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

CONTEXT DIRECTIONS LLC Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD. Defendant.	Civil Action No. 6:20-cv-1063 **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Context Directions LLC ("CONTEXT" or "Plaintiff"), for its Complaint against Defendant Samsung Electronics Co., Ltd., (referred to herein as "SAMSUNG" or "Defendant"), alleges the following:

NATURE OF THE ACTION

1.   This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq*.

THE PARTIES

2.   Plaintiff CONTEXT is a limited liability company organized under the laws of the State of Delaware with a place of business at 261 West 35th Street, Suite 1003, New York, NY 10001.

3.   Upon information and belief, SAMSUNG is a corporation organized under the laws of South Korea, with a place of business at 1-1, Samsungjeonja-ro, Hwaseong-si, Gyeonggi-do, South Korea. Upon further information and belief, SAMSUNG sells, offers to sell, and/or uses products and services throughout the United States, including in this judicial district, and

introduces infringing products and services into the stream of commerce knowing that they would and will be sold and/or used in this judicial district and elsewhere in the United States.

JURISDICTION AND VENUE

4.   This is an action for patent infringement arising under the Patent Laws of the United States, Title 35 of the United States Code.

5.   This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

6.   Venue is proper in this judicial district under 28 U.S.C. § 1400(b).

7.   Venue is proper as to SAMSUNG in this judicial district under 28 U.S.C. §1391(c)(3). On information and belief, SAMSUNG is not resident in the United States and may be sued in any judicial district.

8.   This Court has personal jurisdiction over the SAMSUNG under the laws of the State of Texas, due at least to its substantial business in Texas and in this judicial district, directly or through intermediaries, including: (i) at least a portion of the infringing activity alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in the State of Texas.

BACKGROUND

The Invention

9.   Pawel Aksamit is the inventor of U.S. Patent No. 10,142,791 ("the '791 patent"). A true and correct copy of the '791 patent is attached as Exhibit A. The '791 patent resulted from the pioneering efforts of Mr. Aksamit (hereinafter, "the Inventor") in the area of methods of detecting context in mobile devices, such as mobile phones, laptops, PDAs, tablets, watches, music players, satellite navigation devices and cameras, as well as the devices themselves having such context detection capability. Detecting context in mobile devices includes, for example, the

awareness of a device regarding the environment in which it is located, the activity of the user and/or the circumstances of the user of the device, all of which can help to improve the usability of the device, as well as the comfort and safety of its use. (*See* '791 patent at 1:28-36.)

10.   The '791 patent includes claims directed to a method for detecting the context of a mobile device, as well as a mobile device having such detection capability, where the mobile device has a plurality of sensors assigned to sensor groups arranged in a hierarchy, along with classifiers assigned to the sensor groups and a context detection module that activates and adapts the classifiers to evaluate the context of the mobile device based on signals from one or more of the sensors.

11.   At the time of the Inventor's pioneering efforts, there were other methods known for addressing the problem of context detection in a mobile device. One of the most widely implemented technologies employed the device's sensors to detect context by indirect means only. In that type of system, for example, one could detect that a mobile device is located in a moving vehicle by determining its approximate position from signals of base stations for cellular phones, and then calculating the average speed of the device. However, those types of systems were not very accurate and resulted in uncertainty as to the position of the device on the order of a few hundred meters to several kilometers, as well as frequent false classifications indicating the movement of the device when that was not the case. (*See* '791 patent at 1:57-2:4.)

12.   Other methods could be used to detect whether a mobile device is in a moving vehicle by analyzing the speed of the device using a global satellite positioning ("GPS") system. While this provided more accurate positioning than using the signals of mobile phone cell towers, the GPS receiver consumed significant amounts of energy and unacceptably reduced the life of the mobile device's battery. (*See* '791 patent at 2:5-14.)

13.   Another system used on an industrial scale utilized a vehicle-mounted, short-range radio transmitter and a mobile device equipped with a receiver that was compatible with the transmitter. The system assumed the mobile device was in a vehicle when it was in range of the transmitter, but an obvious disadvantage of this system was the need for the transmitter in the vehicle. (*See* '791 patent at 2:30-45.)

14.   Yet another method for specifying a device's context was based on analysis of signals from different sensors in the device, such as microphones, accelerometers, light sensors, magnetic field sensors, compasses, cameras and others. However, information from the signals of an individual sensor often was not sufficient to accurately determine the device's context, so most of the known methods of this sort used parallel analysis of signals from multiple sensors. While that increased the effectiveness of the classification, it also increased power consumption and caused a shorter battery life for the mobile device. (*See* '791 patent at 2:54-3:4.)

15.   The'791 patent describes technical improvements and addressed technical problems with other prior systems. The '791 patent describes an accurate and efficient method for determining the context of a mobile device based on signals from sensors found in such mobile devices.

16.   As one example, the '791 patent describes a mobile device having a plurality of sensors assigned to groups arranged in a hierarchy, along with classifiers assigned to the sensor groups, and a context detection module configured to activate and adapt the classifiers to evaluate the context of the mobile device based on signals from one or more of the sensors. Each classifier is adapted to detect the context of the device based on readings from the sensors belonging to its given group. The context detection module is configured to evaluate the context of the mobile device by reading the result of the classification indicated by an active group

classifier. The context detection module may also, for example, adapt the configuration of the classifiers associated with a given sensor group based on the results of classifications indicated by the classifiers associated with a higher level sensor group. (*See* '791 patent at 5:19-41.)

Advantages

17.   The '791 patent describes a number of advantages over certain prior systems and, in particular, improves the operation of context detection in a mobile device (e.g. by making it more accurate and efficient). The improvements in context detection may be achieved by a variety of features that correspond to features recited in the claims, aspects of which are forth in this Complaint.

18.   The '791 patent also describes equipping a mobile device with a context detection module and classifiers, where the sensors of the mobile device are assigned to at least two sensor groups, each of which comprises at least one sensor, and each such group is allocated a classifier adapted to detect the context of the device based on the indications of the sensors belonging to the given sensor group. The groups of sensors are ordered hierarchically, and the context of the mobile device is detected by reading a classification result indicated by the classifier of the currently active group of sensors in the mobile device. When an identified context is detected, the power supply of the sensors in the lower group may be switched on and classification in a group with a higher level activated. The context of the mobile device is read based on the higher group's classifier, and based on the results of the classification indicated by the higher group's classifiers, the configuration of the lower group's classifiers is adapted. (*See* '791 patent at 3:67-4:18.)

19.   Another advantage of the '791 patent relates to detecting the context of a mobile device when a user is driving a car. It is inadvisable in such circumstances, for example, to send

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