

EXHIBIT SIX TO BLACK HILLS MEDIA, LLC'S DISCLOSURE OF
ASSERTED CLAIMS AND PRELIMINARY INFRINGEMENT
CONTENTIONS AND DOCUMENT PRODUCTION ACCOMPANYING
DISCLOSURE UNDER L.R. 3-1 AND 3-2, *Black Hills Media, LLC v. Samsung
Elecs. Co., Ltd. et al.*, Civil Action No. 2-13-cv-00379 (E.D. Tex. Aug. 22, 2013)

U.S. Patent No. 7,835,689

DISTRIBUTION OF MUSIC BETWEEN MEMBERS OF A CLUSTER OF MOBILE AUDIO DEVICES AND A WIDE AREA NETWORK



**Samsung Galaxy S III, Note 2 and Galaxy S IV
(Claims 9 and 10)**

7,835,689— Samsung Galaxy S III, Note 2 and Galaxy S IV – Claim 9
“A method of operating a digital computing device associated with a sharing group, comprising:”

7,835,689 Claim Language	Galaxy S3 and Note 2	Galaxy S4
9. A method of operating a digital computing device associated with a sharing group, comprising:	The accused products implement Samsung Group Cast and/or AllShare Play on a mobile smart phone or tablet (a digital computing device). A user implements the method (referred to as a “sending” user herein). ^{1,2}	The accused products implement Samsung Group Play on a mobile smart phone or tablet (a digital computing device). A user implements the method (referred to as a “sending” user herein).

¹ The Samsung Galaxy S3, Note 2, and Galaxy S4 charted herein are representative of the Samsung Devices. Additional Samsung Devices having the same functionality are also accused.
² As demonstrated herein, the accused devices literally infringe each of the asserted claims. However, to the extent any limitation is not literally met, it is met under the doctrine of equivalents. BHM contends that a person of ordinary skill in the art would have considered any difference between any specific claim limitation and the corresponding element or feature in the accused system, to the extent such limitation is not literally infringed, to be insubstantial or that the alternate implementation(s) employed (1) perform substantially the same function and (2) work in substantially the same way (3) to achieve substantially the same result as the requirement of the claim limitation at issue. Samsung directly infringes, contributorily infringes, and/or induces infringement of each of the asserted claim through at least the identified functionality above. For example, Samsung directly infringes by making, using, offering for sale, and selling the Samsung Devices in the U.S. and by testing the functionality on the Samsung Devices (operating the devices) in the U.S.

receiving a request to join the sharing group from a requesting media player device;	http://www.allshareplay.com/main/faqDetail.do?page=faq06_05#FaqAsk02 For Group Cast, the “sending” user selects a file and selects share through Group Cast (and picks a trusted password). This results in the sending user receiving requests to join Group Cast from others on the same WiFi network. See FAQs 2 and 4 at: http://www.allshareplay.com/main/faqDetail.do?page=faq06_05#FaqAsk02 2. How I can start Group Cast? Just get everyone to connect to the same Wi-Fi network, then select your file, and share through Group Cast. Tell your friends to start 'Join Group Cast' from the AllShare Play menu. 4. How can I join Group Cast? 1) Select 'Join Group Cast' from the AllShare Play menu. 2) A list of ongoing group casts in the currently connected Wi-Fi network is then displayed.	For Group Play, the "sending" user selects "Group Play" and then checks "Group Password" and selects "Create Group". This causes a password screen to open up permitting the sending user to select a password. In response the devices displays "turning on mobile AP" message and permits the sending user to select among options for Share Music/ Share pictures; Share documents/ Play games. When "share pictures" is selected, the device allows the selection of pictures and "done" is selected to enable sharing. The receiving user selects the "Group Play" application and then "join group". The sending user then receives requests from receiving users to obtain the items shared.
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7,835,689– Samsung Galaxy S III, Note 2 and Galaxy S IV – Claim 9
“receiving a request to join the sharing group from a requesting media player device;”

	3) Select a list to join and enter a password. You must get the password from the friend who first created the group cast. 4) After you enter the password, you are automatically directed to the sharing screen. For AllShare Play, the process is essentially the same. See http://www.primeinspiration.com/gadgets/featuring/2584-how-to-share-allshare-play-screen-via-group-cast-on-samsung-galaxy-note-2.html	
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“making a determination as to whether to permit the requesting media player device to join the sharing group based on information associated with a user of the requesting media player device;”

making a determination as to whether to permit the requesting media player device to join the sharing group based on information associated with a user of the requesting media player device;	The “sending” user’s phone/tablet makes a determination to permit requesting phones to access the sharing group, based on the password associated with each user request. See cites above.	The “sending” user’s phone/tablet makes a determination to permit requesting phones to access the sharing group, based on the password associated with each user request.
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“and adding the requesting media player device to the sharing group if the determination is made to permit the requesting media player device to join the sharing group;”

and adding the requesting media player device to the sharing group if the determination is made to permit the requesting media player device to join the sharing group;	The “sending” user’s phone/tablet adds the requesting phones to the sharing group if the passwords match.	The “sending” user’s phone/tablet adds the requesting phones to the sharing group if the passwords match.
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“wherein the information associated with the user of the requesting media player device comprises information, made available by a trusted user, regarding a desirability of the user of the requesting media player device as a member of the sharing group.”

wherein the information associated with the user of the requesting media player device comprises information, made available by a trusted user, regarding a desirability of the user of the requesting media player device as a member of the sharing group.	The information associated with the user of the requesting media player (another phone or tablet) is made available from a trusted user, and is only issued to those desirable as a member of a sharing group. See cites above.	The information associated with the user of the requesting media player (another phone or tablet) is made available from a trusted user, the “sending” user, and is only issued to those desirable as a member of a sharing group. See cites above.
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7,835,689 Claim Language	Galaxy S3 and Note 2	Galaxy S4
10. The method of claim 9 wherein the digital computing device is one of at least two media player devices in the sharing group.	The digital computing device is a smart phone, which is a media player. See FAQ No 6 for supported media formats: 6. What are the file formats supported by Group Cast? The file formats supported by Group Cast are as follows: 1) Photos - BMP, GIF, JPG, JPEG, PNG, WEBP 2) Music - MP3, WAV, MID, 3GA, 3GL, AMR 3) Documents - DOC, DOCX, PPT, PPTX, PDF http://www.allshareplay.com/main/faqDetail.do?page=faq06_05#FaqAsk06	The digital computing device is a smart phone, which is a media player.