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VIA EDIS

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436

Re: First Supplement to the Complaint in *Certain Wearable Activity and Health Monitoring Devices and Systems Containing Same*, Investigation No. 337-TA-____ (Dkt. No. 337-3937)

Dear Secretary Barton:

Complainant UnaliWear, Inc. (“UnaliWear”) supplements the Complaint (Doc. ID 895174) and the Appendices to the Complaint (Doc. ID 895175), filed on September 18, 2026, as follows:

- **Table of Contents** – The underlined text is added to the heading for Section IV.A.3 as follows:

Foreign and Domestic Counterparts of the Patent

- **Exhibit List** – The following exhibits are added:

Exhibit Number	Description
10	Certified Copy of the Assignment Recorded Against U.S. Patent Application No. 16/049,361 (U.S. Patent No. 10,687,193) at Reel 049960, Frame 0895
11	Certified Copy of the Assignment Recorded Against U.S. Patent Application No. 14/917,787 (U.S. Patent No. 10,051,410) at Reel 037951, Frame 0820
12	Certified Copy of the Assignment Recorded Against U.S. Patent Application No. 14/917,787 (U.S. Patent No. 10,051,410) at Reel 037951, Frame 0938



- **Appendix List** – The following appendices are added:

Appendix Letter	Description
<u>A2</u>	Copy of the prosecution history of U.S. Provisional Application No. 61/879,806
<u>A3</u>	Copy of the prosecution history of International Application No. PCT/US2014/056687
<u>A4</u>	Certified copy of the prosecution history of U.S. Application No. 14/917,787 (U.S. Patent No. 10,051,410)

- **Paragraph 27** – The struck-through text is deleted and the underlined text is added as follows:

The sophisticated activity and health monitoring technology of the ~~‘193 Patents~~ ‘193 Patent can automatically alert emergency responders without the wearer needing to take action, which is critical in situations where the person is unconscious or immobilized.

- **Paragraph 29** – The struck-through text is deleted and the underlined text is added as follows:

The ‘193 Patent, titled “Assist Device and System,” issued on June 16, 2020, naming Jean Anne Booth, Brian Kircher, Davin Potts, and Syed Sajjad Ahmed as the inventors. Ex. 2 1 (‘193 Patent) at 1. The ‘193 Patent is based on U.S. Patent Application No. 16/049,361 filed July 30, 2018. Id. at 1. The ‘193 Patent is a continuation-in-part of U.S. Patent Application No. 14/917,787, filed as application No. PCT/US2014/056687 on September 19, 2014, now U.S. Patent No. 10,051,410. Id. The ‘193 Patent also claims priority to U.S. Provisional Application No. 61/879,806, filed September 19, 2013. Id. at 2. The expiration date of the ‘193 Patent is September 19, 2034. A certified copy of the ‘193 Patent is attached as Exhibit 1.

- **Paragraph 30** – The underlined text is added as follows:

This Complaint is accompanied by a certified copy of the prosecution history for the ‘193 Patent. See Appendix A1. Pursuant to Commission Rule 210.12(c)(2), this Complaint is also accompanied by copies of the prosecution histories of each priority application for the ‘193 Patent: U.S. Provisional Application No. 61/879,806 (Appendix A2); International Application No. PCT/US2014/056687 (Appendix A3); and U.S.



Application No. 14/917,787, now U.S. Patent No. 10,051,410 (Appendix A4).

- **Paragraph 31** – The struck-through text is deleted and the underlined text is added as follows:

UnaliWear owns by assignment all rights, title, and interest in the '193 Patent. ~~See Appendix A1.~~ Certified copies of the recorded assignments are attached as Exhibit 10 (assignment of U.S. Patent Application No. 16/049,361 by inventors Jean Anne Booth, Brian Kircher, Davin Potts, and Syed Sajjad Ahmed to UnaliWear, recorded August 5, 2019) and Exhibits 11 and 12 (assignments of parent U.S. Patent Application No. 14/917,787 by inventors Jean Anne Booth, Jonathan Guy, and Brian Kircher to UnaliWear, recorded March 11, 2016). See also Appendix A1.

- **Section IV.A.3 Heading and Paragraph 33** – The underlined text is added to the heading preceding Paragraph 33, and Paragraph 33 is replaced in its entirety with the following:

Foreign and Domestic Counterparts of the Patent

33. The '193 Patent issued from U.S. Patent Application No. 16/049,361, a continuation-in-part of U.S. Patent Application No. 14/917,787, which was filed as International Application No. PCT/US2014/056687 and claims priority to U.S. Provisional Application No. 61/879,806. To the best of UnaliWear's knowledge, information, and belief, the following foreign patents and foreign and domestic patent applications may correspond or relate to U.S. Patent Application No. 14/917,787, with the prosecution status of each:

- (a) U.S. Provisional Application No. 61/879,806, filed September 19, 2013: no longer pending (provisional application; see 35 U.S.C. § 111(b)(5)).
- (b) U.S. Application No. 14/917,787: issued as U.S. Patent No. 10,051,410 on August 14, 2018.
- (c) International Application No. PCT/US2014/056687, filed September 19, 2014, published as WO 2015/042487 A1: international phase concluded; entered the U.S. national stage and the national and regional phases identified in items (b) and (d) through (j).
- (d) Australian Application No. 2014321303: granted as AU 2014321303 B2 on August 2, 2018.



- (e) European Application No. 14845754.2: granted as EP 3047468 B1 on October 20, 2021.
- (f) Chinese Application No. 201480051752.9: granted as CN 105765639 B on October 26, 2018.
- (g) Japanese Application No. 2016-544038: granted as JP 6346953 B2 on June 20, 2018.
- (h) Canadian Application No. 2,923,745: granted as CA 2923745 C on September 20, 2022.
- (i) Mexican Application No. MX/a/2016/003494: published as MX 363492 B on March 26, 2019.
- (j) Israeli Application No. 244489: published as IL 244489 B on November 28, 2019.
- (k) International Application No. PCT/US2019/043583, filed July 26, 2019, claiming priority to U.S. Patent Application No. 16/049,361, published as WO 2020/028157 A1 on February 6, 2020: international phase concluded; no national or regional phase application was filed.

To the best of UnaliWear's knowledge, information, and belief, there are no other foreign patents issued, and no other foreign or domestic patent applications pending, filed, abandoned, withdrawn, or rejected, corresponding to the '193 Patent.

- **Paragraph 35** – The struck-through text is deleted and the underlined text is added as follows:

UnaliWear asserts that the Respondents directly infringe, literally or under the doctrine of equivalents, and/or actively induce the infringement ~~infringe~~ of claims 1–43 1–28 and 35–43 of the '193 Patent in violation of 35 U.S.C. §§ 271(a), (b), and/or (c) and Section 337(a)(1)(B)(i), as described in further detail below.

- **Paragraph 55** – The struck-through text is deleted and the underlined text is added as follows:

A domestic industry exists under Section 337(a)(2) and 337(a)(3). In particular, a domestic industry exists as a result of UnaliWear's significant investments in plant and equipment and significant employment of labor and capital ~~have been made~~ with respect to Domestic Industry Products ("DI Products") that practice and are protected by the Asserted Patent. 19 U.S.C. § 1337(a)(3)(A)-(B).



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New Exhibits 10 through 12 and new Appendices A2 through A4 are submitted herewith.

Thank you for your attention to this matter. Please contact me should you have any question concerning this submission.

Respectfully submitted,

/s/ Matthew D. Aichele

Matthew D. Aichele

Enclosures



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on the following, in the manner indicated below, on October 27, 2026:

The Honorable Lisa R. Barton Secretary to the Commission U.S. INTERNATIONAL TRADE COMMISSION 500 E Street, SW, Room 112 Washington, DC 20436	☒ VIA ELECTRONIC FILING
<u>PROPOSED RESPONDENTS SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.:</u>	
Mareesa A. Frederick FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, L.L.P. 901 New York Avenue, N.W. Washington, DC 20001-4413	☒ Via Electronic Mail Samsung-UnaliWear@finnegan.com
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/s/ Alexandra Loew
RUSS AUGUST & KABAT