude

that the WDTX's interest—which is indistinguishable from the interest of any

other district—is equal in weight to the NDCA's local interest. *See In re Acer Am.*,

626 F.3d at 1256 (the "sale of an accused product offered nationwide does not give

rise to a substantial interest in any single venue"). As this Court has put it, "if

there are significant connections between a particular venue and the events that

gave rise to a suit, this factor should be weighed in that venue's favor." *Id*.; *see*

also In re Apple, 979 F.3d at 1345.

2.   The district court gave too much weight to the court congestion factor.

Finally, the district court found that court congestion weighs against transfer.

It relied on its then-currently scheduled January 2022 trial date, its Order

Governing Proceedings, which assertedly indicates a greater efficiency of bringing

patent cases to trial in the WDTX as compared to the NDCA, and a finding in a

prior case that the WDTX's time-to-trial was then 25% faster than the NDCA's.

Appx221-222. This Court has previously rejected that reasoning.

"[A] court's general ability to set a fast-paced schedule is not particularly

relevant to this factor." *In re Apple*, 979 F.3d at 1344. Indeed, "scheduled trial

dates are often subject to change." *Id.* at 1344 n.5. And merely referencing the

court's own statement in a prior case of time-to-trial statistics is hardly the type of

record evidence to demonstrate "an appreciable difference" in docket congestion between the forums. *In re Adobe Inc.*, 823 F. App'x 929, 932 (Fed. Cir. 2020). Further, because this factor is "the most speculative," this Court has squarely held that it "should not alone outweigh all of th[e] other factors." *In re Genentech*, 566 F.3d at 1347.

C.   The NDCA Is Clearly More Convenient Than The WDTX

When the private and public interest factors are properly weighed, the NDCA is clearly more convenient than the WDTX. Four of the factors strongly favor transfer: the convenience and cost of attendance of witnesses, compulsory process, ease of access to sources of proof, and local interests. By contrast, only the judicial efficiency and court congestion factors are neutral or at most weigh slightly against transfer. There is, in short, "a stark contrast in relevance, convenience, and fairness between the two venues," and a writ directing transfer is appropriate. *In re Hoffmann-La Roche*, 587 F.3d at 1336.

CONCLUSION

The Court should issue a writ of mandamus and direct the district court to transfer the case to the U.S. District Court for the NDCA.

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Bradley N. Garcia
    Bradley N. Garcia
    Counsel for Petitioners

34

CERTIFICATE OF COMPLIANCE

1.   This petition complies with the type-volume limitation of Federal Rule of Appellate Procedure 21(d)(1). The body of the petition contains 7,645 words, excluding the portions exempted by rule.

2.   This brief complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type style requirements of Federal Rule of Appellate Procedure 32(a)(6). The brief has been prepared in a proportionally spaced typeface using Microsoft® Word and 14-point Times New Roman type.

Dated: April 6, 2021   */s/ Bradley N. Garcia*
                                                   Bradley N. Garcia
                                                   Counsel for Petitioners

PROOF OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the

Court for the United States Court of Appeals for the Federal Circuit by using the

appellate CM/ECF system on April 6, 2021.

A copy of the foregoing was served upon the following counsel of record

and district court via an express carrier:

Bradley Earl Beckworth
Jeffrey John Angelovich
Nicholas Andrew Wyss
Nix Patterson, LLP
3600 N. Capital Of Texas Hwy., Bldg. B, Suite 350
Austin, TX 78746
Telephone: (512) 328-5333
bbeckworth@nixlaw.com
jangelovich@nixlaw.com
nwyss@nixlaw.com

Karl Anthony Rupp
Nix Patterson, LLP
Advancial Building
1845 Woodall Rodgers Freeway, Suite 1050
Dallas, TX 75201
Telephone: (972) 831-1188
krupp@nixlaw.com

Howard Wisnia
Wisnia PC
12707 High Bluff Drive
Suite 200
San Diego, CA 92130
Telephone: (858) 461-0989
Howard@wisnialaw.com

36

Derek T. Gilliland
Sorey, Gilliland & Hull, LLP
109 W. Tyler Street
Longview, TX 75601
Telephone: (903) 212-2822
derek@soreylaw.com

Hon. Alan D. Albright
United States District Court for the Western District of Texas
800 Franklin Avenue, Room 301
Waco, Texas 76701
Telephone: (254) 750-1510

I declare under penalty of perjury under the laws of the United States that

the foregoing is true and correct.

Dated: April 6, 2021   */s/ Bradley N. Garcia*
                                          Bradley N. Garcia
                                          Counsel for Petitioners

No. 21-___

UNITED STATES COURT OF APPEALS FOR THE FEDERAL CIRCUIT

IN RE SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioners

On Petition for a Writ of Mandamus to the
United States District Court for the Western District of Texas,
No. 6:20-cv-00259-ADA
Hon. Alan D. Albright

NONCONFIDENTIAL APPENDIX TO PETITION FOR WRIT OF MANDAMUS

Nicholas J. Whilt
Jeffrey G. Lau
O'MELVENY & MYERS LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90071
Telephone: (213) 430–6000

Bradley N. Garcia
O'MELVENY & MYERS LLP
1625 Eye Street, NW
Washington, DC 20006-4061
Telephone: (202) 383–5300

Darin W. Snyder
David S. Almeling
Daniel A. Silverman
O'MELVENY & MYERS LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111-3823
Telephone: (415) 984–8700

Counsel for Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.

April 6, 2021

TABLE OF CONTENTS

i

ii

CONFIDENTIAL MATERIAL OMITTED

The material omitted from the Nonconfidential Appendix includes confidential information relating to business practices and other commercially sensitive information of Petitioners and Plaintiffs. That material is subject to the district court's protective order in its Order Governing Proceedings – Patent Case Version 3.2 (No. 6:20-cv-00259, Dkt. 40)[1] and was redacted from public filings in the district court. For material that is part of the record and had a sealed and a public version of a document, the Confidential Appendix includes the sealed version and the Nonconfidential Appendix includes the public version. In the Confidential Appendix, confidential material is highlighted in yellow, which corresponds to the redacted portions of the public versions.

---

[1] *See also* Order Governing Proceedings – Patent Case, Version 3.3 (W.D. Tex. Feb. 23, 2021), https://www.txwd.uscourts.gov/wp-content/uploads/ Standing%20Orders/Waco/Albright/Order%20Governing%20Proceedings%20- %20Patent%20Cases%20022321.pdf.

U.S. District Court [LIVE]
Western District of Texas (Waco)
CIVIL DOCKET FOR CASE #: 6:20–cv–00259–ADA

Ikorongo Texas LLC v. Samsung Electronics Co., LTD et al
Assigned to: Judge Alan D Albright
Cause: 35:271 Patent Infringement

Date Filed: 03/31/2020
Jury Demand: Plaintiff
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Plaintiff

Ikorongo Texas LLC   represented by   **Bradley Earl Beckworth**
Nix Patterson, LLP
3600 N. Capital Of Texas Hwy., Bldg. B,
Suite 350
Austin, TX 78746
512– 328–5333
Fax: 512– 328–5335
Email: bbeckworth@nixlaw.com
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

Jeffrey John Angelovich
Nix Patterson, LLP
3600 N. Capital Of Texas Hwy., Bldg. B,
Suite 350
Austin, TX 78746
512–328–5333
Fax: 512–328–5335
Email: jangelovich@nixlaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Karl Anthony Rupp
Nix Patterson, LLP
Advancial Building
1845 Woodall Rodgers Freeway, Suite
1050
Dallas, TX 75201
972–831–1188
Fax: 972–444–0716
Email: krupp@nixlaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Nicholas Andrew Wyss
Nix Patterson LLP
3600 N. Capital of Texas Hwy, Suite 350B
Austin, TX 78746
(512) 328–5333
Fax: (512) 328–5335
Email: nwyss@nixlaw.com
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

Howard Wisnia
Wisnia PC
12707 High Bluff Drive
Suite 200
San Diego, CA 92130
858–461–0989

Appx001

Email: Howard@wisnialaw.com
ATTORNEY TO BE NOTICED

Derek T. Gilliland
Sorey, Gilliland & Hull, LLP
109 W. Tyler Street
Longview, TX 75601
903.212.2822
Fax: 903.212.2864
Email: derek@soreylaw.com
ATTORNEY TO BE NOTICED

Plaintiff

Ikorongo Technology LLC   represented by   **Bradley Earl Beckworth**
(See above for address)
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

Jeffrey John Angelovich
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Karl Anthony Rupp
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Nicholas Andrew Wyss
(See above for address)
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

Howard Wisnia
(See above for address)
ATTORNEY TO BE NOTICED

Derek T. Gilliland
(See above for address)
ATTORNEY TO BE NOTICED

V.

Defendant

Samsung Electronics Co., LTD   represented by   **David S. Almeling**
O'Melveny & Myers LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111–3823
415–984–8700
Fax: 415–984–8701
Email: dalmeling@omm.com
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

Nicholas J. Whilt
O'Melveny & Myers LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90071
(213) 430–6000
Fax: (213) 430–6407

Appx002

Email: nwhilt@omm.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Darin W. Snyder
O'Melveny & Myers LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111–3823
415–984–8846
Fax: 415–984–8701
Email: dsnyder@omm.com
PRO HAC VICE
ATTORNEY TO BE NOTICED

G. Blake Thompson
Mann Tindel Thompson
201 E. Howard Street
Henderson, TX 75654
(903) 657–8540
Fax: (903) 657–6003
Email: blake@themannfirm.com
ATTORNEY TO BE NOTICED

J. Mark Mann
Mann Tindel Thompson
201 E. Howard Street
Henderson, TX 75654
903/657–8540
Fax: 903/657–6003
Email: mark@themannfirm.com
ATTORNEY TO BE NOTICED

Jeffrey G. Lau
O'Melveny & Myers LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90071–2899
213–430–8383
Email: jeffreylau@omm.com
ATTORNEY TO BE NOTICED

Defendant

Samsung Electronics America, Inc.   represented by   **David S. Almeling**
(See above for address)
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

Nicholas J. Whilt
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Darin W. Snyder
(See above for address)
PRO HAC VICE
ATTORNEY TO BE NOTICED

G. Blake Thompson
(See above for address)
ATTORNEY TO BE NOTICED

J. Mark Mann
(See above for address)
ATTORNEY TO BE NOTICED

Appx003

Jeffrey G. Lau
(See above for address)
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
03/24/2020	5	STANDING ORDER from U.S. District Judge Alan D. Albright regarding scheduled civil hearings. Signed by Judge Alan D Albright. (Attachments: # 1 Amended Order from Chief Judge Garcia re COVID19, # 2 Order from Chief Judge Garcia re COVID19)(mc5) (Entered: 04/01/2020)
03/31/2020	1	COMPLAINT *for Patent Iinfringement* (Filing fee $ 400 receipt number 0542–13409187). No Summons requested at this time, filed by Ikorongo Texas LLC. (Attachments: # 1 Civil Cover Sheet, # 2 Exhibit A, # 3 Exhibit B, # 4 Exhibit C, # 5 Exhibit D, # 6 Exhibit E, # 7 Exhibit F, # 8 Exhibit G, # 9 Exhibit H, # 10 Exhibit I)(Gilliland, Derek) (Entered: 03/31/2020)
04/01/2020	2	AMENDED COMPLAINT *for Patent Infringement* against All Defendants amending, filed by Ikorongo Texas LLC, Ikorongo Technology LLC. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I)(Gilliland, Derek) (Entered: 04/01/2020)
04/01/2020	3	Notice of Filing of Patent/Trademark Form (AO 120). AO 120 forwarded to the Director of the U.S. Patent and Trademark Office. (Gilliland, Derek) (Entered: 04/01/2020)
04/01/2020		Case assigned to Judge Alan D Albright. CM WILL NOW REFLECT THE JUDGE INITIALS AS PART OF THE CASE NUMBER. PLEASE APPEND THESE JUDGE INITIALS TO THE CASE NUMBER ON EACH DOCUMENT THAT YOU FILE IN THIS CASE. (am) (Entered: 04/01/2020)
04/01/2020	4	AMENDED Notice of Filing of Patent/Trademark Form (AO 120). AO 120 forwarded to the Director of the U.S. Patent and Trademark Office. (Gilliland, Derek) (Entered: 04/01/2020)
04/01/2020	6	NOTICE of Attorney Appearance by Karl Anthony Rupp on behalf of Ikorongo Technology LLC, Ikorongo Texas LLC (Rupp, Karl) (Entered: 04/01/2020)
04/02/2020	7	REQUEST FOR ISSUANCE OF SUMMONS by Ikorongo Technology LLC, Ikorongo Texas LLC. *to Samsung Electronics America, Inc.* (Gilliland, Derek) (Entered: 04/02/2020)
04/02/2020	8	Summons Issued as to Samsung Electronics America, Inc. (lad) (Entered: 04/02/2020)
04/09/2020	9	SUMMONS Returned Executed by Ikorongo Technology LLC, Ikorongo Texas LLC. Samsung Electronics America, Inc. served on 4/3/2020, answer due 4/24/2020. (Rupp, Karl) (Entered: 04/09/2020)
04/16/2020	10	RULE 7 DISCLOSURE STATEMENT filed by Ikorongo Technology LLC, Ikorongo Texas LLC. (Gilliland, Derek) (Entered: 04/16/2020)
04/21/2020	11	MOTION for Extension of Time to File Answer *and Waiver of Foreign Service Requirement* by Ikorongo Technology LLC, Ikorongo Texas LLC. (Attachments: # 1 Proposed Order)(Rupp, Karl) (Entered: 04/21/2020)
04/23/2020		Text Order GRANTING 11 Motion for Extension of Time to Answer entered by Judge Alan D Albright. Before the Court is the Unopposed Motion for Extension of Time to Move, Answer or Otherwise Respond to Ikorongo Plaintiffs' First Amended Complaint and Waiver of Foreign Service Requirement. The Court GRANTS the motion. It is therefore ORDERED that Defendants Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc. have up to and including July 23, 2020 to move, answer or otherwise respond to Plaintiffs' First Amended Complaint for Patent Infringement. (This is a text–only entry generated by the court. There is no document associated with this entry.) (jy) (Entered: 04/23/2020)

04/23/2020		Set/Reset Deadlines: Samsung Electronics America, Inc. answer due 7/23/2020; Samsung Electronics Co., LTD answer due 7/23/2020. (mc5) (Entered: 04/23/2020)
06/06/2020	12	NOTICE of Attorney Appearance by Howard Wisnia on behalf of Ikorongo Technology LLC, Ikorongo Texas LLC. Attorney Howard Wisnia added to party Ikorongo Technology LLC(pty:pla), Attorney Howard Wisnia added to party Ikorongo Texas LLC(pty:pla) (Wisnia, Howard) (Entered: 06/06/2020)
07/23/2020	13	NOTICE of Attorney Appearance by J. Mark Mann on behalf of Samsung Electronics America, Inc., Samsung Electronics Co., LTD. Attorney J. Mark Mann added to party Samsung Electronics America, Inc.(pty:dft), Attorney J. Mark Mann added to party Samsung Electronics Co., LTD(pty:dft) (Mann, J.) (Entered: 07/23/2020)
07/23/2020	14	MOTION to Appear Pro Hac Vice by J. Mark Mann *for Darin W. Snyder* (Filing fee $ 100 receipt number 0542–13791090) by on behalf of Samsung Electronics America, Inc., Samsung Electronics Co., LTD. (Attachments: # 1 Proposed Order)(Mann, J.) (Entered: 07/23/2020)
07/23/2020	15	MOTION to Appear Pro Hac Vice by J. Mark Mann *for David S. Almeling* (Filing fee $ 100 receipt number 0542–13791114) by on behalf of Samsung Electronics America, Inc., Samsung Electronics Co., LTD. (Attachments: # 1 Proposed Order)(Mann, J.) (Entered: 07/23/2020)
07/23/2020	16	MOTION to Dismiss *Ikorongo's Claims of Indirect Infringement* by Samsung Electronics America, Inc., Samsung Electronics Co., LTD. (Attachments: # 1 Declaration of Jeffrey Lau, # 2 Exhibit 1, # 3 Exhibit 2, # 4 Exhibit 3, # 5 Proposed Order)(Mann, J.) (Entered: 07/23/2020)
07/23/2020	17	RULE 7 DISCLOSURE STATEMENT filed by Samsung Electronics America, Inc.. (Mann, J.) (Entered: 07/23/2020)
07/23/2020	18	RULE 7 DISCLOSURE STATEMENT filed by Samsung Electronics Co., LTD. (Mann, J.) (Entered: 07/23/2020)
07/24/2020		Text Order GRANTING 14 Motion to Appear Pro Hac Vice. Before the Court is the Motion for Admission Pro Hac Vice. The Court, having reviewed the Motion, finds it should be GRANTED and therefore orders as follows: IT IS ORDERED the Motion for Admission Pro Hac Vice is GRANTED. IT IS FURTHER ORDERED that Applicant, if he/she has not already done so, shall immediately tender the amount of $100.00, made payable to: Clerk, U.S. District Court, in compliance with Local Rule AT–I (f)(2). Pursuant to our Administrative Policies and Procedures for Electronic Filing, the attorney hereby granted to practice pro hac vice in this case must register for electronic filing with our court within 10 days of this order. entered by Judge Alan D Albright. (This is a text–only entry generated by the court. There is no document associated with this entry.) (jy) (Entered: 07/24/2020)
07/24/2020		Text Order GRANTING 15 Motion to Appear Pro Hac Vice. Before the Court is the Motion for Admission Pro Hac Vice. The Court, having reviewed the Motion, finds it should be GRANTED and therefore orders as follows: IT IS ORDERED the Motion for Admission Pro Hac Vice is GRANTED. IT IS FURTHER ORDERED that Applicant, if he/she has not already done so, shall immediately tender the amount of $100.00, made payable to: Clerk, U.S. District Court, in compliance with Local Rule AT–I (f)(2). Pursuant to our Administrative Policies and Procedures for Electronic Filing, the attorney hereby granted to practice pro hac vice in this case must register for electronic filing with our court within 10 days of this order. entered by Judge Alan D Albright. (This is a text–only entry generated by the court. There is no document associated with this entry.) (jy) (Entered: 07/24/2020)
07/27/2020	19	ORDER GOVERNING PROCEEDINGS PATENT CASE, Telephone Conference set for 8/13/2020 01:30 PM before Judge Alan D Albright. Signed by Judge Alan D Albright. (am) (Entered: 07/27/2020)
08/06/2020	20	Joint MOTION to Dismiss *Stipulated Motion to Dismiss Plaintiffs' Pre–Suit Indirect infringement Claims Without Prejudice and Extension of Time to Respond Regarding Post–Suit Indirect Infringement* by Ikorongo Technology LLC, Ikorongo Texas LLC. (Attachments: # 1 Proposed Order)(Gilliland, Derek) (Entered: 08/06/2020)

Appx005

08/07/2020		Text Order GRANTING 20 Motion to Dismiss entered by Judge Alan D Albright. Before the Court is the Parties' Stipulated Motion to Dismiss Plaintiff's Pre–suit Indirect Infringement Claims Without Prejudice and Extension of Time to Respond Regarding Post–suit Indirect Infringement. The Court GRANTS the motion. It is therefore ORDERED that Plaintiff may reassert those portions of the claims (and if required seeking leave of Court to do so) no later than seven (7) days after the close of fact discovery and Plaintiff may have until August 20, 2020 to respond to Defendants' Motion regarding post–suit indirect infringement. (This is a text–only entry generated by the court. There is no document associated with this entry.) (jy) (Entered: 08/07/2020)
08/13/2020	21	ORDER CANCELLING August 13, 2020 TELEPHONIC SCHEDULING CONFERENCE. Signed by Judge Alan D Albright. (lad) (Entered: 08/13/2020)
08/20/2020	22	Response in Opposition to Motion, filed by Ikorongo Technology LLC, Ikorongo Texas LLC, re 16 MOTION to Dismiss *Ikorongo's Claims of Indirect Infringement* filed by Defendant Samsung Electronics Co., LTD, Defendant Samsung Electronics America, Inc. (Attachments: # 1 Declaration of Derek Gilliland, # 2 Exhibit Exhibit 1)(Rupp, Karl) (Entered: 08/20/2020)
08/24/2020	23	Proposed Scheduling Order by Ikorongo Technology LLC, Ikorongo Texas LLC. (Rupp, Karl) (Entered: 08/24/2020)
08/24/2020	24	SCHEDULING ORDER: Joinder of Parties due by 3/19/2021. Amended Pleadings due by 4/30/2021. Motions due by 11/12/2021.Markman Hearing set for 2/5/2021 01:30 PM before Judge Alan D Albright. Pretrial Conference set for 1/14/2022 before Judge Alan D Albright. Jury Selection Jury Trial set for 1/24/2022 before Judge Alan D Albright. Signed by Judge Alan D Albright. (am) (Entered: 08/25/2020)
08/27/2020	25	REPLY to Response to Motion, filed by Samsung Electronics America, Inc., Samsung Electronics Co., LTD, re 16 MOTION to Dismiss *Ikorongo's Claims of Indirect Infringement* filed by Defendant Samsung Electronics Co., LTD, Defendant Samsung Electronics America, Inc. (Almeling, David) (Entered: 08/27/2020)
09/04/2020	26	Unopposed MOTION for Hearing re 16 MOTION to Dismiss *Ikorongo's Claims of Indirect Infringement* by Ikorongo Technology LLC, Ikorongo Texas LLC. (Attachments: # 1 Proposed Order)(Gilliland, Derek) (Entered: 09/04/2020)
09/11/2020	27	Opposed MOTION to Change Venue *to Northern District of California Under 28 U.S.C. § 1404(a)* by Samsung Electronics America, Inc., Samsung Electronics Co., LTD. (Attachments: # 1 Declaration of Jeffrey Lau, # 2 Exhibit 1, # 3 Exhibit 2, # 4 Exhibit 3, # 5 Exhibit 4, # 6 Exhibit 5, # 7 Exhibit 6, # 8 Exhibit 7, # 9 Exhibit 8, # 10 Exhibit 9, # 11 Exhibit 10, # 12 Exhibit 11, # 13 Exhibit 12, # 14 Exhibit 13, # 15 Exhibit 14, # 16 Exhibit 15, # 17 Exhibit 16, # 18 Exhibit 17, # 19 Exhibit 18, # 20 Exhibit 19, # 21 Exhibit 20, # 22 Exhibit 21, # 23 Exhibit 22, # 24 Exhibit 23, # 25 Declaration of JinHee Lee, # 26 Declaration of Kang Won Lee, # 27 Declaration of Edward Viejo, # 28 Declaration of Daniel S. Friedland, # 29 Proposed Order)(Mann, J.) (Additional attachment(s) added on 9/14/2020: # 30 JinHee Lee Declaration, # 31 Kang Won Lee Declaration, # 32 Viejo Declaration, # 33 Friedland Declaration) (lad). (Entered: 09/11/2020)
09/11/2020	28	Unopposed Motion for leave to File Sealed Document (Attachments: # 1 Declaration of JinHee Lee, # 2 Declaration of Kang Won Lee, # 3 Declaration of Edward Viejo, # 4 Declaration of Daniel S. Friedland, # 5 Proposed Order) (Mann, J.) (Entered: 09/11/2020)
09/13/2020		Text Order GRANTING 28 Motion for Leave to File Sealed Document entered by Judge Alan D Albright. Before the Court is Defendants' motion for leave to file a sealed document. The Court GRANTS the motion. The Clerk's Office is directed to file the Declaration of JinHee Lee, the Declaration of Kang Won Lee, the Declaration of Edward Viejo, and the Declaration of Daniel S. Friedland under seal. (This is a text–only entry generated by the court. There is no document associated with this entry.) (jy) (Entered: 09/13/2020)
09/26/2020	29	STIPULATION *of the Parties re Agreed Schedule for Defendants' Motion to Transfer Venue* by Ikorongo Technology LLC, Ikorongo Texas LLC. (Attachments: # 1 Proposed Order)(Rupp, Karl) (Entered: 09/26/2020)

Appx006

09/28/2020	30	NOTICE *OF INTER PARTES REVIEW* by Ikorongo Technology LLC, Ikorongo Texas LLC (Gilliland, Derek) (Entered: 09/28/2020)
09/28/2020	31	MOTION to Amend/Correct *Unopposed Motion to Amend Scheduling Order* by Samsung Electronics America, Inc., Samsung Electronics Co., LTD. (Attachments: # 1 Proposed Order)(Snyder, Darin) (Entered: 09/28/2020)
09/30/2020		Text Order GRANTING 31 Unopposed Motion to Amend/Correct entered by Judge Alan D Albright. The Court will enter separately an Amended Scheduling Order reflecting the new deadlines. (This is a text–only entry generated by the court. There is no document associated with this entry.) (as) (Entered: 09/30/2020)
09/30/2020	32	SCHEDULING ORDER: Markman Hearing set for 2/5/2021 01:30 PM before Judge Alan D Albright, Joinder of Parties due by 3/19/2021, Amended Pleadings due by 4/30/2021, Dispositive/Daubert Motions due by 11/12/2021, Pretrial Conference set for 1/14/2022 before Judge Alan D Albright, Jury Selection set and Trial set for 1/24/2022 before Judge Alan D Albright. Signed by Judge Alan D Albright. (lad) (Entered: 09/30/2020)
10/01/2020	33	ORDER re 29 Stipulation filed by Ikorongo Technology LLC, Ikorongo Texas LLC. Signed by Judge Alan D Albright. (lad) (Entered: 10/01/2020)
10/01/2020	34	ORDER SETTING TELEPHONIC DISCOVERY HEARING. Telephone Conference set for 10/2/2020 02:00 PM before Judge Alan D Albright. Signed by Judge Alan D Albright. (bw) (Entered: 10/01/2020)
10/02/2020	35	Minute Entry for proceedings held before Judge Alan D Albright: Discovery Hearing held on 10/2/2020. Case called for telephonic discovery hearing. Arguments were presented regarding discovery with deposition witnesses. Case heard with two companion cases. (Minute entry documents are not available electronically.). (Court Reporter Lily Reznik.)(lad) (Entered: 10/02/2020)
10/06/2020	36	TRANSCRIPT REQUEST by Ikorongo Technology LLC, Ikorongo Texas LLC for proceedings held on 10/02/2020. Proceedings Transcribed: Discovery Hearing. Court Reporter: Lily Reznik. (Rupp, Karl) (Main Document 36 replaced on 10/6/2020) (lad). (Entered: 10/06/2020)
10/09/2020	37	MOTION to Appear Pro Hac Vice by Karl Anthony Rupp *for Bradley E. Beckworth* (Filing fee $ 100 receipt number 0542–14057923) by on behalf of Ikorongo Technology LLC, Ikorongo Texas LLC. (Attachments: # 1 Proposed Order)(Rupp, Karl) (Entered: 10/09/2020)
10/09/2020	38	MOTION to Appear Pro Hac Vice by Karl Anthony Rupp *for Jeffrey J. Angelovich* (Filing fee $ 100 receipt number 0542–14057940) by on behalf of Ikorongo Technology LLC, Ikorongo Texas LLC. (Attachments: # 1 Proposed Order)(Rupp, Karl) (Entered: 10/09/2020)
10/13/2020		Text Order GRANTING 37 Motion to Appear Pro Hac Vice for Attorney Bradley Earl Beckworth for Ikorongo Technology LLC and Ikorongo Texas LLC. Before the Court is the Motion for Admission Pro Hac Vice. The Court, having reviewed the Motion, finds it should be GRANTED and therefore orders as follows: IT IS ORDERED the Motion for Admission Pro Hac Vice is GRANTED. IT IS FURTHER ORDERED that Applicant, if he/she has not already done so, shall immediately tender the amount of $100.00, made payable to: Clerk, U.S. District Court, in compliance with Local Rule AT–I (f)(2). Pursuant to our Administrative Policies and Procedures for Electronic Filing, the attorney hereby granted to practice pro hac vice in this case must register for electronic filing with our court within 10 days of this order entered by Judge Alan D Albright. (This is a text–only entry generated by the court. There is no document associated with this entry.) (mm6) (Entered: 10/13/2020)
10/13/2020		Text Order GRANTING 38 Motion to Appear Pro Hac Vice for Attorney Jeffrey John Angelovich for Ikorongo Technology LLC and Ikorongo Texas LLC. Before the Court is the Motion for Admission Pro Hac Vice. The Court, having reviewed the Motion, finds it should be GRANTED and therefore orders as follows: IT IS ORDERED the Motion for Admission Pro Hac Vice is GRANTED. IT IS FURTHER ORDERED that Applicant, if he/she has not already done so, shall immediately tender the amount of $100.00, made payable to: Clerk, U.S. District Court, in compliance with Local Rule AT–I (f)(2). Pursuant to our Administrative Policies and Procedures for Electronic

		Filing, the attorney hereby granted to practice pro hac vice in this case must register for electronic filing with our court within 10 days of this order entered by Judge Alan D Albright. (This is a text–only entry generated by the court. There is no document associated with this entry.) (mm6) (Entered: 10/13/2020)
10/31/2020	39	Transcript filed of Proceedings held on October 2, 2020, Proceedings Transcribed: Telephonic Discovery Hearing. Court Reporter/Transcriber: Lily I. Reznik, Telephone number: 512–391–8792 or Lily_Reznik@txwd.uscourts.gov. Parties are notified of their duty to review the transcript to ensure compliance with the FRCP 5.2(a)/FRCrP 49.1(a). A copy may be purchased from the court reporter or viewed at the clerk's office public terminal. If redaction is necessary, a Notice of Redaction Request must be filed within 21 days. If no such Notice is filed, the transcript will be made available via PACER without redaction after 90 calendar days. The clerk will mail a copy of this notice to parties not electronically noticed Redaction Request due 11/23/2020, Redacted Transcript Deadline set for 12/1/2020, Release of Transcript Restriction set for 1/29/2021, (lr) (Entered: 10/31/2020)
11/09/2020	40	Updated Standing Order Governing Proceedings Patent Cases. Signed by Judge Alan D Albright. (jkda) (Entered: 11/10/2020)
11/11/2020	41	Joint MOTION to Amend/Correct *Scheduling Order to Adopt Claim Construction Briefing Protocol of Court's New Default Order Governing Proceedings* by Samsung Electronics America, Inc., Samsung Electronics Co., LTD. (Attachments: # 1 Proposed Order)(Lau, Jeffrey) (Entered: 11/11/2020)
11/16/2020	42	Amended SCHEDULING ORDER. Signed by Judge Alan D Albright. (lad) (Entered: 11/16/2020)
11/17/2020	43	MOTION to Appear Pro Hac Vice by Nicholas J. Whilt (Filing fee $ 100 receipt number 0542–14192365) by on behalf of Samsung Electronics America, Inc., Samsung Electronics Co., LTD. (Whilt, Nicholas) (Entered: 11/17/2020)
11/18/2020		Text Order GRANTING 43 Motion to Appear Pro Hac Vice for Attorney Nicholas J. Whilt for Samsung Electronics America, Inc. and Samsung Electronics Co., LTD. Before the Court is the Motion for Admission Pro Hac Vice. The Court, having reviewed the Motion, finds it should be GRANTED and therefore orders as follows: IT IS ORDERED the Motion for Admission Pro Hac Vice is GRANTED. IT IS FURTHER ORDERED that Applicant, if he/she has not already done so, shall immediately tender the amount of $100.00, made payable to: Clerk, U.S. District Court, in compliance with Local Rule AT–I (f)(2). Pursuant to our Administrative Policies and Procedures for Electronic Filing, the attorney hereby granted to practice pro hac vice in this case must register for electronic filing with our court within 10 days of this order entered by Judge Alan D Albright. (This is a text–only entry generated by the court. There is no document associated with this entry.) (mm6) (Entered: 11/18/2020)
11/20/2020	44	STIPULATION *OF THE PARTIES REGARDING REVISED SCHEDULE FOR DEFENDANTS MOTION TO TRANSFER VENUE* by Samsung Electronics America, Inc., Samsung Electronics Co., LTD. (Attachments: # 1 Proposed Order)(Lau, Jeffrey) (Entered: 11/20/2020)
12/02/2020	45	BRIEF by Ikorongo Technology LLC, Ikorongo Texas LLC. (Attachments: # 1 Affidavit Declaration of Howard Wisnia, # 2 Exhibit 1, # 3 Exhibit 2, # 4 Exhibit 3, # 5 Exhibit 4, # 6 Exhibit 5, # 7 Exhibit 6, # 8 Exhibit 7, # 9 Exhibit 8, # 10 Exhibit 9, # 11 Exhibit 10, # 12 Exhibit 11, # 13 Exhibit 12, # 14 Exhibit 13)(Gilliland, Derek) (Entered: 12/02/2020)
12/08/2020	46	MOTION to Stay *Pending Transfer* by Samsung Electronics America, Inc., Samsung Electronics Co., LTD. (Attachments: # 1 Proposed Order)(Lau, Jeffrey) (Entered: 12/08/2020)
12/10/2020	47	STIPULATION *re Schedule as to Motion to Transfer Venue* by Ikorongo Technology LLC, Ikorongo Texas LLC. (Attachments: # 1 Proposed Order)(Rupp, Karl) (Entered: 12/10/2020)
12/14/2020	48	MOTION to Appear Pro Hac Vice by Karl Anthony Rupp *for Nicholas Wyss* (Filing fee $ 100 receipt number 0542–14282416) by on behalf of Ikorongo Technology LLC,

		Ikorongo Texas LLC. (Attachments: # 1 Proposed Order)(Rupp, Karl) (Main Document 48 replaced on 12/15/2020) (bw). (Entered: 12/14/2020)
12/15/2020	49	Response in Opposition to Motion, filed by Ikorongo Technology LLC, Ikorongo Texas LLC, re 46 MOTION to Stay *Pending Transfer* filed by Defendant Samsung Electronics Co., LTD, Defendant Samsung Electronics America, Inc. (Attachments: # 1 Declaration of Karl Rupp)(Rupp, Karl) (Entered: 12/15/2020)
12/15/2020		Text Order GRANTING 48 Motion to Appear Pro Hac Vice for Attorney Nicholas Andrew Wyss for Ikorongo Technology LLC and Ikorongo Texas LLC. Before the Court is the Motion for Admission Pro Hac Vice. The Court, having reviewed the Motion, finds it should be GRANTED and therefore orders as follows: IT IS ORDERED the Motion for Admission Pro Hac Vice is GRANTED. IT IS FURTHER ORDERED that Applicant, if he/she has not already done so, shall immediately tender the amount of $100.00, made payable to: Clerk, U.S. District Court, in compliance with Local Rule AT−I (f)(2). Pursuant to our Administrative Policies and Procedures for Electronic Filing, the attorney hereby granted to practice pro hac vice in this case must register for electronic filing with our court within 10 days of this order entered by Judge Alan D Albright. (This is a text−only entry generated by the court. There is no document associated with this entry.) (mm6) (Entered: 12/15/2020)
12/18/2020	50	ORDER GRANTING STIPULATION OF THE PARTIES REGARDING REVISED SCHEDULE FOR DEFENDANTS MOTION TO TRANSFER VENUE. Signed by Judge Alan D Albright. (bw) (Entered: 12/18/2020)
12/22/2020	51	REPLY to Response to Motion, filed by Samsung Electronics America, Inc., Samsung Electronics Co., LTD, re 46 MOTION to Stay *Pending Transfer* filed by Defendant Samsung Electronics Co., LTD, Defendant Samsung Electronics America, Inc. *Defendants' Reply in Support of Motion to Stay Pending Transfer* (Lau, Jeffrey) (Entered: 12/22/2020)
12/23/2020	52	BRIEF by Samsung Electronics America, Inc., Samsung Electronics Co., LTD. (Attachments: # 1 Declaration of Jeffrey Lau, # 2 Ex. 1, # 3 Ex. 2, # 4 Ex. 3, # 5 Ex. 4, # 6 Ex. 5, # 7 Ex. 6, # 8 Ex. 7, # 9 Ex. 8, # 10 Ex. 9, # 11 Ex. 10, # 12 Ex. 11, # 13 Ex. 12, # 14 Ex. 13, # 15 Ex. 14, # 16 Ex. 15, # 17 Ex. 16, # 18 Ex. 17, # 19 Ex. 18, # 20 Ex. 19)(Almeling, David) (Entered: 12/23/2020)
01/05/2021	53	Motion for leave to File Sealed Document (Attachments: # 1 Proposed Order, # 2 Sealed Document, # 3 Sealed Document, # 4 Proposed Order) (Rupp, Karl) (Entered: 01/05/2021)
01/05/2021	54	Motion for leave to File Sealed Document (Attachments: # 1 Proposed Order, # 2 Sealed Document, # 3 Sealed Document, # 4 Sealed Document, # 5 Sealed Document) (Rupp, Karl) (Entered: 01/05/2021)
01/05/2021	55	ATTACHMENT to 54 Motion for leave to File Sealed Document by Ikorongo Technology LLC, Ikorongo Texas LLC. (Attachments: # 1 Declaration of Karl Rupp, # 2 Declaration of Brady Bruce, # 3 Declaration of Michael Mitchell, # 4 Exhibit, # 5 Exhibit, # 6 Exhibit, # 7 Exhibit, # 8 Exhibit, # 9 Exhibit)(Rupp, Karl) (Main Document 55 replaced on 1/6/2021) (mc5). (Attachment 1 replaced on 1/6/2021) (mc5). (Entered: 01/05/2021)
01/08/2021	56	BRIEF regarding 45 Brief, by Ikorongo Technology LLC, Ikorongo Texas LLC. (Attachments: # 1 Affidavit Declaration of Nicholas Wyss, # 2 Exhibit A, # 3 Exhibit B)(Wisnia, Howard) (Entered: 01/08/2021)
01/12/2021	57	Unopposed Motion for leave to File Sealed Document (Attachments: # 1 Proposed Order Granting Defendants' Unopposed Motion for Leave to File Defendants' Response in Opposition to Plaintiffs' Evidentiary Objections to and Motion to Strike Declaration of Daniel S. Friedland Under Seal, # 2 Sealed Document Defendants' Response in Opposition to Plaintiffs' Evidentiary Objections to and Motion to Strike Declaration of Daniel S. Friedland) (Mann, J.) (Entered: 01/12/2021)
01/19/2021	58	Unopposed Motion for leave to File Sealed Document (Attachments: # 1 Proposed Order, # 2 Sealed Document Reply in Support of Opposed Motion to Transfer to The Northern District of California Under 28 U.S.C. § 1404(a), # 3 Exhibit 1) (Mann, J.) (Entered: 01/19/2021)

01/19/2021	59	Unopposed Motion for leave to File Sealed Document (Attachments: # 1 Proposed Order, # 2 Sealed Document Plaintiffs' Reply ISO Motion to Strike Friedland Declaration) (Rupp, Karl) (Entered: 01/19/2021)
01/22/2021	60	RESPONSE *Defendants' Sur–Reply Claim Construction Brief* by Samsung Electronics America, Inc., Samsung Electronics Co., LTD. (Attachments: # 1 Declaration of Jeffrey Lau, # 2 Exhibit 1, # 3 Exhibit 2)(Mann, J.) (Entered: 01/22/2021)
01/27/2021	61	NOTICE of Filing Joint Claim Construction Statement by Ikorongo Technology LLC, Ikorongo Texas LLC (Attachments: # 1 Exhibit A – Disputed Claim Terms)(Rupp, Karl) (Entered: 01/27/2021)
02/01/2021	62	ORDER RESETTING Markman Hearing for 2/5/2021 09:30 AM before Judge Alan D Albright. Signed by Judge Alan D Albright. (bot2) (Entered: 02/01/2021)
02/09/2021	63	Unopposed MOTION *for Entry of Amended Scheduling Order* by Ikorongo Technology LLC, Ikorongo Texas LLC. (Attachments: # 1 Proposed Amended Scheduling Order)(Rupp, Karl) (Entered: 02/09/2021)
02/12/2021	65	Standing Order Regarding Filing Documents Under Seal and Redacted Pleadings in Patent Cases. Signed by Judge Alan D Albright. as of 2/12/2021. (bot1) (Entered: 02/24/2021)
02/22/2021	64	SCHEDULING ORDER: Markman Hearing set for 3/2/2021 01:30 PM before Judge Alan D Albright. Joinder of Parties due by 3/19/2021. Amended Pleadings due by 4/30/2021. Dispositive Motions due by 11/12/2021. Pretrial Conference set for 1/14/2022 before Judge Alan D Albright. Jury Selection and Trial set for 1/24/2022 before Judge Alan D Albright. Signed by Judge Alan D Albright. (bw) (Entered: 02/22/2021)
02/25/2021	66	NOTICE *Updated Notice of Inter Partes Review* by Ikorongo Technology LLC, Ikorongo Texas LLC (Gilliland, Derek) (Entered: 02/25/2021)
03/01/2021	67	ORDER DENYING 27 Motion to Change Venue Signed by Judge Alan D Albright. (lad) (Entered: 03/01/2021)
03/02/2021	68	ORDER RESETTING Zoom Markman Hearing for 4/1/2021 09:00 AM before Judge Alan D Albright. Signed by Judge Alan D Albright. (bot3) (Entered: 03/02/2021)
03/23/2021	69	ORDER RESETTING Zoom Markman Hearing for 4/1/2021 08:30 AM before Judge Alan D Albright. Signed by Judge Alan D Albright. (bot2) (Entered: 03/23/2021)
03/31/2021		Text Order GRANTING 16 Motion to Dismiss entered by Judge Alan D Albright. Before the Court is Defendants motion to dismiss Plaintiffs claims of indirect infringement. On August 20, 2020, Plaintiffs filed their Response. ECF No. 22. On August 27, 2020, Defendants filed their Reply. ECF No. 25. After careful consideration of the parties briefs and the applicable law, the Court GRANTS the motion WITHOUT PREJUDICE. However, the Court ORDERS that Plaintiffs be allowed to take discovery related to these claims when discovery opens. The Court also GRANTS Plaintiffs leave to amend their pleadings to reassert these claims after the start of discovery if they are able to substantiate those allegations. Plaintiffs shall have up to and including June 2, 2021 (three months from the opening of discovery) to amend their pleadings on a good faith basis under Rule 11.(This is a text–only entry generated by the court. There is no document associated with this entry.) (hs) (Entered: 03/31/2021)
03/31/2021		Set/Reset Deadlines: Amended Pleadings due by 6/2/2021. (mc5) (Entered: 03/31/2021)
04/01/2021	70	Minute Entry for proceedings held before Judge Alan D Albright. Markman Hearing held on 4/1/2021. Case called for Markman Hearing by Zoom. Parties announce ready. Defts begin with the plain and ordinary meaning of the term record[s/ed] and the term collect the visited geographic location data. Plaintiffs make counter arguments regarding the construction terms. Court orders that they will maintain their preliminary instruction and keep the plain and order meaning that the court previously determined. Plaintiff argues the term Detection Network Directory. Plaintiffs wishes to modify the courts preliminary instruction with (additional in): A directory that stores and

provides detection data reflecting the location of the location aware cellular phone. Court keeps their preliminary instruction and keeps the plain and ordinary meaning that the court previously determined. Plaintiffs move on to the term recordedusing a satellite–based location–fixing protocol and a detection network directory (704 Patent, claims 33, 46, 48). The defendants argue the word and in the portion of the term protocol and a detection. Court keeps their preliminary instruction as indicated on the record. The defendants argue final claim terms enable[e/ing] definition (543 Patent, claims 32, 39, 46–49, 51, 54, 72, 73, 75; 704 Patent, claims 33, 46, 48) and enable the user to define (543 Patent, claim 56). Defts argue that enable terms should be construed together. Plaintiffs argue that they court should uphold their prior determination of plain and ordinary meaning. Courts preliminary instruction of plain and ordinary meaning are affirmed. Court confirms that they already have a trial date set for January of next year but defts indicate a concern about the date. The parties are concerned because they were previously told trial would be 12 months after the markman but because the markman was twice rescheduled, that is no longer happening. Plaintiffs request that the court reset the trial in accordance with that 12–month time frame. Court considers arguments and determines that the trial will be reset to March 14, 2022. Parties to file an Agreed Amended Scheduling Order considering the revised dates. Plaintiff questions order entered yesterday indicating they have 3 months to develop indirect infringement claims but the date onthe order was not 3 months. Court clarified that the parties have 3 months from yesterday when the order was issued. Plft inquires regarding protective order issue. Parties to review courts order entered yesterday and determine if additional court intervention in necessary. No other pending matters. Hearing concluded. (Minute entry documents are not available electronically.) (Court Reporter Lily Reznik.)(bw) (Entered: 04/01/2021)

Appx011

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

IKORONGO TEXAS LLC,	))	Civil Action No. 2:20-cv-259
Plaintiff,	)))	
v.	))	
SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS AMERICA, INC.,	)))	
Defendants.	))	**JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Ikorongo Texas LLC ("Ikorongo" or "Plaintiff") for its complaint against

defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc.

("SEA") (together "Samsung" or "Defendants"), hereby alleges as follows:

THE PARTIES

1.   Ikorongo is a Texas limited liability company having an address at 678 Bear Tree

Creek, Chapel Hill, NC 27517.

2.   Upon information and belief, Defendant SEC is a corporation organized under the

laws of South Korea, with its principal place of business at 129 Samsung-Ro, Maetan-3dong,

Yeongtong-gu, Suwon, 443-742, South Korea.

3.   Upon information and belief, SEA is a wholly owned subsidiary of SEC and a

corporation organized under the laws of the State of New York, with its principal place of

business at 85 Challenger Rd., Ridgefield Park, New Jersey 07660.

JURISDICTION

4.   This is a civil action for patent infringement under the patent laws of the United States, 35 U.S.C. § 271, *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

5.   This Court has general personal jurisdiction over Samsung because Samsung is engaged in substantial and not isolated activity at its regular and established places of business within this judicial district. This Court has specific jurisdiction over Samsung because Samsung has committed acts of infringement giving rise to this action and has established more than minimum contacts within this judicial district, such that the exercise of jurisdiction over Samsung in this Court would not offend traditional notions of fair play and substantial justice. Samsung, directly and through subsidiaries or intermediaries, has committed and continues to commit acts of infringement of Ikorongo's rights in the Asserted Patents in this District by, among other things, making, using, offering to sell, selling, and importing products and/or services that infringe the Asserted Patents.

6.   Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b). Defendants are registered to do business in Texas, and upon information and belief, Samsung has transacted business in this District and has committed acts of direct and indirect infringement of Ikorongo's rights in this District by, among other things, making, using, offering to sell, selling, and importing products and/or services that infringe the Asserted Patents. Samsung has regular and established places of business in this District, including at 12100 Samsung Boulevard, Austin, Texas 78754; 7300 Ranch Road 2222, Austin, Texas 78730; and 1700 Scenic Loop, Round Rock, Texas 78681.[1]

---

[1] *See, e.g.,* https://www.samsung.com/semiconductor/insights/news-events/austin-texas-named-new-home-for-samsung-electronics/; https://www.statesman.com/news/20181115/samsung-says-

2

FACTUAL BACKGROUND

7.   This action concerns U.S. Patent Numbers RE 41,450 (the '450 Patent), RE 45,543 (the '543 Patent), RE 47,704 (the '704 Patent), and 8,874,554 (the '554 Patent), (collectively the "Asserted Patents"), true and correct copies of which are attached as Exhibits A, B, C, and D, respectively.

8.   Ikorongo, pursuant to the principles of *Waterman v. Mackenzie*, 138 U.S. 252 (1891) and 35 U.S.C. §261, is the owner of the exclusive right under the Asserted Patents within and throughout a specified part of the United States ("the Specified Part") that includes specific counties within the present judicial district, including the right to sue for past, present and future infringement and damages thereof.

9.   Ikorongo Technology LLC is the owner of the entire right, title and interest in the Asserted Patents, including the exclusive right under the Asserted Patents, within and throughout all parts of the United States and world not included in the Specified Part, including the right to sue for past, present and future infringement and damages thereof. This includes at least one county within the present judicial district.

10.   Together Ikorongo and Ikorongo Technology LLC own the entire right, title and interest in the Asserted Patents, including the right to sue for past, present and future infringement and damages thereof, throughout the entire United States and world.

11.   Each of the '450 Patent, the '543 Patent and the '704 Patent is a Reissue Patent of U.S. Patent No. 7,080,139 (the '139 Patent). The '139 Patent, entitled "Method and Apparatus for Selectively Sharing and Passively Tracking Communication Device Experiences" was filed

---

it-will-invest-291-million-in-austin-operations; https://www.service-center-locator.com/samsung/texas/samsung-austin-texas.htm.

on April 24, 2001 as U.S. Patent Application No. 09/841,475. It was duly and legally issued by

the U.S. Patent and Trademark Office (PTO) on July 18, 2006. It received 597 days of patent

term extension. A true and correct copy of the '139 Patent is attached as Exhibit E.

12.   The '450 Patent was filed as Reissue Application 12/172,518 on July 14, 2008. It

was duly and legally reissued by the PTO on July 20, 2010.

13.   The '543 Patent was filed as Reissue Application 13/894,009 on May 14, 2013. It

was duly and legally reissued by the PTO on June 2, 2015.

14.   The '704 Patent was filed as Reissue Application 14/577,746 on December 19,

2014. It was duly and legally reissued by the PTO on November 5, 2019.

15.   The '554 Patent, entitled "Turnersphere" was filed on November 1, 2013 as U.S.

Application 14/069,761. It was duly and legally issued by the PTO on October 28, 2014.

16.   The elements claimed by Asserted Patents, taken alone or in combination, were

not well-understood, routine or conventional to one of ordinary skill in the art at the times of

their respective invention.

COUNT I

(Samsung's Infringement of the '450 Patent)

17.   Paragraphs 1- 16 are reincorporated by reference as if fully set forth herein.

18.   The elements claimed by the '450 patent, taken alone or in combination, were not

well-understood, routine or conventional to one of ordinary skill in the art at the time of the

invention. Rather, the '450 patent provides a technical solution to technical problems.

19.   Samsung has infringed and continues to infringe, literally and/or by the doctrine

of equivalents, individually and/or jointly, at least claim 67 of the '450 patent by making, using,

testing, selling, offering for sale or importing into the Specified Part products and/or services

4

covered by the '450 patent. Samsung's products and/or services that infringe the '450 patent

include, but are not limited to, Samsung smart phones and tablets with GPS capabilities -- such

as the Galaxy line including but not limited to the Samsung Galaxy S10, S10+, Galaxy S20,

Galaxy Note 10, Galaxy Note 10+ -- and any other Samsung products and/or services, either

alone or in combination, that operate in substantially the same manner ("the Accused

Instrumentalities"). As one non-limiting example, use of Samsung S10+, including during

testing, repair and corporate use, includes a computer-implemented method of sharing computer

usage experiences as claimed. *See, e.g.,* exemplary claim chart Exhibit F, which is incorporated

herein by reference.

20.   Additionally, Samsung has been, and currently is, an active inducer of

infringement of the '450 patent under 35 U.S.C. § 271(b) and a contributory infringer of the '450

patent under 35 U.S.C. § 271(c) either literally and/or by the doctrine of equivalents.

21.   Samsung has induced and continues to induce infringement of the '450 patent by

intending that others use, offer for sale, or sell in the Specified Part, products and/or services

covered by the '450 patent, including but not limited to the Accused Instrumentalities. Samsung

provides these products and/or services to others, such as customers, resellers and end-user

customers, who, in turn, use, provision for use, offer for sale, or sell in the Specified Part

products and/or services that directly infringe one or more claims of the '450 patent.

22.   Samsung has contributed to and continues to contribute to the infringement of the

'450 patent by others by knowingly providing products and/or services that when configured

result in a system that directly infringes one or more claims of the '450 patent.

23.   Samsung knew of the '450 patent, or should have known of the '450 patent, but

was willfully blind to its existence. Upon information and belief, Samsung has had actual

Appx016

knowledge of the '450 patent since at least as early as the service upon Samsung of this Complaint.

24.   Samsung has committed and continues to commit affirmative acts that cause infringement of one or more claims of the '450 patent with knowledge of the '450 patent and knowledge or willful blindness that the induced acts constitute infringement of one or more claims of the '450 patent. As an illustrative example only, Samsung induces such acts of infringement by its affirmative actions of intentionally providing hardware and or software components that when used in their normal and customary way, infringe one or more claims of the '450 patent and/or by directly or indirectly providing instructions on how to use its products and/or services in a manner or configuration that infringes one or more claims of the '450 patent, including those found at www.Samsung.com and in product literature.

25.   Samsung has committed and continues to commit contributory infringement by, *inter alia*, knowingly selling products and/or services that when used cause the direct infringement of one or more claims of the '450 patent by a third party, and which have no substantial non-infringing uses, or include a separate and distinct component that is especially made or especially adapted for use in infringement of the '450 patent and is not a staple article or commodity of commerce suitable for substantial non-infringing use.

26.   As a result of Samsung's acts of infringement, Plaintiff has suffered and will continue to suffer damages in an amount to be proved at trial.

COUNT II

(Samsung's Infringement of '543 Patent)

27.   Paragraphs 1- 26 are reincorporated by reference as if fully set forth herein.

6

Appx017

28.   The elements claimed by the '543 patent, taken alone or in combination, were not well-understood, routine or conventional to one of ordinary skill in the art at the time of the invention. Rather, the '543 patent provides a technical solution to technical problems.

29.   Samsung has infringed and continues to infringe, literally and/or by the doctrine of equivalents, individually and/or jointly, at least claim 45 of the '543 patent by making, using, testing, selling, offering for sale or importing into the Specified Part products and/or services covered by the '543 patent, including but not limited to Accused Instrumentalities. As one non-limiting example, the Samsung S10+ meets the claim. *See, e.g.,* exemplary claim chart Exhibit G, which is incorporated herein by reference.

30.   Additionally, Samsung has been, and currently is, an active inducer of infringement of the '543 patent under 35 U.S.C. § 271(b) and a contributory infringer of the '543 patent under 35 U.S.C. § 271(c) either literally and/or by the doctrine of equivalents.

31.   Samsung has induced and continues to induce infringement of the '543 patent by intending that others use, offer for sale, or sell in the Specified Part, products and/or services covered by the '543 patent, including but not limited to the Accused Instrumentalities. Samsung provides these products and/or services to others, such as customers, resellers and end-user customers, who, in turn, use, provision for use, offer for sale, or sell in the Specified Part products and/or services that directly infringe one or more claims of the'543 patent.

32.   Samsung has contributed to and continues to contribute to the infringement of the '543 patent by others by knowingly providing products and/or services that when configured result in a system that directly infringes one or more claims of the '543 patent.

33.   Samsung knew of the '543 patent, or should have known of the '543 patent, but was willfully blind to its existence. Upon information and belief, Samsung has had actual

7

knowledge of the '543 patent since at least as early as the service upon Samsung of this Complaint.

34.   Samsung has committed and continues to commit affirmative acts that cause infringement of one or more claims of the '543 patent with knowledge of the '543 patent and knowledge or willful blindness that the induced acts constitute infringement of one or more claims of the '543 patent. As an illustrative example only, Samsung induces such acts of infringement by its affirmative actions of intentionally providing hardware and or software components that when used in their normal and customary way, infringe one or more claims of the '543 patent and/or by directly or indirectly providing instructions on how to use its products and/or services in a manner or configuration that infringes one or more claims of the '543 patent, including those found at www.Samsung.com and in product literature.

35.   Samsung has committed and continues to commit contributory infringement by, *inter alia*, knowingly selling products and/or services that when used cause the direct infringement of one or more claims of the '543 patent by a third party, and which have no substantial non-infringing uses, or include a separate and distinct component that is especially made or especially adapted for use in infringement of the '543 patent and is not a staple article or commodity of commerce suitable for substantial non-infringing use.

36.   As a result of Samsung's acts of infringement, Plaintiff has suffered and will continue to suffer damages in an amount to be proved at trial.

COUNT III

(Samsung's Infringement of '704 Patent)

37.   Paragraphs 1- 36 are reincorporated by reference as if fully set forth herein.

Appx019

38.   The elements claimed by the '704 patent, taken alone or in combination, were not

well-understood, routine or conventional to one of ordinary skill in the art at the time of the

invention. Rather, the '704 patent provides a technical solution to technical problems.

39.   Samsung has infringed and continues to infringe, literally and/or by the doctrine

of equivalents, individually and/or jointly, at least claim 48 of the '704 patent by making, using,

testing, selling, offering for sale or importing into the Specified Part products and/or services

covered by the '704 patent, including but not limited to Accused Instrumentalities.   As one non-

limiting example, the Samsung S10+ infringes the patent. *See, e.g.,* exemplary claim chart

Exhibit H, which is incorporated herein by reference.

40.   Additionally, Samsung has been, and currently is, an active inducer of

infringement of the '704 patent under 35 U.S.C. § 271(b) and a contributory infringer of the '704

patent under 35 U.S.C. § 271(c) either literally and/or by the doctrine of equivalents.

41.   Samsung has induced and continues to induce infringement of the '704 patent by

intending that others use, offer for sale, or sell in the Specified Part, products and/or services

covered by the '704 patent, including but not limited to the Accused Instrumentalities. Samsung

provides these products and/or services to others, such as customers, resellers and end-user

customers, who, in turn, use, provision for use, offer for sale, or sell in the Specified Part

products and/or services that directly infringe one or more claims of the'704 patent.

42.   Samsung has contributed to and continues to contribute to the infringement of the

'704 patent by others by knowingly providing products and/or services that when configured

result in a system that directly infringes one or more claims of the '704 patent.

43.   Samsung knew of the '704 patent, or should have known of the '704 patent, but

was willfully blind to its existence. Upon information and belief, Samsung has had actual

9

knowledge of the '704 patent since at least as early as the service upon Samsung of this Complaint.

44.   Samsung has committed and continues to commit affirmative acts that cause infringement of one or more claims of the '704 patent with knowledge of the '704 patent and knowledge or willful blindness that the induced acts constitute infringement of one or more claims of the '704 patent. As an illustrative example only, Samsung induces such acts of infringement by its affirmative actions of intentionally providing hardware and or software components that when used in their normal and customary way, infringe one or more claims of the '704 patent and/or by directly or indirectly providing instructions on how to use its products and/or services in a manner or configuration that infringes one or more claims of the '704 patent, including those found at www.Samsung.com and in product literature.

45.   Samsung has committed and continues to commit contributory infringement by, *inter alia*, knowingly selling products and/or services that when used cause the direct infringement of one or more claims of the '704 patent by a third party, and which have no substantial non-infringing uses, or include a separate and distinct component that is especially made or especially adapted for use in infringement of the '704 patent and is not a staple article or commodity of commerce suitable for substantial non-infringing use.

46.   As a result of Samsung's acts of infringement, Plaintiff has suffered and will continue to suffer damages in an amount to be proved at trial.

COUNT IV

(Samsung's Infringement of '554 Patent)

47.   Paragraphs 1- 46 are reincorporated by reference as if fully set forth herein.

Appx021

48.   The elements claimed by the '554 patent, taken alone or in combination, were not well-understood, routine or conventional to one of ordinary skill in the art at the time of the invention. Rather, the '554 patent provides a technical solution to technical problems.

49.   Samsung has infringed and continues to infringe, literally and/or by the doctrine of equivalents, individually and/or jointly, at least claim 1 of the '554 patent by making, using, testing, selling, offering for sale or importing into the Specified Part products and/or services covered by the '554 patent, including but not limited to Accused Instrumentalities. As one non-limiting example, the Samsung S10+ infringes the patent. *See, e.g.,* exemplary claim chart Exhibit I, which is incorporated herein by reference.

50.   Additionally, Samsung has been, and currently is, an active inducer of infringement of the '554 patent under 35 U.S.C. § 271(b) and a contributory infringer of the '554 patent under 35 U.S.C. § 271(c) either literally and/or by the doctrine of equivalents.

51.   Samsung has induced and continues to induce infringement of the '554 patent by intending that others use, offer for sale, or sell in the Specified Part, products and/or services covered by the '554 patent, including but not limited to the Accused Instrumentalities. Samsung provides these products and/or services to others, such as customers, resellers and end-user customers, who, in turn, use, provision for use, offer for sale, or sell in the Specified Part products and/or services that directly infringe one or more claims of the'554 patent.

52.   Samsung has contributed to and continues to contribute to the infringement of the '554 patent by others by knowingly providing products and/or services that when configured result in a system that directly infringes one or more claims of the '554 patent.

53.   Samsung knew of the '554 patent, or should have known of the '554 patent, but was willfully blind to its existence. Upon information and belief, Samsung has had actual

Appx022

knowledge of the '554 patent since at least as early as the service upon Samsung of this

Complaint.

54.   Samsung has committed and continues to commit affirmative acts that cause

infringement of one or more claims of the '554 patent with knowledge of the '554 patent and

knowledge or willful blindness that the induced acts constitute infringement of one or more

claims of the '554 patent. As an illustrative example only, Samsung induces such acts of

infringement by its affirmative actions of intentionally providing hardware and or software

components that when used in their normal and customary way, infringe one or more claims of

the '554 patent and/or by directly or indirectly providing instructions on how to use its products

and/or services in a manner or configuration that infringes one or more claims of the '554 patent,

including those found at www.Samsung.com and in product literature.

55.   Samsung has committed and continues to commit contributory infringement by,

inter alia, knowingly selling products and/or services that when used cause the direct

infringement of one or more claims of the '554 patent by a third party, and which have no

substantial non-infringing uses, or include a separate and distinct component that is especially

made or especially adapted for use in infringement of the '554 patent and is not a staple article or

commodity of commerce suitable for substantial non-infringing use.

56.   As a result of Samsung's acts of infringement, Plaintiff has suffered and will

continue to suffer damages in an amount to be proved at trial.

PRAYER FOR RELIEF

Plaintiff requests that the Court enter judgment against Samsung:

(A)   that Samsung has infringed one or more claims of each of the Asserted

Patents, directly and/or indirectly, literally and/or under the doctrine of equivalents;

Appx023

(B)   awarding damages sufficient to compensate Plaintiff for Samsung's infringement under 35 U.S.C. § 284;

(C)   finding this case exceptional under 35 U.S.C. § 285 and awarding Plaintiff its reasonable attorneys' fees;

(D)   awarding Plaintiff its costs and expenses incurred in this action;

(E)   awarding Plaintiff prejudgment and post-judgment interest; and

(F)   granting Plaintiff such further relief as the Court deems just and appropriate.

DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury of all claims so triable under Federal Rule Of Civil

Procedure 38.

Date: March 31, 2020   Respectfully submitted,

/s/Derek Gilliland
DEREK GILLILAND
STATE BAR NO. 24007239
SOREY, GILLILAND & HULL, LLP
109 W. Tyler St.
Longview, Texas 75601
903.212.2822 (telephone)
903.212.2864 (facsimile)
derek@soreylaw.com

KARL RUPP
State Bar No. 24035243
NIX PATTERSON L.L.P.
1845 Woodall Rodgers Fwy., Suite 1050
Dallas, Texas 45001
972.831.1188 (telephone)
972.444.0716 (facsimile)
krupp@nixlaw.com

OF COUNSEL:

HOWARD WISNIA (*pro hac vice* forthcoming*)*
WISNIA PC
12770 High Bluff Dr., Suite 200
San Diego, CA 92130
Tel: (858) 461-0989
howard@wisnialaw.com

COUNSEL for PLAINTIFF

Appx025

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

	)	
IKORONGO TECHNOLOGY LLC	)	
and IKORONGO TEXAS LLC,	)	Civil Action No. 6:20-cv-259
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
SAMSUNG ELECTRONICS CO., LTD.,	)	
and SAMSUNG ELECTRONICS	)	
AMERICA, INC.,	)	
Defendants.	)	**JURY TRIAL DEMANDED**
	)	

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Ikorongo Technology LLC ("Ikorongo Tech") and Ikorongo Texas LLC

("Ikorongo TX") (together "Ikorongo" or "Plaintiffs") for their complaint against defendants

Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA")

(together "Samsung" or "Defendants"), hereby alleges as follows:

THE PARTIES

1.   Ikorongo Tech is a North Carolina limited liability company having an address at

678 Bear Tree Creek, Chapel Hill, NC 27517.

2.   Ikorongo TX is a Texas limited liability company having an address at 678 Bear

Tree Creek, Chapel Hill, NC 27517.

3.   Upon information and belief, Defendant SEC is a corporation organized under the

laws of South Korea, with its principal place of business at 129 Samsung-Ro, Maetan-3dong,

Yeongtong-gu, Suwon, 443-742, South Korea.

Appx026

4.   Upon information and belief, SEA is a wholly owned subsidiary of SEC and a corporation organized under the laws of the State of New York, with its principal place of business at 85 Challenger Rd., Ridgefield Park, New Jersey 07660.

JURISDICTION

5.   This is a civil action for patent infringement under the patent laws of the United States, 35 U.S.C. § 271, *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

6.   This Court has general personal jurisdiction over Samsung because Samsung is engaged in substantial and not isolated activity at its regular and established places of business within this judicial district. This Court has specific jurisdiction over Samsung because Samsung has committed acts of infringement giving rise to this action and has established more than minimum contacts within this judicial district, such that the exercise of jurisdiction over Samsung in this Court would not offend traditional notions of fair play and substantial justice. Samsung, directly and through subsidiaries or intermediaries, has committed and continues to commit acts of infringement of Ikorongo's rights in the Asserted Patents in this District by, among other things, making, using, offering to sell, selling, and importing products and/or services that infringe the Asserted Patents.

7.   Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b). Defendants are registered to do business in Texas, and upon information and belief, Samsung has transacted business in this District and has committed acts of direct and indirect infringement in this District by, among other things, making, using, offering to sell, selling, and importing products and/or services that infringe the Asserted Patents. Samsung has regular and established places of business in this District, including at 12100 Samsung Boulevard, Austin, Texas 78754;

Appx027

7300 Ranch Road 2222, Austin, Texas 78730; and 1700 Scenic Loop, Round Rock, Texas 78681.[1]

FACTUAL BACKGROUND

8.   This action concerns U.S. Patent Numbers RE 41,450 (the '450 Patent), RE 45,543 (the '543 Patent), RE 47,704 (the '704 Patent), and 8,874,554 (the '554 Patent), (collectively the "Asserted Patents"), true and correct copies of which are attached as Exhibits A, B, C, and D, respectively.

9.   Ikorongo TX, pursuant to the principles of *Waterman v. Mackenzie*, 138 U.S. 252 (1891) and 35 U.S.C. §261, is the owner of the exclusive right under the Asserted Patents within and throughout a specified part of the United States ("the Specified Part") that includes specific counties within the present judicial district, including the right to sue for past, present and future infringement and damages thereof.

10.   Ikorongo Tech is the owner of the entire right, title and interest in the Asserted Patents, including the exclusive right under the Asserted Patents, within and throughout all parts of the United States and world not included in the Specified Part, including the right to sue for past, present and future infringement and damages thereof. This includes at least one county within the present judicial district.

11.   Together Ikorongo TX and Ikorongo Tech own the entire right, title and interest in the Asserted Patents, including the right to sue for past, present and future infringement and damages thereof, throughout the entire United States and world.

---

[1] *See, e.g.,* https://www.samsung.com/semiconductor/insights/news-events/austin-texas-named-new-home-for-samsung-electronics/; https://www.statesman.com/news/20181115/samsung-says-it-will-invest-291-million-in-austin-operations; https://www.service-center-locator.com/samsung/texas/samsung-austin-texas.htm.

12.   Each of the '450 Patent, the '543 Patent and the '704 Patent is a Reissue Patent of U.S. Patent No. 7,080,139 (the '139 Patent). The '139 Patent, entitled "Method and Apparatus for Selectively Sharing and Passively Tracking Communication Device Experiences" was filed on April 24, 2001 as U.S. Patent Application No. 09/841,475. It was duly and legally issued by the U.S. Patent and Trademark Office (PTO) on July 18, 2006. It received 597 days of patent term extension. A true and correct copy of the '139 Patent is attached as Exhibit E.

13.   The '450 Patent was filed as Reissue Application 12/172,518 on July 14, 2008. It was duly and legally reissued by the PTO on July 20, 2010.

14.   The '543 Patent was filed as Reissue Application 13/894,009 on May 14, 2013. It was duly and legally reissued by the PTO on June 2, 2015.

15.   The '704 Patent was filed as Reissue Application 14/577,746 on December 19, 2014. It was duly and legally reissued by the PTO on November 5, 2019.

16.   The '554 Patent, entitled "Turnersphere" was filed on November 1, 2013 as U.S. Application 14/069,761. It was duly and legally issued by the PTO on October 28, 2014.

17.   The elements claimed by Asserted Patents, taken alone or in combination, were not well-understood, routine or conventional to one of ordinary skill in the art at the times of their respective invention.

COUNT I

(Samsung's Infringement of the '450 Patent)

18.   Paragraphs 1- 17 are reincorporated by reference as if fully set forth herein.

19.   The elements claimed by the '450 patent, taken alone or in combination, were not well-understood, routine or conventional to one of ordinary skill in the art at the time of the invention. Rather, the '450 patent provides a technical solution to technical problems.

20.   Samsung has infringed and continues to infringe, literally and/or by the doctrine of equivalents, individually and/or jointly, at least claim 67 of the '450 patent by making, using, testing, selling, offering for sale or importing into the United States products and/or services covered by the'450 patent. Samsung's products and/or services that infringe the'450 patent include, but are not limited to, Samsung smart phones and tablets with GPS capabilities -- such as the Galaxy line including but not limited to the Samsung Galaxy S10, S10+, Galaxy S20, Galaxy Note 10, Galaxy Note 10+ -- and any other Samsung products and/or services, either alone or in combination, that operate in substantially the same manner ("the Accused Instrumentalities"). As one non-limiting example, use of Samsung S10+, including during testing, repair and corporate use, includes a computer-implemented method of sharing computer usage experiences as claimed. *See, e.g.,* exemplary claim chart Exhibit F, which is incorporated herein by reference.

21.   Additionally, Samsung has been, and currently is, an active inducer of infringement of the '450 patent under 35 U.S.C. § 271(b) and a contributory infringer of the '450 patent under 35 U.S.C. § 271(c) either literally and/or by the doctrine of equivalents.

22.   Samsung has induced and continues to induce infringement of the '450 patent by intending that others use, offer for sale, or sell in the United States, products and/or services covered by the '450 patent, including but not limited to the Accused Instrumentalities. Samsung provides these products and/or services to others, such as customers, resellers and end-user customers, who, in turn, use, provision for use, offer for sale, or sell in the United States products and/or services that directly infringe one or more claims of the'450 patent.

23.   Samsung has contributed to and continues to contribute to the infringement of the '450 patent by others by knowingly providing products and/or services that when configured result in a system that directly infringes one or more claims of the '450 patent.

24.   Samsung knew of the '450 patent, or should have known of the '450 patent, but was willfully blind to its existence. Upon information and belief, Samsung has had actual knowledge of the '450 patent since at least as early as the service upon Samsung of this Complaint.

25.   Samsung has committed and continues to commit affirmative acts that cause infringement of one or more claims of the '450 patent with knowledge of the '450 patent and knowledge or willful blindness that the induced acts constitute infringement of one or more claims of the '450 patent. As an illustrative example only, Samsung induces such acts of infringement by its affirmative actions of intentionally providing hardware and or software components that when used in their normal and customary way, infringe one or more claims of the '450 patent and/or by directly or indirectly providing instructions on how to use its products and/or services in a manner or configuration that infringes one or more claims of the '450 patent, including those found at www.Samsung.com and in product literature.

26.   Samsung has committed and continues to commit contributory infringement by, *inter alia*, knowingly selling products and/or services that when used cause the direct infringement of one or more claims of the '450 patent by a third party, and which have no substantial non-infringing uses, or include a separate and distinct component that is especially made or especially adapted for use in infringement of the '450 patent and is not a staple article or commodity of commerce suitable for substantial non-infringing use.

27.   As a result of Samsung's acts of infringement, Plaintiffs have suffered and will continue to suffer damages in an amount to be proved at trial.

COUNT II

(Samsung's Infringement of '543 Patent)

28.   Paragraphs 1- 27 are reincorporated by reference as if fully set forth herein.

29.   The elements claimed by the '543 patent, taken alone or in combination, were not well-understood, routine or conventional to one of ordinary skill in the art at the time of the invention. Rather, the '543 patent provides a technical solution to technical problems.

30.   Samsung has infringed and continues to infringe, literally and/or by the doctrine of equivalents, individually and/or jointly, at least claim 45 of the '543 patent by making, using, testing, selling, offering for sale or importing into the United States products and/or services covered by the '543 patent, including but not limited to Accused Instrumentalities. As one non-limiting example, the Samsung S10+ meets the claim. *See, e.g.,* exemplary claim chart Exhibit G, which is incorporated herein by reference.

31.   Additionally, Samsung has been, and currently is, an active inducer of infringement of the '543 patent under 35 U.S.C. § 271(b) and a contributory infringer of the '543 patent under 35 U.S.C. § 271(c) either literally and/or by the doctrine of equivalents.

32.   Samsung has induced and continues to induce infringement of the '543 patent by intending that others use, offer for sale, or sell in the United States, products and/or services covered by the '543 patent, including but not limited to the Accused Instrumentalities. Samsung provides these products and/or services to others, such as customers, resellers and end-user customers, who, in turn, use, provision for use, offer for sale, or sell in the United States products and/or services that directly infringe one or more claims of the'543 patent.

7

Appx032

33.   Samsung has contributed to and continues to contribute to the infringement of the '543 patent by others by knowingly providing products and/or services that when configured result in a system that directly infringes one or more claims of the '543 patent.

34.   Samsung knew of the '543 patent, or should have known of the '543 patent, but was willfully blind to its existence. Upon information and belief, Samsung has had actual knowledge of the '543 patent since at least as early as the service upon Samsung of this Complaint.

35.   Samsung has committed and continues to commit affirmative acts that cause infringement of one or more claims of the '543 patent with knowledge of the '543 patent and knowledge or willful blindness that the induced acts constitute infringement of one or more claims of the '543 patent. As an illustrative example only, Samsung induces such acts of infringement by its affirmative actions of intentionally providing hardware and or software components that when used in their normal and customary way, infringe one or more claims of the '543 patent and/or by directly or indirectly providing instructions on how to use its products and/or services in a manner or configuration that infringes one or more claims of the '543 patent, including those found at www.Samsung.com and in product literature.

36.   Samsung has committed and continues to commit contributory infringement by, *inter alia*, knowingly selling products and/or services that when used cause the direct infringement of one or more claims of the '543 patent by a third party, and which have no substantial non-infringing uses, or include a separate and distinct component that is especially made or especially adapted for use in infringement of the '543 patent and is not a staple article or commodity of commerce suitable for substantial non-infringing use.

8

Appx033

37.   As a result of Samsung's acts of infringement, Plaintiffs have suffered and will continue to suffer damages in an amount to be proved at trial.

COUNT III

(Samsung's Infringement of '704 Patent)

38.   Paragraphs 1- 37 are reincorporated by reference as if fully set forth herein.

39.   The elements claimed by the '704 patent, taken alone or in combination, were not well-understood, routine or conventional to one of ordinary skill in the art at the time of the invention. Rather, the '704 patent provides a technical solution to technical problems.

40.   Samsung has infringed and continues to infringe, literally and/or by the doctrine of equivalents, individually and/or jointly, at least claim 48 of the '704 patent by making, using, testing, selling, offering for sale or importing into the United States products and/or services covered by the '704 patent, including but not limited to Accused Instrumentalities.   As one non-limiting example, the Samsung S10+ infringes the patent. *See, e.g.,* exemplary claim chart Exhibit H, which is incorporated herein by reference.

41.   Additionally, Samsung has been, and currently is, an active inducer of infringement of the '704 patent under 35 U.S.C. § 271(b) and a contributory infringer of the '704 patent under 35 U.S.C. § 271(c) either literally and/or by the doctrine of equivalents.

42.   Samsung has induced and continues to induce infringement of the '704 patent by intending that others use, offer for sale, or sell in the United States, products and/or services covered by the '704 patent, including but not limited to the Accused Instrumentalities. Samsung provides these products and/or services to others, such as customers, resellers and end-user customers, who, in turn, use, provision for use, offer for sale, or sell in the United States products and/or services that directly infringe one or more claims of the'704 patent.

9

43.   Samsung has contributed to and continues to contribute to the infringement of the '704 patent by others by knowingly providing products and/or services that when configured result in a system that directly infringes one or more claims of the '704 patent.

44.   Samsung knew of the '704 patent, or should have known of the '704 patent, but was willfully blind to its existence. Upon information and belief, Samsung has had actual knowledge of the '704 patent since at least as early as the service upon Samsung of this Complaint.

45.   Samsung has committed and continues to commit affirmative acts that cause infringement of one or more claims of the '704 patent with knowledge of the '704 patent and knowledge or willful blindness that the induced acts constitute infringement of one or more claims of the '704 patent. As an illustrative example only, Samsung induces such acts of infringement by its affirmative actions of intentionally providing hardware and or software components that when used in their normal and customary way, infringe one or more claims of the '704 patent and/or by directly or indirectly providing instructions on how to use its products and/or services in a manner or configuration that infringes one or more claims of the '704 patent, including those found at www.Samsung.com and in product literature.

46.   Samsung has committed and continues to commit contributory infringement by, *inter alia*, knowingly selling products and/or services that when used cause the direct infringement of one or more claims of the '704 patent by a third party, and which have no substantial non-infringing uses, or include a separate and distinct component that is especially made or especially adapted for use in infringement of the '704 patent and is not a staple article or commodity of commerce suitable for substantial non-infringing use.

10

Appx035

47.   As a result of Samsung's acts of infringement, Plaintiffs have suffered and will continue to suffer damages in an amount to be proved at trial.

COUNT IV

(Samsung's Infringement of '554 Patent)

48.   Paragraphs 1- 47 are reincorporated by reference as if fully set forth herein.

49.   The elements claimed by the '554 patent, taken alone or in combination, were not well-understood, routine or conventional to one of ordinary skill in the art at the time of the invention. Rather, the '554 patent provides a technical solution to technical problems.

50.   Samsung has infringed and continues to infringe, literally and/or by the doctrine of equivalents, individually and/or jointly, at least claim 1 of the '554 patent by making, using, testing, selling, offering for sale or importing into the United States products and/or services covered by the '554 patent, including but not limited to Accused Instrumentalities. As one non-limiting example, the Samsung S10+ infringes the patent. *See, e.g.,* exemplary claim chart Exhibit I, which is incorporated herein by reference.

51.   Additionally, Samsung has been, and currently is, an active inducer of infringement of the '554 patent under 35 U.S.C. § 271(b) and a contributory infringer of the '554 patent under 35 U.S.C. § 271(c) either literally and/or by the doctrine of equivalents.

52.   Samsung has induced and continues to induce infringement of the '554 patent by intending that others use, offer for sale, or sell in the United States, products and/or services covered by the '554 patent, including but not limited to the Accused Instrumentalities. Samsung provides these products and/or services to others, such as customers, resellers and end-user customers, who, in turn, use, provision for use, offer for sale, or sell in the United States products and/or services that directly infringe one or more claims of the'554 patent.

11

53.   Samsung has contributed to and continues to contribute to the infringement of the '554 patent by others by knowingly providing products and/or services that when configured result in a system that directly infringes one or more claims of the '554 patent.

54.   Samsung knew of the '554 patent, or should have known of the '554 patent, but was willfully blind to its existence. Upon information and belief, Samsung has had actual knowledge of the '554 patent since at least as early as the service upon Samsung of this Complaint.

55.   Samsung has committed and continues to commit affirmative acts that cause infringement of one or more claims of the '554 patent with knowledge of the '554 patent and knowledge or willful blindness that the induced acts constitute infringement of one or more claims of the '554 patent. As an illustrative example only, Samsung induces such acts of infringement by its affirmative actions of intentionally providing hardware and or software components that when used in their normal and customary way, infringe one or more claims of the '554 patent and/or by directly or indirectly providing instructions on how to use its products and/or services in a manner or configuration that infringes one or more claims of the '554 patent, including those found at www.Samsung.com and in product literature.

56.   Samsung has committed and continues to commit contributory infringement by, *inter alia*, knowingly selling products and/or services that when used cause the direct infringement of one or more claims of the '554 patent by a third party, and which have no substantial non-infringing uses, or include a separate and distinct component that is especially made or especially adapted for use in infringement of the '554 patent and is not a staple article or commodity of commerce suitable for substantial non-infringing use.

57.   As a result of Samsung's acts of infringement, Plaintiffs have suffered and will continue to suffer damages in an amount to be proved at trial.

PRAYER FOR RELIEF

Plaintiffs request that the Court enter judgment against Samsung:

(A)   that Samsung has infringed one or more claims of each of the Asserted Patents, directly and/or indirectly, literally and/or under the doctrine of equivalents;

(B)   awarding damages sufficient to compensate Plaintiffs for Samsung's infringement under 35 U.S.C. § 284;

(C)   finding this case exceptional under 35 U.S.C. § 285 and awarding Plaintiffs their reasonable attorneys' fees;

(D)   awarding Plaintiffs their costs and expenses incurred in this action;

(E)   awarding Plaintiffs prejudgment and post-judgment interest; and

(F)   granting Plaintiffs such further relief as the Court deems just and appropriate.

DEMAND FOR JURY TRIAL

Plaintiffs demand trial by jury of all claims so triable under Federal Rule Of Civil

Procedure 38.

Date: April 1, 2020   Respectfully submitted,

/s/Derek Gilliland
DEREK GILLILAND
STATE BAR NO. 24007239
SOREY, GILLILAND & HULL, LLP
109 W. Tyler St.
Longview, Texas 75601
903.212.2822 (telephone)
903.212.2864 (facsimile)
dgilliland@SoreyLaw.com

KARL RUPP
State Bar No. 24035243
NIX PATTERSON L.L.P.
1845 Woodall Rodgers Fwy., Suite 1050
Dallas, Texas 45001
972.831.1188 (telephone)
972.444.0716 (facsimile)
krupp@nixlaw.com

OF COUNSEL:

HOWARD WISNIA (*pro hac vice* forthcoming*)*
WISNIA PC
12770 High Bluff Dr., Suite 200
San Diego, CA 92130
Tel: (858) 461-0989
howard@wisnialaw.com

COUNSEL for PLAINTIFFS

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

IKORONGO TECHNOLOGY LLC and IKORONGO TEXAS LLC, Plaintiffs, v. SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Civil Action No. 6:20-cv-259-ADA **JURY TRIAL DEMANDED**

**DEFENDANTS' OPPOSED MOTION TO TRANSFER TO THE NORTHERN
DISTRICT OF CALIFORNIA UNDER 28 U.S.C. § 1404(a)**

TABLE OF CONTENTS

<div align="right">

Page

</div>

TABLE OF AUTHORITIES

Page(s)

I.   INTRODUCTION

Pursuant to 28 U.S.C. § 1404(a), Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung") seek transfer of this action to the Northern District of California ("NDCA").   The private and public interest factors courts deem most important—convenience for witnesses, particularly third-party witnesses, compulsory process for third parties, and the location of evidence—all weigh in favor of transfer.   Indeed, this Court recently granted a motion to transfer in *Parus Holdings* under similar circumstances.   *See Parus Holdings Inc. v. LG Elecs. Inc.*, No. 6:19-CV-00432-ADA, 2020 WL 4905809 (W.D. Tex. Aug. 20, 2020).

Transfer to the NDCA is clearly more convenient.   While Plaintiffs Ikorongo Technology LLC and Ikorongo Texas LLC (collectively, "Ikorongo") allege infringement against smartphones and tablets sold by Samsung, Ikorongo's infringement contentions are directed at functionality found in the Google Maps, Google+, Google Play Music, YouTube Music, and AT&T Secure Family applications (collectively, the "Accused Applications") running on those devices.   For three out of the five applications, the accused features were developed in the NDCA: Google Maps, Google+, and AT&T Secure Family.   The accused features in Google Play Music and YouTube Music were primarily developed in New York City.   *None* of the Accused Applications were developed in the Western District of Texas ("WDTX").   Moreover, two of the named inventors of the four asserted patents currently reside in the NDCA, and no named inventors or other third-party witnesses appear to be located in the WDTX.   Because the location of the third parties and evidence in the NDCA strongly favor transfer, this action should be transferred to the NDCA.

II.   FACTUAL BACKGROUND

A.   Ikorongo's Allegations Are Directed At Third-Party Applications

Ikorongo alleges that Samsung's smartphones and tablets infringe four patents—U.S.
Patent Nos. RE41,450 (the "'450 Patent"); RE45,543 (the "'543 Patent"); RE47,704 (the "'704
Patent"); and 8,874,554 (the "'554 Patent") (collectively, "Asserted Patents"). The three reissue
patents are directed to users sharing visited geographic location data with a group of other users
using mobile devices. Am. Compl., ECF No. 2, Exs. F-H. The '554 Patent is directed to providing
location-based media recommendations. Am. Compl., ECF No. 2, Ex. I.

Ikorongo's preliminary infringement contentions, served on August 8, 2020, make clear
that its allegations rely on functionality found in the Accused Applications. *See* Lau Decl., Ex. 1
(Ikorongo Infringement Contentions Cover Pleading) at 1, 3-4, 6. Indeed, Ikorongo's allegations
concern devices "preloaded" with the Accused Applications. *Id.*

B.   Google is Located in the NDCA

Third-party Google LLC ("Google") is a Delaware limited liability company with its
principal place of business in Mountain View, California in the NDCA. Declaration of Daniel S.
Friedland in Support of Defendants' Motion to Transfer ("Friedland Decl.") ¶ 2.   Google's
headquarters, which includes offices in Sunnyvale and San Francisco (collectively referred to as
"Bay Area"), is the strategic center of Google's business. *Id.*

Google's employees knowledgeable about the accused Google Maps and Google+ features
are based in the NDCA. *Id.* ¶¶ 4-8. For example, the engineer who leads a team working on
location sharing for Google Maps is based in Mountain View, along with her team members. *Id.*
¶ 5. Another engineer who leads a team working on Android location infrastructure and his team
members are also based in Mountain View. *Id.* Additionally, the team of engineers that developed
and supported the accused Google+ features were located in Mountain View. *Id.* ¶¶ 7-8. Google

is unaware of any employees located in the WDTX who have worked on the accused Google Maps and Google+ functionality. *Id.* ¶¶ 5, 8.

Google's employees knowledgeable about the accused Google Play Music and YouTube Music features are located primarily in New York City, with team members also located in Seattle and Mountain View. *Id.* ¶¶ 9-10. For example, one engineer who has worked on the accused Google Play Music and YouTube Music features is currently based in Seattle, Washington, but belongs to a broader team of engineers, most of whom are based in New York City. *Id.* ¶ 10. Google is unaware of any employees who have worked on the accused Google Play Music and YouTube Music functionality and are located in the WDTX. *Id.*

C.   Relevant Samsung Employees and Documents Are Not in This District

Defendant Samsung Electronics Co., Ltd. "SEC") is a corporation founded under the laws of Korea with its principal place of business in Korea. Declaration of Jinhee Lee in Support of Defendants' Motion to Transfer ("Lee Decl.") ¶ 6. Defendant Samsung Electronics America, Inc. ("SEA") is a corporation formed under the laws of New York with its principal place of business in New Jersey. Declaration of Edward Viejo in Support of Defendants' Motion to Transfer ("Viejo Decl.") ¶ 7.   SEA has offices in the NDCA with over three hundred employees. *Id.* ¶ 12.

SEC and SEA (collectively "Samsung") have no employees in this District or elsewhere who control the design and development of the functionality of the Accused Applications. Lee Decl. ¶¶ 8-9; Viejo Decl. ¶ 8-9; Declaration of Kang Won Lee in Support of Defendants' Motion to Transfer ("W. Lee Decl.") ¶ 5. Further, Samsung does not have any employees who modify any aspect of the source code for the Accused Applications. Lee Decl. ¶ 10; Viejo Decl. ¶ 10; W. Lee Decl. ¶ 6. Nor does it have source code or internal, non-public technical documentation regarding the Accused Applications. Lee Decl. ¶ 11; Viejo Decl. ¶ 11; W. Lee Decl. ¶ 7. Samsung employees responsible for the design, engineering, sourcing components, testing, quality

SAMSUNG'S MOT. FOR TRANSFER   -3-   6:20-cv-259-ADA
TO NDCA

management, and manufacturing of the Accused Devices are located in Korea. Lee Decl. ¶ 14.

Samsung employees responsible for incorporating the Accused Applications into Samsung

products are located in Korea and Bellevue, Washington. Lee Decl. ¶ 14; W. Lee Decl. ¶ 8. To

the extent Samsung has any technical documents relevant to this case, the vast majority of them

would be located in Korea. Lee Decl. ¶ 12.

> **D.   AT&T Secure Family Was Researched, Designed, and Developed in the NDCA**

Based on publicly available information, it appears that AT&T's Secure Family was

researched, designed, and developed by third-party Location Labs at its headquarters in

Emeryville, California within the NDCA. Lau Decl., Ex. 2 (Location Labs by Avast Blog); Ex 3

(Shanna Jan Resume); Ex. 4 (Location Labs Crunchbase Webpage). A team of approximately 30

engineers at Location Labs researched, designed, and developed Secure Family. Lau Decl., Ex.

2 (Location Labs by Avast Blog). Location Labs was later acquired by Avast Software s.r.o.

("Avast"). Lau Decl., Ex. 4 (Location Labs Crunchbase Webpage). Avast currently has four

U.S. offices, two of which are in NDCA—Avast's Silicon Valley and Emeryville offices. Lau

Decl., Ex. 5 (Avast Contacts Webpage). Avast does not have any offices in Texas. *Id.*

Moreover, although AT&T is headquartered in Dallas, Texas, it appears they did not develop

Secure Family, as detailed above. Instead, the lead app developer for Secure Family is a

Location Labs employee located in Merced, California. Lau Decl., Ex. 6 (Secure Family Lead

LinkedIn Profile).

> **E.   Named Inventors Are Located in the NDCA**

There are six named inventors in the Asserted Patents. Two of them, Brady Bruce and

Michael Mitchell, currently reside in the NDCA in San Francisco and Santa Cruz, California,

respectively. Lau Decl. ¶ 8. None of the named inventors currently reside in or near WDTX. *Id.*

III.   LEGAL STANDARD

Under 28 U.S.C. § 1404(a), "For the convenience of parties and witnesses, in the interest of justice, a district court may transfer any civil action to any other district or division where it might have been brought . . . ." 28 U.S.C. § 1404(a). "The preliminary question under § 1404(a) is whether a civil action 'might have been brought' in the destination venue." *In re Volkswagen of Am., Inc.*, 545 F.3d 304, 312 (5th Cir. 2008) (*Volkswagen II*) (quoting 28 U.S.C. § 1404(a)).

"The determination of 'convenience' turns on a number of public and private interest factors, none of which can be said to be of dispositive weight." *Action Indus., Inc. v. U.S. Fid. & Guar. Co.*, 358 F.3d 337, 340 (5th Cir. 2004). The private factors include: "(1) the relative ease of access to sources of proof; (2) the availability of compulsory process to secure the attendance of witnesses; (3) the cost of attendance for willing witnesses; and (4) all other practical problems that make trial of a case easy, expeditious and inexpensive." *In re Volkswagen AG*, 371 F.3d 201, 203 (5th Cir. 2004) (*Volkswagen I*). The public factors include: "(1) the administrative difficulties flowing from court congestion; (2) the local interest in having localized interests decided at home; (3) the familiarity of the forum with the law that will govern the case; and (4) the avoidance of unnecessary problems of conflict of laws of the application of foreign law." *Id.*

IV.   THIS CASE COULD HAVE BEEN FILED IN THE NDCA

A patent infringement case may be brought in "the judicial district where the defendant resides, or where the defendant has committed acts of infringement and has a regular and established place of business." 28 U.S.C. § 1400(b). SEA has offices in the NDCA with over 300 employees. Additionally, SEC is a foreign corporation, so venue is proper in any district, including the NDCA. 28 U.S.C. § 1391(c)(3). Thus, these cases could have been brought in the NDCA.

V.   THE NDCA IS THE MOST CONVENIENT FORUM FOR THIS CASE

A.   The Private Interest Factors Heavily Favor Transfer to the NDCA

1.   The Relative Access to Sources of Proof

"[T]he sources of proof requirement is a meaningful factor" in the transfer analysis. *In re Volkswagen of Am., Inc.*, 545 F.3d 304, 316 (5th Cir. 2008) (*Volkswagen II*). To determine the ease of access to sources of proof, the Court should look at "the location where the allegedly infringing products were researched, designed, developed and tested." *XY, LLC v. Trans Ova Genetics, LC*, No. 16-CA-00447-RP, 2017 WL 5505340, at *13 (W.D. Tex. Apr. 5, 2017).

This factor heavily favors transfer because the greatest volume of evidence is in the NDCA with Google and other key third-parties. As discussed in Section II.A above, Ikorongo's infringement allegations focus on features in the Accused Applications. A significant number of the development activities related to the accused features in Google Maps and Google+ occurred at Google's Mountain View headquarters. Friedland Decl. ¶¶ 4-8. And nearly all the documents that relate to the development or operation of these applications, including highly confidential proprietary source code, are either physically present in or electronically accessible from Google's offices within the NDCA. *Id.*, ¶¶ 4, 7. In addition, based on publicly available information, it appears that Secure Family was researched, designed, and developed by third-party Location Labs from its Emeryville, California headquarters. *See* Section II.D, *supra*. Secure Family witnesses and documents are thus also likely to be in the NDCA. While some witnesses for Google Play Music and YouTube Music are in Seattle and New York, none are in the WDTX. Friedland Decl. ¶¶ 9-10.

Moreover, none of Samsung's employees with responsibilities for the accused functionality in the Accused Applications are located in Austin. Lee Decl. ¶¶ 8-11. Defendants

are also unaware of any Austin-based AT&T or Google employees involved in the research or design of the Accused Applications.

While Ikorongo Texas LLC has not yet identified any relevant evidence in WDTX, any such limited evidence is greatly outweighed by the relevant evidence located in the NDCA. *See In re Genentech, Inc.*, 566 F.3d 1338, 1345 (Fed. Cir. 2009). The relative ease of access of proof heavily favors transfer.

2. The Availability of Compulsory Process to Secure the Attendance of Witnesses

When deciding a transfer motion, the Court considers the availability of compulsory process to secure the attendance of witnesses, particularly non-party witnesses whose attendance may need to be secured by a court order. *In re Volkswagen of Am., Inc.*, 545 F.3d 304, 316 (5th Cir. 2008) (*Volkswagen II)*. A court may subpoena a witness to attend trial only "within 100 miles of where the person resides, is employed, or regularly transacts business in person." Fed. R. Civ. P. 45(c)(1)(A).

The availability of compulsory process weighs heavily in favor of transfer. As discussed above in connection with the first factor, the vast majority of third-party witnesses who are likely to testify reside in the NDCA. No identifiable witnesses reside in WDTX or are subject to the Court's subpoena power. Accordingly, this factor weighs heavily in favor of a transfer.

3. The Convenience of Third-Party Witnesses and Party Witnesses Strongly Favors Transfer

"The convenience of witnesses is the single most important factor in the transfer analysis." *Parus Holdings Inc. v. LG Elecs. Inc.*, No. 6:19-CV-00432-ADA, 2020 WL 4905809, at *5 (W.D. Tex. Aug. 20, 2020) (citing *In re Genentech, Inc.*, 566 F.3d at 1342). "The Court gives the convenience of party witnesses little weight." *Id.*

The convenience of witnesses weighs strongly in favor of transfer to NDCA. As detailed in Section II.B, the majority of key third-party witnesses reside in the NDCA, Seattle, and New York, while none reside in or even near this District. If this case remains in WDTX, those witnesses will need to fly and/or drive to Waco, Texas for trial and any hearings that require their testimony. Flying multiple employees to Waco and providing food, lodging, and transportation is unduly expensive. These inconveniences are easily avoided by transferring this action to the NDCA, where many third-party witnesses can drive less than 50 miles to any court proceeding and return home afterwards.

The lost productivity and interruption to the witnesses' daily and personal lives due to the time they will spend traveling also greatly weighs in favor of transfer. *See In re Volkswagen of Am.*, 545 F.3d at 317 ("Witnesses not only suffer monetary costs, but also the personal costs associated with being away from work, family, and community."). The shortest commercial flights to Waco from the Bay Area require around 5 hours and 15 minutes of air travel (including a one hour layover in Dallas), not to mention time spent getting to, from, and waiting at the airport. As this Court has recognized, "the task of scheduling fact witnesses so as to minimize the time when they are removed from their regular work or home responsibilities gets increasingly difficult and complicated when the travel time from their home or work site to the court facility is five or six hours one-way as opposed to 30 minutes or an hour." *Wet Sounds, Inc. v. Audio Formz, LLC*, No. A-17-CV-141-LY, 2017 WL 4547916, at *3 (W.D. Tex. Oct. 11, 2017), report and recommendation adopted, No. 1:17-CV-141-LY, 2018 WL 1219248 (W.D. Tex. Jan. 22, 2018).

For any third-party witnesses that do not reside in the NDCA, adding flight time to the Bay Area is insignificant when compared to the cost of requiring Google and other third-party inventors to travel to Waco. These witnesses will already need food, lodging, and transportation in Waco

because none reside in WDTX. Furthermore, the Federal Circuit has recently explained that "[t]he comparison between the transferor and transferee forums is not altered by the presence of other witnesses and documents in places outside both forums." *In re Adobe Inc.*, No. 2020-126, 2020 WL 4308164, at *3 (Fed. Cir. July 28, 2020). Accordingly, any argument that other third parties who live outside of WDTX may be inconvenienced by a transfer does not withstand scrutiny.

Moreover, it is much more convenient for SEC's Korea-based witnesses to travel to the Bay Area than to Waco, Texas, which requires over 17 hours of travel and multiple flights. Lau Decl. ¶¶ 5-6. While Waco may be more convenient for Ikorongo, it is improper for a court to use "its central location as a consideration in the absence of witnesses within the plaintiff's choice of venue." *In re Genentech, Inc.*, 566 F.3d at 1344. This factor weighs in favor of transfer. *Parus Holdings Inc.*, 2020 WL 4905809, at *6 (W.D. Tex. Aug. 20, 2020).

4. All Other Practical Problems That Make Trial of a Case Easy, Expeditious, and Inexpensive

There are no practical problems associated with transfer. This case is in its infancy. The *Markman* hearing will not occur for five months, on February 5, 2021. Thus, transfer at this point would not cause delays. This factor is neutral.

B. The Public Interest Factors Favor Transfer

The public interest factors also weigh in favor of transfer. NDCA has a strong local interest in this dispute: three of the Accused Applications, Google Maps, Google+, and AT&T Secure Family were developed in the NDCA. By contrast, the WDTX has little local interest in this dispute. Public records indicate Ikorongo Texas LLC was just recently incorporated in Texas on February 26, 2020, only weeks before it filed suit against Samsung. Lau Decl., Ex. 13 (Ikorongo Texas LLC Public Business Record). And the Amended Complaint provides the same North Carolina address for both Ikorongo Technology LLC and Ikorongo Texas, LLC, indicating

that neither entity, including Ikorongo Texas, LLC, is based in the WDTX. Am. Compl., ECF

No. 2 at ¶¶ 1-2. Moreover, although this Court may be able to try the case earlier than a court in

the NDCA, "time to trial appears to be the most speculative" of the factors in the transfer

analysis. *In re Genentech, Inc.*, 566 F.3d 1338, 1347 (Fed. Cir. 2009); *see also In re Adobe Inc.*,

No. 2020-126, 2020 WL 4308164, at *3 (Fed. Cir. July 28, 2020) ("Nothing about [a] court's

general ability to set a schedule directly speaks to that issue."). The familiarity with governing

law and conflict of laws factors are neutral as both NDCA and this District are familiar with, and

will apply, federal patent law.

VI.   CONCLUSION

For the foregoing reasons, Samsung respectfully requests the Court transfer this case to

NDCA.

Dated: September 11, 2020   */s/ J. Mark Mann*
                                                   J. Mark Mann
                                                   State Bar No. 12926150
                                                   Email: Mark@themannfirm.com
                                                   G. Blake Thompson
                                                   State Bar No. 24042033
                                                   Email: Blake@themannfirm.com
                                                   MANN TINDEL THOMPSON
                                                   300 West Main Street
                                                   Henderson, Texas 75652
                                                   Telephone: (903) 657-8540
                                                   Facsimile: (903) 657-6003

Darin W. Snyder (*Pro Hac Vice*)
dsnyder@omm.com
David S. Almeling (*Pro Hac Vice*)
dalmeling@omm.com
O'MELVENY & MYERS LLP
Two Embarcadero Center
28th Floor
San Francisco, CA 94111
Telephone: 415-984-8700
Facsimile: 415-984-8701

Jeffrey Lau
jeffreylau@omm.com
O'MELVENY & MYERS LLP
400 South Hope Street
18th Floor
Los Angeles, CA 90071
Telephone: 213-430-6000

***Attorneys for Defendants Samsung
Electronics Co., Ltd. and Samsung
Electronics America, Inc.***

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), counsel for Samsung conferred with counsel for

Ikorongo on September 9, 2020, in a good-faith effort to resolve the matter presented herein and

counsel for Ikorongo stated that it opposed the motion.

/s/ J. Mark Mann
Mark Mann

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify

that, on September 11, 2020, all counsel of record who have appeared in this case are being served

with a copy of the foregoing via the Court's CM/ECF system.

/s/ J. Mark Mann
Mark Mann

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

IKORONGO TECHNOLOGY LLC and IKORONGO TEXAS LLC, Plaintiffs, v. SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Civil Action No. 6:20-cv-259-ADA **JURY TRIAL DEMANDED**

DECLARATION OF JEFFREY LAU IN SUPPORT OF DEFENDANTS' MOTION TO TRANSFER TO THE NORTHERN DISTRICT OF CALIFORNIA

I, Jeffrey Lau, declare and state as follows:

1.   I am a Counsel at O'Melveny & Myers LLP, located at 400 South Hope Street, 18th Floor, Los Angeles, California 90071. I represent Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung") in this action. I submit this Declaration in support of Defendants' Opposed Motion to Transfer to the Northern District of California, and I make this declaration based upon my personal knowledge.

2.   I looked for flight times from the San Francisco International Airport (SFO) to the Waco Regional Airport (ACT) and also from the San Jose Airport (SJC) to the Waco Regional Airport (ACT). I found that there were no direct flights. I found that the shortest commercial flights from SFO to ACT require approximately 5 hours and 19 minutes of travel time one-way including about an hour and 4 minute layover, and the shortest commercial flights from SJC to ACT require approximately 5 hours and 19 minutes of travel time including about an hour and 6 minute layover. I also looked up flight prices from SFO and SJC to ACT. I found that prices for these flights begin at approximately at $298 round-trip. *See* Exhibits 14-15.

3.   I looked for flight times from the John F. Kennedy International Airport (JFK) to ACT and also from LaGuardia Airport (LGA) to ACT. I found that there were no direct flights. I found that the shortest commercial flights from JFK to ACT require approximately 9 hours and 49 minutes of travel time one-way, including two layovers of approximately 2 hours and 55 minutes and 1 hour and 36 minutes. I found that the shortest commercial flights from LGA to ACT require approximately 5 hours and 19 of travel time one-way, including one layover of about 44 minutes. I also looked up flight prices from JFK and LGA to ACT. I found that prices for these flights begin at approximately $335 round-trip. *See* Exhibits 16-17.

4.   I looked up flight times from JFK to SFO. I found that the shortest commercial

flights from JFK to SFO are direct flights that require approximately 6 hours and 16 minutes of travel time one-way. I also looked up flight prices from JFK to SFO. I found that prices for these flights begin at approximately $197 round-trip. *See* Exhibit 18.

5.   I looked up the flight times from the Incheon International Airport (ICN) in Korea to ACT. I found that the shortest commercial flights require approximately 17 hours and 49 minutes of travel time one-way, including one layover of approximately 3 hours and 40 minutes. I also looked at flight prices from ICN to ACT. Flights from ICN to ACT begin at approximately $722. *See* Exhibit 19.

6.   I looked up flight times from ICN to SFO. I found that the shortest commercial flights are direct flights that require approximately 10 hours and 35 minutes of travel time one-way. I also looked up flight prices from ICN to SFO. I found that prices for these flights begin at approximately $655 round-trip. *See* Exhibit 20.

7.   I looked up the distance between Google's Mountain View headquarters and the Phillip Burton Federal Building & United States Courthouse. I found that the distance between these locations was approximately 35 miles. I also looked up the distance between Google's Mountain View Headquarters and the Ronald V. Dellums Federal Building. I found the distance between these locations was approximately 37 miles. I also looked up the distance between Google's Mountain View headquarters and the Robert F. Peckham Federal Building. I found the distance between these locations is approximately 14.4 miles. *See* Exhibits 21-23.

8.   Upon information and belief, two inventors of U.S. Patent Nos. RE41,450, RE45,543, and RE47,704, Brady Bruce and Michael Mitchell, currently reside in San Francisco, California and Santa Cruz, California, respectively. *See* Exhibits 7-8. Upon information and

belief, the following table presents the current residences of the inventors of the Asserted Patents[1].

See Exhibits 7-12.

Patent	Named Inventor	Residence
RE41,450, RE45,543, RE47,704	Brady O. Bruce	San Francisco, CA
RE41,450, RE45,543, RE47,704	Michael W. Mitchell	Santa Cruz, CA
RE41,450, RE45,543, RE47,704	Darren P. Briggs	Nashville, TN
RE41,450. RE45,543, RE47,704	Emile L. Reed, IV	Denver, CO
8,874,554	Hugh Svedsen	Chapel Hill, NC
8,874,554	Scott Curtis	Durham, NC

9.   Exhibit 1 to my declaration is a true and correct copy of Exhibit 1 to Plaintiffs'

Ikorongo Texas LLC and Ikorongo Technology LLC August 6, 2020 Preliminary Infringement

Contentions in this case.

10.   Exhibit 2 is a true and correct printout of the webpage at

http://www.shannajan.com/location-labs-by-avast, as of September 10, 2020.

11.   Exhibit 3 is a true and correct printout of the webpage at

http://www.shannajan.com/about, as of September 10, 2020.

12.   Exhibit 4 is a true and correct printout of the webpage at

https://www.crunchbase.com/organization/location-labs, as of September 10, 2020.

13.   Exhibit 5 is a true and correct printout of screenshots of the webpage at

https://www.avast.com/contacts, as of September 10, 2020.

14.   Exhibit 6 is a true and correct printout of the LinkedIn profile of Francisco

Velazquez, which indicates that Mr. Velazquez currently resides in Merced, California.

---

[1] U.S. Patent Nos. RE41,450, RE45,543, RE47,704, and '8,874,554 (collectively, "Asserted Patents").

J. Lau Decl. ISO Samsung's Mot.   6:20-cv-259-ADA
for Transfer to NDCA

15.   Exhibit 7 is a true and correct printout of the LinkedIn profile of Brady Bruce, inventor of U.S. Patent Nos. RE41,450, RE45,543, and RE47,704, which indicates that Mr. Bruce is located in San Francisco, California.

16.   Exhibit 8 is a true and correct redacted printout of an excerpt of a LexisNexis Public Records Report of Michael W. Mitchell, inventor of U.S. Patent Nos. RE41,450, RE45,543, and RE47,704, which indicates Mr. Mitchell currently resides in Santa Cruz, California.

17.   Exhibit 9 is a true and correct printout of the LinkedIn profile of Darren P. Briggs, inventor of U.S. Patent Nos. RE41,450, RE45,543, and RE47,704, which indicates Mr. Briggs is located in Nashville, Tennessee.

18.   Exhibit 10 is a true and correct redacted printout of an excerpt of a LexisNexis Public Records Report of Emile L. Reed, IV, inventor of U.S. Patent Nos. RE41,450, RE45,543, and RE47,704, which indicates that Mr. Reed currently resides in Denver, Colorado.

19.   Exhibit 11 is a true and correct printout of the LinkedIn profile of Hugh Svedsen, inventor of U.S. Patent No. 8,874,554, which indicates that he currently resides in Chapel Hill, North Carolina.

20.   Exhibit 12 is a true and correct printout of the LinkedIn profile of Scott Curtis, inventor of U.S. Patent No. 8,874,554, which indicates that he currently resides in Durham, North Carolina.

21.   Exhibit 13 is a true and correct printout of an excerpt of a LexisNexis Public Record Report for Ikorongo Texas LLC, as of September 10, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 11, 2020, in Los Angeles, California.

/s/ Jeffrey Lau
Jeffrey Lau

J. Lau Decl. ISO Samsung's Mot.   6:20-cv-259-ADA
for Transfer to NDCA
-5-

Appx059

EXHIBIT 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

IKORONGO TEXAS LLC and IKORONGO TECHNOLOGY LLC, Plaintiffs, v. SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	)))))))))))))	Civil Action No. 6:20-cv-259 **JURY TRIAL DEMANDED**

**PLAINTIFFS' IKORONGO TEXAS LLC AND IKORONGO TECHNOLOGY LLC
PRELIMINARY INFRINGEMENT CONTENTIONS**

Plaintiffs Ikorongo Texas LLC ("Ikorongo TX") and Ikorongo Technology LLC ("Ikorongo Tech") (together "Ikorongo" or "Plaintiffs"), pursuant to the Order Governing Proceedings – Patent Case, submit this disclosure of asserted claims and infringement contentions.

Disclosure of Asserted Claims and Infringement Contentions

1. U.S. Patent No. 8,874,554 ("the '554 Patent"):

    a. Ikorongo asserts that Defendants infringe at least claims 1-4, 9-12, 17-20, 25-28, 33-36, 39-42. *See*, claim charts submitted herewith. The claim charts are exemplary in that they describe a particular device of the Defendants that was preloaded with Google Play Music or YouTube Music. However, Ikorongo asserts that each Defendant mobile device that has GPS and was preloaded with Android Version Marshmallow or later and/or was preloaded with the Google

Play Music version announced on November 14, 2014 or later and/or was preloaded with YouTube Music (believed to be Samsung Android Devices available after September 2019 with Android Version 9 or later) infringes the asserted claims . This includes, but is not limited to, those products of Defendants identified in Exhibit A hereto. In addition, other products and/or services of the Defendants that are substantially similar to the listed products infringe. Plaintiff's investigation is ongoing and much of the relevant infringement evidence is not publicly available or not yet identified, as such Plaintiffs reserve its rights to identify additional and/or different accused products and services as discovery proceeds.

b. Ikorongo asserts infringement literally and/or under the doctrine of equivalents. Ikorongo asserts direct and indirect infringement (including but not limited to contributory infringement and infringement by inducement).

c. With respect to method claims, Ikorongo asserts direct infringement and indirect infringement, where Defendants' customers or end customers directly infringe. With respect to Samsung Electronics Co., Ltd., Ikorongo also asserts indirect infringement to the extent others import and distribute the accused products in the U.S. (e.g., where Samsung Electronics America imports and distributes the products).

d. With respect to non-method claims, Ikorongo asserts direct infringement. With respect to Samsung Electronics Co., Ltd., Ikorongo also asserts indirect infringement to the extent others import and distribute the accused products in

2

the U.S. (e.g., where Samsung Electronics America imports and distributes the products).

e. A copy of the prosecution history is being served with this document.

f. The earliest date of invention for claims 1-4, 17-20 and 33-36 is at least as early as July 2007. The earliest date of invention for the remaining asserted claims is at least as early as September 9, 2011. Documents relevant to the conception and reduction to practice are being produced with this document. Plaintiffs' investigation is ongoing, and they reserve the right to produce additional documents related to the conception or reduction to practice and reserves the right to identify an earlier priority date should it become appropriate.

2. U.S. Patent No. RE41,450 ("the '450 Patent"):

a. Ikorongo asserts that Defendants infringe at least claims 67, 74-75, 83, 84, 93, 94, 96. *See*, claim charts submitted herewith. The claim charts are exemplary in that they describe a particular device of the Defendants that was preloaded with Google Maps or that was preloaded with Google+ during the period of time that Google+ contained the features described in the claim charts. However, Ikorongo asserts that each Defendant mobile device that has GPS and was preloaded with Android Version KitKat or later infringes the asserted claims. This includes, but is not limited to, those products of Defendants identified in Exhibit A hereto. In addition, other products and/or services of the Defendant that are substantially similar to the listed products infringe. Plaintiffs' investigation is ongoing and much of the relevant infringement evidence is not publicly available or not yet identified, as such Plaintiffs reserve

3

Appx063

their rights to identify additional and/or different accused products and services as discovery proceeds.

b. Ikorongo asserts infringement literally and/or under the doctrine of equivalents. Ikorongo asserts direct and indirect infringement (including but not limited to contributory infringement and infringement by inducement).

c. With respect to method claims, Ikorongo asserts direct infringement. It also asserts indirect infringement, where Defendants' customers or end customers directly infringe. With respect to Samsung Electronics Co., Ltd., Ikorongo also asserts indirect infringement to the extent others import and distribute the accused products in the U.S. (e.g., where Samsung Electronics America imports and distributes the products) and those entities practice the method, *e.g.,* as part of testing, quality control and marketing.

d. A copy of the prosecution history is being served with this document.

e. The earliest date of invention for the asserted claims is at least as early as the filing date of its parent application on April 24, 2001. Plaintiffs' investigation is ongoing, and they reserve the right to produce additional documents related to the conception or reduction to practice and reserve the right to identify an earlier priority date should it become appropriate.

3. U.S. Patent No. RE45543 ("the '543 Patent"):

a. Ikorongo asserts that Defendants infringe at least claims 32, 36, 38, 39, 43, 44- 49, 51, 54, 56, 72, 73, 75. *See*, claim charts submitted herewith. The claim charts are exemplary in that they describe a particular device of the Defendants that was preloaded with AT&T Secure Family, Google Maps or that was

4

Appx064

preloaded with Google+ during the period of time that Google+ contained the features described in the claim charts. However, Ikorongo asserts that each Defendant mobile device that has GPS and was preloaded with AT&T Secure Family, or Android version KitKat or later infringes the asserted claims. This includes, but is not limited to, those products of Defendants identified in Exhibit A hereto. In addition, other products and/or services of the Defendant that are substantially similar to the listed products infringe. Plaintiffs' investigation is ongoing and much of the relevant infringement evidence is not publicly available or not yet identified, as such Plaintiffs reserve their rights to identify additional and/or different accused products and services as discovery proceeds. For example, it is believed that discovery will reveal additional preloaded programs, similar to AT&T Secure Family, for other carriers that provide the infringing features.

b. Ikorongo asserts infringement literally and/or under the doctrine of equivalents. Ikorongo asserts direct and indirect infringement (including but not limited to contributory infringement and infringement by inducement).

c. With respect to method claims, Ikorongo asserts direct infringement. It also asserts indirect infringement, where Defendants' customers or end customers directly infringe. With respect to Samsung Electronics Co., Ltd., Ikorongo also asserts indirect infringement to the extent others import and distribute the accused products in the U.S. (e.g., where Samsung Electronics America imports and distributes the products) and those entities practice the method, *e.g.,* as part of testing, quality control and marketing.

5

Appx065

   d.   With respect to non-method claims, Ikorongo asserts direct infringement. With respect to Samsung Electronics Co., Ltd., Ikorongo also asserts indirect infringement to the extent others import and distribute the accused products in the U.S. (e.g., where Samsung Electronics America imports and distributes the products).

   e.   A copy of the prosecution history is being served with this document.

   f.   The earliest date of invention for the asserted claims is at least as early as the filing date of its parent application on April 24, 2001.   Plaintiffs' investigation is ongoing, and they reserve the right to produce additional documents related to the conception or reduction to practice and reserve the right to identify an earlier priority date should it become appropriate.

4.   <u>U.S. Patent No. RE47704 ("the '704 Patent"):</u>

   a.   Ikorongo asserts that Defendants infringe at least claims 33-40, and 45-48. *See*, claim charts submitted herewith. The claim charts are exemplary in that they describe a particular device of the Defendants that was preloaded with AT&T Secure Family, Google Maps or that was preloaded with Google+ during the period of time that Google+ contained the features described in the claim charts. However, Ikorongo asserts that each Defendant mobile device that has GPS and was preloaded with AT&T Secure Family or Android version KitKat or later infringes the asserted claims. This includes, but is not limited to, those products of Defendants identified in Exhibit A hereto. In addition, other products and/or services of the Defendant that are substantially similar to the listed products infringe.   Plaintiffs' investigation is ongoing and much of the relevant

6

Appx066

infringement evidence is not publicly available or not yet identified, as such Plaintiffs reserve their rights to identify additional and/or different accused products and services as discovery proceeds. For example, it is believed that discovery will reveal additional preloaded programs, similar to AT&T Secure Family, for other carriers that provide the infringing features.

b. Ikorongo asserts infringement literally and/or under the doctrine of equivalents. Ikorongo asserts direct and indirect infringement (including but not limited to contributory infringement and infringement by inducement).

c. With respect to method claims, Ikorongo asserts direct infringement. It also asserts indirect infringement, where Defendants' customers or end customers directly infringe. With respect to Samsung Electronics Co., Ltd., Ikorongo also asserts indirect infringement to the extent others import and distribute the accused products in the U.S. (e.g., where Samsung Electronics America imports and distributes the products) and those entities practice the method, *e.g.,* as part of testing, quality control and marketing.

d. With respect to non-method claims, Ikorongo asserts direct infringement. With respect to Samsung Electronics Co., Ltd., Ikorongo also asserts indirect infringement to the extent others import and distribute the accused products in the U.S. (e.g., where Samsung Electronics America imports and distributes the products).

e. A copy of the prosecution history is being served with this document.

f. The earliest date of invention for the asserted claims is at least as early as the filing date of its parent application on April 24, 2001.   Plaintiffs' investigation

Appx067

is ongoing, and they reserve the right to produce additional documents related

to the conception or reduction to practice and reserve the right to identify an

earlier priority date should it become appropriate.

Date: August 6, 2020   Respectfully submitted,

                                                  /s/Derek Gilliland
                                                  DEREK GILLILAND
                                                  STATE BAR NO. 24007239
                                                  SOREY, GILLILAND & HULL, LLP
                                                  109 W. Tyler St.
                                                  Longview, Texas 75601
                                                  903.212.2822 (telephone)
                                                  903.212.2864 (facsimile)
                                                  derek@soreylaw.com

                                                  KARL RUPP
                                                  State Bar No. 24035243
                                                  NIX PATTERSON L.L.P.
                                                  1845 Woodall Rodgers Fwy., Suite 1050
                                                  Dallas, Texas 45001
                                                  972.831.1188 (telephone)
                                                  972.444.0716 (facsimile)
                                                  krupp@nixlaw.com

                                                  HOWARD WISNIA
                                                  WISNIA PC
                                                  12770 High Bluff Dr., Suite 200
                                                  San Diego, CA 92130
                                                  Tel: (858) 461-0989
                                                  howard@wisnialaw.com

                                                  COUNSEL for PLAINTIFFS

8

Appx068

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above and foregoing Plaintiffs'

Preliminary Infringement Contentions is being served on this August 6, 2020, via e-mail, on all counsel

of record for Defendants, each of whom are deemed to have consented to electronic service per Local

Rule CV-5.

<div style="text-align:center">

/s/Derek Gilliland
DEREK GILLILAND

</div>

EXHIBIT A

Samsung Mobile Communication Devices with Cellular and GPS from January 2014 through August 6, 2020

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
2020	Samsung Galaxy Z Fold2 5G	Phone	Sep 1, 2020	Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/6, dual-band, Wi-Fi Direct, hotspc	Yes, with A-GPS, GLONASS, GALILEO, BDS na	na
	Samsung Galaxy Note20 Ultra 5G	Phone	Aug 21, 2020	Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/6, dual-band, Wi-Fi Direct, hotspc	Yes, with A-GPS, GLONASS, GALILEO, BDS na	na
	Samsung Galaxy Note20 Ultra	Phone	Aug 21, 2020	Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/6, dual-band, Wi-Fi Direct, hotspc	Yes, with A-GPS, GLONASS, GALILEO, BDS na	na
	Samsung Galaxy Note20 5G	Phone	Aug 21, 2020	Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/6, dual-band, Wi-Fi Direct, hotspc	Yes, with A-GPS, GLONASS, GALILEO, BDS na	na
	Samsung Galaxy Note20	Phone	Aug 21, 2020	Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/6, dual-band, Wi-Fi Direct, hotspc	Yes, with A-GPS, GLONASS, GALILEO, BDS na	na
	Samsung Galaxy Tab S7+	Tablet	Aug 21, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/6, dual-band, Wi-Fi Direct, hotspc	Yes, with A-GPS, GLONASS, GALILEO, BDS na	na
	Samsung Galaxy Tab S7	Tablet	Aug 21, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/6, dual-band, Wi-Fi Direct, hotspc	Yes, with A-GPS, GLONASS, GALILEO, BDS na	na
	Samsung Galaxy Z Flip 5G	Phone	Aug 7, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/6, dual-band, Wi-Fi Direct, hotspc	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F707B
			Aug 7, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/6, dual-band, Wi-Fi Direct, hotspc	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F707N
	Samsung Galaxy M31s	Phone	Aug 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS na	na
	Samsung Galaxy M01s	Phone	Jul 16, 2020	Android 9.0 (Pie), One UI Core 1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M017F
			Jul 16, 2020	Android 9.0 (Pie), One UI Core 1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M017F/DS
	Samsung Galaxy M01 Core	Phone	Jul 27, 2020	Android 10 (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-M013F
			Jul 27, 2020	Android 10 (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-M013F/DS
	Samsung Galaxy A01 Core	Phone	Aug 1, 2020	Android 10 (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-A013F
			Aug 21, 2020	Android 10 (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-A013F/D
			Aug 21, 2020	Android 10 (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-A013G
			Aug 21, 2020	Android 10 (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-A013G/DS
	Samsung Galaxy A71 5G UW	Phone	Jul 16, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A716V
	Samsung Galaxy M01	Phone	Jun 2, 2020	Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M015G/DS
			Jun 2, 2020	Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M015F/DS
	Samsung Galaxy A21s	Phone	Jun 2, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A217F
			Jun 2, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A217F/DS
			Jun 2, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A217F/DSN
	Samsung Galaxy A Quantum	Phone	May 22, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A716N
			May 22, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A716SS
	Samsung Galaxy J2 Core (2020)	Phone	Apr 27, 2020	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J260GU
			Apr 27, 2020	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J260GU/DS
	Samsung Galaxy A71 5G	Phone	Jun 15, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A716F
			Jun 15, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A716F/DS
			Jun 15, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A716F/DSN
			Jun 15, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A7160
			Jun 15, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A716B/DS
			Jun 15, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A716U
	Samsung Galaxy A51 5G	Phone	Apr 29, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A516F
			Apr 29, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A516F/DSN
			Apr 29, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A516N
			Apr 29, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A516B/DS
	Samsung Galaxy A21	Phone	Jun 26, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A215U
			Jun 26, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A215U1

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 13 of 40

EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
	Samsung Galaxy M11	Phone	May 4, 2020	Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M115F
		Phone	May 4, 2020	Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M115F/DSN
	Samsung Galaxy Tab S6 Lite	Tablet	May 16, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-P610N
		Tablet	May 16, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-P615
	Samsung Galaxy A31	Phone	Apr 27, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A315F
		Phone	Apr 27, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A315F/DS
		Phone	Apr 27, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A315G/DS
	Samsung Galaxy A41	Phone	May 22, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A415F/DSN
		Phone	May 22, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A415F/DSM
	Samsung Galaxy M21	Phone	Mar 23, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	na
	Samsung Galaxy A11	Phone	May 1, 2020	Android 10	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A115F/DS
	Samsung Galaxy M31	Phone	Mar 5, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M315F
		Phone	Mar 5, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M315F/DS
		Phone	Mar 5, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M315F/DSN
	Samsung Galaxy S20 Ultra 5G	Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G988
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G988U
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G988U1
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G9880
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G988B/DS
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G988N
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G988B
	Samsung Galaxy S20 Ultra	Phone	Mar 15, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G988B/DS
	Samsung Galaxy S20+ 5G	Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G986
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G986F
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G986F/DS
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G986U
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G986U1
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G9860
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G986B/DS
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G986N
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G986B
	Samsung Galaxy S20+	Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G985
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G985F
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G985F/DS
	Samsung Galaxy S20 5G	Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G981
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G981F
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G981F/DS
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G981B/DS
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G981U
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G981U1
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G981N
	Samsung Galaxy S20	Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G980

2

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 14 of 40

EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G980F
		Phone	Mar 6, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G980F/DS
	Samsung Galaxy Z Flip	Phone	Feb 14, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F700
		Phone	Feb 14, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F700F
		Phone	Feb 14, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F700F/DS
		Phone	Feb 14, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F700U/DS
		Phone	Feb 14, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F700U1/DS
		Phone	Feb 14, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F700N
		Phone	Feb 14, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F7000
	Samsung Galaxy Tab S6 5G	Tablet	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-T866N
	Samsung Galaxy Xcover Pro	Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/k/v/r, dual-band, Wi-Fi Direct, hot	Yes, with A-GPS	SM-G715FN
		Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/k/v/r, dual-band, Wi-Fi Direct, hot	Yes, with A-GPS	SM-G715F
	Samsung Galaxy Note10 Lite	Phone	Jan 21, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-N770F
		Phone	Jan 21, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-N770F/DS
		Phone	Jan 21, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-N770F/DSM
	Samsung Galaxy S10 Lite	Phone	Feb 3, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G770F
		Phone	Feb 3, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G770F/DS
		Phone	Feb 3, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G770F/DSM
	Samsung Galaxy A01	Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A015F
		Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A015F/DS
		Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A015G
		Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A015G/DS
		Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A015M
		Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A015M/DS
	Samsung Galaxy A71	Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A715F
		Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A715F/DS
		Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A715F/DSN
		Phone	Jan 30, 2020	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A715F/DSM
	Samsung Galaxy Xcover FieldPro	Phone	Apr 6, 2020	Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac/ax/i/r, dual-band, Wi-Fi Direct, ho	Yes, with A-GPS, GLONASS, GALILEO	SM-G889F
		Phone	Apr 6, 2020	Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac/ax/i/r, dual-band, Wi-Fi Direct, ho	Yes, with A-GPS, GLONASS, GALILEO	SM-G889A
2019							
	Samsung Galaxy A51	Phone	Dec 16, 2019	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A515F
		Phone	Dec 16, 2019	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A515F/DSN
		Phone	Dec 16, 2019	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A515F/DS
		Phone	Dec 16, 2019	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A515F/DST
		Phone	Dec 16, 2019	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A515F/DSM
		Phone	Dec 16, 2019	Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A515F/N
	Samsung Galaxy A70s	Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A707F
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A707FN
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A707GM
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A707MN
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A7070

3

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 15 of 40

EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
	Samsung Galaxy A20s	Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/v/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A707W
		Phone	Oct 5, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A207F
		Phone	Oct 5, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A207M
		Phone	Oct 5, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A2070
	Samsung Galaxy M30s	Phone	Oct 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M307F
		Phone	Oct 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M307FN
		Phone	Oct 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M307F/DS
		Phone	Oct 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M307FN/DS
	Samsung Galaxy M10s	Phone	Sep 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M107F
		Phone	Sep 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M107G
		Phone	Sep 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M107Y
		Phone	Sep 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M107M
	Samsung Galaxy Fold 5G	Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F907F
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F907
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F907W
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F907U
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F907B
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F907N
	Samsung Galaxy Fold	Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F900F
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F9000
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F900W
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F900U
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-F900N
	Samsung Galaxy Tab Active Pro	Tablet	Oct 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T545
		Tablet	Oct 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T547
	Samsung Galaxy A90 5G	Phone	Sep 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A908B
		Phone	Sep 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A908N
		Phone	Sep 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A9080
	Samsung Galaxy A30s	Phone	Sep 11, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A307F
		Phone	Sep 11, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A307FN
		Phone	Sep 11, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A307G
		Phone	Sep 11, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A307GN
		Phone	Sep 11, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A307GT
	Samsung Galaxy A50s	Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A507F
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A507FN
		Phone	Sep 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A5070
	Samsung Galaxy Note10+ 5G	Phone	Aug 30, 2019	Android 9.0 (Pie), planned upgrade to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N976F
		Phone	Aug 30, 2019	Android 9.0 (Pie), planned upgrade to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N976U
		Phone	Aug 30, 2019	Android 9.0 (Pie), planned upgrade to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N976
		Phone	Aug 30, 2019	Android 9.0 (Pie), planned upgrade to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N976B
		Phone	Aug 30, 2019	Android 9.0 (Pie), planned upgrade to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N976N
		Phone	Aug 30, 2019	Android 9.0 (Pie), planned upgrade to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N976V

4

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Aug 30, 2019	Android 9.0 (Pie), planned upgrade to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N9760
		Phone	Aug 30, 2019	Android 9.0 (Pie), planned upgrade to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N976Q
	Samsung Galaxy Note10+	Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N975F
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N975U
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N9750
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N975U1
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N975W
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N975N
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N975X
	Samsung Galaxy Note10 5G	Phone	Aug 30, 2019	Android 9.0 (Pie), planned upgrade to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N971U
		Phone	Aug 30, 2019	Android 9.0 (Pie), planned upgrade to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N971N
	Samsung Galaxy Note10	Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N970F
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N970U
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N970U1
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N9700
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N970W
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N9700
		Phone	Aug 23, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N970N
	Samsung Galaxy A10s	Phone	Aug 27, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO	SM-A107F
		Phone	Aug 27, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO	SM-A107M
	Samsung Galaxy A10e	Phone	Aug 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO	SM-A102U
		Phone	Aug 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO	SM-S102DL
		Phone	Aug 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO	SM-A102U1
	Samsung Galaxy Tab S6	Tablet	Aug 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-T860
		Tablet	Aug 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-T865
	Samsung Galaxy Tab A 8.0 (2019)	Tablet	Jul 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-T290
		Tablet	Jul 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-T295
	Samsung Galaxy Xcover 4s	Phone	Jul 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G398F
		Phone	Jul 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G398FN/DS
		Phone	Jul 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G398FN
	Samsung Galaxy A2 Core	Phone	Apr 30, 2019	Android 8.0 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A260F
		Phone	Apr 30, 2019	Android 8.0 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A260G
	Samsung Galaxy View2	Tablet	Apr 30, 2019	Android 8.1 (Oreo)	Wi-Fi 802.11 a/b/g/n, hotspot	Yes, with A-GPS, GLONASS	SM-T927A
		Tablet	Apr 30, 2019	Android 8.1 (Oreo)	Wi-Fi 802.11 b/g/n, hotspot	Yes, with A-GPS, GLONASS	SM-T920
	Samsung Galaxy S10 5G	Phone	Apr 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G977U
		Phone	Apr 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G977N
		Phone	Apr 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G977B
		Phone	Apr 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G9770
	Samsung Galaxy S10+	Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G975F
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G975U
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G975W
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G975U1

5

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G9750
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G975N
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G975X
	Samsung Galaxy S10	Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G973F
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G973U
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G973W
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G973U1
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G9730
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G973N
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.1	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G973X
	Samsung Galaxy S10e	Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G970F
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G970U
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G970W
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G9700
		Phone	Mar 8, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac/ax, dual-band, Wi-Fi Direct, hotsp	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G970U1
	Samsung Galaxy M40	Phone	Jun 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M405F
		Phone	Jun 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M405FN
		Phone	Jun 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-M405G
	Samsung Galaxy M30	Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M305F
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M305FN
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M305G
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M305M
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A3051
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A3058
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A3050
	Samsung Galaxy M20	Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M205F
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M205FN
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M205G
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M205M
	Samsung Galaxy M10	Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M105F
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M105G
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M105Y
		Phone	Feb 27, 2019	Android 8.1 (Oreo), upgradable to Android 10, One UI 2	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-M105M
	Samsung Galaxy A80	Phone	Apr 10, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A805F
		Phone	Apr 10, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A8050
	Samsung Galaxy A70	Phone	May 1, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A705F
		Phone	May 1, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A705FN
		Phone	May 1, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A705GM
		Phone	May 1, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A705MN
		Phone	May 1, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A7050
		Phone	May 1, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A705W
		Phone	May 1, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A705YN

Case 6:20-cv-00259-ADA　Document 27-2　Filed 09/11/20　Page 18 of 40
EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	May 1, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A705X
	Samsung Galaxy A60	Phone	Jun 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A606F
		Phone	Jun 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A6060
		Phone	Jun 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A606Y
	Samsung Galaxy A50	Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505F
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505FN
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505GN
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505G
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505FM
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505YN
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505W
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505X
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505U
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505GT
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505U1
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505G
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A505N
	Samsung Galaxy A40	Phone	Apr 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A405F
		Phone	Apr 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A405FN
		Phone	Apr 30, 2019	Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A405FM
	Samsung Galaxy A30	Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A305F
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A305FN
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A305G
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A305GN
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A305YN
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A3050
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A305N
		Phone	Feb 25, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A305GT
	Samsung Galaxy A20e	Phone	May 30, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A202F
	Samsung Galaxy A20	Phone	Apr 5, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A205F
		Phone	Apr 5, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A205FN
		Phone	Apr 5, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A205GN
		Phone	Apr 5, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A205YN
		Phone	Apr 5, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A205G
		Phone	Apr 5, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A205W
		Phone	Apr 5, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A205U
		Phone	Apr 5, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A205S
	Samsung Galaxy A10	Phone	Mar 19, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A105F
		Phone	Mar 19, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A105G
		Phone	Mar 19, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A105M
		Phone	Mar 19, 2019	Android 9.0 (Pie), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-A105FN
	Samsung Galaxy Tab S5e	Tablet	Apr 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-T725

7

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 19 of 40
EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Tablet	Apr 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-T720
	Samsung Galaxy Tab A 10.1 (201	Tablet	Apr 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-T515
		Tablet	Apr 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-T510
	Samsung Galaxy Tab A 8.0 & S P	Tablet	Apr 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-P205
		Tablet	Apr 30, 2019	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-P200
2018	Samsung Galaxy Tab A 8.0 (2018	Tablet	Sep 30, 2018	Android 8.1 (Oreo)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T387
		Tablet	Sep 30, 2018	Android 8.1 (Oreo)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T387W
		Tablet	Sep 30, 2018	Android 8.1 (Oreo)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T387V
	Samsung Galaxy Tab S4 10.5	Tablet	Aug 30, 2018	Android 8.1 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-T830
		Tablet	Aug 30, 2018	Android 8.1 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-T835
	Samsung Galaxy Tab A 10.5	Tablet	Aug 30, 2018	Android 8.1 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-T590
		Tablet	Aug 30, 2018	Android 8.1 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-T595
	Samsung Galaxy A8s	Phone	Dec 30, 2018	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G8870
		Phone	Dec 30, 2018	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G887F
		Phone	Dec 30, 2018	Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, GALILEO, BDS	SM-G887N
	Samsung Galaxy A6s	Phone	Nov 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G6200
	Samsung Galaxy A9 (2018)	Phone	Nov 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-A920F
		Phone	Nov 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-A9200
		Phone	Nov 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-A920N
	Samsung Galaxy A7 (2018)	Phone	Oct 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A750F
		Phone	Oct 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A750FN
		Phone	Oct 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A750G
		Phone	Oct 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A750GN
	Samsung Galaxy Note9	Phone	Aug 24, 2018	Android 8.1 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N960F
		Phone	Aug 24, 2018	Android 8.1 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N9600
		Phone	Aug 24, 2018	Android 8.1 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N960F
		Phone	Aug 24, 2018	Android 8.1 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N960U
		Phone	Aug 24, 2018	Android 8.1 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N960U1
		Phone	Aug 24, 2018	Android 8.1 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N960N
		Phone	Aug 24, 2018	Android 8.1 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N960W
		Phone	Aug 24, 2018	Android 8.1 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N960X
		Phone	Aug 24, 2018	Android 8.1 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SCV40
	Samsung Galaxy J6+	Phone	Oct 30, 2018	Android 8.1 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J610F
		Phone	Oct 30, 2018	Android 8.1 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J610F
		Phone	Oct 30, 2018	Android 8.1 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J610G
		Phone	Oct 30, 2018	Android 8.1 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J610FN
	Samsung Galaxy J4 Core	Phone	Nov 30, 2018	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J410D
		Phone	Nov 30, 2018	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J410F
		Phone	Nov 30, 2018	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J410G
	Samsung Galaxy J4+	Phone	Oct 30, 2018	Android 8.1 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J415F
		Phone	Oct 30, 2018	Android 8.1 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J415FN

8

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 20 of 40
EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Oct 30, 2018	Android 8.1 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J415G
		Phone	Oct 30, 2018	Android 8.1 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J415GN
		Phone	Oct 30, 2018	Android 8.1 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J415N
	Samsung Galaxy J2 Core	Phone	Aug 30, 2018	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J260M
		Phone	Aug 30, 2018	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J260Y
		Phone	Aug 30, 2018	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J260G
		Phone	Aug 30, 2018	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J260F
		Phone	Aug 30, 2018	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J260T1
		Phone	Aug 30, 2018	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J260A
		Phone	Aug 30, 2018	Android 8.1 Oreo (Go edition)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J260AZ
	Samsung Galaxy On6	Phone	Jul 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J600GF
	Samsung Galaxy J7 (2018)	Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J737F
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J737V
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J737T
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J737A
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J737P
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J737T1
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J737U
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J737S
	Samsung Galaxy J3 (2018)	Phone	Jun 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-J337U
		Phone	Jun 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-J337W
		Phone	Jun 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-J337A
		Phone	Jun 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-J337R
		Phone	Jun 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-J337T
		Phone	Jun 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-J337P
		Phone	Jun 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-J337AZ
		Phone	Jun 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-J337VPP
	Samsung Galaxy A8 Star (A9 Star)	Phone	Jun 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G885F
		Phone	Jun 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G8850
		Phone	Jun 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G885Y
	Samsung Galaxy S Light Luxury	Phone	May 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G8750
	Samsung Galaxy J8	Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J810G
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J810F
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	J810Y
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J810Y
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J810GF
		Phone	Jul 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J810M
	Samsung Galaxy J6	Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J600G
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J600F
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J600G
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J600FN
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J600GF

Appx079

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 21 of 40

EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J600GT
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J600L
	Samsung Galaxy J4	Phone	May 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J400G
		Phone	May 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J400F
		Phone	May 30, 2018	Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J400M
	Samsung Galaxy A6+ (2018)	Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A605FN
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A605G
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A605F
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A605GN
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A6050
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A605K
	Samsung Galaxy A6 (2018)	Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A600F
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A600FN
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A600A
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A600G
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A600GN
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A600P
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A600N
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A600T1
		Phone	May 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A600AZ
	Samsung Galaxy J7 Duo	Phone	Apr 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J720F
		Phone	Apr 30, 2018	Android 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J720M
	Samsung Galaxy J7 Prime 2	Phone	Apr 30, 2018	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G611F
		Phone	Apr 30, 2018	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G611FF
		Phone	Apr 30, 2018	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G611M
		Phone	Apr 30, 2018	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G611MT
		Phone	Apr 30, 2018	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G611K
	Samsung Galaxy S9+	Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G965F
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G965U
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G965W
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G9650
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G965U1
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G965N
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SCV39
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G965X
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SC-03K
	Samsung Galaxy S9	Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G960F
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G960
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G960F
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G960U
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G960W
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G9600

10

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 22 of 40
EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G960U1
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G960N
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SCV38
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G960X
		Phone	Mar 30, 2018	Android 8.0 (Oreo), upgradable to Android 10, One UI 2.0	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SC-02K
	Samsung Galaxy J2 Pro (2018)	Phone	Jan 30, 2018	Android 7.1 (Nougat), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J250F
		Phone	Jan 30, 2018	Android 7.1 (Nougat), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J250G
		Phone	Jan 30, 2018	Android 7.1 (Nougat), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J250F
		Phone	Jan 30, 2018	Android 7.1 (Nougat), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J250M
		Phone	Jan 30, 2018	Android 7.1 (Nougat), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J250Y
	Samsung Galaxy A8+ (2018)	Phone	Jan 30, 2018	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A730F
	Samsung Galaxy A8 (2018)	Phone	Jan 30, 2018	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A530F
		Phone	Jan 30, 2018	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A530F
		Phone	Jan 30, 2018	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A530K
		Phone	Jan 30, 2018	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A530L
		Phone	Jan 30, 2018	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A530S
		Phone	Jan 30, 2018	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A530N
		Phone	Jan 30, 2018	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A530W
2017	Samsung Galaxy J2 (2017)	Phone	Oct 30, 2017	Android 7.0 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J200G
		Phone	Oct 30, 2017	Android 7.0 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J200BT
	Samsung Galaxy Tab Active 2	Tablet	Nov 30, 2017	Android 7.1.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	-
	Samsung Galaxy Tab A 8.0 (2017	Tablet	Sep 30, 2017	Android 7.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-T380
		Tablet	Sep 30, 2017	Android 7.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-T385
	Samsung Galaxy C7 (2017)	Phone	Oct 30, 2017	Android 7.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-C710F
		Phone	Oct 30, 2017	Android 7.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-C7100
		Phone	Oct 30, 2017	Android 7.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-C7108
	Samsung Galaxy Note8	Phone	Sep 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N950F
		Phone	Sep 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N950U
		Phone	Sep 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N9500
		Phone	Sep 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N950U1
		Phone	Sep 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N950N
		Phone	Sep 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N950W
		Phone	Sep 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SC-01K
		Phone	Sep 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N950FD
	Samsung Galaxy S8 Active	Phone	Aug 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G892A
		Phone	Aug 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G892U
	Samsung Galaxy J7 V	Phone	Mar 30, 2017	Android 7.0.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J727V
		Phone	Mar 30, 2017	Android 7.0.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J727P
		Phone	Mar 30, 2017	Android 7.0.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J727T
		Phone	Mar 30, 2017	Android 7.0.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J727F
		Phone	Mar 30, 2017	Android 7.0.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J727U

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 23 of 40

EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Mar 30, 2017	Android 7.0.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J727S
		Phone	Mar 30, 2017	Android 7.0.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J727VPP
		Phone	Mar 30, 2017	Android 7.0.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J727AZ
		Phone	Mar 30, 2017	Android 7.0.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-S727VL
		Phone	Mar 30, 2017	Android 7.0.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J727R4
	Samsung Galaxy Note FE	Phone	Mar 30, 2017	Android 7.0.1 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J727A
		Phone	Jul 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N935F
		Phone	Jul 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N935L
		Phone	Jul 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N935S
		Phone	Jul 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N935K
	Samsung Galaxy J7 Max	Phone	Jun 30, 2017	Android 7.0 (Nougat), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G615F
		Phone	Jun 30, 2017	Android 7.0 (Nougat), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G615FU
	Samsung Galaxy J7 Pro	Phone	Jul 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J730G
		Phone	Jul 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J730GM
	Samsung Galaxy J7 (2017)	Phone	Jul 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J730F
		Phone	Jul 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J730FM
		Phone	Jul 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-S727VL
		Phone	Jul 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J730K
	Samsung Galaxy J5 (2017)	Phone	Jun 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J530F
		Phone	Jun 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J530Y
		Phone	Jun 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J530FM
		Phone	Jun 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J530G
		Phone	Jun 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J530YM
		Phone	Jun 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J530L
		Phone	Jun 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J530S
		Phone	Jun 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J530K
		Phone	Jun 30, 2017	Android 7.1.1 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J530GM
	Samsung Galaxy J3 (2017)	Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J330F
		Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	J330F
		Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	J330G
		Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J330G
		Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J330FN
		Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J3308
		Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J327F
		Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-S337TL
		Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J3300
		Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J330L
		Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J327U
		Phone	Jul 30, 2017	Android 7.0 (Nougat), 8.0 (Oreo), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J330N
	Samsung Galaxy Folder2	Phone	Jul 30, 2017	Android 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G1650W
	Samsung Z4	Phone	Jun 30, 2017	Tizen 3.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct	Yes, with A-GPS, GLONASS	SM-Z400F
		Phone	Jun 30, 2017	Tizen 3.0	Wi-Fi 802.11 b/g/n, Wi-Fi Direct	Yes, with A-GPS, GLONASS	SM-Z400Y

12

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 24 of 40
EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
	Samsung Galaxy S8	Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950FD
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950W
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950S
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950K
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950L
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G9500
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950A
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950P
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950T
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950U
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950V
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950F
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950U1
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950N
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SC-02J
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SCV36
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G950
		Phone	Apr 24, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	G950F
	Samsung Galaxy S8+	Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955F
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955FD
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955W
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955A
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955P
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955T
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955V
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955R4
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955U
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955S
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955K
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955L
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955U1
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G955N
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-G9550
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SC-03J
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	G955F
	Samsung Galaxy C5 Pro	Phone	Mar 30, 2017	Android 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-C5010
		Phone	Mar 30, 2017	Android 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-C5018
	Samsung Galaxy Xcover 4	Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G390F
		Phone	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G390Y
	Samsung Galaxy Tab S3 9.7	Tablet	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-T820
		Tablet	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-T825

13

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 25 of 40
EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Tablet	Apr 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-T825Y
	Samsung Galaxy J3 Emerge	Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J327A
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J327
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J327T
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J327V
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J327P
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J327W
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J326AZ
	Samsung Galaxy C7 Pro	Phone	Feb 28, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-C7010
		Phone	Feb 28, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-C701F
		Phone	Feb 28, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-C7018
	Samsung Galaxy A7 (2017)	Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A720F
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A720S
	Samsung Galaxy A5 (2017)	Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A520F
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A520F
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A520K
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A520L
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A520S
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A520W
	Samsung Galaxy A3 (2017)	Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A320F
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A320Y
		Phone	Jan 30, 2017	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A320FL
2016	Samsung Galaxy J1 mini prime	Phone	Dec 30, 2016	Android 5.1 (Lollipop) - 3G model	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J106F
		Phone	Dec 30, 2016	Android 5.1 (Lollipop) - 3G model	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J106B
		Phone	Dec 30, 2016	Android 5.1 (Lollipop) - 3G model	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J106H
		Phone	Dec 30, 2016	Android 5.1 (Lollipop) - 3G model	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J106M
	Samsung Galaxy Grand Prime Plu	Phone	Nov 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G532F
	Samsung Galaxy J2 Prime	Phone	Nov 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G532G
		Phone	Nov 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G532M
		Phone	Nov 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G532G
		Phone	Nov 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G532F
		Phone	Nov 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G532MT
	Samsung Galaxy C9 Pro	Phone	Nov 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de)	SM-C9000
		Phone	Nov 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de)	SM-C900F
		Phone	Nov 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de)	SM-C9008
		Phone	Nov 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de)	SM-C900Y
	Samsung Galaxy A8 (2016)	Phone	Oct 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de)	SM-A8100
		Phone	Oct 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de)	SM-A810F
		Phone	Oct 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de)	SM-A810F
		Phone	Oct 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de)	SM-A810YZ
		Phone	Oct 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de)	SM-A810S

14

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
	Samsung Galaxy On8	Phone	Oct 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J710FN
	Samsung Galaxy On7 (2016)	Phone	Oct 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de	SM-G6100
		Phone	Oct 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de	SM-G610L
		Phone	Oct 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de	SM-G610K
	Samsung Galaxy J5 Prime	Phone	Oct 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de	SM-G570F
		Phone	Oct 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de	SM-G570F/DD
		Phone	Oct 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de	SM-G570F
		Phone	Oct 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de	SM-G570Y
		Phone	Oct 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de	SM-G570M
	Samsung Galaxy J7 Prime	Phone	Nov 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G610F
		Phone	Nov 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G610Y
		Phone	Nov 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G610M
		Phone	Nov 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J727T1
		Phone	Nov 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G610
	Samsung Galaxy Z2	Phone	Aug 30, 2016	Tizen 2.4	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-Z200F/DD
		Phone	Aug 30, 2016	Tizen 2.4	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-Z200F
		Phone	Aug 30, 2016	Tizen 2.4	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-Z200Y
	Samsung Galaxy Note7 (USA)	Phone	Aug 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N930V
		Phone	Aug 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N930A
		Phone	Aug 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N930P
		Phone	Aug 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N930T
		Phone	Aug 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N930R4
		Phone	Aug 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N930W8
		Phone	Aug 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N930F
		Phone	Aug 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N930G
		Phone	Aug 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N930S
	Samsung Galaxy Note7	Phone	Sep 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N930V
		Phone	Sep 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N930A
		Phone	Sep 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N930P
		Phone	Sep 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N930T
		Phone	Sep 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N930R4
		Phone	Sep 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N930W8
		Phone	Sep 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N930F
		Phone	Sep 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N930G
		Phone	Sep 30, 2016	Android 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS, GALILEO	SM-N930S
	Samsung Galaxy On7 Pro	Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de	SM-G600FY
	Samsung Galaxy On5 Pro	Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G5500
		Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G550F
		Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G550FY
	Samsung Galaxy Tab J	Tablet	Aug 30, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T285YD
	Samsung Galaxy J Max	Phone	Aug 30, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T285
		Phone	Aug 30, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T285YD

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 27 of 40
EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
	Samsung Galaxy J2 Pro (2016)	Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J210F
		Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J210G
		Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J210H
		Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J210GU
	Samsung Galaxy J2 (2016)	Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J210F
		Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J210G
		Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J210H
		Phone	Jul 30, 2016	Android 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J210GU
	Samsung Z3 Corporate	Phone	Jun 30, 2016	Tizen 2.4	Wi-Fi 802.11 b/g/n, Wi-Fi Direct	Yes, with A-GPS, GLONASS	-
	Samsung Galaxy Xcover 3 G389F	Phone	Apr 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G389F
	Samsung Galaxy S7 active	Phone	Jun 30, 2016	Android 6.0 (Marshmallow), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G891A
	Samsung Galaxy J3 Pro	Phone	Jun 30, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J3119
		Phone	Jun 30, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J3110
		Phone	Jun 30, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J327
		Phone	Jun 30, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J3119S
	Samsung Galaxy C7	Phone	Jun 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de	SM-C7000
	Samsung Galaxy C5	Phone	Jun 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo)	Wi-Fi 802.11 a/b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (region de	SM-C5000
	Samsung Galaxy A9 Pro (2016)	Phone	May 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A9100
		Phone	May 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A910F
		Phone	May 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A910F
	Samsung Galaxy J7 (2016)	Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J710FN
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J710F
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J710H
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J710M
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J710GN
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J710MN
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J710K
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J7108
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to Android 8.0 (Oreo), Experienc	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J710FQ
	Samsung Galaxy J5 (2016)	Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510F
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510G
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510FN
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510Y
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510M
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510GN
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510H
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510MN
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J5108
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510UN
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510L
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510S
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510FQ

16

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 28 of 40

EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Apr 30, 2016	Android 6.0.1 (Marshmallow), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J510K
	Samsung Galaxy Tab A 10.1 (201	Tablet	May 30, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.1 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, Beidou (market	SM-T580
		Phone	May 30, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.1 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, Beidou (market	SM-T585
		Phone	May 30, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.1 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, Beidou (market	SM-P580
		Phone	May 30, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.1 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, Beidou (market	SM-P585
		Phone	May 30, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.1 (Oreo)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, Beidou (market	SM-P585Y
	Samsung Galaxy Tab A 7.0 (2016	Tablet	Mar 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T280
		Tablet	Mar 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T285
	Samsung Galaxy S7	Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930F
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930A
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930P
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930V
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930T
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930R
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930F
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930FD
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930W8
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930S
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930L
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G930K
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G9300
	Samsung Galaxy S7 edge	Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G935F
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G935FD
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G935W8
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G9350
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G935S
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SC-02H
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G935K
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G935L
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G935R4
	Samsung Galaxy S7 edge (USA)	Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G935A
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G935P
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G935V
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G935T
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G935R
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G935U
		Phone	Mar 11, 2016	Android 6.0 (Marshmallow), upgradable to Android 8.0 (Oreo), TouchWiz	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G935L
	Samsung Galaxy J1 Nxt	Phone	Feb 28, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J105F
		Phone	Feb 28, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J105H
		Phone	Feb 28, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J105H
		Phone	Feb 28, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J105B
		Phone	Feb 28, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J105Y

17

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 29 of 40

EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Feb 28, 2016	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J105M
	Samsung Galaxy Tab E 8.0	Tablet	Jan 30, 2016	Android 5.1.1 (Lollipop), upgradable to 7.1 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T377W
		Tablet	Jan 30, 2016	Android 5.1.1 (Lollipop), upgradable to 7.1 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T377
		Tablet	Jan 30, 2016	Android 5.1.1 (Lollipop), upgradable to 7.1 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T375
		Tablet	Jan 30, 2016	Android 5.1.1 (Lollipop), upgradable to 7.1 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T377P
		Tablet	Jan 30, 2016	Android 5.1.1 (Lollipop), upgradable to 7.1 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T377R
	Samsung Galaxy J1 (2016)	Phone	Jan 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120F
		Phone	Jan 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120H
		Phone	Jan 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120M
		Phone	Jan 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120M
		Phone	Jan 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120T
		Phone	Jan 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120G
		Phone	Jan 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120A
		Phone	Jan 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120FN
		Phone	Jan 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120AZ
		Phone	Jan 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120ZN
		Phone	Jan 30, 2016	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120W
	Samsung Galaxy A9 (2016)	Phone	Jan 30, 2016	Android 5.1.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A900F
		Phone	Jan 30, 2016	Android 5.1.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A9000
	Samsung Galaxy Express Prime	Phone	Apr 30, 2016	Android 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-J320AZ
	Samsung Galaxy J3 (2016)	Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320H
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J3109
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320FN
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320P
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320F
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320M
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320Y
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320A
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320G
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J327T1
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320V
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320YZ
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320W8
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320ZN
		Phone	May 6, 2016	Android 5.1.1 (Lollipop) or Android 6.0 (Marshmallow), upgradable to 7.1.1	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J320N0
2015	Samsung Galaxy A7 (2016)	Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A710F
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A710S
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A710M
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A710FD
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A710Y
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A7100

18

Appx088

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 30 of 40
EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A710L
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A710K
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A7108
	Samsung Galaxy A5 (2016)	Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A5100
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A510F
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A510M
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A510Y
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A510FD
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A5108
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A510S
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A510K
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A510L
	Samsung Galaxy A3 (2016)	Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A310F
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A310M
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A310Y
		Phone	Dec 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A310N0
	Samsung Galaxy View	Tablet	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T670
		Tablet	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T810
		Tablet	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T677A
		Tablet	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T677
		Tablet	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T677Y
	Samsung Galaxy On7	Phone	Nov 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G600S
		Phone	Nov 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G6000
		Phone	Nov 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G600F
		Phone	Nov 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G600FY
	Samsung Galaxy On5	Phone	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G5500
		Phone	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G550F
		Phone	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G5528
		Phone	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G5510
		Phone	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G550T1
		Phone	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G550T
		Phone	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-S550TL
		Phone	Nov 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G550T2
	Samsung Z3	Phone	Oct 30, 2015	Tizen 2.3, upgradable to 2.4	Wi-Fi 802.11 b/g/n, Wi-Fi Direct	Yes, with A-GPS, GLONASS	SM-Z300H/DD
		Phone	Oct 30, 2015	Tizen 2.3, upgradable to 2.4	Wi-Fi 802.11 b/g/n, Wi-Fi Direct	Yes, with A-GPS, GLONASS	SM-Z300H
	Samsung Galaxy J1 Ace	Phone	Oct 30, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J111F
		Phone	Oct 30, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J110G
		Phone	Oct 30, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J110F
		Phone	Oct 30, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J110H
		Phone	Oct 30, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J110M
		Phone	Oct 30, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J110L
		Phone	Oct 30, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J111M

19

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 31 of 40
EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
	Samsung Galaxy Note5 (USA)	Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N920
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N920P
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N920V
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N920R
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N920W8
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N920R4
	Samsung Galaxy Note5	Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920T
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920A
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920I
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920G
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920F
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920S
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920L
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920K
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920
	Samsung Galaxy Note5 Duos	Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N9208
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920CD
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N920C
	Samsung Galaxy S6 edge+ (USA)	Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928V
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928P
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928R
	Samsung Galaxy S6 edge+	Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928A
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928F
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928A
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928T
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928I
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928G
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928C
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928I
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SCV31
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G9280
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928L
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928S
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928K
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928W8
	Samsung Galaxy S6 edge+ Duos	Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G9287C
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G9287
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928A
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G928F
	Samsung Galaxy S5 Neo	Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G903F

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G903W
		Phone	Aug 30, 2015	Android 5.1.1 (Lollipop), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G903M
	Samsung Galaxy S4 mini I9195I	Phone	Jun 30, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	GT-I9195I
	Samsung Galaxy Folder	Phone	Jul 30, 2015	Android 5.1 (Lollipop)	Wi-Fi 802.11 b/g/n, hotspot	Yes, with A-GPS, GLONASS	SM-G150N0
	Samsung Galaxy Tab S2 9.7	Tablet	Sep 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T810, T815	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T810
		Tablet	Sep 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T810, T815	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T815
		Tablet	Sep 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T810, T815	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T813N
		Tablet	Sep 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T810, T815	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T819N
		Tablet	Sep 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T810, T815	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T819
		Tablet	Sep 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T810, T815	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T813
		Tablet	Sep 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T810, T815	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T815Y
	Samsung Galaxy Tab S2 8.0	Tablet	Jul 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T710, T715	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T715
		Tablet	Jul 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T710, T715	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T710
		Tablet	Jul 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T710, T715	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T719N
		Tablet	Jul 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T710, T715	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T719
		Tablet	Jul 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T710, T715	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T715Y
		Tablet	Jul 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T710, T715	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T719Y
		Tablet	Jul 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow) - T710, T715	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T713
	Samsung Galaxy A8 Duos	Phone	Aug 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A8000
		Phone	Aug 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A800F
		Phone	Aug 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A800Y
		Phone	Aug 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A800I
		Phone	Aug 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A800IZ
		Phone	Aug 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A800S
		Phone	Aug 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A800YZ
	Samsung Galaxy A8	Phone	Aug 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A8000
		Phone	Aug 30, 2015	Android 5.1 (Lollipop), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A800F
	Samsung Galaxy V Plus	Phone	Jul 30, 2015	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G318HZ
		Phone	Jul 30, 2015	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G318H
		Phone	Jul 30, 2015	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G318MZ
	Samsung Galaxy J7	Phone	Jul 16, 2015	Android 5.1 (Lollipop), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J700F
		Phone	Jul 16, 2015	Android 5.1 (Lollipop), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J700H
		Phone	Jul 16, 2015	Android 5.1 (Lollipop), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J700M
		Phone	Jul 16, 2015	Android 5.1 (Lollipop), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J700T
		Phone	Jul 16, 2015	Android 5.1 (Lollipop), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J700T1
		Phone	Jul 16, 2015	Android 5.1 (Lollipop), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J700K
		Phone	Jul 16, 2015	Android 5.1 (Lollipop), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J700P
		Phone	Jul 16, 2015	Android 5.1 (Lollipop), upgradable to 7.1.1 (Nougat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J7008
?	Samsung Galaxy J7 Nxt	Phone	Jul 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J701F
		Phone	Jul 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J701F
		Phone	Jul 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J701M
		Phone	Jul 30, 2017	Android 7.0 (Nougat), upgradable to Android 9.0 (Pie), One UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J701MT

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
	Samsung Galaxy J5	Phone	Jun 19, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J500F
		Phone	Jun 19, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J500G
		Phone	Jun 19, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J500FN
		Phone	Jun 19, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J500Y
		Phone	Jun 19, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J500M
		Phone	Jun 19, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J500S
		Phone	Jun 19, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J500H
		Phone	Jun 19, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J5007
		Phone	Jun 19, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J500N0
		Phone	Jun 19, 2015	Android 5.1 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-J5008
	Samsung Galaxy Tab E 9.6	Tablet	Jul 30, 2015	Android 4.4 (KitKat) - EU model	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-T560
		Tablet	Jul 30, 2015	Android 4.4 (KitKat) - EU model	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-T561
	Samsung Galaxy S6 active	Phone	Jun 30, 2015	Android 5.0.2 (Lollipop), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G890A
	Samsung Galaxy Tab 3 V	Tablet	Apr 30, 2015	Android 4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with GLONASS	SM-T116
		Tablet	Apr 30, 2015	Android 4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with GLONASS	SM-T116BU
		Tablet	Apr 30, 2015	Android 4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with GLONASS	SM-T116NQ
		Tablet	Apr 30, 2015	Android 4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with GLONASS	SM-T116NU
		Tablet	Apr 30, 2015	Android 4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with GLONASS	SM-T116NY
	Samsung Galaxy Tab A 9.7 & S P	Tablet	Jul 30, 2015	Android 5.0 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-P550
		Tablet	Jul 30, 2015	Android 5.0 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-P555
	Samsung Galaxy Tab A 9.7	Tablet	May 30, 2015	Android 5.0 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T555
		Tablet	May 30, 2015	Android 5.0 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T550
		Tablet	May 30, 2015	Android 5.0 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-P555
		Tablet	May 30, 2015	Android 5.0 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-P550
	Samsung Galaxy Tab A 8.0 & S P	Tablet	May 30, 2015	Android 5.0 (Lollipop), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-P355
	Samsung Galaxy Tab A 8.0 (2015	Tablet	May 30, 2015	Android 5.0 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T350
		Tablet	May 30, 2015	Android 5.0 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T355
	Samsung Galaxy Xcover 3	Phone	Apr 30, 2015	Android 4.4.4 (KitKat), upgradable to 5.0 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G388F
	Samsung Galaxy S6 edge (USA)	Tablet	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G925P
		Tablet	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G925R
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G925V
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G925W8
	Samsung Galaxy S6 (USA)	Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G920P
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G920V
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G920R
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G920W8
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G920R4
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G920T1
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G920AZ
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 5.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-S907VL
	Samsung Galaxy S6 edge	Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G9250
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G925A

22

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 34 of 40
EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G925F
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G925FQ
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G925I
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G925K
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G925L
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G925S
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G925T
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to 7.0 (Nougat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G925D
	Samsung Galaxy S6 Duos	Phone	Jun 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G920
	Samsung Galaxy S6	Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G9200
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G9208
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G9208/SS
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G9209
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G920A
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G920F
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G920FD
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G920I
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G920S
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G920T
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G920K
		Phone	Apr 30, 2015	Android 5.0.2 (Lollipop), upgradable to Android 8.0 (Oreo), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G920L
	Samsung Galaxy J1 4G	Phone	Mar 30, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J120G
	Samsung Galaxy J1	Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J100F
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J100FN
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J100H
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J100H/DD
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J100H
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J100M
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J100MU
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J100ML
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J100VPP
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J100Y
	Samsung Galaxy J2	Phone	Sep 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J200F
		Phone	Sep 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J200G
		Phone	Sep 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J200H
		Phone	Sep 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J200GU
		Phone	Sep 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J200M
		Phone	Sep 30, 2015	Android 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-J200Y
	Samsung Galaxy Tab 3 Lite 7.0 VI	Tablet	Mar 30, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T113
	Samsung Z1	Phone	Jan 30, 2015	Tizen 2.3	Wi-Fi 802.11 b/g/n	Yes, with A-GPS	SM-Z130H
		Phone	Jan 30, 2015	Tizen 2.3	Wi-Fi 802.11 b/g/n	Yes, with A-GPS	SM-Z130H
	Samsung Galaxy A7 Duos	Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A7000

23

Appx093

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A7009
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A700H
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A700YD
	Samsung Galaxy A7	Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A700F
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A700FD
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A700K
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A700L
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A700S
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS/ BDS (market de	SM-A700X
	Samsung Galaxy Grand Max	Phone	Jan 30, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G720N0
		Phone	Jan 30, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G720AX
	Samsung Galaxy E7	Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-E7000
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-E7009
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-E700F
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-E700F
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-E700H
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-E700H/DD
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-E700H
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-E700M
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-E700M
	Samsung Galaxy E5	Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, hotspot	Yes, with A-GPS, GLONASS	SM-E500F
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, hotspot	Yes, with A-GPS, GLONASS	SM-E500F
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, hotspot	Yes, with A-GPS, GLONASS	SM-E500H
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, hotspot	Yes, with A-GPS, GLONASS	SM-E500H/DD
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, hotspot	Yes, with A-GPS, GLONASS	SM-E500H
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, hotspot	Yes, with A-GPS, GLONASS	SM-E500HQ
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, hotspot	Yes, with A-GPS, GLONASS	SM-E500M
		Phone	Feb 28, 2015	Android 4.4.4 (KitKat)	Wi-Fi 802.11 b/g/n, hotspot	Yes, with A-GPS, GLONASS	SM-E500M
2014	Samsung Galaxy Core Prime	Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360T
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G3606
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G3608
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G3609
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360BT
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360F
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360FY
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360G
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360GY
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360H
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360H/D
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360BT
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G361

24

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 36 of 40
EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G361H
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G361F
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360HU
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360T1
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360M
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360P
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.1.1 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G360V
	Samsung Galaxy A5 Duos	Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, hotspot	Yes, with A-GPS, GLONASS	SM-A500G
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, hotspot	Yes, with A-GPS, GLONASS	SM-A500H
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, hotspot	Yes, with A-GPS, GLONASS	SM-A500M
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, hotspot	Yes, with A-GPS, GLONASS	SM-A5000
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, hotspot	Yes, with A-GPS, GLONASS	SM-A500F
	Samsung Galaxy A5	Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A5000
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A5009
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500F
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500F1
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500FQ
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500FU
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500G
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500H
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500HQ
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500K
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500L
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500S
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500YZ
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500Y
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 7.0 (Nougat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A500W
	Samsung Galaxy A3 Duos	Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A300F
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A300G
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A300H
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-A300M
	Samsung Galaxy A3	Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A300F
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A300FU
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A300G
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A300HQ
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A300M
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A300XU
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A300XZ
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A300Y
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A300YZ
		Phone	Dec 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0.1 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-A300H
	Samsung Galaxy S5 Plus	Phone	Nov 30, 2014	Android 4.4.2 (KitKat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G901F

25

Appx095

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
	Samsung Galaxy Pocket 2	Phone	Sep 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G110B
		Phone	Sep 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G110B
		Phone	Sep 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G110H
		Phone	Sep 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G110M
	Samsung Galaxy V	Phone	Sep 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	-
	Samsung Galaxy Grand Prime Duo	Phone	Oct 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-G530BT
	Samsung Galaxy Ace Style LTE G	Phone	Sep 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G357FZ
	Samsung Galaxy Note Edge	Phone	Nov 30, 2014	Android 4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N9150
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915A
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915D
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915F
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915FY
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915G
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915K
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915L
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915P
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915R4
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915S
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915T
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915V
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915W8
		Phone	Nov 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N915X
	Samsung Galaxy Note 4 Duos	Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N9100
	Samsung Galaxy Note 4 (USA)	Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N910A
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N910T
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N910V
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N910M
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N910P
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N910R4
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N910W8
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N910T3
	Samsung Galaxy Note 4	Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N910C
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N910S
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N910H
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N910F
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N910G
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N910U
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N910K
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N916S
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N910L
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N916L
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N916K

26

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 38 of 40

EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Oct 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0 (Marshmallow)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-N910T3
	Samsung Galaxy Tab Active LTE	Tablet	Dec 30, 2014	Android 4.4.2 (KitKat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T365
	Samsung Galaxy Mega 2	Phone	Sep 30, 2014	Android 4.4.3 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G750F
		Phone	Sep 30, 2014	Android 4.4.3 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G7508
		Phone	Sep 30, 2014	Android 4.4.3 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G7508Q
		Phone	Sep 30, 2014	Android 4.4.3 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G750H
		Phone	Sep 30, 2014	Android 4.4.3 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G750A
	Samsung Galaxy S5 LTE-A G901	Phone	Aug 30, 2014	Android 4.4.2 (KitKat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G901F
	Samsung Galaxy Alpha (S801)	Phone	Sep 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G8508S
		Phone	Sep 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G850W
		Phone	Sep 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G850A
	Samsung Galaxy Alpha	Phone	Aug 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G850F
		Phone	Aug 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G850FQ
		Phone	Aug 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G850Y
		Phone	Aug 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G850M
		Phone	Aug 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G850T
		Phone	Aug 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G850A
		Phone	Aug 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G850S
		Phone	Aug 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G850L
		Phone	Aug 30, 2014	Android 4.4.4 (KitKat), upgradable to 5.0.2 (Lollipop)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G850K
	Samsung Galaxy S5 mini Duos	Phone	Aug 30, 2014	Android 4.4.4 (KitKat), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G800H
	Samsung Galaxy Avant	Phone	Jul 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G386T
	Samsung Galaxy S Duos 3	Phone	Aug 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G313HU
		Phone	Aug 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G316HU
	Samsung Galaxy Ace NXT	Phone	Aug 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G313H
		Phone	Aug 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G313HZ
	Samsung Galaxy S5 mini	Phone	Jul 30, 2014	Android 4.4.2 (KitKat), upgradable to 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G800H
		Phone	Jul 30, 2014	Android 4.4.2 (KitKat), upgradable to 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G800F
		Phone	Jul 30, 2014	Android 4.4.2 (KitKat), upgradable to 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G800M
	Samsung Galaxy Ace 4 LTE G313	Phone	Aug 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G313F
	Samsung Galaxy Ace 4	Phone	Aug 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	-
	Samsung Galaxy Young 2	Phone	Oct 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G130H
		Phone	Oct 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G130HN
	Samsung Galaxy Core II	Phone	Jul 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G355H
		Phone	Jul 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G355HN
		Phone	Jul 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G355M
	Samsung Galaxy S5 Sport	Phone	Jun 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G860
		Phone	Jun 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G860P
	Samsung Galaxy S5 LTE-A G906	Phone	Jul 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G906S
		Phone	Jul 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G906K
		Phone	Jul 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G906L
	Samsung Galaxy Tab S 8.4 LTE	Tablet	Jul 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-T705

27

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 39 of 40

EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
	Samsung Galaxy Tab S 10.5 LTE	Tablet	Jul 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-T805
	Samsung Galaxy Core Lite LTE	Phone	Jun 30, 2014	Android 4.3 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G3586V
	Samsung I9301I Galaxy S3 Neo	Phone	Jun 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I9301I
	Samsung Galaxy W	Phone	Sep 30, 2014	Android 4.3 (Jelly Bean)	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS	SM-T255
	Samsung Z	Phone	Sep 30, 2014	Tizen 2.2.1	Wi-Fi 802.11 a/b/g/n, dual-band, hotspot	Yes, with A-GPS, GLONASS	SM-Z910F
	Samsung Galaxy S5 Active	Phone	May 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G870A
		Phone	May 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SC-02G
		Phone	May 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G870D
		Phone	May 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G870F
		Phone	May 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G870W
	Samsung Galaxy K zoom	Phone	Jun 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-C115
		Phone	Jun 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-C111
	Samsung Galaxy Beam2	Phone	Apr 30, 2014	Android 4.2.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G3858
	Samsung I9300I Galaxy S3 Neo	Phone	Apr 30, 2014	Android 4.3 (Jelly Bean), upgradable to 4.4.4 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I9300I
		Phone	Apr 30, 2014	Android 4.3 (Jelly Bean), upgradable to 4.4.4 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I9300RWI
	Samsung Galaxy Ace Style	Phone	Apr 30, 2014	Android 4.4.2 (KitKat), TouchWiz Essence UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G310HN
?	Samsung ATIV SE	Phone	Apr 30, 2014	Microsoft Windows Phone 8, upgradable to 8.1	Wi-Fi 802.11 a/b/g/n/ac, dual-band, hotspot	Yes, with A-GPS	SM-W750V
	Samsung Galaxy Tab 4 7.0 3G	Tablet	May 30, 2014	Android 4.4.2 (KitKat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T231
	Samsung Galaxy Tab 4 7.0 LTE	Tablet	May 30, 2014	Android 4.4.2 (KitKat), TouchWiz UX UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T235
	Samsung Galaxy Tab 4 8.0 3G	Tablet	Jun 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T331
	Samsung Galaxy Tab 4 8.0 LTE	Tablet	Jun 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T335
	Samsung Galaxy Tab 4 10.1 3G	Tablet	Jun 30, 2014	Android 4.4.2 (KitKat), upgradable to 5.0.2 (Lollipop), TouchWiz UX UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T531
	Samsung Galaxy Tab 4 10.1 LTE	Tablet	Jun 30, 2014	Android 4.4.2 (KitKat), TouchWiz UX UI	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T535
	Samsung G3812B Galaxy S3 Slim	Phone	Mar 30, 2014	Android 4.2 (Jelly Bean), TouchWiz UI	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G3812B
	Samsung I8200 Galaxy S III mini	Phone	Mar 30, 2014	Android 4.2.2 (Jelly Bean)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I8200
		Phone	Mar 30, 2014	Android 4.2.2 (Jelly Bean)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I8200N
		Phone	Mar 30, 2014	Android 4.2.2 (Jelly Bean)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I8200L
	Samsung Galaxy S5 Duos	Phone	Jun 30, 2014	Android 4.4.2 (KitKat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900FD
	Samsung Galaxy S5 (octa-core)	Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0.1 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G900H
	Samsung Galaxy S5 (USA)	Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 5.0.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, hotspot	Yes, with A-GPS, GLONASS	SM-G900V
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 5.0.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, hotspot	Yes, with A-GPS, GLONASS	SM-G900R4
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 5.0.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G900P
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G9006V
	Samsung Galaxy S5	Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900F
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900I
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900M
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900T
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900W8
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900H
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900FD
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900P
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900A

28

Case 6:20-cv-00259-ADA   Document 27-2   Filed 09/11/20   Page 40 of 40

EXHIBIT A

Year	Device Name	Device	Available Date	Android Version	WLAN	GPS	Model
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SC-04F
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G9008W
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900L
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900FQ
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900K
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900S
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SCL23
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900D
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900MD
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900V
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900T3
		Phone	Apr 30, 2014	Android 4.4.2 (KitKat), upgradable to 6.0 (Marshmallow), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS, BDS	SM-G900T1
	Samsung Galaxy Core LTE G386W	Phone	Nov 30, 2014	Android 4.4.2 (KitKat)	Wi-Fi 802.11 a/b/g/n, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G386W
	Samsung Galaxy Core LTE	Phone	May 30, 2014	Android 4.2.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G386F
		Phone	May 30, 2014	Android 4.2.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-G386T1
	Samsung Galaxy Star Trios S5283	Phone	May 30, 2014	Android 4.1.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS	GT-S5283B
	Samsung Galaxy Note 3 Neo Duos	Phone	Feb 28, 2014	Android 4.3 (Jelly Bean), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-N7502
	Samsung Galaxy Note 3 Neo	Phone	Feb 28, 2014	Android 4.3 (Jelly Bean), upgradable to 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, DLNA, Wi-Fi Direct, h	Yes, with A-GPS, GLONASS	SM-N750
		Phone	Feb 28, 2014	Android 4.3 (Jelly Bean), upgradable to 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, DLNA, Wi-Fi Direct, h	Yes, with A-GPS, GLONASS	SM-N7505
		Phone	Feb 28, 2014	Android 4.3 (Jelly Bean), upgradable to 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, DLNA, Wi-Fi Direct, h	Yes, with A-GPS, GLONASS	SM-N750K
		Phone	Feb 28, 2014	Android 4.3 (Jelly Bean), upgradable to 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, DLNA, Wi-Fi Direct, h	Yes, with A-GPS, GLONASS	SM-N750S
		Phone	Feb 28, 2014	Android 4.3 (Jelly Bean), upgradable to 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, DLNA, Wi-Fi Direct, h	Yes, with A-GPS, GLONASS	SM-N7507
		Phone	Feb 28, 2014	Android 4.3 (Jelly Bean), upgradable to 5.1.1 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, DLNA, Wi-Fi Direct, h	Yes, with A-GPS, GLONASS	SM-N750L
	Samsung Galaxy Tab 3 Lite 7.0 3G	Tablet	Feb 28, 2014	Android 4.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T111
	Samsung Galaxy Grand Neo	Phone	Feb 28, 2014	Android 4.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I9060I
		Phone	Feb 28, 2014	Android 4.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I9062
		Phone	Feb 28, 2014	Android 4.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I9060
		Phone	Feb 28, 2014	Android 4.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I9060C
		Phone	Feb 28, 2014	Android 4.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I9060M
		Phone	Feb 28, 2014	Android 4.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	GT-I9060L
	Samsung Galaxy Note Pro 12.2 LTE	Tablet	Mar 30, 2014	Android 4.4 (KitKat), upgradable to 5.0.2 (Lollipop), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-P905
	Samsung Galaxy Note Pro 12.2 3G	Tablet	Mar 30, 2014	Android 4.4 (KitKat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-P901
	Samsung Galaxy Tab Pro 10.1 LTE	Tablet	Mar 30, 2014	Android 4.4 (KitKat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T525
	Samsung Galaxy Tab Pro 8.4 3G/LTE	Tablet	Mar 30, 2014	Android 4.4 (KitKat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T325
		Tablet	Mar 30, 2014	Android 4.4 (KitKat), TouchWiz UI	Wi-Fi 802.11 a/b/g/n/ac, dual-band, Wi-Fi Direct, hotspot	Yes, with A-GPS, GLONASS	SM-T321
	Samsung Galaxy Core Advance	Phone	May 30, 2014	Android 4.2 (Jelly Bean)	Wi-Fi 802.11 b/g/n, hotspot	Yes, with A-GPS, GLONASS	-

29

Appx099

EXHIBIT 2

SHANNA JAN (/)   product design

work (/)
about (/about)

Location Labs by Avast

Parental controls app to empower parents to limit when and how often their children's phones can be used. Launched with Verizon and AT&T.
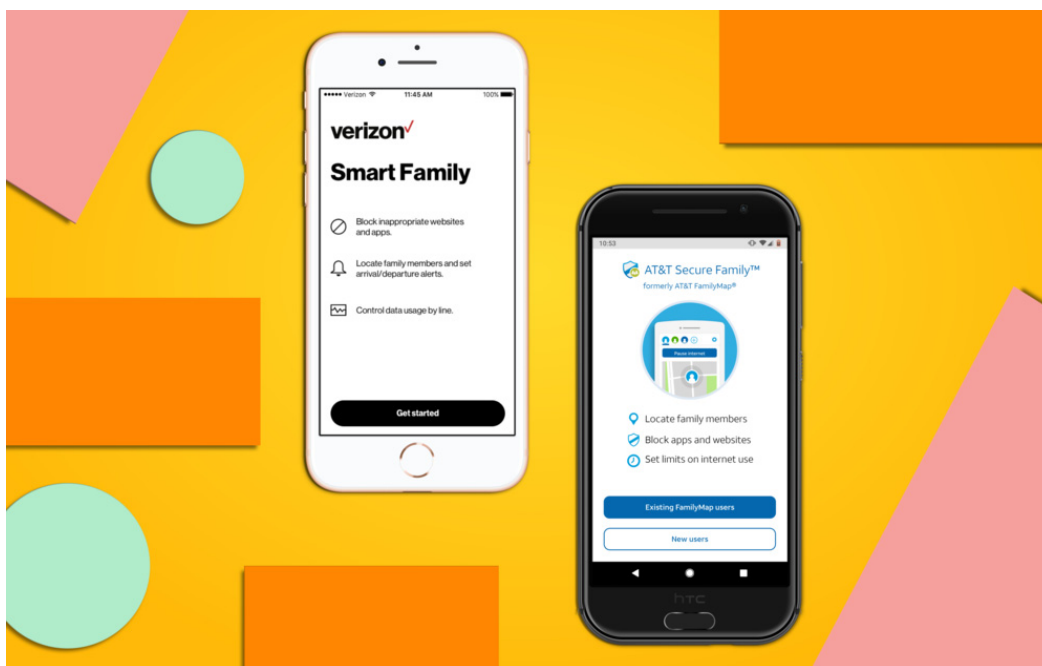
The Problem

Location Labs has been providing apps to all the major US phone carriers like Verizon, AT&T, T-Mobile, and Sprint since 2002. By 2016, a lot of these platforms were outdated and extremely difficult to update. AT&T's platform allowed parents to locate their children and Verizon's platform allowed for parental controls. Even though they had valuable features, we were facing stark competition which threatened our business contracts.

The Task

The Team

The design team was asked to reimagine the platforms into one powerful app for families that would revive the product and win renewed carrier deals. With dynamic UI design, new features, and critical design thinking, we were able to win over Verizon and AT&T and put our company back on track.

- 30 engineers

- 10 quality assurance testers

- 2 product managers

- 1 project manager

- 2 product designers

- 1 visual designer
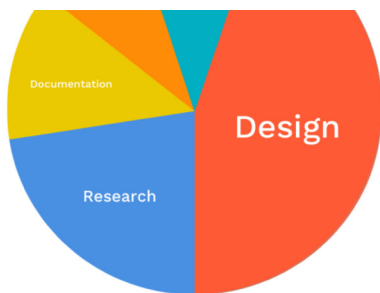
My Role

- prioritize features and roadmap with PM's

- lead and conduct user research and usability testing

- present key research findings to clients and company

- wireframe and UI design

- create interactive prototypes

- create design documentation for engineering and QA

- organize alignment meetings between teams

- aid visual designer to create component library

- aid QA teams to catch visual, copy, and ux bugs

- illustration

- copywriting

• light visual design

The Pitch

We needed to come up with a compelling and extensible product vision to win renewed contracts with our carrier partners. Our idea was to create an app that was more than a parental controls product but something that would serve the family as it evolved. I was able to help bring the product vision to life through my illustrations of the "highlight" cards, below.

Protect Sarah from inappropriate content

Noah looked at adult content

www.badthings.com

View Details
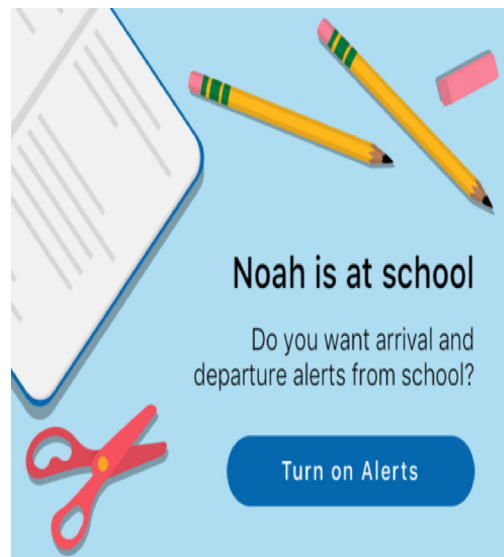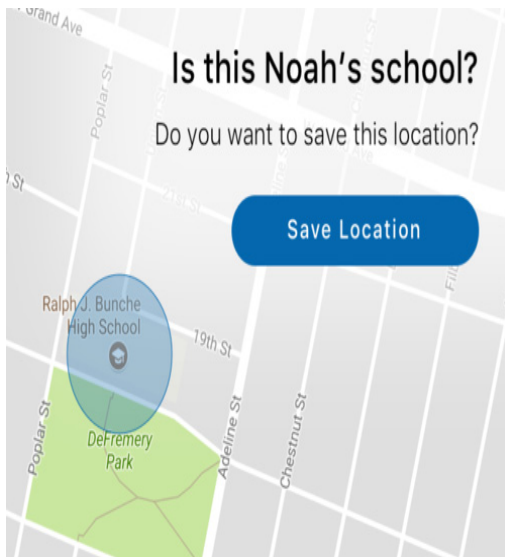
Verizon signed on and AT&T quickly followed.

Project Timeline

We had less than 6 months from start to launch for Verizon Smart Family and another 6 months to hand off AT&T Secure Family with some overlap.

Starting Point

Luckily for our timeline, we had already been experimenting and testing new designs for each of the legacy platforms we were to update and combine. We also had a great deal of research about our users spanning the life of all of our products.

User Research

Although we had a wealth of research from previous product launches, I lead several more runs to validate our assumptions about our users, their habits, and their needs. We interviewed over 25 parents that represented our target audience and presented our findings company-wide and to carrier partners. Not surprisingly, we found little differences between parent concerns from our recent research to our older research.
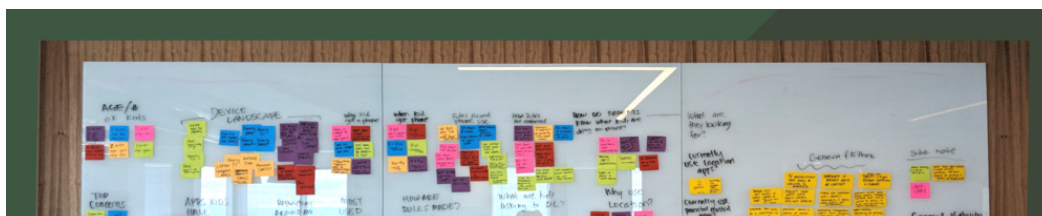
Research synthesis after a slew of user interviews

Top Parent Concerns:

Keeping kids safe - digitally and physically

- Inappropriate content - To limit exposure and target specific concerns
- Location - This becomes more important as kids gain independence in cases like walking home from school, driving, etc.

Helping kids become successful adults - balancing parental management with teaching self-sufficiency

- Screen time - To teach kids to balance a healthy amount of screen time at an early age

Feeling like they are being good parents

- Understand their child's usage and behaviors in the context of other kids their age
- Perception of self among other parents

Appx107

Goals

After distilling user goals and concerns, we set off to define our design and business goals.

Business Goals

- Win over carrier partners with strong product vision for the future

- Maintain and grow our user base by providing new product value

- Improve user retention and lifetime value

Design Goals

- Leverage our existing technologies to create *the one* parental controls app that every family could use

- Assist parents in their goals to keep their kids safe, help them raise successful adults, and feel like good parents

- Integrate seamlessly into a parent's normal habit and routine

Design Principles

We then created design principles to guide our thinking throughout the entire process.

1. *Grow with the family*

   As kids grow up, parenting techniques change with them. Using the Avast Mobile Intelligence lab, we gleaned insights to help the app adapt to changing family needs over time. This is an important factor to the lifetime value of the product and user retention.

2. *Deliver value proactively*

   Parents are busy. Leave them alone unless there's something important to tell them. Give them insights, not data. By delivering insights with minimal effort from the parent, they can spend less time in the app and more time with their family, increasing the app's perceived value.

3. *Be action-oriented*

   Allow parents to take immediate action when issues arise so they can feel confident about taking charge. This empowers parents to take control and feel like good parents.

4. *Require minimal behavior change*

Working with a parent's natural behavior means less user drop off. Work into their lives, don't make them work more.

Sketching

After countless hours sketching, pair designing, collaborating with engineers, and design critiques, we were ready to move forward with usability testing.

Sketching UI and listing goals for each segment of the app

Usability Testing

We performed multiple usability testing sessions throughout our process, putting hand-drawn sketches to high fidelity prototypes in front of participants to tease out issues in flow, copy, and UI.

Below, is a sketch of the 3 different navigation models we tested. We showed each one to a different participant and had them perform a task. At the end, we showed all 3 of the navigation models to them and asked for their feedback. The majority of our participants preferred the first model, which we ultimately moved forward with.
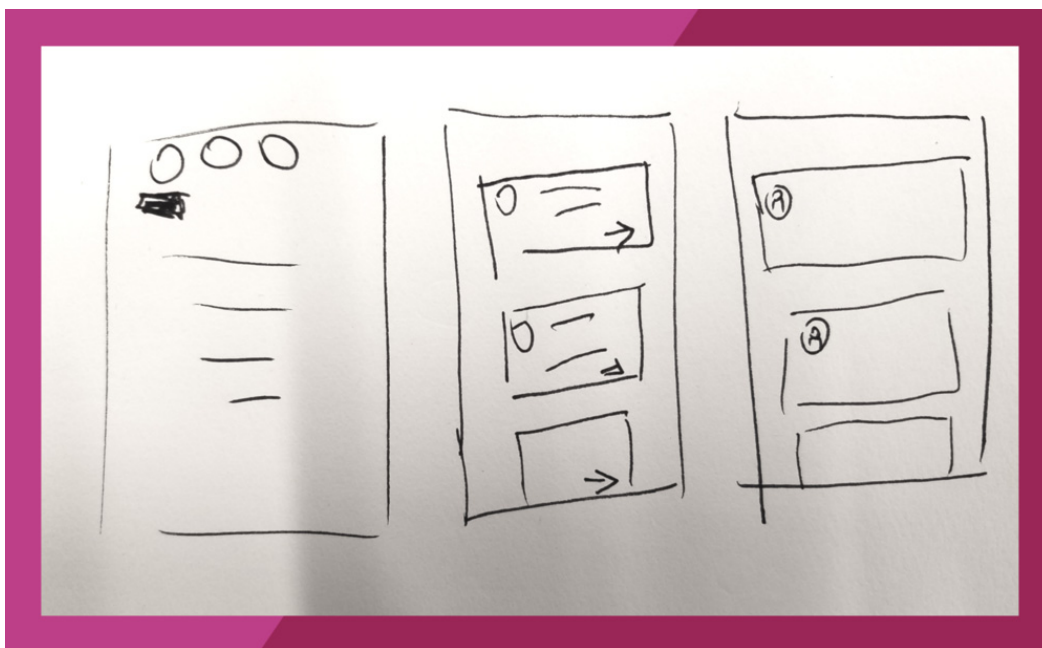
Quick and dirty sketch of the navigation models we tested

Another challenge was the information hierarchy within the "status" section, illustrated in the sketch below. Again, usability testing was able to help us move forward.
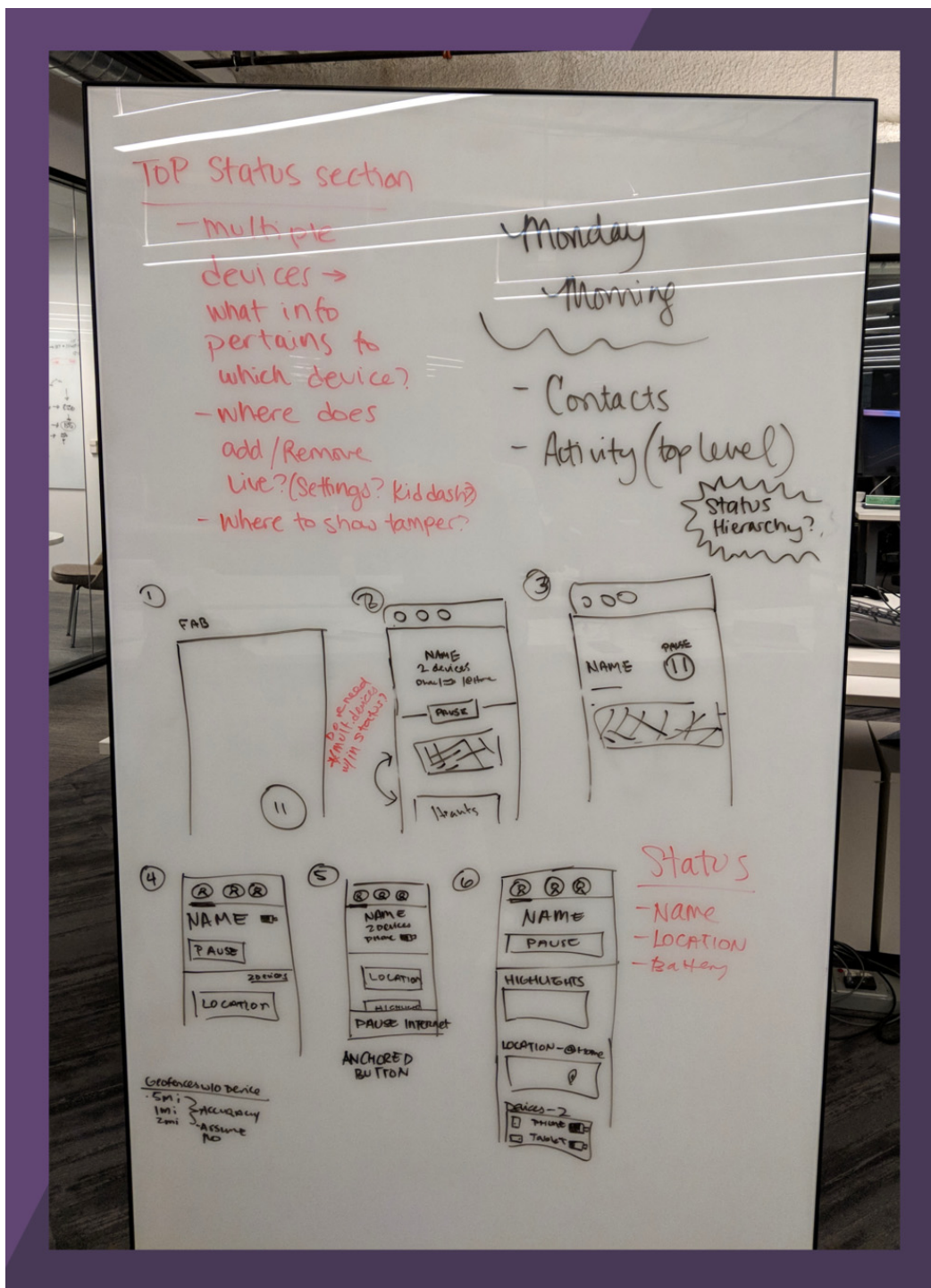
Figuring out the hierarchy within the "status" section.

We wrapped up every session by asking our participants how they would describe the app to their friend to see which main features stuck with them. Without being primed by the value propositions we had written, we were pleased to find that the majority of our users could easily understand, repeat the main product features, and relate to moments in their lives where the product would be useful.

Home Screen Tour

There are a differences between the home screen of Verizon and AT&T but the basic components are the same. The image below is from Verizon Smart Family.
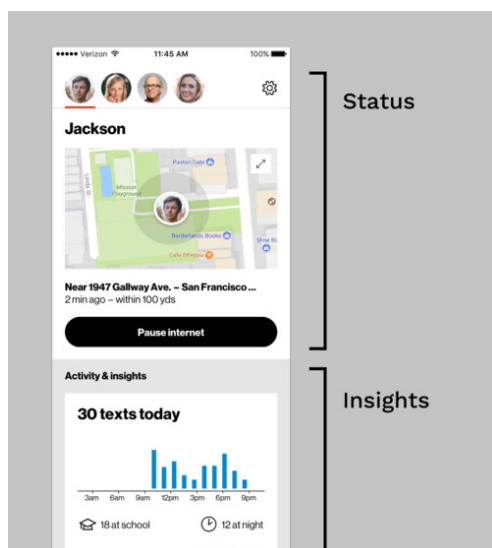
Status

We wanted to use the most valuable real estate to offer immediate answers to questions about a kid's location and allows parents
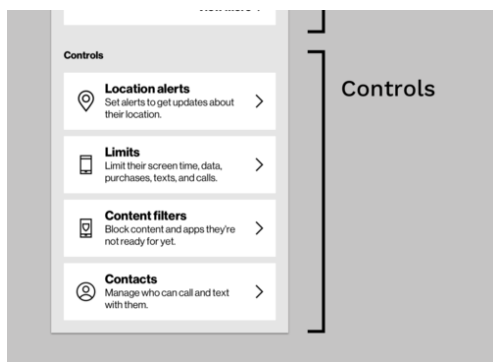
to pause access to the internet when their kid needs a break.

Insights

New insight cards are shown every few times the parent return to the app providing details on their child's device usage and serving as a method of passive onboarding; telling parents about other features they can use.

Controls

Controls are the "set it and forget it" features that are unlikely to change often. Unlike the more dynamic highlight cards, we set them at the bottom of the screen, out of the way. We use different onboarding techniques to help parents set up more features.

Visual Design & Component Library

Both Verizon and AT&T had an established branding library and strict guidelines about use of color and iconography. Because Verizon's color palette was mainly black and white with minimal iconography, it was an interesting challenge creating visual interest in pages and creating UI cues. AT&T was on the other side of the spectrum with lots of colors and iconography which meant being very judicious about what we used. Alongside the visual design team, we worked to create and maintain Sketch Libraries to improve design consistency and efficiency.
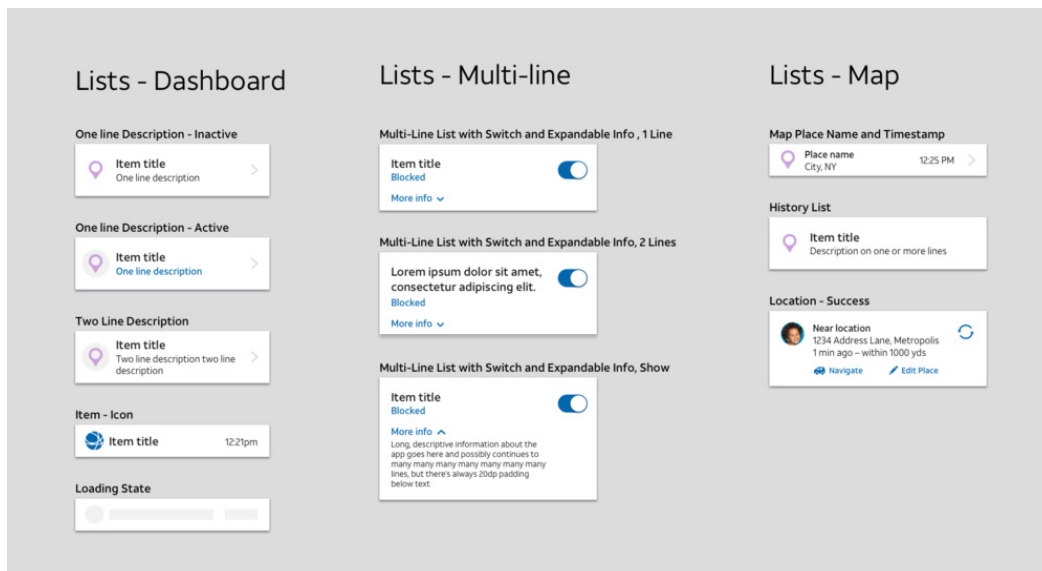
AT&T - Branded Component Library

Featured in

- The Verge
  (https://www.theverge.com/2018/4/19/17257114/verizon-
  new-parental-control-app-smart-family)

- Engadget (https://www.engadget.com/2018/04/19/verizon-
  adds-location-tracking-to-parental-control-app/)

- MacRumors
  (https://www.macrumors.com/2018/04/19/verizon-smart-
  family-ios-app/)

VIEW PRODUCT SITE
(HTTPS://WWW.VERIZONWIRELESS.COM/SOLUTIONS-
AND-SERVICES/VERIZON-SMART-FAMILY/)

AT&T

Appx116

Featured In

- The Verge
  (https://www.theverge.com/2018/11/15/18097410/att-secure-family-app-smart-limits)

- PC Mag (https://www.pcmag.com/news/364992/at-t-launches-secure-family-parental-control-app)

```
VIEW PRODUCT SITE
(HTTPS://WWW.ATT.COM/FEATURES/SECURE-FAMILY.HTML)
```

Challenges

Not only did we need to keep track of the differences between iOS and Android
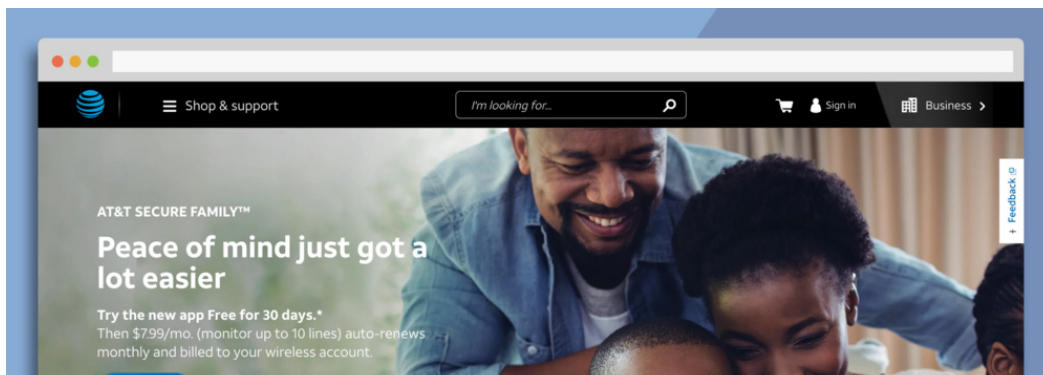
platforms, we needed to keep track of the differences between Verizon Smart Family and AT&T Secure Family product.

Because we had such a large development team, the best way to disseminate information was to document in great detail and to hold kick-off meetings with team leads to ensure everyone was clear on what we were making. I became the key-holder for creating and updating this "source of truth" document.

Learnings

It's all about documentation! Documenting product changes, design reasonings, future updates, and iterations were insurmountable to getting engineering and PM buy-in and maintaining a comprehensive catalogue of information for the entire team. It provided clarity and alignment which was helpful as we made progress.

Ba in ⊗

Launching Verizon

With over 1.7 million users, we have seen an increase of 40% in daily active users from the legacy product, Verizon FamilyBase.

Introducing Verizon Smart Family

EXHIBIT 3

SHANNA JAN (/)   product design   work (/)
                                                   about (/about)

Hi, I'm Shanna

I'm a full stack product designer and illustrator living in foggy San Francisco.

I found design through art, film, and video, getting my BFA from The School Of The Art Institute Of Chicago (http://www.saic.edu/t4/front/).

Design ethics and accessibility are important to me and I look to incorporate them into every project. Check out my résumé (/resume) to see what I've been working on.

When I'm not behind a computer screen, I'm crafting, voguing, lifting weights, and petting cats.

Let's be pen pals! Drop me a line at heygirl@shannajan.com (mailto:heygirl@shannajan.com)

EXHIBIT 4

crunchbase

LOCATION **Location Labs**   ⊕ SAVE
LABS

Summary   Financials   People   Technology   Signals & News

About

Location Labs provides mobile security solutions for people worldwide.

Acquired by
AVG **AVG Technologies**

San Francisco Bay Area, West Coast, Western US

101-250

Series B

Private

locationlabs.com ⌷

108,126

Highlights

Number of Acquisitions	Total Funding Amount
2	**$25.8M**
Number of Current Team Members	Number of Investors
12	**7**

Recent News & Activity

News · Sep 30, 2016
PE HUB — **PE-backed Avast completes take-private AVG acquisition**

News · Aug 8, 2016
Funders Club Blog — **Building a Customer-focused Grocery Delivery Startup with Max Mullen, co-founder at Instacart.**

News · Jun 15, 2016
Next Gov — **LinkedIn May Just Be the Beginning of Mega-Acquisitions for Silicon Valley**

VIEW ALL ›

Details   ⌄

Industries

Location Based Services   Mobile   Security   Wireless

Headquarters Location
Emeryville, California, United States

Appx125

Headquarters Regions
San Francisco Bay Area, West Coast, Western US

Location Labs

⊕ SAVE

| Summary | Financials | People | Technology | Signals & News |

Operating Status
Active

Last Funding Type
Series B

Also Known As
wavemarket

Company Type
For Profit

Contact Email
contact@locationlabs.com

Location Labs provides mobile security solutions for people worldwide.

The company offers Phone Controls which provides anti-virus and cloud-based backup solutions for protecting people who carry phones, including kids, families, and individuals; Locator that enables users to see where important people are on a map, get automatic location...

READ MORE

Lists Featuring This Company ⌄
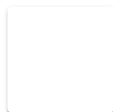
Acquired West Coast Companies (Top 10K)   ⚡ TRACK
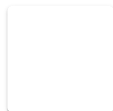
United States Acquired Companies (Top 10K)   ⚡ TRACK

Bain & Company Alumni Founded Companies   ⚡ TRACK
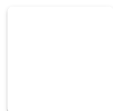
Security Companies that Exited   ⚡ TRACK

⚡ SHOW MORE

M&A Details

Location Labs was acquired by **AVG Technologies** for $220M on Sep 3, 2014. This deal was done in Cash.

Appx126

Appx127

Transaction Name
Location Labs acquired by AVG Technologies

Location Labs

⊕ SAVE

Summary   Financials   People   Technology   Signals & News

Sep 3, 2014

Price
$220M

Discover more with Pro

Upgrade to Pro to access the expansive Crunchbase dataset to uncover the companies, people, and news that matters.

⚡ Target your search with intuitive filters & unlimited results

⚡ Uncover hidden opportunities with growth signals

⚡ Monitor companies and industry trends with customizable alerts

⚡ Pull data on multiple companies in one-go when you import a list of targets

⚡ TRY PRO FREE

EXHIBIT 5

avast

Worldwide offices

Silicon Valley

Redwood City, California

Emeryville, California

Prague

Enterprise Office Center
Pikrtova 1737/1A
140 00 Prague 4

London

110 High Holborn
London
WC1V 6JS
United Kingdom

Silicon Valley

2625 Broadway Street
Redwood City, CA 94063
USA
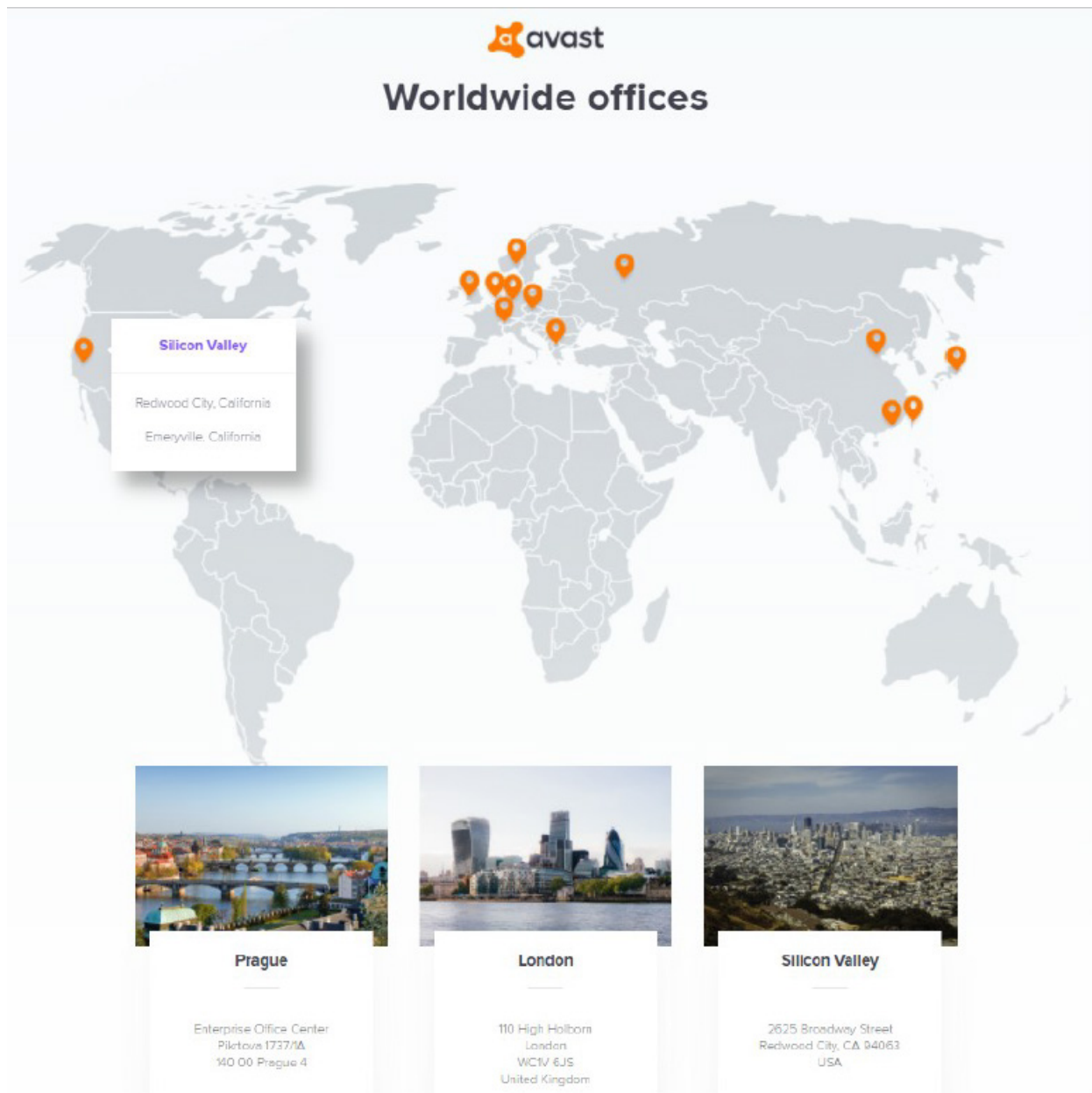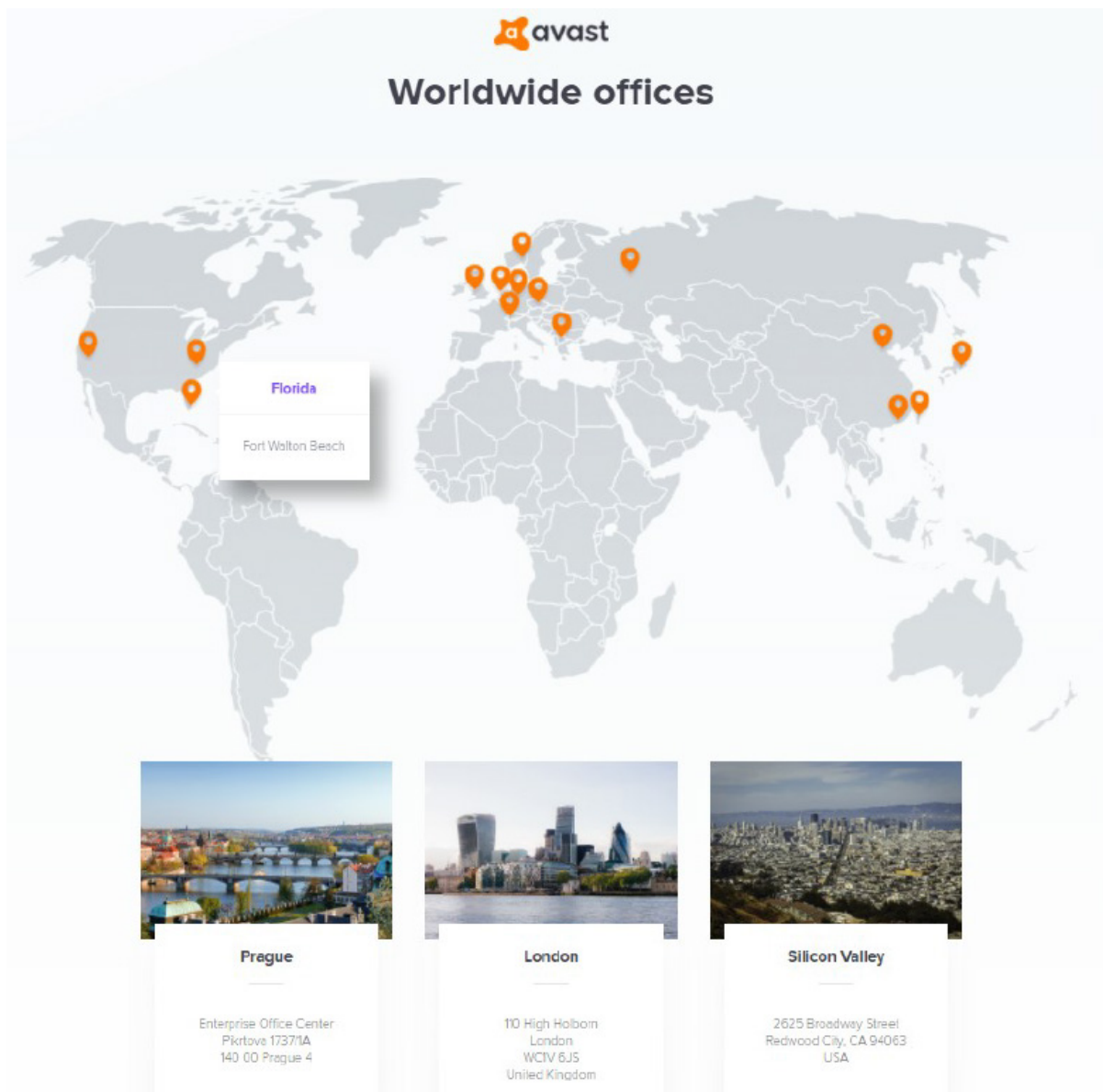
EXHIBIT 13

Texas Secretary of State

Corporate Filing 1

Business Information

Filing Type:	CURRENT
Filing Number:	0803558982
Name:	IKORONGO TEXAS, LLC
Name Type:	LEGAL
Filing Date:	02/26/2020
Filing Type:	CREATION
Status:	IN USE
Place Incorporated:	TEXAS
Date Incorporated:	02/26/2020
Partnership:	NO
Status Comment:	RIGHT TO TRANSACT BUSINESS: ACTIVE
Date Last Seen:	03/07/2020

Corporate Filing 2

Business Information

Filing Type:	CURRENT
Filing Number:	0803558982
Name:	IKORONGO TEXAS, LLC
Name Type:	LEGAL
Standard Business Address:	206 E 9TH ST STE 1300 AUSTIN, TX 78701-4411
Original Business Address:	206 E 9TH ST STE 1300 AUSTIN, TX 787014411 US
State Tax ID:	32073559000
Business Type:	DOMESTIC LIMITED LIABILITY COMPANY (LLC)
Status:	IN EXISTENCE
Place Incorporated:	TEXAS
Date Incorporated:	02/26/2020
Foreign/Domestic:	DOMESTIC
Terms:	PERPETUAL
Partnership:	NO
Status Comment:	RIGHT TO TRANSACT BUSINESS: ACTIVE
Date Last Seen:	03/07/2020

Appx134

Declaration of JinHee Lee

Filed Under Seal

Slip Sheet

(Pursuant to Practice Notes to Federal
Circuit Rule 25.1, this slip sheet is to cover
pages in its corresponding version included
in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Declaration of Kang Won Lee

Filed Under Seal

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Declaration of Edward Viejo

Filed Under Seal

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Declaration of Daniel S. Friedland

Filed Under Seal

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal
Circuit Rule 25.1, this slip sheet is to cover
pages in its corresponding version included
in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal
Circuit Rule 25.1, this slip sheet is to cover
pages in its corresponding version included
in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal
Circuit Rule 25.1, this slip sheet is to cover
pages in its corresponding version included
in the Confidential Appendix)

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
WACO DIVISION

IKORONGO TEXAS LLC and	§	**Case No. 6:20-cv-00259-ADA**
IKORONGO TECHNOLOGY LLC,	§	
	§	**[FILED UNDER SEAL]**
Plaintiffs,	§	
	§	
	§	
v.	§	
	§	
SAMSUNG ELECTRONICS CO, LTD.	§	
and SAMSUNG ELECTRONICS	§	
AMERICA, INC.,	§	
	§	
Defendant.	§	

PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANT'S
MOTION TO TRANSFER VENUE AND BRIEF IN SUPPORT

Appx148

Slip Sheet

(Pursuant to Practice Notes to Federal
Circuit Rule 25.1, this slip sheet is to cover
pages in its corresponding version included
in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal
Circuit Rule 25.1, this slip sheet is to cover
pages in its corresponding version included
in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal
Circuit Rule 25.1, this slip sheet is to cover
pages in its corresponding version included
in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal
Circuit Rule 25.1, this slip sheet is to cover
pages in its corresponding version included
in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal
Circuit Rule 25.1, this slip sheet is to cover
pages in its corresponding version included
in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

EXHIBIT A

505988798   03/27/2020

PATENT ASSIGNMENT COVER SHEET

Electronic Version v1.1   EPAS ID: PAT6035507
Stylesheet Version v1.2

SUBMISSION TYPE:	NEW ASSIGNMENT
NATURE OF CONVEYANCE:	ASSIGNMENT
SEQUENCE:	1

CONVEYING PARTY DATA

Name	Execution Date
IKORONGO TECHNOLOGY, LLC	03/20/2020

RECEIVING PARTY DATA

Name:	HUGH B SVENDSEN
Street Address:	678 BEAR TREE CREEK
City:	CHAPEL HILL
State/Country:	NORTH CAROLINA
Postal Code:	27517
Name:	SARAH S SVENDSEN
Street Address:	678 BEAR TREE CREEK
City:	CHAPEL HILL
State/Country:	NORTH CAROLINA
Postal Code:	27517
Name:	SCOTT D CURTIS
Street Address:	3611 UNIVERSITY DRIVE #11U
City:	DURHAM
State/Country:	NORTH CAROLINA
Postal Code:	27707
Name:	EUGENE FARRELLY
Street Address:	103 ORILLA COURT
City:	CARY
State/Country:	NORTH CAROLINA
Postal Code:	27513
Name:	MICHAEL W HELPINGSTINE
Street Address:	WATERLOO STATION DRIVE
City:	CARY
State/Country:	NORTH CAROLINA
Postal Code:	27513

PROPERTY NUMBERS Total: 17

PATENT
505988798   REEL: 052246 FRAME: 0756

Property Type	Number
Patent Number:	7080139
Patent Number:	RE41450
Patent Number:	RE44324
Patent Number:	RE45351
Patent Number:	RE45543
Application Number:	14550100
Patent Number:	RE47704
Patent Number:	8060525
Patent Number:	8117193
Patent Number:	8316015
Patent Number:	8332425
Patent Number:	8577874
Patent Number:	8874554
Patent Number:	8886666
Patent Number:	8983937
Patent Number:	9275138
Patent Number:	9552428

CORRESPONDENCE DATA

Fax Number:

Correspondence will be sent to the e-mail address first; if that is unsuccessful, it will be sent using a fax number, if provided; if that is unsuccessful, it will be sent via US Mail.

Phone:	919-642-0082
Email:	prosecution@ikorongo.com
Correspondent Name:	HUGH B SVENDSEN
Address Line 1:	678 BEAR TREE CREEK
Address Line 4:	CHAPEL HILL, NORTH CAROLINA 27517

NAME OF SUBMITTER:	HUGH B. SVENDSEN
SIGNATURE:	/Hugh B. Svendsen/
DATE SIGNED:	03/27/2020

Total Attachments: 9

source=1) Ikorongo NC to Members - Assignment of Patent Rights - FINAL - EXECUTED#page1.tif
source=1) Ikorongo NC to Members - Assignment of Patent Rights - FINAL - EXECUTED#page2.tif
source=1) Ikorongo NC to Members - Assignment of Patent Rights - FINAL - EXECUTED#page3.tif
source=1) Ikorongo NC to Members - Assignment of Patent Rights - FINAL - EXECUTED#page4.tif
source=1) Ikorongo NC to Members - Assignment of Patent Rights - FINAL - EXECUTED#page5.tif
source=1) Ikorongo NC to Members - Assignment of Patent Rights - FINAL - EXECUTED#page6.tif
source=1) Ikorongo NC to Members - Assignment of Patent Rights - FINAL - EXECUTED#page7.tif
source=1) Ikorongo NC to Members - Assignment of Patent Rights - FINAL - EXECUTED#page8.tif
source=1) Ikorongo NC to Members - Assignment of Patent Rights - FINAL - EXECUTED#page9.tif

PATENT
REEL: 052246 FRAME: 0757

ASSIGNMENT OF PATENT RIGHTS
(Assignment 1 of 2)

This Assignment of Patent Rights (this "**Assignment**"), effective as of March 20, 2020 (the "**Effective Date**"), is made by and between (a) **Ikorongo Technology, LLC**, a North Carolina limited liability company with an address at 678 Bear Tree Creek, Chapel Hill, NC 27517 (the "**Assignor**"), on the one hand, and (b) each of Hugh B. Svendsen, an individual with an address at 678 Bear Tree Creek, Chapel Hill, NC 27517 ("**H. Svendsen**"), Sarah Sowers Svendsen, an individual with an address at 678 Bear Tree Creek, Chapel Hill, NC 27517 ("**S. Svendsen**"), Eugene Farrelly, an individual with an address at 103 Orilla Court, Cary, NC 27513 ("**Farrelly**"), Michael W. Helpingstine, an individual with an address at 108 Waterloo Station Dr., Cary, NC 27513 ("**Helpingstine**"), and Scott D. Curtis, an individual with an address at 1706 Ward St., Durham, NC 27707 ("**Curtis**," and, together with H. Svendsen, S. Svendsen, Farrelly, and Helpingstine, the "**Assignee**"), on the other hand.

WHEREAS, Assignor is the owner of all rights, title and interest in and to all of the patents, reissues, reissue applications and patent applications identified in Schedule A and in any patent letters, reissues, and patent registrations that have been and/or may be granted with respect to the same, and all divisions, renewals, and continuations thereof, and all patents which may be granted thereon and all reissues and extensions thereof (collectively the "**Patents**");

WHEREAS, Assignee owns all of the issued and outstanding membership interests in Assignor;

WHEREAS, Assignor desires to assign, grant and convey to Assignee as a distribution, and Assignee desires to acquire and assume from Assignor as a distribution, the exclusive right under the Patents within and throughout the specified part of the United States identified on Schedule B; and

WHEREAS, this assignment is made consistent with the principles of *Waterman v. Mackenzie*, 138 U.S. 252 (1891) and 35 U.S.C. §261;

NOW, THEREFORE, for good and valuable consideration, the sufficiency and receipt of which is hereby acknowledged Assignor hereby assigns, grants and conveys to Assignee as a distribution, and Assignee hereby acquires and assumes from Assignor as a distribution, the exclusive right under the Patents within and throughout the specified part of the United States identified on Schedule B, including the right to sue for past, present and future infringement and damages thereof;

For the avoidance of doubt, Assignor retains for itself (and does not assign, grant or convey to Assignee) the exclusive right under the Patents within and throughout all parts of the United States and world not identified on Schedule B;

ASSIGNOR HEREBY covenants and agrees that it has the full right to convey the entire interest herein assigned, and that Assignor has not executed, and will not execute, any agreement in conflict herewith; and

ASSIGNOR agrees to execute and deliver to Assignee all documents necessary to effectuate and maintain registrations pertaining to the Patents and inventions therein described now and in the future and to perfect - including through the correction of any inaccuracy or omission to the Patents or otherwise enable the transfer, conveyance and assignment of the assigned exclusive right in the Patents; and

PATENT
REEL: 052246 FRAME: 0758

ASSIGNOR AND ASSIGNEE agree that this Assignment may be executed in any number of counterparts, each of which shall be deemed an original of this Assignment. Counterparts of this Assignment may be delivered via facsimile, electronic mail (including pdf or any electronic signature complying with the U.S. federal ESIGN Act of 2000, *e.g.*, www.docusign.com) or other transmission method and any counterpart so delivered shall be deemed to have been duly and validly delivered and be valid and effective for all purposes.

[*Signature Page Follows*]

IN WITNESS WHEREOF, Assignor and Assignee have executed this Assignment as of the Effective Date.

ASSIGNOR:

IKORONGO TECHNOLOGY, LLC

By: _____

Name: Hugh B. Svendsen

Title: Manager

ASSIGNEE:

_____

Hugh B. Svendsen

_____

Sarah Sowers Svendsen

_____

Eugene Farrelly

_____

Michael W. Helpingstine

_____

Scott D. Curtis

IN WITNESS WHEREOF, Assignor and Assignee have executed this Assignment as of the Effective Date.

ASSIGNOR:

IKORONGO TECHNOLOGY, LLC

By: _____
Name: Hugh B. Svendsen
Title: Manager

ASSIGNEE:

_____
Hugh B. Svendsen

_____
Sarah Sowers Svendsen

_____
Eugene Farrelly

_____
Michael W. Helpingstine

_____
Scott D. Curtis

PATENT
REEL: 052246 FRAME: 0761

Appx174

IN WITNESS WHEREOF, Assignor and Assignee have executed this Assignment as of the Effective Date.

ASSIGNOR:

IKORONGO TECHNOLOGY, LLC

By: _____
Name: Hugh B. Svendsen
Title: Manager

ASSIGNEE:

_____
Hugh B. Svendsen

_____
Sarah Sowers Svendsen

_____
Eugene Farrelly

_____
Michael W. Helpingstine

_____
Scott D. Curtis

PATENT
REEL: 052246 FRAME: 0762

Appx175

IN WITNESS WHEREOF, Assignor and Assignee have executed this Assignment as of the Effective Date.

ASSIGNOR:

IKORONGO TECHNOLOGY, LLC

By: _____
Name: Hugh B. Svendsen
Title: Manager

ASSIGNEE:

_____
Hugh B. Svendsen

_____
Sarah Sowers Svendsen

_____
Eugene Farrelly

_____
Michael W. Helpingstine

_____
Scott D. Curtis

PATENT
REEL: 052246 FRAME: 0763

Appx176

SCHEDULE A

APPLICATION NUMBER	FILING DATE	PATENT NUMBER	ISSUE DATE	STATUS	TITLE
09841475	4/24/2001	7080139	7/18/2006	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
12172518	7/14/2008	RE41450	7/20/2010	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
12820579	6/22/2010	RE44324	6/25/2013	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
13893992	5/14/2013	RE45351	1/20/2015	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
13894009	5/14/2013	RE45543	6/2/2015	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
14550100	11/21/2014			Pending	Method and apparatus for selectively sharing and passively tracking communication device experiences
14577746	12/19/2014	RE47704	11/5/2019	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
11963050	12/21/2007	8060525	11/15/2011	Active	Method and system for generating media recommendations in a distributed environment based on tagging play history information with location information

PATENT
REEL: 052246 FRAME: 0764

Appx177

12192682	08/15/2008	8117193	02/14/2012	Active	Tunersphere
13228688	09/09/2011	8316015	11/20/2012	Active	Tunersphere
13286746	01/11/2011	8332425	12/11/2012	Active	Method and system for generating media recommendations in a distributed environment based on tagging play history information with location information
13655648	10/19/2012	8577874	11/05/2013	Expired	Tunersphere
14069761	01/11/2013	8874554	10/28/2014	Active	Turnersphere
13616651	09/14/2012	8886666	11/11/2014	Expired	Method and system for generating media recommendations in a distributed environment based on tagging play history information with location information
14488456	09/17/2014	8983937	03/17/2015	Active	Tunersphere
14658551	03/16/2015	9275138	03/01/2016	Active	System for generating media recommendations in a distributed environment based on seed information
15056310	02/29/2016	9552428	01/24/2017	Active	System for generating media recommendations in a distributed environment based on seed information

SCHEDULE B

The specified part of the United States is the following counties of the State of Texas:

Andrews, Atascosa, Bandera, Bastrop, Bell, Bexar, Blanco, Bosque, Brewster, Burleson, Burnet, Caldwell, Comal, Coryell, Crane, Culberson, Dimmit, Ector, Edwards, Falls, Freestone, Frio, Gillespie, Gonzales, Guadalupe, Hamilton, Hays, Hill, Hudspeth, Jeff Davis, Karnes, Kendall, Kerr, Kimble, Kinney, Lampasas, Lee, Leon, Limestone, Llano, Loving, Martin, Mason, Maverick, McCulloch, McLennan, Medina, Midland, Milam, Pecos, Presidio, Real, Reeves, Robertson, San Saba, Somervell, Terrell, Travis, Upton, Uvalde, Val Verde, Ward, Washington, Williamson, Wilson, Winkler, Zavalla;

Anderson, Angelina, Bowie, Camp, Cass, Cherokee, Collin, Cook, Delta, Denton, Fannin, Franklin, Grayson, Gregg, Hardin, Harrison, Henderson, Hopkins, Houston, Jasper, Lamar, Liberty, Marion, Morris, Nacogdoches, Newton, Orange, Panola, Polk, Rains, Red River, Rusk, Sabine, San Augustine, Shelby, Smith, Titus, Trinity, Tyler, Upshur, Van Zandt, and Wood.

EXHIBIT B

505988804   03/27/2020

PATENT ASSIGNMENT COVER SHEET

Electronic Version v1.1   EPAS ID: PAT6035513
Stylesheet Version v1.2

SUBMISSION TYPE:	NEW ASSIGNMENT
NATURE OF CONVEYANCE:	ASSIGNMENT
SEQUENCE:	2

CONVEYING PARTY DATA

Name	Execution Date
HUGH B SVENDSEN	03/20/2020
SARAH S SVENDSEN	03/20/2020
SCOTT D CURTIS	03/20/2020
EUGENE FARRELLY	03/20/2020
MICHAEL W HELPINGSTINE	03/20/2020

RECEIVING PARTY DATA

Name:	IKORONGO TEXAS, LLC
Street Address:	678 BEAR TREE CREEK
City:	CHAPEL HILL
State/Country:	NORTH CAROLINA
Postal Code:	27517

PROPERTY NUMBERS Total: 17

Property Type	Number
Patent Number:	7080139
Patent Number:	RE41450
Patent Number:	RE44324
Patent Number:	RE45351
Patent Number:	RE45543
Application Number:	14550100
Patent Number:	RE47704
Patent Number:	8060525
Patent Number:	8117193
Patent Number:	8316015
Patent Number:	8332425
Patent Number:	8577874
Patent Number:	8874554
Patent Number:	8886666
Patent Number:	8983937

PATENT
505988804   **REEL: 052246 FRAME: 0791**

Appx181

Property Type	Number
Patent Number:	9275138
Patent Number:	9552428

CORRESPONDENCE DATA

Fax Number:

Correspondence will be sent to the e-mail address first; if that is unsuccessful, it will be sent using a fax number, if provided; if that is unsuccessful, it will be sent via US Mail.

Phone:	919-642-0082
Email:	prosecution@ikorongo.com
Correspondent Name:	HUGH B SVENDSEN
Address Line 1:	678 BEAR TREE CREEK
Address Line 4:	CHAPEL HILL, NORTH CAROLINA 27517

NAME OF SUBMITTER:	HUGH B. SVENDSEN
SIGNATURE:	/Hugh B. Svendsen/
DATE SIGNED:	03/27/2020

Total Attachments: 9

source=2) Members to Ikorongo TX - Assignment of Patent Rights - FINAL - EXECUTED#page1.tif
source=2) Members to Ikorongo TX - Assignment of Patent Rights - FINAL - EXECUTED#page2.tif
source=2) Members to Ikorongo TX - Assignment of Patent Rights - FINAL - EXECUTED#page3.tif
source=2) Members to Ikorongo TX - Assignment of Patent Rights - FINAL - EXECUTED#page4.tif
source=2) Members to Ikorongo TX - Assignment of Patent Rights - FINAL - EXECUTED#page5.tif
source=2) Members to Ikorongo TX - Assignment of Patent Rights - FINAL - EXECUTED#page6.tif
source=2) Members to Ikorongo TX - Assignment of Patent Rights - FINAL - EXECUTED#page7.tif
source=2) Members to Ikorongo TX - Assignment of Patent Rights - FINAL - EXECUTED#page8.tif
source=2) Members to Ikorongo TX - Assignment of Patent Rights - FINAL - EXECUTED#page9.tif

**PATENT
REEL: 052246 FRAME: 0792**

ASSIGNMENT OF PATENT RIGHTS
(Assignment 2 of 2)

This Assignment of Patent Rights (this "**Assignment**"), effective as of March 20, 2020 (the "**Effective Date**"), is made by and between (a) each of Hugh B. Svendsen, an individual with an address at 678 Bear Tree Creek, Chapel Hill, NC 27517 ("**H. Svendsen**"), Sarah Sowers Svendsen, an individual with an address at 678 Bear Tree Creek, Chapel Hill, NC 27517 ("**S. Svendsen**"), Eugene Farrelly, an individual with an address at 103 Orilla Court, Cary, NC 27513 ("**Farrelly**"), Michael W. Helpingstine, an individual with an address at 108 Waterloo Station Dr., Cary, NC 27513 ("**Helpingstine**"), and Scott D. Curtis, an individual with an address at 1706 Ward St., Durham, NC 27707 ("**Curtis**," and, together with H. Svendsen, S. Svendsen, Farrelly, and Helpingstine, the "**Assignor**"), on the one hand, and (b) **Ikorongo Texas, LLC**, a Texas limited liability company with an address at 678 Bear Tree Creek, Chapel Hill, NC 27517 (the "**Assignee**"), on the other hand.

WHEREAS, all of the patents, reissues, reissue applications and patent applications identified in Schedule A and any patent letters, reissues, and patent registrations that have been and/or may be granted with respect to the same, and all divisions, renewals, and continuations thereof, and all patents which may be granted thereon and all reissues and extensions thereof are collectively defined herein as the "**Patents**";

WHEREAS, Assignor is the owner of the exclusive right under the Patents within and throughout the specified part of the United States identified on Schedule B;

WHEREAS, Assignor owns all of the issued and outstanding membership interests in Assignee;

WHEREAS, Assignor desires to assign, grant and convey to Assignee as a contribution, and Assignee desires to acquire and assume from Assignor as a contribution, the exclusive right under the Patents within and throughout the specified part of the United States identified on Schedule B; and

WHEREAS, this assignment is made consistent with the principles of *Waterman v. Mackenzie*, 138 U.S. 252 (1891) and 35 U.S.C. §261;

NOW, THEREFORE, for good and valuable consideration, the sufficiency and receipt of which is hereby acknowledged Assignor hereby assigns, grants and conveys to Assignee as a contribution, and Assignee hereby acquires and assumes from Assignor as a contribution, the exclusive right under the Patents within and throughout the specified part of the United States identified on Schedule B, including the right to sue for past, present and future infringement and damages thereof;

ASSIGNOR HEREBY covenants and agrees that it has the full right to convey the entire interest herein assigned, and that Assignor has not executed, and will not execute, any agreement in conflict herewith; and

ASSIGNOR agrees to execute and deliver to Assignee all documents necessary to effectuate and maintain registrations pertaining to the Patents and inventions therein described now and in the future and to perfect - including through the correction of any inaccuracy or omission to the Patents or otherwise enable the transfer, conveyance and assignment of the assigned exclusive right in the Patents; and

ASSIGNOR AND ASSIGNEE agree that this Assignment may be executed in any number of counterparts, each of which shall be deemed an original of this Assignment. Counterparts of this

PATENT
REEL: 052246 FRAME: 0793

Appx183

Assignment may be delivered via facsimile, electronic mail (including pdf or any electronic signature complying with the U.S. federal ESIGN Act of 2000, *e.g.*, www.docusign.com) or other transmission method and any counterpart so delivered shall be deemed to have been duly and validly delivered and be valid and effective for all purposes.

[*Signature Page Follows*]

IN WITNESS WHEREOF, Assignor and Assignee have executed this Assignment as of the Effective Date.

ASSIGNOR:

_____
Hugh B. Svendsen

_____
Sarah Sowers Svendsen

_____
Eugene Farrelly

_____
Michael W. Helpingstine

_____
Scott D. Curtis

ASSIGNEE:

IKORONGO TEXAS, LLC

By: _____
Name: Hugh B. Svendsen
Title: Manager

IN WITNESS WHEREOF, Assignor and Assignee have executed this Assignment as of the Effective Date.

ASSIGNOR:

_____
Hugh B. Svendsen

_____
Sarah Sowers Svendsen

_____
Eugene Farrelly

_____
Michael W. Helpingstine

_____
Scott D. Curtis

ASSIGNEE:

IKORONGO TEXAS, LLC

By: _____
Name: Hugh B. Svendsen
Title: Manager

Appx186

IN WITNESS WHEREOF, Assignor and Assignee have executed this Assignment as of the Effective Date.

ASSIGNOR:

_____
Hugh B. Svendsen

_____
Sarah Sowers Svendsen

_____
Eugene Farrelly

_____
Michael W. Helpingstine

_____
Scott D. Curtis

ASSIGNEE:

IKORONGO TEXAS, LLC

By: _____
Name: Hugh B. Svendsen
Title: Manager

IN WITNESS WHEREOF, Assignor and Assignee have executed this Assignment as of the Effective Date.

ASSIGNOR:

_____

Hugh B. Svendsen

_____

Sarah Sowers Svendsen

_____

Eugene Farrelly

_____

Michael W. Helpingstine

_____

Scott D. Curtis

ASSIGNEE:

IKORONGO TEXAS, LLC

By: _____
Name: Hugh B. Svendsen
Title: Manager

Appx188

SCHEDULE A

APPLICATION NUMBER	FILING DATE	PATENT NUMBER	ISSUE DATE	STATUS	TITLE
09841475	4/24/2001	7080139	7/18/2006	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
12172518	7/14/2008	RE41450	7/20/2010	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
12820579	6/22/2010	RE44324	6/25/2013	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
13893992	5/14/2013	RE45351	1/20/2015	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
13894009	5/14/2013	RE45543	6/2/2015	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
14550100	11/21/2014			Pending	Method and apparatus for selectively sharing and passively tracking communication device experiences
14577746	12/19/2014	RE47704	11/5/2019	Patented	Method and apparatus for selectively sharing and passively tracking communication device experiences
11963050	12/21/2007	8060525	11/15/2011	Active	Method and system for generating media recommendations in a distributed environment based on tagging play history information with location information

PATENT
REEL: 052246 FRAME: 0799

Appx189

12192682	08/15/2008	8117193	02/14/2012	Active	Tunersphere
13228688	09/09/2011	8316015	11/20/2012	Active	Tunersphere
13286746	01/11/2011	8332425	12/11/2012	Active	Method and system for generating media recommendations in a distributed environment based on tagging play history information with location information
13655648	10/19/2012	8577874	11/05/2013	Expired	Tunersphere
14069761	01/11/2013	8874554	10/28/2014	Active	Turnersphere
13616651	09/14/2012	8886666	11/11/2014	Expired	Method and system for generating media recommendations in a distributed environment based on tagging play history information with location information
14488456	09/17/2014	8983937	03/17/2015	Active	Tunersphere
14658551	03/16/2015	9275138	03/01/2016	Active	System for generating media recommendations in a distributed environment based on seed information
15056310	02/29/2016	9552428	01/24/2017	Active	System for generating media recommendations in a distributed environment based on seed information

SCHEDULE B

The specified part of the United States is the following counties of the State of Texas:

Andrews, Atascosa, Bandera, Bastrop, Bell, Bexar, Blanco, Bosque, Brewster, Burleson, Burnet, Caldwell, Comal, Coryell, Crane, Culberson, Dimmit, Ector, Edwards, Falls, Freestone, Frio, Gillespie, Gonzales, Guadalupe, Hamilton, Hays, Hill, Hudspeth, Jeff Davis, Karnes, Kendall, Kerr, Kimble, Kinney, Lampasas, Lee, Leon, Limestone, Llano, Loving, Martin, Mason, Maverick, McCulloch, McLennan, Medina, Midland, Milam, Pecos, Presidio, Real, Reeves, Robertson, San Saba, Somervell, Terrell, Travis, Upton, Uvalde, Val Verde, Ward, Washington, Williamson, Wilson, Winkler, Zavalla;

Anderson, Angelina, Bowie, Camp, Cass, Cherokee, Collin, Cook, Delta, Denton, Fannin, Franklin, Grayson, Gregg, Hardin, Harrison, Henderson, Hopkins, Houston, Jasper, Lamar, Liberty, Marion, Morris, Nacogdoches, Newton, Orange, Panola, Polk, Rains, Red River, Rusk, Sabine, San Augustine, Shelby, Smith, Titus, Trinity, Tyler, Upshur, Van Zandt, and Wood.

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal Circuit Rule 25.1, this slip sheet is to cover pages in its corresponding version included in the Confidential Appendix)

Slip Sheet

(Pursuant to Practice Notes to Federal
Circuit Rule 25.1, this slip sheet is to cover
pages in its corresponding version included
in the Confidential Appendix)

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

IKORONGO TEXAS LLC and
IKORONGO TECHNOLOGY LLC,
        Plaintiffs,
 	
v.
 	
SAMSUNG ELECTRONICS CO. LTD.,
and SAMSUNG ELECTRONICS
AMERICA, INC.,
        Defendants.
	§
	§
	§
	§
	§
	§
	§
	§
	§
	§
	§
	§
		CAUSE NO. 6:20-cv-00259-ADA
		
		JURY TRIAL DEMANDED

ORDER DENYING DEFENDANTS' MOTION TO TRANSFER

Before the Court is Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc's (collectively, Samsung) Opposed Motion to Transfer (ECF No. 27), Plaintiffs Ikorongo Texas LLC and Ikorongo Technology LLC's (collectively, Ikorongo) Response (ECF No. 54), and Defendants' Reply (ECF No. 58). After having reviewed the parties' briefs, case file, and applicable law, the Court has determined that Defendants' Motion to Transfer should be **DENIED**.

I. Background

Ikorongo Texas filed this action on March 31, 2020, pursuant to the Court's original jurisdiction under 28 U.S.C. §§ 1331 and 1338(a). ECF No. 1. Ikorongo Texas and Ikorongo Technologies then filed an amended complaint on April 1, 2020. ECF No. 2. Plaintiffs allege patent infringement claims against Samsung relating to four U.S. Patents, Nos. RE 41,450; RE 45,543; RE 47,704; and 8,874,554. *Id.* at 3.

On September 11, 2020, Samsung filed an opposed Motion to Transfer under 28 U.S.C. § 1404(a). Defendants' Opposed Mot. to Transfer to the Northern District of California Under 28 U.S.C. § 1404(a) (hereinafter "Mot. to Transfer"), ECF No. 27. In Samsung's Motion to Transfer, Samsung argues transfer to the Northern District of California is proper because: (1) Ikorongo could have originally filed suit in the proposed transferee venue and (2) the convenience of the

1

Appx206

parties and interests of justice weigh in favor of transfer. *Id.* at 8–13. On January 5, 2021, Ikorongo

filed a response to Samsung's Motion. Pls.' Resp. in Opp'n to Defs.' Mot. to Transfer Venue and

Br. in Supp. (hereinafter "Resp."), ECF No. 54. On January 19, 2021, Samsung filed a reply. Defs.'

Reply in Supp. of Defs.' Opposed Mot. to Transfer to the Northern District of California Under 28

U.S.C. § 1404(a) (hereinafter "Reply"), ECF No. 58.

II. Legal Standard

In patent cases, motions to transfer under 28 U.S.C. § 1404(a) are governed by the law of

the regional circuit. *In re TS Tech USA Corp.*, 551 F.3d 1315, 1319 (Fed. Cir. 2008). Under

§ 1404(a), "[f]or the convenience of parties and witnesses, in the interest of justice, a district court

may transfer any civil action to any other district or division where it might have been brought or

to any district or division to which all parties have consented." 28 U.S.C. § 1404(a). Section

1404(a)'s threshold inquiry is whether the case could initially have been brought in the proposed

transferee forum. *In re Volkswagen AG*, 371 F.3d 201, 202–03 (5th Cir. 2004) [*Volkswagen I*]. If

that inquiry is satisfied, the Court determines whether transfer is proper by analyzing and weighing

various private and public interest factors. *Humble Oil & Ref. Co. v. Bell Marine Serv.*, 321 F.2d

53, 56 (5th Cir. 1963); *In re Apple Inc.*, 979 F.3d 1332, 1338 (Fed. Cir. 2020) (applying Fifth

Circuit law). The private interest factors are "(1) the relative ease of access to sources of proof;

(2) the availability of compulsory process to secure the attendance of witnesses; (3) the cost of

attendance for willing witnesses; and (4) all other practical problems that make trial of a case easy,

expeditious and inexpensive." *In re Volkswagen of Am., Inc.*, 545 F.3d 304, 315 (5th Cir. 2008)

(en banc) [*Volkswagen II*] (quoting *Volkswagen I*, 371 F.3d at 203). The public interest factors are

"(1) the administrative difficulties flowing from court congestion; (2) the local interest in having

localized interests decided at home; (3) the familiarity of the forum with the law that will govern

the case; and (4) the avoidance of unnecessary problems of conflict of laws [or in] the application

of foreign law." *Id.* (quoting *Volkswagen I*, 371 F.3d at 203) (alterations in original). The factors

are neither exclusive nor exhaustive, and no one factor is dispositive. *Id.* In applying these factors,

the court enjoys considerable discretion and assesses the case "on an 'individualized, case-by-case

consideration of convenience and fairness.'" *In re Vistaprint Ltd.*, 628 F.3d 1342, 1346 (Fed. Cir.

2010) (quotation omitted). The burden to prove that a case should be transferred for convenience

falls squarely on the moving party. *See id.* Although the plaintiff's choice of forum is not a separate

factor entitled to special weight, respect for the plaintiff's choice of forum is encompassed in the

movant's elevated burden to "clearly demonstrate" that the proposed transferee forum is "clearly

more convenient" than the forum in which the case was filed. *Id.* at 314–15. While "clearly more

convenient" is not necessarily equivalent to "clear and convincing," the moving party "must

show materially more than a mere preponderance of convenience, lest the standard have no real

or practical meaning." *Quest NetTech Corp. v. Apple, Inc.*, No. 2:19-cv-118, 2019 WL 6344267,

at *7 (E.D. Tex. Nov. 27, 2019).

III. Discussion

The Court now turns to examine Samsung's § 1404(a) arguments. Samsung argues the

Northern District of California is both a proper and more convenient venue for this action. Mot. to

Transfer at 8–13.

**A.   Samsung Has Not Met the Threshold Requirement as to Ikorongo Texas LLC, But It
Has Met the Threshold Requirement as to Ikorongo Technology LLC.**

Samsung has not met its burden to show that Ikorongo Texas's current action could have

initially been brought in the Northern District of California. Under 28 U.S.C. § 1400(b), a patent

infringement action "may be brought" in any judicial district "where the defendant has committed

acts of infringement and has a regular and established place of business." 28 U.S.C. § 1400(b).

Ikorongo alleges Samsung committed acts of infringement in the Northern District of California and does not dispute it has a regular and established place of business in the Northern District of California. However, Ikorongo argues that this case could not have been brought in the Northern District because Ikorongo Texas owns exclusive rights under the Asserted Patents only in a geographic location that includes this District. Resp. at 5. According to Ikorongo, this ownership only permits Ikorongo Texas to file suit in this geographic location because Samsung's alleged acts of infringement with respect to Ikorongo Texas only occur within this geographic location. *Id.* at 8.[1]

The Court agrees. *Waterman v. Mackenzie*, 138 U.S. 252 (1891) and 35 U.S.C. § 261, which Ikorongo references in support of its argument, provide the principles that an applicant, patentee, or the individual's assigns or legal representatives can convey an exclusive right under his application to the whole or any specified part of the United States. These rights include the right to sue infringers. *Waterman*, 138 U.S. at 255. The Specified Part allows Ikorongo Texas to protect its rights to the patent within the prescribed geographic region.

Samsung argues that Ikorongo alleges Samsung committed acts of infringement in the Northern District of California and that the Court should focus on a defendant's contacts with the transferee forum when determining the threshold issue rather than if a plaintiff can sue in the transferee forum based on contractual permissions. Reply at 2, 3. As to the first argument, Samsung presumes far too much from Ikorongo's complaint. Ikorongo merely alleges that Samsung infringed and continues to infringe in the United States in each paragraph cited by Samsung. First Am. Compl. for Patent Infringement, ECF No. 2, at ¶¶ 21, 31, 41, 51. The Court does not read

---

[1]Because neither party argues that Samsung cannot satisfy this issue as to Ikorongo Technology LLC, the Court will simply state the threshold issue has been satisfied for Ikorongo Technology.

these paragraphs as allegations that infringement occurred in the Northern District of California for each plaintiff's claims just as the Court would not read these paragraphs as allegations that infringement occurred in this District for each plaintiff's claims.

Samsung's second argument incorrectly casts Ikorongo Texas's Specified Part as incidental to Samsung's contacts with the proposed transferee forum. Of course, a defendant's mere contacts with the proposed forum does not satisfy the threshold question's test. As noted above, a plaintiff can bring an action in any district where the defendant has a regular and established place of business *and* where the defendant has committed acts of infringement. 28 U.S.C. § 1400(b). While Samsung protests that the Specified Part cannot fix venue, it misses the fact that infringement itself is not fixed in one venue. Indeed, the Supreme Court recognized as far back as *Waterman* that assignment of an exclusive right to make, use, and vend a patented machine within a district gives the grantee the right to sue for infringement within that district because the assignment excludes all others, even the patentee, from making, using, or vending like machines within that particular district. *Waterman*, 138 U.S. at 256. Thus, the focus turns not to where Samsung committed any alleged acts of infringement but to where Samsung committed any alleged acts of infringement as to Ikorongo Texas. Any alleged infringement by Samsung of Ikorongo Texas's Specified Part could have only occurred within the geographic locations described in the specialized part. As with the hypothetical grantee in *Waterman*, Ikorongo Texas only has the right to sue for infringement that occurred within the districts included in its assignment.

Samsung argues that the Court should not endorse Ikorongo's "gamesmanship" because any patent holder could defeat § 1404 by simply creating a new entity and assigning that new entity the right to sue only in a particular district. Reply at 2–3. The Court does not agree. First, a suit

5

Appx210

brought on any Specified Part still must satisfy the venue requirements of § 1400(b). An assignee

cannot simply avoid transfer by pointing to its geographically limited right. The district still must

be either the district where the defendant resides or where the defendant has committed acts of

infringement and has a regular and established place of business. In other words, assignment

cannot grant a plaintiff access to a forum it could not access already. Second, regardless of whether

an entity's right to sue has been limited by a Specified Part, an action may always be brought in

the judicial district where the defendant resides. 28. U.S.C. 1400(b). A § 1404 motion to transfer

to that district will always satisfy the threshold issue. Thus, Samsung has not met the threshold

issue as to Ikorongo Texas. However, even assuming, *arguendo*, that Samsung has met the

threshold issue as to Ikorongo Texas, the *Volkswagen* private and public interest factors do not

support transfer.

B.   The *Volkswagen* Private and Public Interest Factors Disfavor Transfer

In order to determine whether Samsung has demonstrated good cause, the Court must

weigh the private and public interest factors catalogued in *Volkswagen II*. The private interest

factors include: "(1) the relative ease of access to sources of proof; (2) the availability of

compulsory process to secure the attendance of witnesses; (3) the cost of attendance for willing

witnesses; and (4) all other practical problems that make trial of a case easy, expeditious and

inexpensive." *Volkswagen II*, 545 F.3d at 315 (quoting *Volkswagen I*, 371 F.3d at 203). The public

interest factors are "(1) the administrative difficulties flowing from court congestion; (2) the local

interest in having localized interests decided at home; (3) the familiarity of the forum with the law

that will govern the case; and (4) the avoidance of unnecessary problems of conflict of laws [or in]

the application of foreign law." *Id.* (quoting *Volkswagen I*, 371 F.3d at 203) (alterations in

original). If, when added together, the relevant private and public interest factors are in

equilibrium, or even if they do not clearly lean in favor of the transferee venue, the motion must be denied. *Volkswagen II*, 545 F.3d at 315. Once again, the Court's ultimate inquiry is which forum will best serve the convenience of the parties and the interests of justice. *Koster v. Am. Lumbermens Mut. Cas. Co.*, 330 U.S. 518, 527 (1947).

In this case, the relevant factors do not support Samsung's motion to transfer this case. Samsung has not shown that the Northern District of California is "clearly more convenient" than the Western District of Texas when weighing the *Volkswagen* private and public interest.

1.   The Private Interest Factors Do Not Clearly Establish that the Northern District of California is a More Convenient Venue

In considering private factors, the Court necessarily engages in a comparison between the hardships the defendant would suffer through the retention of jurisdiction and the hardships the plaintiff would suffer from transferring the action to the transferee venue. *Cf. Iragorri v. United Technologies Corp.*, 274 F.3d 65, 74 (2d Cir. 2001) (stating courts engage in such a comparison for *forum non conveniens* analyses). The Court will assess each of these factors in turn.

i.   The Relative Ease of Access to Sources of Proof

A court looks to where documentary evidence, such as documents and physical evidence, is stored when considering the first private interest factor. *Volkswagen II*, 545 F.3d at 316. "To properly consider this factor, parties must "describe with specificity the evidence they would not be able to obtain if trial were held in the [alternate forum]." *Piper Aircraft Co. v. Reyno*, 454 U.S. 235, 258 (1981).

Samsung claims the ease of access to sources of proof compared across venues weighs heavily in favor of transfer, stating that the greatest volume of evidence is with key third parties located in the Northern District of California. Mot. to Transfer at 9. Specifically, Samsung argues that technical documents and source code relating to the accused technology are in Mountain View

7

Appx212

and Emeryville, California. *Id.* Additionally, Samsung alleges that Ikorongo has not identified any evidence in this District, but to the extent such evidence does it exist, far more relevant evidence exists in the Northern District of California. *Id.* at 10.

Ikorongo responds to Samsung's contentions by advancing two arguments. First, Ikorongo argues this factor weighs against transfer because Samsung could access sources of proof just as easily in this District as in the proposed transferee district and that certain sources of proof are not even accessible in the proposed transferee district. Resp. at 9–10. According to Ikorongo, key third-party documents from Google are electronically accessible from anywhere and are not physically present in the Northern District of California. *Id.* Ikorongo also argues that Samsung has not identified any Samsung documents that are located in the Northern District of California. *Id.* at 11–12. Additionally, Ikorongo challenges the competence of Samsung's evidence on this factor; Ikorongo has filed a separate motion on this point. *See* Ikorongo Evidentiary Objs. to and Mot. to Strike Friedland Decl., ECF No. 53.

In its reply, Samsung reiterates that key third-party sources of proof are located in the Northern District of California. Reply at 4. Essentially, Samsung maintains that no Texas-based third-party locations can access relevant source code or technical documents, and all such sources of proof are created, maintained, and accessed by engineers and other third parties in the Northern District of California. *Id.* Samsung also argues that Ikorongo has not identified any relevant sources of proof in or around this District. *Id.*

The Court determines the ease of access to sources of proof factor weighs in favor of transfer. Given that Samsung is the accused infringer, it will likely have the bulk of the documents that are relevant in this case. *See, e.g., In re Genentech, Inc.*, 566 F.3d 1338, 1345 (Fed. Cir. 2009) ("In patent infringement cases, the bulk of the relevant evidence usually comes from the accused

infringer. Consequently, the place where the defendant's documents are kept weighs in favor of

transfer to that location."). Therefore, the Court finds that the location of the documents relevant

in this case tilts this factor towards transfer.[2]

ii.   The Availability of Compulsory Process to Secure the Attendance of Witnesses

When balancing this factor, the Court considers the availability of compulsory process to

secure the attendance of witnesses whose attendance may require a court order. *Volkswagen II*,

545 F.3d at 316.

In its initial brief, Samsung asserts this factor weighs in favor of transfer because the

majority of third-party witnesses who it expects to testify are located in the Northern District of

California. Mot. to Transfer at 11. Ikorongo responds to Samsung's arguments by stating the factor

weighs against transfer. Resp. at 12–13. Ikorongo argues Samsung has not provided evidentiary

support that the majority of third-party witnesses reside in the proposed transferee district and that

the Court should not credit this argument. *Id.* at 12. Ikorongo also argues that the factor weighs

---

[2]Although the Court wishes to make clear that it has followed Fifth Circuit precedent regarding this factor, the Court believes that the factor itself is at odds with the realities of modern patent litigation. In patent disputes like the one now before the Court, relevant documents are typically located on a server, which may or may not be in the transferee district (or given the use of cloud-based storage, may be located on multiple servers in multiple districts, or even multiple countries) and are equally accessible from both the transferee and transferor districts. Therefore, in this Court's view, there is no difference in the relative ease of access to sources of proof from the transferor district as compared to the transferee district when the vast bulk of documents are electronic. District courts — particularly those with patent-heavy dockets that have very significant document productions — have recently begun to acknowledge this reality. *Uniloc USA Inc. v. Samsung Elecs. Am.*, No. 2:16-cv-00642-JRG, ECF No. 216 at 8-9 (E.D. Tex. Apr. 19, 2017) ("Despite the absence of newer cases acknowledging that in today's digital world computer stored documents are readily moveable to almost anywhere at the click of a mouse, the Court finds it odd to ignore this reality in favor of a fictional analysis that has more to do with early Xerox machines than modem server forms."). The Court emphasizes that this factor was meant to be one of convenience, developed in a now antiquated world where hauling hundreds of boxes of physical documents across the country was most impractical. Indeed, it seems odd that, despite the likely relative ease of access to all kinds of relevant documents in today's digital world, a party (and a technologically savvy one at that) can automatically tilt a private factor in this analysis in its favor and away from a plaintiff's selected forum simply by raising its hand and acknowledging its status as the alleged infringer. However, under current Fifth Circuit precedent, the physical location of electronic documents affects this factor's outcome. *See, e.g., Volkswagen II*, 545 F.3d at 316. Even though it would not have changed the outcome of this motion, this Court expresses its hope that the Fifth Circuit will consider addressing and amending its precedent to explicitly give district courts the discretion to fully consider the ease of accessing electronic documents.

against transfer because Google is not a true third-party in this case. *Id.* at 13. Finally, Ikorongo alleges that third-party end users reside in this District, and it might need to subpoena those individuals for trial. *Id.* In response, Samsung simply points out that compulsory process would exist over non-party engineers and inventors and that Ikorongo has not specifically identified witnesses likely to testify at trial who are subject to the Court's compulsory process. Reply at 4–5.

After considering the parties' arguments, the Court finds that this factor neutral. First, as to Samsung's arguments that third-party engineers are not within the Court's subpoena power, this Court has previously held that certain third parties with locations within this District and their employees do fall within the Court's subpoena power. *Parkervision, Inc. v. Intel Corp.*, No. 6:20-cv-00108, 2021 WL _____, at *7 (W.D. Tex. Jan. 26, 2021).

Second, and perhaps more to the point, Samsung has not shown any potential witness is unwilling to testify. When no party has alleged or shown any witness's unwillingness, a court should not attach much weight to the compulsory process factor. *Duha v. Agrium, Inc.*, 448 F.3d 867, 877 (6th Cir. 2006); *CloudofChange, LLC v. NCR Corp.*, No. 6:19-cv-00513, 2020 WL 6439178, at *4 (W.D. Tex. Mar. 17, 2020). Here, neither Samsung nor Ikorongo have identified any unwilling witnesses. Indeed, while Samsung points to Google and Avast employees as witnesses within the subpoena power of the Northern District of California, the Court is reluctant to give these witnesses weight because these parties collaborate with Samsung to implement their technology into Samsung products, which makes it unlikely that the employees would be unwilling to testify at a trial concerning Samsung. *Parus Holdings Inc. v. LG Elecs. Inc.*, No. 6:19-cv-00432, 2020 WL 4905809, at *4 (W.D. Tex. Aug. 20, 2020). Absent any showing of unwillingness, the Court will not attach much weight to this factor. Consequently, the Court finds this factor neutral.

iii.   The Cost of Attendance for Willing Witnesses

The convenience of witnesses is the most important factor in a § 1404(a) analysis. *Genentech, Inc.*, 566 F.3d at 1342. While a court should not consider the significance of identified witnesses' testimonies, it should consider whether the witnesses may provide materially relevant evidence. *Id.* at 1343.

To assist in analyzing this factor, the Fifth Circuit adopted a "100-mile rule." *Volkswagen I*, 371 F.3d at 204–205; *see also Volkswagen II*, 545 F.3d at 317. "When the distance between an existing venue for trial of a matter and a proposed venue under § 1404(a) is more than 100 miles, the factor of inconvenience to witnesses increases in direct relationship to the additional distance to be traveled." *Volkswagen I*, 371 F.3d at 204–05. Consequently, the threshold question is whether the movant's proposed venue and a plaintiff's chosen venue are more than 100 miles apart. *See Volkswagen II*, 545 F.3d at 317. If the distance is greater, then a court will consider the distances between the witnesses and the two proposed venues. *See id.* Importantly, the venue need not be convenient for *all* witnesses. *Genentech, Inc.*, 566 F.3d at 1345. If a substantial number of witnesses reside in one venue and no witnesses reside in another, the factor will weigh in favor of the venue where witnesses reside. *See id.*

As previously stated by this Court, "given typical time limits at trial, the Court does not assume that all of the party and third-party witnesses listed in 1404(a) briefing will testify at trial." *Fintiv, Inc.*, 2019 WL 4743678, at *6. Indeed, the Court assumes only a few party witnesses and even fewer non-party witnesses (if any) will testify at trial. *Id.* Consequently, long lists of potential party and non-party witnesses do not affect the Court's analysis for this factor. *Id.*

Samsung argues that this factor weighs in favor of transfer because its relevant party witnesses and third-party witnesses are either closer to or within the Northern District of California

11

Appx216

than this District. Mot. to Transfer at 11–12. In response, Ikorongo argues that Samsung has not carried its burden to show that the proposed transferee district is clearly more convenient because relevant witnesses are scattered across the country. Resp. at 13–14. According to Ikorongo, the varied locations of these witnesses make this District more convenient than the proposed transferee district. *Id.* Additionally, Ikorongo also argues Samsung failed to carry its burden on this factor because the cost of bringing witnesses to the Northern District of California far exceeds the cost of bringing them to this District. *Id.* at 15–16. Finally, Ikorongo stated it would cover the costs for the attendance of any live witness other than Samsung corporate representatives. *Id.* at 16. Samsung replies by stating it expects key testimony from third-party witnesses who are located in the Northern District of California. Reply at 5. Samsung also argues that Ikorongo has not identified any relevant witnesses in this District. *Id.* Finally, Samsung states that any cost savings due to the difference in food and lodging costs between the two districts would likely balance out because more witnesses would have to travel to this District. *Id.*

The Court finds that this factor weighs only very slightly in favor of transfer. First, the convenience of party witnesses is typically given little weight because the witnesses' employer could compel their testimony at trial. *Turner v. Cincinnati Ins. Co.*, 6:19-cv-642-ADA-JCM, 2020 WL 210809, at *4 (W.D. Tex. Jan. 14, 2020); *Freehold Licensing, Inc. v. Aequitatem Capital Partners, LLC*, A-18-cv-413 LY, 2018 WL 5539929, at *7 (W.D. Tex. Oct. 29, 2018). Some courts have considered how far these witnesses would need to travel if few or no witnesses reside within the current district. *See, e.g., Genentech, Inc.*, 566 F.3d at 1345 (determining the convenience factor favored transfer, and not only slightly, in part because the defendants' employees and managers would not have to travel as far and the foreign plaintiff had no connection to the current venue); *contra Fintiv, Inc.*, 2019 WL 4743678, at *6 (stating the cost of attendance for party

12

Appx217

witnesses did not weigh for or against transfer because there were several potential witnesses in both potential venues). However, because courts give the convenience of party witnesses little weight, the Court finds this consideration neutral irrespective of where these individuals may reside.

The Court agrees with Samsung that Ikorongo's failure to identify specific third-party witnesses in this District should factor into the analysis of this factor. The Court also recognizes that Samsung has established that Google and Avast would have few potential witnesses in this District and that it would be more convenient for these third-party witnesses to testify in the Northern District of California. This Court has recognized that the Northern District of California is the more convenient forum for a high percentage of Google's employees who may be relevant witnesses. *Parus Holdings Inc.*, 2020 WL 4905809, at *6. However, as mentioned above, this Court has previously recognized that only a few party witnesses and even fewer non-party witnesses will likely testify at trial. *Fintiv, Inc.*, 2019 WL 4743678, at *6. Moreover, given this reality, the Court finds the difference in cost of food and lodging somewhat relevant. Perhaps if every third-party witness were to testify, the cost-savings between the two districts would offset. Given the likelihood that not every identified third-party witness will testify and that Ikorongo has stated a willingness to cover those expenses for non-party witnesses, the Court finds these considerations not insignificant when evaluating this factor. Consequently, this factor weighs only slightly in favor of transfer.

iv.   Other Factors That Make Trial Easy, Expeditious, and Inexpensive

In considering a transfer motion, the court considers "all other practical problems that make trial of a case easy, expeditious and inexpensive." *Volkswagen II*, 545 F.3d at 315. Samsung initially asserted that this factor weighs neutrally because the case is still in early stages and transfer

13

would not cause delays. Mot. to Transfer at 12. Ikorongo responded by arguing that transferring

the case would actually be less expeditious because Ikorongo has filed suit against other entities,

such as Bumble, in this District on some of the same patents Resp. at 16–17. Ikorongo also claims

that transfer would make the case more expensive and hinder the progress of the case. *Id.* at 17–

18. Samsung counters by now arguing the factor favors transfer because the case is still in its early

stages. Reply at 5–6. Samsung also argues that the co-pendency of related suits does not

automatically tip this factor in Ikorongo's favor. *Id.*

  The Court finds this factor weighs against transfer. Even if transfer may not cause delay as

Samsung argues, the Court notes such a finding would not weigh for or against transfer. The fact

that a transfer would not cause a delay does not mean it rises to the level of a practical problem

that clearly shows the proposed transferee venue is more convenient. It simply shows transfer is

feasible.

  While cases involving the same patents but different defendants, products, and witnesses

will not necessarily be expedited by being in the same court, judicial economy may be served by

having the Court try cases that involve the same patents. *See Hammond Dev. Int'l, Inc. v. Google

LLC*, 1:20-cv-00342-ADA, 2020 WL 3452987 (W.D. Tex. June 24, 2020) (denying motion to

transfer venue and finding that judicial economy was served by having the same district court try

cases involving the same patents due to consolidation of the cases). As Ikorongo correctly points

out, it has filed suit against Bumble in this District for infringing on patents asserted in this action,

and Bumble withdrew its motion to transfer. Samsung's argument that the co-pendency of related

suits should not play a role in the Court's analysis does not apply here. Granted, the co-pendency

of suits does not automatically tip this factor in favor of the non-movant. *In re Google Inc.*, No.

2017-107, 2017 WL 977038, at *2 (Fed. Cir. Feb. 23, 2017). However, this simply means that the

mere existence of co-pending cases does not weigh against transfer. It does not mean co-pending cases should never affect the weight of this factor.

An examination of the case cited by Samsung proves instructive. In *Google*, there were co-pending cases against Walmart, Google, and Amazon. *Id.* All three filed motions to transfer to the same venue. *Id.* at *1. The district court denied Walmart's motion to transfer and found this factor weighed against transfer in large part because of the co-pending cases against Google and Amazon. *Id.* at *2. The district court then denied Google's motion to transfer and found this factor weighed against transfer in large part because of the co-pending cases against Walmart and Amazon. *Id.* The Court of Appeals held that the district court incorrectly analyzed this factor because "[b]ased on the district court's rationale . . . the mere co-pendency of related suits in a particular district would automatically tip the balance in non-movant's favor regardless of the existence of co-pending transfer motions and their underlying merits." *Id.* The outcome of the district court's analysis of this factor would, at best, depend on which transfer motion the court ruled on first. *Id.* In other words, mere co-pendency cannot weigh against transfer; it must implicate issues of judicial economy, potentially inconsistent rulings, or expeditious litigation.

Here, co-pendency does raise these concerns. Ikorongo has a co-pending case against Bumble implicating the same patents in this District. That case will continue in this District. The Court emphasizes it does not find this factor weighs against transfer merely because Ikorongo has filed suits against multiple defendants in this District. Rather, judicial economy and the possibility of inconsistent rulings causes the Court to find this factor weighs against transfer, given that at least one of the co-pending cases will remain in this District.

2. The Public Interest Factors Do Not Clearly Establish the Northern District of California is a More Convenient Venue

The relevant public-interest factors also do not favor transfer. As previously noted, these factors include: (1) the administrative difficulties flowing from court congestion; (2) the local interest in having localized interests decided at home; (3) the familiarity of the forum with the law governing the case; and (4) the avoidance of unnecessary problems of conflict of laws or the application of foreign law. *Volkswagen II*, 545 F.3d at 315. The Court will also consider each of these factors in turn.

i. Administrative Difficulties

Administrative difficulties manifest when litigation accumulates in congested centers instead of being handled at its origin. *Gulf Oil*, 330 U.S. at 508. This factor concerns "whether there is an appreciable difference in docket congestion between the two forums." *Parsons v. Chesapeake & Ohio Ry. Co.*, 375 U.S. 71, 73 (1963); *Koehring Co. v. Hyde Constr. Co.*, 324 F.2d 295, 296 (5th Cir. 1963). The relevant inquiry under this factor is the speed with which a case comes to trial and is resolved. *Genentech, Inc.*, 566 F.3d at 1347.

Samsung states that, while this Court may be able to try this case earlier than the Northern District of California, time-to-trial is the most speculative of factors in this analysis. Mot. to Transfer at 13. Ikorongo, on the other hand, argues against transfer because the Court has set a trial date of January 2022 and surmises that the Northern District of California will suffer from more congestion than usual given the continued suspension of in-person proceedings due to the current COVID-19 pandemic. Resp. at 18. Samsung responds by simply stating this factor is neutral because time-to-trial is speculative. Reply at 6.

This Court recently had reason to analyze the difference in congestion between the Northern District of California and this District. *Parus Holdings Inc.*, 2020 WL 4905809, at *7.

16

At that time, this Court's time-to-trial was 25% faster than the Northern District of California. *Id.* Further, the comparison of time-to-trial throughout the Western District of Texas may overlook a faster time-to-trial within the Waco Division. Importantly, the Waco Division has its own patent-specific Order Governing Proceedings ("OGP") that ensures efficient administration of patent cases. In fact, a trial date has already been set in January 2022, which is roughly 11 months away. These facts indicate a greater efficiency of bringing cases, especially patent cases, to trial in the Western District of Texas than in the Northern District of California. This factor weighs against transfer.

ii.   Local Interests

There is "a local interest in having localized controversies decided at home." *Gulf Oil Corp. v. Gilbert*, 330 U.S. 501, 511 (1947); *Piper Aircraft*, 454 U.S. 235, 260 (1981).

Samsung argues that the Northern District of California has a stronger local interest in this litigation than the Western District of Texas because three of the applications were developed there. Mot. to Transfer at 13. To further bolster this position, Samsung points out that Ikorongo Texas formed only a few weeks before it filed suit against Samsung and has a North Carolina address. *Id.* In response, Ikorongo argues that Samsung has not provided competent evidence that no Austin-based Google employees work on relevant functions. Resp. at 19. Ikorongo alleges Samsung ignores the fact that Ikorongo Texas's claims relate to infringement in Texas and this District. *Id.* Samsung replies by stating nothing about Ikorongo Texas's infringement claim is distinct from an infringement claim in any other district or the specific interests of the proposed transferee forum given the development of "nearly every Accused Application" in the Northern District of California. Reply at 6.

17

Appx222

The Court finds this factor weighs neutrally for the reasons that follow. First, Samsung rightly argues that the infringement of an accused product offered nationwide does not allow for any venue to claim a substantial interest. *In re Hoffmann-La Roche Inc.*, 587 F.3d 1333, 1338 (Fed. Cir. 2009). Such arguments in this regard typically speak more to whether an entity could reasonably expect to be hailed into court in this District, not whether this District is more convenient for parties, witnesses, and in the interest of justice. The localized interest of a district exists when "the cause of action calls into question the work and reputation of several individuals residing in or near that district who presumably conduct business in that community." *Id.* at 1336. Such a situation presents itself here.

However, these interests are mitigated because a company's presence in a particular district weighs only slightly in favor of transfer because "it is generally a fiction that patent cases give rise to local controversy or interest, particularly without record evidence suggesting otherwise." *Found. Med., Inc.*, 2017 WL 590297, at *4. Along with this fiction, Ikorongo Texas's claims do specifically relate to infringement in this District. This fact holds true regardless of when the entity formed because Ikorongo Texas has the exclusive right to assert infringement claims that arise within this District. Accordingly, the Court finds that the local interest in having localized interests decided at home weighs neutrally.

iii.   Familiarity of the Forum with the Law That Will Govern the Case

Both parties agree that this factor is neutral. Mot. to Transfer at 13; Resp. at 19. The Court also agrees.

iv.   Avoiding Conflict of Laws and the Application of Foreign Laws Factors

Both parties agree that this factor is neutral. Mot. to Transfer at 13; Resp. at 19. The Court also agrees.

IV. Conclusion

Having found that Samsung has not met the threshold issue as to Ikorongo Texas and, even if it has satisfied the threshold issue, that the access to proof and the cost of attendance for willing witnesses weigh in favor or only slightly in favor of transfer while other practical problems that make trial of a case easy, expeditious and inexpensive, and administrative difficulties weigh against transfer with the other factors being neutral, the Court finds that Samsung has not met its "heavy burden" to demonstrate that the Northern District of California is "clearly more convenient." *Volkswagen II*, 545 F.3d at 314 n.10, 315.

IT IS THEREFORE ORDERED that Defendants' Motion to Transfer (ECF No. 27) is **DENIED**. It is further **ORDERED** that the above-styled case remain on the docket of United States District Judge Alan D Albright.

SIGNED this 1st day of March, 2021.

ALAN D ALBRIGHT
UNITED STATES DISTRICT JUDGE

19

PROOF OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the

Court for the United States Court of Appeals for the Federal Circuit by using the

appellate CM/ECF system on April 6, 2021.

A copy of the foregoing was served upon the following counsel of record

and district court via an express carrier:

Bradley Earl Beckworth
Jeffrey John Angelovich
Nicholas Andrew Wyss
Nix Patterson, LLP
3600 N. Capital Of Texas Hwy., Bldg. B, Suite 350
Austin, TX 78746
Telephone: (512) 328-5333
bbeckworth@nixlaw.com
jangelovich@nixlaw.com
nwyss@nixlaw.com

Karl Anthony Rupp
Nix Patterson, LLP
Advancial Building
1845 Woodall Rodgers Freeway, Suite 1050
Dallas, TX 75201
Telephone: (972) 831-1188
krupp@nixlaw.com

Howard Wisnia
Wisnia PC
12707 High Bluff Drive
Suite 200
San Diego, CA 92130
Telephone: (858) 461-0989
Howard@wisnialaw.com

Derek T. Gilliland

Sorey, Gilliland & Hull, LLP
109 W. Tyler Street
Longview, TX 75601
Telephone: (903) 212-2822
derek@soreylaw.com

Hon. Alan D. Albright
United States District Court for the Western District of Texas
800 Franklin Avenue, Room 301
Waco, Texas 76701
Telephone: (254) 750-1510

I declare under penalty of perjury under the laws of the United States that

the foregoing is true and correct.

Dated: April 6, 2021   */s/ Bradley N. Garcia*
                                         Bradley N. Garcia
                                         Counsel for Petitioners