

**UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, DC  
Before the Honorable E. James Gildea  
Administrative Law Judge**

In the Matter of

CERTAIN WIRELESS CONSUMER  
ELECTRONIC DEVICES AND  
COMPONENTS THEREOF

Investigation No. 337-TA-853

**RESPONDENT SAMSUNG ELECTRONICS CO., LTD.'S AND SAMSUNG  
ELECTRONICS AMERICA, INC'S RESPONSE TO THE SECOND AMENDED  
COMPLAINT OF TECHNOLOGY PROPERTIES LIMITED LLC, PATRIOT  
SCIENTIFIC CORPORATION AND PHOENIX DIGITAL SOLUTIONS LLC  
UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED**

**Respondents**

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## **PRELIMINARY STATEMENT**

On November 13, 2012, Complainants Technology Properties Limited LLC, Phoenix Digital Solutions LLC and Patriot Scientific Corporation (collectively, “Complainants”) filed a motion for leave to file a Second Amended Complaint. Motion Docket No. 853-010. On January 8, 2013, the Administrative Law Judge issued an Order granting the motion. Order No. 14.

The Second Amended Complaint differs from the First Amended Complaint in that Complainants amended paragraph 16 to include three new respondents (Huawei Device Co., Ltd., Huawei Device USA Inc. and Futurewei Technologies, Inc. d/b/a Huawei Technologies (USA)) and to remove respondent Huawei North America.

Consequently, Respondents Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) hereby incorporates the entirety of their September 24, 2012 Response to the Complaint and Notice of Investigation and January 11, 2013 Response to First Amended Complaint, and responds below to amended paragraph 16 of the Second Amended Complaint.

**SAMSUNG ELECTRONICS CO., LTD.'S AND SAMSUNG ELECTRONICS AMERICA,  
INC'S RESPONSE TO THE AMENDED PARAGRAPH IN THE  
SECOND AMENDED COMPLAINT**

16. Samsung is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 16 and, on that basis, denies the allegations of paragraph 16 of the Second Amended Complaint.

Date: March 14, 2013

Respectfully submitted,

*/s/ Aaron Wainscoat*

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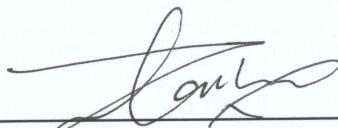
Attorneys for Respondents Samsung Electronics  
Co., Ltd. and Samsung Electronics America,  
Inc.

## VERIFICATION

I, Yeo Joo Jeong, am a senior engineer at Samsung Electronics Co., Ltd. I am authorized to sign this verification on behalf of Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung"). I have read the Response of Samsung to the Second Amended Complaint and declare that, based on reasonable inquiry with the assistance of employees at Samsung, the facts set forth in the Response, as they relate to Samsung, are true and correct to the best of my knowledge, information, and belief. The allegations and contentions in the Response have evidentiary support, or they are likely to have evidentiary support after a reasonable opportunity for further investigation and discovery, to the best of my knowledge, information, and belief.

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

DATED: March 4, 2013

  
\_\_\_\_\_  
Yeo Joo Jeong

**CERTIFICATE OF SERVICE**

I, Matthew Salcedo, hereby certify that on March 14, 2013, a copy of **RESPONDENT SAMSUNG ELECTRONICS CO., LTD.’S AND SAMSUNG ELECTRONICS AMERICA, INC’S RESPONSE TO THE SECOND AMENDED COMPLAINT OF TECHNOLOGY PROPERTIES LIMITED LLC, PATRIOT SCIENTIFIC CORPORATION AND PHOENIX DIGITAL SOLUTIONS LLC UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED** was served on the following as indicated:

The Honorable Lisa R. Barton  
Acting Secretary  
U.S. International Trade Commission  
500 E Street, S.W.  
Washington, D.C. 20436

- Via Hand Delivery (2 copies)**
- Via Overnight Courier**
- Via E-Filing**

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