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

IKORONGO TECHNOLOGY LLC and IKORONGO TEXAS LLC, Plaintiffs, v. LG ELECTRONICS INC., and LG ELECTRONICS U.S.A., INC., Defendants.	Civil Action No. 6:20-cv-257-ADA **JURY TRIAL DEMANDED**
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' PRELIMINARY INVALIDITY CONTENTIONS

I. INTRODUCTION

Pursuant to the Court's Scheduling Order, Defendants LG Electronics Inc., LG Electronics U.S.A., Inc., Samsung Electronics Co. Ltd., and Samsung Electronics America, Inc. (collectively, "Defendants") provide these Preliminary Invalidity Contentions to Plaintiffs Ikorongo Texas LLC ("Ikorongo TX") and Ikorongo Technology LLC ("Ikorongo Tech") (together "Ikorongo" or "Plaintiffs") for the following patents (collectively, "Asserted Patents") and claims (collectively, "Asserted Claims") identified as asserted in Plaintiff Ikorongo's Preliminary Infringement Contentions served on August 6, 2020 ("Infringement Contentions"):

- U.S. Patent No. 8,874,554 ("'554 Patent"): Claims 1-4, 9-12, 17-20, 25-28, 33-36, and 39-42 ("'554 Asserted Claims")
- U.S. Patent No. RE41,450 ("'450 Patent"): Claims 67, 74-76, 83, 84, 93, 94, and 96 ("'450 Asserted Claims")
- U.S. Patent No. RE45,543 ("'543 Patent"): Claims 32, 36, 38, 39, 43, 44-49, 51, 54, 56, 72, 73, and 75 ("'543 Asserted Claims")
- U.S. Patent No. RE47,704 ("'704 Patent"): Claims 33-40, and 45-48 ("'704 Asserted Claims") (the '450 Asserted Claims, '543 Asserted Claims, and '704 Asserted Claims will collectively be referred to as the "Reissue Asserted Claims")

Defendants address the invalidity of the Asserted Claims and conclude with a description of their document productions and identification of additional reservations and explanations. These Preliminary Invalidity Contentions use the acronym "POSITA" to refer to a person having ordinary skill in the art to which the claimed inventions pertain.

II. PRIORITY DATE OF THE '554 PATENT

Ikorongo asserts that the earliest date of invention for claims 1-4, 17-20, and 33-36 of the '554 Patent is July 2007 ("July 2007 '554 Asserted Claims"), and that the earliest date of invention for claims 9-12, 25-28, and 39-42 is September 9, 2011 ("Sept. 2011 '554 Asserted Claims). It is Ikorongo's burden to show entitlement to its asserted priority date, and Ikorongo

has failed to meet that burden. The documents produced by Ikorongo in support of its alleged conception and actual reduction to practice dates (IKR 000001-000040) do not show that the named inventors of the '554 Patent conceived the July 2007 '554 Asserted Claims on or after July 2007 and do not show that the named inventors of the '554 Patent were diligent in reducing to practice their alleged invention.

A. Ikorongo's Laboratory Notebook Does Not Support A Priority Date of July, 2007 for Any of the Asserted Claims

Ikorongo has failed to demonstrate that any July 2007 '554 Asserted Claim is entitled to a priority date of no later than July 2007. "Conception is the formulation of a definite and permanent idea of the complete and operative invention." *Slip Track Sys., Inc. v. Metal–Lite, Inc.*, 304 F.3d 1256, 1262-63 (Fed. Cir. 2002). Thus, "conception must encompass all limitations of the claimed invention." *Singh v. Brake*, 222 F.3d 1362, 1367 (Fed. Cir. 2000); *Kridl v. McCormick*, 105 F.3d 1446, 1449 (Fed. Cir. 1997) ("Conception must include every feature or limitation of the claimed invention."). In support of its July 2007 invention date, Ikorongo produced pages from a notebook (IKR 000001-IKR 000005) ("Laboratory Notebook"). On its face, the Laboratory Notebook fails to provide written description support and disclosure for all of the July 2007 '554 Asserted Claims.

A laboratory notebook that is "mostly illegible" and "difficult to decipher" provides no evidentiary value for purposes of determining conception. *Universal Stabilization Techs., Inc. v. Advanced Bionutrition Corp.*, No. 17CV87-GPC(MDD), 2018 WL 3993369, at *10 (S.D. Cal. Aug. 21, 2018) (granting defendant's motion for summary judgment). Because Ikorongo's Laboratory Notebook consists of hand-written notations that are illegible and difficult to decipher, it is entitled to no evidentiary value for purposes of determining conception.

"Unwitnessed laboratory notebooks on their own are insufficient to support [a] claim [of

conception.]." *Medichem, S.A. v. Rolabo, S.L.*, 437 F.3d 1157, 1170–73 (Fed. Cir. 2006) (citing *Stern v. Trustees of Columbia Univ. in City of New York*, 434 F.3d 1375, 1378 (Fed. Cir. 2006)); *see also Apator Miitors ApS v. Kamstrup A/S*, 887 F.3d 1293, 1297 (Fed. Cir. 2018) ("an unwitnessed laboratory notebook, alone, cannot corroborate an inventor's testimony of conception"); *Procter & Gamble Co. v. Teva Pharm. USA, Inc.*, 566 F.3d 989, 998–99 (Fed. Cir. 2009) (affirming district court conclusion that unwitnessed laboratory notebook entry was insufficient to corroborate inventor testimony regarding date of conception); *Transocean Offshore Deepwater Drilling, Inc. v. GlobalSantaFe Corp.*, 443 F. Supp. 2d 836, 856 (S.D. Tex. 2006) ("an inventor's own unwitnessed documentation does not corroborate an inventor's testimony about inventive facts") (*quoting Brown v. Barbacid*, 276 F.3d 1327, 1335 (Fed. Cir. 2002)). Because Ikorongo's Laboratory Notebook is unwitnessed and unsigned, it is insufficient to support a claim of conception or to corroborate potential testimony from either of the '554 Patent's inventors.

Ikorongo has failed to demonstrate the authenticity or date of the Laboratory Notebook. *See Brown*, 276 F.3d at 1333 (noting that Federal Rule of Evidence 902 excludes notes and lab notebooks from the list of self-authenticating extrinsic evidence).

Ikorongo has also failed to demonstrate that the inventors or prosecution attorneys were diligent in actual or constructive reduction to practice between the alleged July 2007 date of invention and December 21, 2007, the filing date of the earliest application to which the '554 Patent claims priority. *See id.* at 1380 (requiring that "an inventor's testimony concerning his diligence be corroborated").

B. Ikorongo's "More Like This" Documents Do Not Support A Priority Date of July, 2007 for Any of the Asserted Claims

In addition to the Laboratory Notebook, Ikorongo also produced two documents

purportedly having the filenames “More Like This” and “More Like This v2” to support their July 2007 invention date for the July 2007 ’554 Asserted Claims. On their face, these documents also fail to provide written description support and disclosure for many limitations of the July 2007 ’554 Asserted Claims including, for example:

- “a communication interface component adapted to provide media item information identifying the media item, the communication interface component adapted to provide location information identifying a geographic location associated with the user device at which the media item was interacted with” (claim 1)
- “a location determination component adapted to receive an identification of a geographic area” (claim 1)
- “the communication interface component adapted to receive information that identifies a second media item, wherein location information associated with the second media item is associated with the identified geographic area”
- “a user interface component adapted to present, via the user device, the information that identifies the second media item” (claim 1)
- “The user device of claim 3 wherein the geographic area includes the current location of the user device” (claim 4)
- “provide, via the user device, media item information identifying the media item” (claim 17)
- “receive, via the user device, an identification of a geographic area” (claim 17)
- “present, via the user device, the information that identifies the second media item” (claim 17)
- “The non-transitory computer readable medium of claim 19 wherein the geographic

area includes the current location of the user device" (claim 20)

- "providing, via the user device, media item information identifying the media item" (claim 33)
- "receiving, via the user device, an identification of a geographic area" (claim 33)
- "presenting, via the user device, the information that identifies the second media item" (claim 33)
- "The method of claim 35 wherein the geographic area includes the current location of the user device" (claim 36).

C. None of the July 2007 '554 Asserted Claims Are Entitled To the December 21, 2007 Priority Date of Application No. 11/963,050.

None of the July 2007 '554 Asserted Claims can claim priority to the December 21, 2007 filing date of Application No. 11/963,050, which published as U.S. Pub. No. 2009/0164516 (the "'516 Publication") under 35 U.S.C. § 120. Ikorongo has the burden to show that the Continuation Patents can claim priority to an earlier, related application. *See PowerOasis, Inc. v. T-Mobile USA, Inc.*, 522 F.3d 1299, 1305-06 (Fed. Cir. 2008); *Tech. Licensing Corp. v. Videotek, Inc.*, 545 F.3d 1316, 1327 (Fed. Cir. 2008) (the patent owner must show "why the written description in the earlier application supports the claim."). To claim such priority, Ikorongo must show that an earlier application provides written description support and enablement for the full scope of each asserted claim of later applications. *See Atl. Research Mktg. Sys., Inc. v. Troy*, 659 F.3d 1345, 1355 (Fed. Cir. 2011); *Sitrick v. Dreamworks, LLC*, 516 F.3d 993, 999-1000 (Fed. Cir. 2008). The '516 Publication fails to provide written description support and enabling disclosure for various limitations of the July 2007 '554 Asserted Claims, including, for example:

- "a communication interface component adapted to provide media item information

identifying the media item, the communication interface component adapted to provide location information identifying a geographic location associated with the user device at which the media item was interacted with" (claim 1)

- "a location determination component adapted to receive an identification of a geographic area" (claim 1)
- "the communication interface component adapted to receive information that identifies a second media item, wherein location information associated with the second media item is associated with the identified geographic area"
- "a user interface component adapted to present, via the user device, the information that identifies the second media item" (claim 1)
- "The user device of claim 3 wherein the geographic area includes the current location of the user device" (claim 4)
- "provide, via the user device, media item information identifying the media item" (claim 17)
- "receive, via the user device, an identification of a geographic area" (claim 17)
- "present, via the user device, the information that identifies the second media item" (claim 17)
- "The non-transitory computer readable medium of claim 19 wherein the geographic area includes the current location of the user device" (claim 20)
- "providing, via the user device, media item information identifying the media item" (claim 33)
- "receiving, via the user device, an identification of a geographic area" (claim 33)
- "presenting, via the user device, the information that identifies the second media

item" (claim 33)

- "The method of claim 35 wherein the geographic area includes the current location of the user device" (claim 36).

III. INVALIDITY UNDER 35 U.S.C. § 101

To be patentable subject matter under § 101, a claim must be directed to one of four eligible subject matter categories: "new and useful process, machine, manufacture, or composition of matter." 35 U.S.C. § 101. "Claims that fall within one of the four susbject matter categories may nevertheless be ineligible if they encompass laws of nature, physical phenomena, or abstract ideas." *Diamond v. Chakrabarty*, 447 U.S. 303, 309 (1980). The Supreme Court established a two-step test for deciding the subject matter eligibility of claims under § 101. *Alice Corp. Pty. Ltd. v. CLS Bank Int'l*, 134 S. Ct. 2347, 2355 (2014). First, the claims must be analyzed to determine whether they are drawn to one of the statutory exceptions. *Id.* Claims that invoke generic computer components instead of reciting specific improvements in computer capabilities are abstract under this first step. *See Enfish, LLC v. Microsoft Corp.*, 822 F.3d 1327, 1335-36 (Fed. Cir. 2016). Second, the elements of the claims must be viewed both individually and as an ordered combination to see if there is an "inventive concept." *Id.* The mere fact that a claim recites or implies that an abstract idea is implemented using a general-purpose computer does not supply an inventive concept necessary to satisfy § 101. *See Elec. Power Grp., LLC v. Alstom S.A.*, 830 F.3d 1350, 1355 (Fed. Cir. 2016); *Alice*, 134 S. Ct. at 2357-59.

All of the Asserted Claims are directed to ineligible subject matter under 35 U.S.C. § 101 and applicable case law authority.[1] For the Reissue Asserted Claims, at *Alice* step one, the

[1] *See, e.g., Alice Corp. Pty. Ltd. v. CLS Bank Int'l*, 134 S. Ct. 2347 (2014); *Mayo Collaborative Servs. v. Prometheus Labs., Inc.*, 132 S. Ct. 1289 (2012); *Trading Techs. Int'l, Inc. v. IBG, LLC*,

Reissue Asserted Claims are directed to the ineligible abstract idea of sharing one's location with another by employing conventional technologies in standard ways. Each of the Reissue Asserted Claims generally recite the same simple process: selecting users to share one's location with, defining access rights for those users, and uploading information about the user to a server so that the information can be shared with the selected users. *E.g.*, '450 Patent Claim 67, '543 Patent Claims 32, 39, 45-49, 51, 54, 56, 71, 73, 75; '704 Patent Claims 33, 46, 48. Neither the Reissue Asserted Claims nor the specifications of the reissue patents disclose any technological improvement to any technological problem; instead the claimed features merely apply conventional, generic computer and location tracking technologies. At *Alice* step two, the Reissue Asserted Claims fail to disclose an inventive concept. The Reissue Asserted Claims recite conventional, generic computer and location tracking technologies at the highest level of abstraction, such as the recited steps of registering users, sharing from "categories," or reporting the data, which does not add anything particularly inventive to the asserted claims. Considered collectively, the Reissue Asserted Claims' limitations amount to nothing more than sharing a

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921 F.3d 1084 (Fed. Cir. 2019); *ChargePoint, Inc. v. SemaConnect, Inc.*, 920 F.3d 759 (Fed. Cir. 2019); *SAP America, Inc. v. InvestPic, LLC*, 898 F.3d 1161 (Fed. Cir. 2018); *Interval Licensing LLC v. AOL, Inc.*, 896 F.3d 1335 (Fed. Cir. 2018); *Aatrix Software, Inc. v. Green Shades Software, Inc.*, 882 F.3d 1121 (Fed. Cir. 2018); *Two-Way Media Ltd. v. Comcast Cable Commc'ns, LLC*, 874 F.3d 1329 (Fed. Cir. 2017), *cert. denied*, 139 S. Ct. 378 (2018); *Intellectual Ventures I LLC v. Capital One Fin. Corp.*, 850 F.3d 1332 (Fed. Cir. 2017); *Apple, Inc. v. Ameranth, Inc.*, 842 F.3d 1229 (Fed. Cir. 2016); *Affinity Labs of Texas, LLC v. DIRECTV, LLC*, 838 F.3d 1253 (Fed. Cir. 2016); *Elec. Power Grp., LLC v. Alstom S.A.*, 830 F.3d 1350 (Fed. Cir. 2016); *Enfish, LLC v. Microsoft Corp.*, 822 F.3d 1327 (Fed. Cir. 2016); *Genetic Techs. Ltd. v. Merial L.L.C.*, 818 F.3d 1369 (Fed. Cir. 2016); *Intellectual Ventures I LLC v. Capital One Bank (USA)*, 792 F.3d 1363 (Fed. Cir. 2015); *Internet Patents Corp. v. Active Network, Inc*, 790 F.3d 1343 (Fed. Cir. 2015); *OIP Techs., Inc. v. Amazon.com, Inc.*, 788 F.3d 1359 (Fed. Cir. 2015); *Content Extraction & Transmission LLC v. Wells Fargo Bank, Nat'l Ass'n*, 776 F.3d 1343 (Fed. Cir. 2014); *DDR Holdings, LLC v. Hotels.com, L.P.*, 773 F.3d 1245 (Fed. Cir. 2014); *buySAFE, Inc. v. Google, Inc.*, 765 F.3d 1350 (Fed. Cir. 2014); *Digitech Image Techs., LLC v. Elecs. for Imaging, Inc.*, 758 F.3d 1344 (Fed. Cir. 2014); *CyberSource Corp. v. Retail Decisions, Inc.*, 654 F.3d 1366 (Fed. Cir. 2011).

user's location with another user.

For the '554 Patent, at *Alice* step one, the '554 Asserted Claims are directed to the ineligible abstract idea of using location information to make recommendations by employing conventional technologies in standard ways. Each of the '554 Asserted Claims generally recite the same simple process: providing a location to a server when a user interacts with a media item, and receiving a recommendation for other media items based on the location at which the first media item was played. *E.g.*, '554 Patent Claims 1-4, 9-12, 17-20, 25-28, 33-36, 39-42. Neither the '554 Asserted Claims nor the '554 Patent specification disclose any technological improvement to any technological problem; instead the claimed features merely apply conventional, generic computer and recommendation technologies. At *Alice* step two, the '554 Asserted Claims fail to disclose an inventive concept. The '554 Asserted Claims recite conventional, generic computer and a "media player component," a "communication interface component," a "location determination component," and a "user interface component." Considered collectively, the '554 Asserted Claims' limitations amount to nothing more than making location-based recommendations.

IV. INVALIDITY UNDER 35 U.S.C. §§ 102 AND 103

Defendants identify the following prior art now known to Defendants to anticipate or render obvious the Asserted Claims under at least 35 U.S.C. §§ 102(a), (b), (e), and/or (g), and/or § 103, either expressly or inherently as understood by a POSITA.

A. '543 Patent

1. Prior Art Publications

The following patents and publications are prior art to the '543 Asserted Claims under at least 35 U.S.C. §§ 102(a), (b), (e), and/or (g), and/or § 103. Invalidity claim charts for these references are attached as Exhibits A1 through A14.

1. U.S. Patent Pub. No. 2003/0055983 ("Callegari"). *See* Ex. A1.
2. U.S. Patent Pub. No. 2002/0115453 ("Poulin"). *See* Ex. A2.
3. U.S. Patent No. 6,968,179 ("De Vries"). *See* Ex. A3.
4. U.S. Patent No. 6,714,791 ("Friedman"). *See* Ex. A4.
5. U.S. Patent No. 6,553,236 ("Dunko"). *See* Ex. A5.
6. U.S. Patent Pub. No. 2001/0048449 ("Baker I"). *See* Ex. A6.
7. U.S. Patent Pub. No. 2002/0107027 ("O'Neil"). *See* Ex. A7.
8. U.S. Patent No. 6,757,740 ("Parekh"). *See* Ex. A8.
9. U.S. Patetn No. 6,208,866 ("Rouhollahzadeh"). *See* Ex. A9.
10. U.S. Patent No. 7,769,620 ("Fernandez"). *See* Ex. A10.
11. Cyberguide: A Mobile Context-Aware Tour Guide by Abowd et al. ("Abowd"), published in 1997. *See* Ex. A11.
12. Making Contact: Getting the Group Communicating with Groupware by Cockburn et al. ("Cockburn"), published in 1993. *See* Ex. A12.
13. Ensuring Privacy in Presence Awareness Systems: An Automated Verification Approach by Godefroid et al. ("Godefroid"), published in 2000. *See* Ex. A13.
14. Architectural Considerations for Scalable, Secure, Mobile Computing with Location Information by Spreitzer et al. ("Spreitzer"), published in 1994. *See* Ex. A14.
15. U.S. Patent No. 7,130,630 ("Enzmann"). *See* Ex. A15

Defendants additionally identify and rely on patent or publication references that describe or are otherwise related to the prior art systems identified below. Defendants' investigation into prior art patent and publication references remains ongoing, and Defendants reserve the right to identify and rely on additional patent or publication references that are identified through further investigation or discovery. To the extent any Defendant had knowledge of a prior art reference that was not disclosed in these contentions, such knowledge is not attributed to other

Defendants. Defendants reserve the right to supplement as further prior art is identified through investigation or discovery.

2. Prior Art Systems

The following systems are prior art to the '543 Asserted Claims under at least 35 U.S.C. §§ 102(a), (b) and/or (g). Invalidity claim charts for these references are attached as Exhibits B1 through B8, A11, A12.

1. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Benefon Esc! System ("Benefon"). Benefon qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of Benefon, as compared to the limitations of the '543 Asserted Claims, is provided in Exhibit B1. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

2. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Travel Technoogy System ("TravTek"). TravTek qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of TravTek, as compared to the limitations of the '543 Asserted Claims, is provided in Exhibit B2. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

3. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the FriendZone System ("FriendZone"). FriendZone qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of FriendZone, as compared to the limitations of the '543 Asserted Claims, is provided in Exhibit B3. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

4. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Palo Alto Research Center System ("PARC"). PARC qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of PARC, as compared to the limitations of the '543 Asserted Claims, is provided in Exhibit B4. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

5. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the SignalSoft System ("SignalSoft"). SignalSoft qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of SignalSoft, as compared to the limitations of the '543 Asserted Claims, is provided in Exhibit B5. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

6. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Seiko Epson Locatio PDA System ("Locatio"). Locatio qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of Locatio, as compared to the limitations of the '543 Asserted Claims, is provided in Exhibit B6. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

7. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Ericsson Mobile Positioning System ("MPS"). MPS qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of MPS, as compared to the limitations of the '543 Asserted Claims, is provided in Exhibit B7. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

8. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Garmin NavTalk Cellular Phone/GPS Receiver System ("NavTalk"). NavTalk qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of NavTalk, as compared to the limitations of the '543 Asserted Claims, is provided in Exhibit B8. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

9. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the CyberGuide System ("CyberGuide"). CyberGuide qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of CyberGuide, as compared to the limitations of the '543 Asserted Claims, is provided in Exhibit A11 (same chart as Abowd, above). Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

10. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the TELEFREEK System ("TELEFREEK"). TELEFREEK qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of TELEFREEK, as compared to the limitations of the '543 Asserted Claims, is provided in Exhibit A12 (same chart as Cockburn, above). Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

Defendants' investigation into prior art systems remains ongoing and Defendants reserve the right to identify and rely on systems that represent different versions or are otherwise related variations of the systems identified above.

3. Obviousness

Below is a listing of exemplary combinations of references that would render obvious the

’543 Asserted Claims. In addition to the exemplary combinations of references below, the combination of (1) any of the references listed in Section IV.A.1-IV.A.2 with the knowledge of one of ordinary skill or (2) any of the exemplary combinations listed below with the knowledge of ordinary skill would render obvious the ’543 Asserted Claims.

These identified combinations are exemplary, and Defendants reserve the right to identify additional combinations in their final invalidity contentions, during expert discovery, and later stages of the case.

a. Independent Claim 32 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O’Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Enzmann in view of Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- O’Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Rouhollahzadeh, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Rouhollahzadeh, Callegari, De Vries, Friedman, Dunko, , Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Callegari in view of Friedman, O’Neil, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Poulin in view of Friedman, Callegari, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O’Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O’Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft.

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Godefroid in view of Parekh

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, TravTek, FriendZone, PARC, and/or SignalSoft

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, and/or SignalSoft

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, PARC, and/or SignalSoft

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, and/or SignalSoft

- SignalSoft Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, and/or PARC

b. Claim 36 Exemplary Combinations

Claim 36 depends on Claim 32. The same exemplary combinations listed above for Claim 32 apply to Claim 36. Additional exemplary combinations for Claim 36 are listed below:

- Callegari in view of Friedman

- Poulin in view of Friedman and, Callegari

- Abowd (or CyberGuide) in view of Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, SignalSoft, and/or MPS

- Enzmann in view of Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, SignalSoft, and/or MPS

- Baker in view of view of Fernandez, Godefroid, Friedman, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS

- Cockburn (or TELEFREEK) in view of Fernandez, Friedman, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS

- Godefroid in view of Fernandez, O'Neil, Spreitzer, Friedman, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS

- Locatio in view of Fernandez, Godefroid, O'Neil, Friedman, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS

- NavTalk in view of Fernandez, Godefroid, O'Neil, Friedman, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS

- MPS in view of Fernandez, Godefroid, O'Neil, Friedman, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, TravTek, SignalSoft, and/or De Vries

- Dunkon view of Fernandez, Godefroid, O'Neil, Friedman, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS

- Spreitzer in view of Rouhollahzadeh, Friedman, TravTek, and/or SignalSoft,

- Benefon in view of Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, SignalSoft, and/or MPS

- TravTek in view of Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, SignalSoft, and/or MPS

- FriendZone in view of Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, SignalSoft, and/or MPS

- PARC in view of Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, SignalSoft, and/or MPS

- SignalSoft in view of Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, and/or MPS

c. Claim 38 Exemplary Combinations

Claim 38 depends on Claim 32. The same exemplary combinations listed above for

Claim 32 apply to Claim 38. Additional exemplary combinations for Claim 38 are listed below:

- Callegari in view of Friedman, Eschenbach (U.S. Patent No. 6,373,429, which discloses DGPS, *see, e.g.*, Eschenbach at 2:5-19)

- Poulin in view of Friedman and Callegari

- Cockburn (or TELEFREEK) in view of Abowd (or Cyberguide), Baker, Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Locatio, NavTalk, MPS, Benefon, TravTek, SignalSoft, and/or Dunko

- Parekh in view of Abowd (or Cyberguide), Baker, Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Locatio, NavTalk, MPS, Benefon, TravTek, SignalSoft, and/or Dunko

- FriendZone in view of Abowd (or Cyberguide), Baker, Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Locatio, NavTalk, MPS, Benefon, TravTek, SignalSoft, and/or Dunko

- PARC in view of Abowd (or Cyberguide), Baker, Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Locatio, NavTalk, MPS, Benefon, TravTek, SignalSoft, and/or Dunko

d. Independent Claim 39 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Enzmann in view of Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Rouhollahzadeh, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Rouhollahzadeh, Callegari, De Vries, Friedman, Dunko, , Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Callegari in view of Friedman, O'Neil, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Poulin in view of Friedman, Callegari, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft.

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Godefroid in view of Parekh

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, TravTek, FriendZone, PARC, and/or SignalSoft

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, and/or SignalSoft

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, PARC, and/or SignalSoft

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, and/or SignalSoft

- SignalSoft Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, and/or PARC

e. Claim 43 Exemplary Combinations

Claim 43 depends on Claim 39. The same exemplary combinations listed above for Claim 39 apply to Claim 43. Additional exemplary combinations for Claim 43 are listed below:

- Callegari in view of Friedman
- Poulin in view of Friedman and, Callegari
- Abowd (or CyberGuide) in view of Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, SignalSoft, and/or MPS
- Enzmann in view of Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, SignalSoft, and/or MPS
- Baker in view of view of Fernandez, Godefroid, Friedman, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS
- Cockburn (or TELEFREEK) in view of Fernandez, Friedman, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS
- Godefroid in view of Fernandez, O'Neil, Spreitzer, Friedman, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS
- Locatio in view of Fernandez, Godefroid, O'Neil, Friedman, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS
- NavTalk in view of Fernandez, Godefroid, O'Neil, Friedman, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS
- MPS in view of Fernandez, Godefroid, O'Neil, Friedman, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, TravTek, SignalSoft, and/or De Vries
- Dunkon view of Fernandez, Godefroid, O'Neil, Friedman, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, and/or MPS
- Spreitzer in view of Rouhollahzadeh, Friedman, TravTek, and/or SignalSoft,
- Benefon in view of Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, SignalSoft, and/or MPS
- TravTek in view of Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, SignalSoft, and/or MPS
- FriendZone in view of Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, SignalSoft, and/or MPS

- PARC in view of Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, SignalSoft, and/or MPS
- SignalSoft in view of Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, TravTek, and/or MPS

f. Claim 44 Exemplary Combinations

Claim 44 depends on Claims 39 and 43. The same exemplary combinations listed above for Claims 39 and 43 apply to Claim 44. Additional exemplary combinations for Claim 44 are listed below:

- Callegari in view of Friedman, O'Neil, TravTek, and/or SignalSoft
- Friedman in view of Callegari, O'Neil, TravTek, and/or SignalSoft
- Poulin in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- Abowd (or Cyberguide) in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- Enzmann in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- Baker in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- Cockburn (or TELEFREEK) in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- Fernandez in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- Godefroid in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- O'Neil in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- Spreitzer in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- Parekh in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- Rouhollahzadeh in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- De Vries in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- Locatio in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- NavTalk in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- MPS in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft

- Dunko in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- Benefon in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- TravTek in view of Friedman, Callegari, O'Neil, and/or SignalSoft
- FriendZone in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- PARC in view of Friedman, Callegari, O'Neil, TravTek, and/or SignalSoft
- SignalSoft in view of Friedman, Callegari, O'Neil, and/or TravTek

g. Independent Claim 45 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Enzmann in view of Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Rouhollahzadeh, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Rouhollahzadeh, Callegari, De Vries, Friedman, Dunko, , Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Callegari in view of Friedman, O'Neil, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Poulin in view of Friedman, Callegari, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft
- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft.

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Godefroid in view of Parekh

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, TravTek, FriendZone, PARC, and/or SignalSoft

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, and/or SignalSoft

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, PARC, and/or SignalSoft

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, and/or SignalSoft

- SignalSoft Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, and/or PARC

h. Independent Claim 46 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Enzmann in view of Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Rouhollahzadeh, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Rouhollahzadeh, Callegari, De Vries, Friedman, Dunko, , Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Callegari in view of Friedman, O'Neil, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Poulin in view of Friedman, Callegari, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft.

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Godefroid in view of Parekh

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, TravTek, FriendZone, PARC, and/or SignalSoft

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, and/or SignalSoft

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, PARC, and/or SignalSoft

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, and/or SignalSoft

- SignalSoft Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, and/or PARC

i. Independent Claim 47 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), O'Neil, Enzmann, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Enzmann in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Friedman, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Callegari in view of Friedman, O'Neil, Friedman, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Poulin in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Friedman, O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Rouhollahzadeh in view of Abowd (or Cyberguide), Baker, Friedman, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Friedman, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or Locatio

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

j. Independent Claim 48 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), O'Neil, Enzmann, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Enzmann in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Friedman, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Callegari in view of Friedman, O'Neil, Friedman, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Poulin in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Friedman, O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Rouhollahzadeh in view of Abowd (or Cyberguide), Baker, Friedman, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Friedman, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or Locatio

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

k. Independent Claim 49 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), O'Neil, Enzmann, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Enzmann in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Friedman, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Callegari in view of Friedman, O'Neil, Friedman, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Poulin in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Friedman, O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Rouhollahzadeh in view of Abowd (or Cyberguide), Baker, Friedman, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Friedman, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or Locatio

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

l. Independent Claim 51 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Enzmann in view of Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Rouhollahzadeh, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Rouhollahzadeh, Callegari, De Vries, Friedman, Dunko, , Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Callegari in view of Friedman, O'Neil, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Poulin in view of Friedman, Callegari, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft.

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, PARC, and/or SignalSoft

- Godefroid in view of Parekh

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, TravTek, FriendZone, PARC, and/or SignalSoft

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, and/or SignalSoft

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, PARC, and/or SignalSoft

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, and/or SignalSoft

- SignalSoft Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Dunko, Benefon, TravTek, FriendZone, and/or PARC

m. Independent Claim 54 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), O'Neil, Enzmann, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Enzmann in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Friedman, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Callegari in view of Friedman, O'Neil, Friedman, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Poulin in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Friedman, O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Rouhollahzadeh in view of Abowd (or Cyberguide), Baker, Friedman, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Friedman, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or Locatio

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

n. Independent Claim 56 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), O'Neil, Enzmann, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Enzmann in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Friedman, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Callegari in view of Friedman, O'Neil, Friedman, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Poulin in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Friedman, O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Rouhollahzadeh in view of Abowd (or Cyberguide), Baker, Friedman, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Friedman, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or Locatio

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

o. Independent Claim 72 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), O'Neil, Enzmann, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Enzmann in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Friedman, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Callegari in view of Friedman, O'Neil, Friedman, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Poulin in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Friedman, O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Rouhollahzadeh in view of Abowd (or Cyberguide), Baker, Friedman, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Friedman, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or Locatio

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

p. Independent Claim 73 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), O'Neil, Enzmann, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Enzmann in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Friedman, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Callegari in view of Friedman, O'Neil, Friedman, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Poulin in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Friedman, O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Rouhollahzadeh in view of Abowd (or Cyberguide), Baker, Friedman, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Friedman, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or Locatio

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

q. Independent Claim 75 Exemplary Combinations

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), O'Neil, Enzmann, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Enzmann in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Friedman, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- O'Neil in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Friedman, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Parekh in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Callegari in view of Friedman, O'Neil, Friedman, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Friedman in view of Callegari, De Vries, Baker, Godefroid, Spreitzer, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Poulin in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Friedman, O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Rouhollahzadeh in view of Abowd (or Cyberguide), Baker, Friedman, Cockburn (or TELEFREEK), O'Neil, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Dunko in view Friedman, Callegari, Abowd (or Cyberguide), Friedman, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spretizer, Rouhollahzadeh, De Vries, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Cockburn (or TELEFREEK) in view of De Vries, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or Locatio

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), O'Neil, Friedman, Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

B. '704 Patent

1. Prior Art Publications

The following patents and publications are prior art to the '704 Asserted Claims under at least 35 U.S.C. §§ 102(a), (b), (e), and/or (g), and/or § 103. Invalidity claim charts for these references are attached as Exhibits C1 through C14.

1. U.S. Patent Pub. No. 2003/0055983 ("Callegari"). *See* Ex. C1.
2. U.S. Patent Pub. No. 2002/0115453 ("Poulin"). *See* Ex. C2.
3. U.S. Patent No. 6,968,179 ("De Vries"). *See* Ex. C3.
4. U.S. Patent No. 6,714,791 ("Friedman"). *See* Ex. C4.
5. U.S. Patent No. 6,553,236 ("Dunko"). *See* Ex. C5.
6. U.S. Patent Pub. No. 2001/0048449 ("Baker I"). *See* Ex. C6.
7. U.S. Patent Pub. No. 2002/0107027 ("O'Neil"). *See* Ex. C7.
8. U.S. Patent No. 6,757,740 ("Parekh"). *See* Ex. C8.
9. U.S. Patetn No. 6,208,866 ("Rouhollahzadeh"). *See* Ex. C9.
10. U.S. Patent No. 7,769,620 ("Fernandez"). *See* Ex. C10.
11. Cyberguide: A Mobile Context-Aware Tour Guide by Abowd et al. ("Abowd"), published in 1997. *See* Ex. C11.
12. Making Contact: Getting the Group Communicating with Groupware by Cockburn et al. ("Cockburn"), published in 1993. *See* Ex. C12.
13. Ensuring Privacy in Presence Awareness Systems: An Automated Verification Approach by Godefroid et al. ("Godefroid"), published in 2000. *See* Ex. C13.
14. Architectural Considerations for Scalable, Secure, Mobile Computing with Location Information by Spreitzer et al. ("Spreitzer"), published in 1994. *See* Ex. C14.
15. U.S. Patent No. 7,130,630 ("Enzmann"). *See* Ex. C15.

Defendants additionally identify and rely on patent or publication references that describe or are otherwise related to the prior art systems identified below. Defendants' investigation into prior art patent and publication references remains ongoing, and Defendants reserve the right to

identify and rely on additional patent or publication references that are identified through further investigation or discovery. To the extent any Defendant had knowledge of a prior art reference that was not disclosed in these contentions, such knowledge is not attributed to other Defendants. Defendants reserve the right to supplement as further prior art is identified through investigation or discovery.

2. Prior Art Systems

The following systems are prior art to the '704 Asserted Claims under at least 35 U.S.C. §§ 102(a), (b) and/or (g). Invalidity claim charts for these references are attached as Exhibits D1 through D14, C11, and C12.

1. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Benefon Esc! System ("Benefon"). Benefon qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of Benefon, as compared to the limitations of the '704 Asserted Claims, is provided in Exhibit D1. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

2. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Travel Technoogy System ("TravTek"). TravTek qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of TravTek, as compared to the limitations of the '704 Asserted Claims, is provided in Exhibit D2. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

3. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the FriendZone System ("FriendZone"). FriendZone qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without

being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of FriendZone, as compared to the limitations of the '704 Asserted Claims, is provided in Exhibit D3. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

4. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Palo Alto Research Center System ("PARC"). PARC qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of PARC, as compared to the limitations of the '704 Asserted Claims, is provided in Exhibit D4. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

5. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the SignalSoft System ("SignalSoft"). SignalSoft qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of SignalSoft, as compared to the limitations of the '704 Asserted Claims, is provided in Exhibit D5. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

6. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Seiko Epson Locatio PDA System ("Locatio"). Locatio qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of Locatio, as compared to the limitations of the '704 Asserted Claims, is provided in Exhibit D6. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

7. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Ericsson Mobile Positioning System ("MPS"). MPS qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced

to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of MPS, as compared to the limitations of the '704 Asserted Claims, is provided in Exhibit D7. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

8. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Garmin NavTalk Cellular Phone/GPS Receiver System ("NavTalk"). NavTalk qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of NavTalk, as compared to the limitations of the '704 Asserted Claims, is provided in Exhibit D8. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

9. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the CyberGuide System ("CyberGuide"). CyberGuide qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of CyberGuide, as compared to the limitations of the '704 Asserted Claims, is provided in Exhibit C11 (same chart as Abowd, above). Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

10. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the TELEFREEK System ("TELEFREEK"). TELEFREEK qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of TELEFREEK, as compared to the limitations of the '704 Asserted Claims, is provided in Exhibit C12 (same chart as Cockburn, above). Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

Defendants' investigation into prior art systems remains ongoing and Defendants reserve the right to identify and rely on systems that represent different versions or are otherwise related variations of the systems identified above.

3. Obviousness

Below is a listing of exemplary combinations of references that would render obvious the '704 Asserted Claims. In addition to the exemplary combinations of references below, the combination of (1) any of the references listed in Section IV.B.1-IV.B.2 with the knowledge of one of ordinary skill or (2) any of the exemplary combinations listed below with the knowledge of ordinary skill would render obvious the '704 Asserted Claims.

These identified combinations are exemplary, and Defendants reserve the right to identify additional combinations in their final invalidity contentions, during expert discovery, and in later stages of the case.

a. Independent Claim 33 Exemplary Combinations

- Abowd (or CyberGuide) in view of Eschenbach,[2] Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Enzmann in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- O'Neil in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

[2] U.S. Patent No. 6,373,429 ("Eschenbach" was filed on July 27, 1999 and issued on April 16, 2002, and qualifies as prior art against the '704 Patent under at least pre-AIA 35 U.S.C. § 102(e). Eschenbach discloses a "detection network directory" as required by the asserted independent claims of the '704 Patent. *See, e.g.*, Eschenbach at Abstract, 5:19-35, Fig. 2A, Fig. 3C

- Parekh in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Callegari in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Poulin in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- De Vries in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Benefon in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- TravTek in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- FriendZone in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- PARC in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, SignalSoft, NavTalk, Locatio, and/or MPS

- SignalSoft in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, NavTalk, Locatio, and/or MPS

- Locatio in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh,

Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, and/or MPS

- MPS in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, and/or Locatio

- NavTalk in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, Locatio, and/or MPS

b. Claim 34 Exemplary Combinations

Claim 34 depends on Claim 33. The same exemplary combinations listed above for Claim 33 apply to Claim 34.

c. Claim 35 Exemplary Combinations

Claim 35 depends on Claim 33. The same exemplary combinations listed above for Claim 33 apply to Claim 35.

d. Claim 36 Exemplary Combinations

Claim 36 depends on Claim 33. The same exemplary combinations listed above for Claim 33 apply to Claim 36.

e. Claim 37 Exemplary Combinations

Claim 37 depends on Claim 33. The same exemplary combinations listed above for Claim 33 apply to Claim 37.

f. Claim 38 Exemplary Combinations

Claim 38 depends on Claim 33. The same exemplary combinations listed above for Claim 33 apply to Claim 38. Additional exemplary combinations for Claim 39 are listed below:

- Dunko in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, Locatio, MPS, and/or NavTalk

g. Claim 39 Exemplary Combinations

Claim 39 depends on Claim 33. The same exemplary combinations listed above for Claim 33 apply to Claim 39. Additional exemplary combinations for Claim 39 are listed below:

- O'Neil in light of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- Parekh in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- Rouhollahzadeh in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- Poulin in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- De Vries in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- Benefon in light of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- TravTek in light of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- PARC in light of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- SignalSoft in light of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- Locatio in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, NavTalk, Dunko, FriendZone, and/or Friedman

- NavTalk in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, Dunko, FriendZone, and/or Friedman

- MPS in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

h. Claim 40 Exemplary Combinations

Claim 40 depends on Claim 33. The same exemplary combinations listed above for Claim 33 apply to Claim 40. Additional exemplary combinations for Claim 40 are listed below:

- O'Neil in light of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- Parekh in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- Rouhollahzadeh in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- Poulin in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- De Vries in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- Benefon in light of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- TravTek in light of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- PARC in light of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- SignalSoft in light of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

- Locatio in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, NavTalk, Dunko, FriendZone, and/or Friedman

- NavTalk in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, Dunko, FriendZone, and/or Friedman

- MPS in light of O'Neil, Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Callegari, De Vries, Locatio, NavTalk, Dunko, FriendZone, and/or Friedman

i. Claim 45 Exemplary Combinations

Claim 45 depends on Claim 33. The same exemplary combinations listed above for Claim 33 apply to Claim 45. Additional exemplary combinations for Claim 45 are listed below:

- Abowd (or Cyberguide) in light of Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Benefon, TravTek, SignalSoft, MPS, and/or Friedman.

- Baker in light of Abowd (or Cyberguide), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Benefon, TravTek, SignalSoft, MPS, and/or Friedman

- Cockburn in light of Abowd (or Cyberguide), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Benefon, TravTek, SignalSoft, MPS, and/or Friedman

- Godefroid in light of Abowd (or Cyberguide), Enzmann, Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Benefon, TravTek, SignalSoft, MPS, and/or Friedman

- Dunko in light of Abowd (or Cyberguide), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Benefon, TravTek, SignalSoft, MPS, and/or Friedman

- Benefon in light of Abowd (or Cyberguide), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, TravTek, SignalSoft, MPS, and/or Friedman

- TravTek in light of Abowd (or Cyberguide), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Benefon, SignalSoft, MPS, and/or Friedman

- FriendZone in light of Abowd (or Cyberguide), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Benefon, TravTek, SignalSoft, MPS, and/or Friedman

- PARC in light of Abowd (or Cyberguide), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Benefon, TravTek, SignalSoft, MPS, and/or Friedman

- Locatio in light of Abowd (or Cyberguide), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Benefon, TravTek, SignalSoft, MPS, and/or Friedman

- NavTalk in light of Abowd (or Cyberguide), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Benefon, TravTek, SignalSoft, MPS, and/or Friedman

- MPS in light of Abowd (or Cyberguide), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Benefon, TravTek, SignalSoft, and/or Friedman

j. Independent Claim 46 Exemplary Combinations

- Abowd (or CyberGuide) in view of Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Enzmann in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- O'Neil in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Parekh in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Callegari in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Poulin in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- De Vries in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Benefon in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- TravTek in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- FriendZone in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- PARC in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, SignalSoft, NavTalk, Locatio, and/or MPS

- SignalSoft in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, NavTalk, Locatio, and/or MPS

- Locatio in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, and/or MPS

- MPS in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari,

Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, and/or Locatio

- NavTalk in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, Locatio, and/or MPS

k. Claim 47 Exemplary Combinations

Claim 47 depends on Claim 46. The same exemplary combinations listed above for Claim 46 apply to Claim 47.

l. Independent Claim 48 Exemplary Combinations

- Abowd (or CyberGuide) in view of Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Enzmann in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- O'Neil in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Parekh in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Callegari in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Poulin in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- De Vries in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- Benefon in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, TravTek, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- TravTek in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- FriendZone in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, PARC, SignalSoft, NavTalk, Locatio, and/or MPS

- PARC in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, SignalSoft, NavTalk, Locatio, and/or MPS

- SignalSoft in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, NavTalk, Locatio, and/or MPS

- Locatio in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, and/or MPS

- MPS in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, NavTalk, and/or Locatio

- NavTalk in view of Abowd (or CyberGuide), Eschenbach, Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Friedman, Benefon, TravTek, FriendZone, PARC, SignalSoft, Locatio, and/or MPS

C. ’450 Patent

1. Prior Art Publications

The following patents and publications are prior art to the ’450 Asserted Claims under at least 35 U.S.C. §§ 102(a), (b), (e), and/or (g), and/or § 103. Invalidity claim charts for these references are attached as Exhibits E1 through E14.

1. U.S. Patent Pub. No. 2003/0055983 (“Callegari”). *See* Ex. E1.
2. U.S. Patent Pub. No. 2002/0115453 (“Poulin”). *See* Ex. E2.
3. U.S. Patent No. 6,968,179 (“De Vries”). *See* Ex. E3.
4. U.S. Patent No. 6,714,791 (“Friedman”). *See* Ex. E4.
5. U.S. Patent No. 6,553,236 (“Dunko”). *See* Ex. E5.
6. U.S. Patent Pub. No. 2001/0048449 (“Baker I”). *See* Ex. E6.
7. U.S. Patent Pub. No. 2002/0107027 (“O’Neil”). *See* Ex. E7.
8. U.S. Patent No. 6,757,740 (“Parekh”). *See* Ex. E8.
9. U.S. Patetn No. 6,208,866 (“Rouhollahzadeh”). *See* Ex. E9.
10. U.S. Patent No. 7,769,620 (“Fernandez”). *See* Ex. E10.
11. Cyberguide: A Mobile Context-Aware Tour Guide by Abowd et al. (“Abowd”), published in 1997. *See* Ex. E11.
12. Making Contact: Getting the Group Communicating with Groupware by Cockburn et al. (“Cockburn”), published in 1993. *See* Ex. E12.
13. Ensuring Privacy in Presence Awareness Systems: An Automated Verification Approach by Godefroid et al. (“Godefroid”), published in 2000. *See* Ex. E13.
14. Architectural Considerations for Scalable, Secure, Mobile Computing with Location Information by Spreitzer et al. (“Spreitzer”), published in 1994. *See* Ex. E14.
15. U.S. Patent No. 7,130,630 (“Enzmann”). *See* Ex. E15.

Defendants additionally identify and rely on patent or publication references that describe or are otherwise related to the prior art systems identified below. Defendants’ investigation into prior art patent and publication references remains ongoing, and Defendants reserve the right to

identify and rely on additional patent or publication references that are identified through further investigation or discovery. To the extent any Defendant had knowledge of a prior art reference that was not disclosed in these contentions, such knowledge is not attributed to other Defendants. Defendants reserve the right to supplement as further prior art is identified through investigation or discovery.

2. Prior Art Systems

The following systems are prior art to the '450 Asserted Claims under at least 35 U.S.C. §§ 102(a), (b) and/or (g). Invalidity claim charts for these references are attached as Exhibits F1 through F8, E11, and E12.

1. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Benefon Esc! System ("Benefon"). Benefon qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of Benefon, as compared to the limitations of the '450 Asserted Claims, is provided in Exhibit F1. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

2. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Travel Technoogy System ("TravTek"). TravTek qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of TravTek, as compared to the limitations of the '450 Asserted Claims, is provided in Exhibit F2. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

3. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the FriendZone System ("FriendZone"). FriendZone qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without

being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of FriendZone, as compared to the limitations of the '450 Asserted Claims, is provided in Exhibit F3. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

4. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Palo Alto Research Center System ("PARC"). PARC qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of PARC, as compared to the limitations of the '450 Asserted Claims, is provided in Exhibit F4. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

5. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the SignalSoft System ("SignalSoft"). SignalSoft qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of SignalSoft, as compared to the limitations of the '450 Asserted Claims, is provided in Exhibit F5. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

6. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Seiko Epson Locatio PDA System ("Locatio"). Locatio qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of Locatio, as compared to the limitations of the '450 Asserted Claims, is provided in Exhibit F6. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

7. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Ericsson Mobile Positioning System ("MPS"). MPS qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced

to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of MPS, as compared to the limitations of the '450 Asserted Claims, is provided in Exhibit F7. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

8. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Garmin NavTalk Cellular Phone/GPS Receiver System ("NavTalk"). NavTalk qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of NavTalk, as compared to the limitations of the '450 Asserted Claims, is provided in Exhibit F8. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

9. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the CyberGuide System ("CyberGuide"). CyberGuide qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of CyberGuide, as compared to the limitations of the '450 Asserted Claims, is provided in Exhibit E11 (same chart as Abowd, above). Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

10. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the TELEFREEK System ("TELEFREEK"). TELEFREEK qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of TELEFREEK, as compared to the limitations of the '450 Asserted Claims, is provided in Exhibit E12 (same chart as Cockburn, above). Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

Defendants' investigation into prior art systems remains ongoing and Defendants reserve the right to identify and rely on systems that represent different versions or are otherwise related variations of the systems identified above.

3. Obviousness

Below is a listing of exemplary combinations of references that would render obvious the '450 Asserted Claims. In addition to the exemplary combinations of references below, the combination of (1) any of the references listed in Section IV.C.1-IV.C.2 with the knowledge of one of ordinary skill or (2) any of the exemplary combinations listed below with the knowledge of ordinary skill would render obvious the '450 Asserted Claims.

These identified combinations are exemplary, and Defendants reserve the right to identify additional combinations in their final invalidity contentions, during expert discovery, and in later stages of the case.

a. Independent Claim 67 Exemplary Combinations

- De Vries in view of Friedman, Callegari, Dunko, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, and/or NavTalk
- Baker in view of Godefroid, Spreitzer, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, and/or NavTalk
- Abowd (or Cyberguide) in view of Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk, and/or Friedman
- Cockburn (or TELEFREEK) in view of Baker, Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk, and/or Friedman
- Enzmann in view of Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, De Vries, Dunko, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk, and/or Friedman
- Godefroid in view of Baker, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk, and/or Spreitzer

- O'Neil in view of Baker, Cockburn (or TELEFREEK), Fernandez, Enzmann, Godefroid, Spreitzer, Poulin, Friedman, Abowd (or CyberGuide), Baker, Rouhollahzadeh, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk, and/or Callegari

- Spreitzer in view of Baker, Cockburn (or TELEFREEK), Fernandez, Enzmann, Godefroid, Poulin, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk, and/or Friedman

- Parekh in view of Baker, Cockburn (or TELEFREEK), Fernandez, Enzmann, Godefroid, Spreitzer, Poulin, Friedman, Abowd (or CyberGuide), Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk, and/or Rouhollazadeh

- Rouhollazadeh in view of Baker, Cockburn (or TELEFREEK), Fernandez, Enzmann, Godefroid, Spreitzer, Poulin, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk, and/or Friedman

- Callegari in view of Baker, of Cockburn (or TELEFREEK), Fernandez, Godefroid, Enzmann, Spreitzer, Poulin, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk, and/or Friedman

- Poulin in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, Spreitzer, Rouhallazadeh, Callegari, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk and/or Friedman

- Friedman in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Enzmann, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhallazadeh, Callegari, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk and/or Poulin

- Dunko in view of Baker, of Cockburn (or TELEFREEK), Fernandez, Enzmann, Godefroid, Spreitzer, Poulin, Benefon, FriendZone, SignalSoft, Locatio, MPS, PARC, NavTalk and/or Friedman

- Benefon in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Friedman, Dunko, Enzmann, FriendZone, PARC, SignalSoft, Locatio, MPS, and/or NavTalk

- TravTek in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Friedman, Dunko, Enzmann, Benefon, FriendZone, PARC, SignalSoft, Locatio, MPS, and/or NavTalk

- FriendZone in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Friedman, Dunko, Enzmann, Benefon, PARC, SignalSoft, Locatio, MPS, and/or NavTalk

- PARC in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Friedman, Dunko, Enzmann, Benefon, FriendZone, SignalSoft, Locatio, MPS, and/or NavTalk

- SignalSoft in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Friedman, Dunko, Enzmann, Benefon, FriendZone, PARC, Locatio, MPS, and/or NavTalk

- Locatio in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Friedman, Dunko, Enzmann, Benefon, FriendZone, PARC, SignalSoft, MPS, and/or NavTalk

- MPS in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Friedman, Dunko, Enzmann, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- NavTalk in view of Abowd (or Cyberguide), Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Poulin, Friedman, Dunko, Enzmann, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or MPS

b. Claim 74 Exemplary Combinations

Claim 74 depends on Claim 67. The same exemplary combinations listed above for Claim 67 apply to Claim 74. Additional exemplary combinations for Claim 74 are listed below:

- De Vries in view of Friedman, Callegari, Dunko, and/or Enzmann

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Godefroid, Enzmann, O'Neil, Spretizer, Parekh, FriendZone, TravTek, and/or Friedman

- Enzmann in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spretizer, Parekh, FriendZone, TravTek, and/or Friedman

- Baker in view of Godefroid, Spreitzer, FriendZone, TravTek, and/or Enzmann

- Cockburn (or TELEFREEK) in view of Baker, Godefroid, O'Neil, Spreitzer, Parekh, Friedman, FriendZone, TravTek, and/or Enzmann.

- Godefroid in view of Baker, Spreitzer, FriendZone, TravTek, and/or Enzmann

- O'Neil in view of Baker, Cockburn (or TELEFREEK), Godefroid, Spretzer, Parekh, Friedman, FriendZone, TravTek, and/or Enzmann.

- Spreitzer in view of Baker, Godefroid, FriendZone, TravTek, and/or Enzmann

- Parekh in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- Rouhollazadeh in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, Friedman, FriendZone, TravTek, and/or Enzmann.

- Callegari in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, Friedman, FriendZone, TravTek, and/or Enzmann.

- Poulin in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, Friedman, FriendZone, TravTek, and/or Enzmann.

- Friedman in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, FriendZone, TravTek, and/or Enzmann

- Benefon in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- TravTek in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, and/or Enzmann

- FriendZone in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, TravTek, and/or Enzmann

- PARC in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- SignalSoft in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- Locatio in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- MPS in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- NavTalk in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

c. Claim 75 Exemplary Combinations

Claim 75 depends on Claims 67 and 74. The same exemplary combinations listed above for Claims 67 and 74 apply to Claim 75. Additional exemplary combinations for Claim 75 are listed below:

- De Vries in view of Friedman, Callegari, and/or Enzmann

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Godefroid, Enzmann, O'Neil, Spretizer, Parekh, FriendZone, TravTek, and/or Friedman

- Enzmann in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spretizer, Parekh, FriendZone, TravTek, and/or Friedman

- Baker in view of Godefroid, Spreitzer, FriendZone, TravTek, and/or Enzmann

- Cockburn (or TELEFREEK) in view of Baker, Godefroid, O'Neil, Spreitzer, Parekh, Friedman, FriendZone, TravTek, and/or Enzmann.

- Godefroid in view of Baker, Spreitzer, FriendZone, TravTek, and/or Enzmann

- O'Neil in view of Baker, Cockburn (or TELEFREEK), Godefroid, Spretzer, Parekh, Friedman, FriendZone, TravTek, and/or Enzmann.

- Spreitzer in view of Baker, Godefroid, FriendZone, TravTek, and/or Enzmann

- Parekh in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- Rouhollazadeh in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, Friedman, FriendZone, TravTek, and/or Enzmann.

- Callegari in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, Friedman, FriendZone, TravTek, and/or Enzmann.

- Poulin in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, Friedman, FriendZone, TravTek, and/or Enzmann.

- Friedman in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, FriendZone, TravTek, and/or Enzmann

- Benefon in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- TravTek in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, and/or Enzmann

- FriendZone in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, TravTek, and/or Enzmann

- PARC in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- SignalSoft in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- Locatio in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- MPS in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

- NavTalk in view of Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Friedman, FriendZone, TravTek, and/or Enzmann

d. Claim 76 Exemplary Combinations

Claim 76 depends on Claims 67. The same exemplary combinations listed above for Claims 67 apply to Claim 76. Additional exemplary combinations for Claim 76 are listed below

- De Vries in view of Friedman, Callegari, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Dunko

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Enzmann in view of Baker, Godefroid, Spreitzer, Callegari, Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Enzmann, Parekh, Callegari, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Baker in view of Godefroid, Spreitzer, Callegari, Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Enzmann, Parekh, Callegari, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Cockburn (or TELEFREEK) in view of Abowd (or CyberGuide), Baker, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Fernandez in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- O'Neil in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Spreitzer in view of Baker, Godefroid, Enzmann, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Callegari

- Parekh in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Rouhollazadeh in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Callegari in view of Baker, Godefroid, Enzmann, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Spreitzer

- Poulin in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Friedman in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Poulin

- Benefon in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, Locatio, and/or NavTalk

- Locatio in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- MPS in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- NavTalk in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman,

Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or Locatio

e. Claim 83 Exemplary Combinations

Claim 83 depends on Claim 67. The same exemplary combinations listed above for Claim 67 apply to Claim 83. Additional exemplary combinations for Claim 83 are listed below:

- De Vries in view of Friedman, Callegari, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Dunko
- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Dunko, and/or Friedman
- Enzmann in view of Baker, Godefroid, Spreitzer, Callegari, Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Enzmann, Parekh, Callegari, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- Baker in view of Godefroid, Spreitzer, Callegari, Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Enzmann, Parekh, Callegari, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- Cockburn (or TELEFREEK) in view of Abowd (or CyberGuide), Baker, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- Fernandez in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- O'Neil in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- Spreitzer in view of Baker, Godefroid, Enzmann, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Callegari
- Parekh in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- Rouhollazadeh in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Callegari in view of De Vries, Baker, Godefroid, Enzmann, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Spreitzer

- Dunko in view of De Vries, Baker, Godefroid, Enzmann, Dunko, Friedman, Callegari, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Spreitzer

- Poulin in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Friedman in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Poulin

- Benefon in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, Locatio, and/or NavTalk

- Locatio in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- MPS in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- NavTalk in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or Locatio

f. Claim 84 Exemplary Combinations

Claim 84 depends on Claim 67. The same exemplary combinations listed above for Claim 67 apply to Claim 84. Additional exemplary combinations for Claim 84 are listed below:

- De Vries in view of Friedman, Callegari, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Dunko
- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Dunko, and/or Friedman
- Enzmann in view of Baker, Godefroid, Spreitzer, Callegari, Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Enzmann, Parekh, Callegari, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- Baker in view of Godefroid, Spreitzer, Callegari, Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Enzmann, Parekh, Callegari, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- Cockburn (or TELEFREEK) in view of Abowd (or CyberGuide), Baker, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- Fernandez in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- O'Neil in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- Spreitzer in view of Baker, Godefroid, Enzmann, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Callegari
- Parekh in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- Rouhollazadeh in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman
- Callegari in view of De Vries, Baker, Godefroid, Enzmann, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Spreitzer

- Dunko in view of De Vries, Baker, Godefroid, Enzmann, Dunko, Friedman, Callegari, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Spreitzer

- Poulin in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Friedman in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Poulin

- Benefon in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, Locatio, and/or NavTalk

- Locatio in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- MPS in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

g. Claim 93 Exemplary Combinations

Claim 93 depends on Claim 67. The same exemplary combinations listed above for Claim 67 apply to Claim 93. Additional exemplary combinations for Claim 93 are listed below:

- De Vries in view of Friedman, Callegari, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Dunko

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Dunko, and/or Friedman

- Enzmann in view of Baker, Godefroid, Spreitzer, Callegari, Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Enzmann, Parekh, Callegari, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Baker in view of Godefroid, Spreitzer, Callegari, Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Enzmann, Parekh, Callegari, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Cockburn (or TELEFREEK) in view of Abowd (or CyberGuide), Baker, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Fernandez in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- O'Neil in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Spreitzer in view of Baker, Godefroid, Enzmann, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Callegari

- Parekh in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Callegari, Poulin, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Rouhollazadeh in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Poulin, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Callegari in view of De Vries, Baker, Godefroid, Enzmann, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Spreitzer

- Dunko in view of De Vries, Baker, Godefroid, Enzmann, Dunko, Friedman, Callegari, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Spreitzer

- Poulin in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Friedman

- Friedman in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, NavTalk, and/or Poulin

- Benefon in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, Locatio, and/or NavTalk

- Locatio in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- MPS in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

h. Claim 94 Exemplary Combinations

Claim 94 depends on Claim 67. The same exemplary combinations listed above for Claim 67 apply to Claim 94. Additional exemplary combinations for Claim 94 are listed below:

- De Vries in view of Friedman, Callegari, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Dunko, and/or Friedman

- Enzmann in view of Baker, Godefroid, Spreitzer, Callegari, Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Enzmann, Parekh,

Callegari, Poulin, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Baker in view of Godefroid, Spreitzer, Callegari, Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, Godefroid, O'Neil, Spreitzer, Enzmann, Parekh, Callegari, Poulin, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Cockburn (or TELEFREEK) in view of Abowd (or CyberGuide), Baker, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Fernandez in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- O'Neil in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, Spreitzer, Parekh, Callegari, Poulin, Enzmann, Dunko, Friedman, , Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Spreitzer in view of Baker, Godefroid, Enzmann, Friedman, Dunko, Callegari, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Parekh in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Callegari, Poulin, Enzmann, Dunko, Friedman, , Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Rouhollazadeh in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Poulin, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Callegari in view of De Vries, Baker, Godefroid, Enzmann, Dunko, Friedman, Spreitzer, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Dunko in view of De Vries, Baker, Godefroid, Enzmann, Dunko, Friedman, Callegari, Spreitzer, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Poulin in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Dunko, Friedman, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Friedman in view of Abowd (or CyberGuide), Baker, Cockburn, Fernandez, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Enzmann, Dunko, Poulin, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- Benefon in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- TravTek in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

- FriendZone in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, PARC, SignalSoft, Locatio, and/or NavTalk

- PARC in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, SignalSoft, Locatio, and/or NavTalk

- SignalSoft in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, Locatio, and/or NavTalk

- Locatio in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, and/or NavTalk

- MPS in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, Dunko, Godefroid, O'Neil, Spreitzer, Parekh, Callegari, Poulin, Friedman, Dunko, Benefon, FriendZone, PARC, SignalSoft, Locatio, and/or NavTalk

i. Claim 96 Exemplary Combinations

Claim 96 depends on Claim 67. The same exemplary combinations listed above for Claim 67 apply to Claim 96. Additional exemplary combinations for Claim 96 are listed below:

- De Vries in view of Friedman, Abowd (or Cyberguide), Baker, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Abowd (or CyberGuide) in view of Baker, Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Enzmann in view of Baker, Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Baker in view of Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Cockburn (or TELEFREEK) in view of Abowd (or CyberGuide), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Fernandez in view of Abowd (or CyberGuide), Cockburn (or TELEFREEK), O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Godefroid in view of Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- O'Neil in view of Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Spreitzer in view of Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, O'Neil, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Parekh in view of Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Rouhollahzadeh in view of Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Callegari in view of Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Poulin in view of Abowd (or CyberGuide), Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- Friedman in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, and/or Enzmann

- Benefon in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, PARC, SignalSoft, MPS, and/or NavTalk

- TravTek in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- FriendZone in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- PARC in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, SignalSoft, MPS, and/or NavTalk

- SignalSoft in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, MPS, and/or NavTalk

- Locatio in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, MPS, and/or NavTalk

- MPS in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, and/or NavTalk

- NavTalk in view of Abowd (or CyberGuide), Baker, Cockburn (or TELEFREEK), Fernandez, O'Neil, Spreitzer, Parekh, Rouhollahzadeh, Callegari, Friedman, Enzmann, Benefon, PARC, SignalSoft, and/or MPS

D. '554 Patent

1. Prior Art Publications

The following patents and publications are prior art to the '554 Asserted Claims under at least 35 U.S.C. §§ 102(a), (b), (e), and/or (g). Invalidity claim charts for these references are attached as Exhibits G1 through G9.

1. U.S. Patent Pub. No. 2009/0049051 ("Horowitz"). *See* Ex. G1.

2. U.S. Patent No. 8,156,118 ("Kalasapur"). *See* Ex. G2.

3. U.S. Patent Pub. No. 2007/0233743 ("Rosenberg"). *See* Ex. G3.

4. U.S. Patent No. 7,761,400 ("Reimer"). *See* Ex. G4.

5. U.S. Patent Pub. No. 2008/0064351 ("Landschaft"). *See* Ex. G5.

6. U.S. Patent No. 7,203,752 ("Rice"). *See* Ex. G6.

7. U.S. Patent No. 6,823,225 ("Sass"). *See* Ex. G7.

8. U.S. Patent App. Pub. No. 2003/0135493 ("Phelan"). *See* Ex. G8.

9. U.S. Patent No. 7,900,229 ("Dureau"). *See* Ex. G9.

Defendants additionally identify and rely on patent or publication references that describe or are otherwise related to the prior art systems identified below. Defendants' investigation into prior art patent and publication references remains ongoing, and Defendants reserve the right to identify and rely on additional patent or publication references that are identified through further investigation or discovery. To the extent any Defendant had knowledge of a prior art reference that was not disclosed in these contentions, such knowledge is not attributed to other Defendants. Defendants reserve the right to supplement as further prior art is identified through investigation or discovery.

2. Prior Art Systems

The following systems are prior art to the '554 Asserted Claims under at least 35 U.S.C. §§ 102(a), (b) and/or (g). Invalidity claim charts for these references are attached as Exhibits H1 through H8.

1. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Lifetrak System ("Lifetrak"). Lifetrak qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of Lifetrak, as compared to the limitations of the '554 Asserted Claims, is provided in Exhibit H1. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

2. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the GeoNotes Location-based Information System for Public Spaces ("GeoNotes"). GeoNotes qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants'

investigation progresses. The substantive disclosures of GeoNotes, as compared to the limitations of the '554 Asserted Claims, is provided in Exhibit H2. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

3. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the FolkMusic Mobile Peer-to-Peer Entertainment System ("FolkMusic"). FolkMusic qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of FolkMusic, as compared to the limitations of the '554 Asserted Claims, is provided in Exhibit H3. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

4. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Customized Internet Radio System ("Customized Internet Radio"). Customized Internet Radio qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of Customized Internet Radio, as compared to the limitations of the '554 Asserted Claims, is provided in Exhibit H4. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

5. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the CyberGuide System ("CyberGuide"). CyberGuide qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of CyberGuide, as compared to the limitations of the '554 Asserted Claims, is provided in Exhibit H5. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

6. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Palo Alto Research Center System ("PARC"). PARC qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims

without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of PARC, as compared to the limitations of the '554 Asserted Claims, is provided in Exhibit H6. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

7. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the Nokia Media Terminal System ("Nokia Media Terminal"). Nokia Media Terminal qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of Nokia Media Terminal, as compared to the limitations of the '554 Asserted Claims, is provided in Exhibit H7. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

8. Products, components, systems, and methods invented, designed, developed, reduced to practice, and/or in public use or on sale related to the SignalSoft System ("SignalSoft"). SignalSoft qualifies as prior art under § 102 because it was either (1) in public use or on sale in the United States no later than the priority date of the Asserted Claims or (2) reduced to practice in the United States no later than the priority date of the Asserted Claims without being abandoned, suppressed, or concealed. Defendants reserve the right to rely on other sources of evidence identified as discovery and Defendants' investigation progresses. The substantive disclosures of SignalSoft, as compared to the limitations of the '554 Asserted Claims, is provided in Exhibit H8. Defendants reserve the right to supplement, amend, add to, or otherwise revise this disclosure to rely on other sources of evidence identified as discovery and Defendants' investigation progresses.

Defendants' investigation into prior art systems remains ongoing and Defendants reserve the right to identify and rely on systems that represent different versions or are otherwise related variations of the systems identified above.

3. Obviousness

Below is a listing of exemplary combinations of references that would render obvious the '554 Asserted Claims. In addition to the exemplary combinations of references below, the combination of (1) any of the references listed in Section IV.D.1-IV.D.2 with the knowledge of one of ordinary skill or (2) any of the exemplary combinations listed below with the knowledge

of ordinary skill would render obvious the '554 Asserted Claims.

These identified combinations are exemplary, and Defendants reserve the right to identify additional combinations in their final invalidity contentions, during expert discovery, and in later stages of the case.

a. Independent Claim 1 Exemplary Combinations

- Horowitz in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Kalasapur in view of Horowitz, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Rosenberg in view of Horowitz, Kalasapur, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Reimer in view of Horowitz, Kalasapur, Rosenberg, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Landschaft in view of Horowitz, Kalasapur, Rosenberg, Reimer, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Rice in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Sass in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Phelan in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Dureau in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Lifetrak in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- GeoNotes in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- FolkMusic in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Customized Internet Radio in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- CyberGuide in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, PARC, Nokia Media Terminal, and/or SignalSoft

- PARC in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, Nokia Media Terminal, and/or SignalSoft

- Nokia Media Terminal in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, and/or SignalSoft

- SignalSoft in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, and/or Nokia Media Terminal

b. Claim 2 Exemplary Combinations

Claim 2 depends on Claim 1. The same exemplary combinations listed above for Claim 1 apply to Claim 2. Additional exemplary combinations for Claim 2 are listed below:

- Horowitz in view of Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, Customized Internet Radio, and/or Nokia Media Terminal

- Kalasapur in view of Horowitz, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, Customized Internet Radio, and/or Nokia Media Terminal

- Rosenberg in view of Horowitz, Kalasapur, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, Customized Internet Radio, and/or Nokia Media Terminal

- Reimer in view of Horowitz, Kalasapur, Rosenberg, Landschaft, Sass, Lifetrak, FolkMusic, Customized Internet Radio, and/or Nokia Media Terminal

- Landschaft in view of Horowitz, Kalasapur, Rosenberg, Reimer, Sass, Lifetrak, FolkMusic, Customized Internet Radio, and/or Nokia Media Terminal

- Rice in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, PARC, and/or Nokia Media Terminal

- Sass in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Lifetrak, FolkMusic, Customized Internet Radio, and/or Nokia Media Terminal

- Phelan in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, PARC, and/or Nokia Media Terminal

- Dureau in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, PARC, and/or Nokia Media Terminal

- Lifetrak in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, FolkMusic, Customized Internet Radio, and/or Nokia Media Terminal

- GeoNotes in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Dureau, Lifetrak, FolkMusic, Customized Internet Radio, PARC, Nokia and/or Media Terminal

- FolkMusic in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, Customized Internet Radio, and/or Nokia Media Terminal

- Customized Internet Radio in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Nokia Media Terminal

- CyberGuide in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, PARC, and/or Nokia Media Terminal

- PARC in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, and/or Nokia Media Terminal

- Nokia Media Terminal in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- SignalSoft in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, PARC, and/or Nokia Media Terminal

c. Claim 3 Exemplary Combinations

Claim 3 depends on Claim 1. The same exemplary combinations listed above for Claim 1 apply to Claim 3. Additional exemplary combinations for Claim 2 are listed below:

- Horowitz in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft
- Kalasapur in view of Rosenberg, Reimer, Landschaft, Rice, Dureau, Lifetrak, GeoNotes, CyberGuide, PARC, and/or SignalSoft
- Rosenberg in view of Kalasapur, Reimer, Landschaft, Rice, Dureau, Lifetrak, GeoNotes, CyberGuide, PARC, and/or SignalSoft
- Reimer in view of Kalasapur, Rosenberg, Landschaft, Rice, Dureau, Lifetrak, GeoNotes, CyberGuide, PARC, and/or SignalSoft
- Landschaft in view of Kalasapur, Rosenberg, Reimer, Rice, Dureau, Lifetrak, GeoNotes, CyberGuide, PARC, and/or SignalSoft
- Rice in view of Kalasapur, Rosenberg, Reimer, Landschaft, Dureau, Lifetrak, GeoNotes, CyberGuide, PARC, and/or SignalSoft
- Sass in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft
- Phelan in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft
- Dureau in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Lifetrak, GeoNotes, CyberGuide, PARC, and/or SignalSoft
- Lifetrak in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Dureau, GeoNotes, CyberGuide, PARC, and/or SignalSoft
- GeoNotes in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Dureau, Lifetrak, CyberGuide, PARC, and/or SignalSoft
- FolkMusic in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Customized Internet Radio in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- CyberGuide in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Dureau, Lifetrak, GeoNotes, PARC, and/or SignalSoft

- PARC in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Dureau, Lifetrak, GeoNotes, CyberGuide, and/or SignalSoft

- Nokia Media Terminal in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, and/or SignalSoft

- SignalSoft in view of Kalasapur, Rosenberg, Reimer, Landschaft, Rice, Dureau, Lifetrak, GeoNotes, CyberGuide, and/or PARC

d. Claim 4 Exemplary Combinations

Claim 4 depends on Claims 1 and 3. The same exemplary combinations listed above for Claims 1 and 3 apply to Claim 4. Additional exemplary combinations for Claim 4 are listed below:

- Horowitz in view of Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Kalasapur in view of Rosenberg, Landschaft, Lifetrak, FolkMusic, Customized Internet Radio, CyberGuide, PARC, and/or SignalSoft

- Rosenberg in view of Kalasapur, Landschaft, Lifetrak, FolkMusic, Customized Internet Radio, CyberGuide, PARC, and/or SignalSoft

- Reimer in view of Horowitz, Kalasapur, Rosenberg, Landschaft, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Landschaft in view of Kalasapur, Rosenberg, Lifetrak, FolkMusic, Customized Internet Radio, CyberGuide, PARC, and/or SignalSoft

- Rice in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Sass in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Phelan in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Dureau in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Phelan, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- Lifetrak in view of Kalasapur, Rosenberg, Landschaft, FolkMusic, Customized Internet Radio, CyberGuide, PARC, and/or SignalSoft

- GeoNotes in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Phelan, Dureau, Lifetrak, FolkMusic, Customized Internet Radio, CyberGuide, PARC, Nokia Media Terminal, and/or SignalSoft

- FolkMusic in view of Kalasapur, Rosenberg, Landschaft, Lifetrak, Customized Internet Radio, CyberGuide, PARC, and/or SignalSoft

- Customized Internet Radio in view of Kalasapur, Rosenberg, Landschaft, Lifetrak, FolkMusic, CyberGuide, PARC, and/or SignalSoft

- CyberGuide in view of Kalasapur, Rosenberg, Landschaft, Lifetrak, FolkMusic, Customized Internet Radio, PARC, and/or SignalSoft

- PARC in view of Kalasapur, Rosenberg, Landschaft, Lifetrak, FolkMusic, Customized Internet Radio, CyberGuide, and/or SignalSoft

- Nokia Media Terminal in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Phelan, Dureau, Lifetrak, GeoNotes, FolkMusic, Customized Internet Radio, CyberGuide, PARC, and/or SignalSoft

- SignalSoft in view of Kalasapur, Rosenberg, Landschaft, Lifetrak, FolkMusic, Customized Internet Radio, CyberGuide, and/or PARC

e. Claim 9 Exemplary Combinations

Claim 9 depends on Claim 1. The same exemplary combinations listed above for Claim 1 apply to Claim 9. Additional exemplary combinations for Claim 9 are listed below:

- Horowitz in view of Kalasapur, Landschaft, Dureau, and/or GeoNotes

- Kalasapur in view of Horowitz, Landschaft, Dureau, and/or GeoNotes

- Rosenberg in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Reimer in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Landschaft in view of Horowitz, Kalasapur, Dureau, and/or GeoNotes
- Rice in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Sass in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Phelan in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Dureau in view of Horowitz, Kalasapur, Landschaft, and/or GeoNotes
- Lifetrak in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- GeoNotes in view of Horowitz, Kalasapur, Landschaft, and/or Dureau
- FolkMusic in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Customized Internet Radio in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- CyberGuide in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- PARC in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Nokia Media Terminal in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- SignalSoft in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes

f. Claim 10 Exemplary Combinations

Claim 10 depends on Claims 1 and 9. The same exemplary combinations listed above for Claims 1 and 9 apply to Claim 10. Additional exemplary combinations for Claim 10 are listed below:

- Horowitz in view of Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio
- Kalasapur in view of Horowitz, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio
- Rosenberg in view of Horowitz, Kalasapur, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Reimer in view of Horowitz, Kalasapur, Rosenberg, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Landschaft in view of Horowitz, Kalasapur, Rosenberg, Reimer, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Rice in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Sass in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Phelan in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Dureau in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Lifetrak in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, FolkMusic, and/or Customized Internet Radio

- GeoNotes in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- FolkMusic in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, and/or Customized Internet Radio

- Customized Internet Radio in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, and/or FolkMusic

- CyberGuide in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- PARC in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Nokia Media Terminal in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- SignalSoft in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

g. Claim 11 Exemplary Combinations

Claim 11 depends on Claim 1. The same exemplary combinations listed above for Claim 1 apply to Claim 11. Additional exemplary combinations for Claim 11 are listed below:

- Horowitz in view of Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Kalasapur in view of Horowitz, Landschaft, Dureau, and/or GeoNotes
- Rosenberg in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Reimer in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Landschaft in view of Horowitz, Kalasapur, Dureau, and/or GeoNotes
- Rice in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Sass in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Phelan in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Dureau in view of Horowitz, Kalasapur, Landschaft, and/or GeoNotes
- Lifetrak in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- GeoNotes in view of Horowitz, Kalasapur, Landschaft, and/or Dureau
- FolkMusic in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Customized Internet Radio in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- CyberGuide in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- PARC in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- Nokia Media Terminal in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes
- SignalSoft in view of Horowitz, Kalasapur, Landschaft, Dureau, and/or GeoNotes

h. Claim 12 Exemplary Combinations

Claim 12 depends on Claims 1 and 11. The same exemplary combinations listed above for Claims 1 and 11 apply to Claim 12. Additional exemplary combinations for Claim 12 are listed below:

- Horowitz in view of Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Kalasapur in view of Horowitz, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Rosenberg in view of Horowitz, Kalasapur, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Reimer in view of Horowitz, Kalasapur, Rosenberg, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Landschaft in view of Horowitz, Kalasapur, Rosenberg, Reimer, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Rice in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Sass in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Phelan in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Dureau in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Lifetrak in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, FolkMusic, and/or Customized Internet Radio

- GeoNotes in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- FolkMusic in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, and/or Customized Internet Radio

- Customized Internet Radio in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, and/or FolkMusic

- CyberGuide in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- PARC in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- Nokia Media Terminal in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

- SignalSoft in view of Horowitz, Kalasapur, Rosenberg, Reimer, Landschaft, Sass, Lifetrak, FolkMusic, and/or Customized Internet Radio

i. Independent Claim 17 Exemplary Combinations

Claim 17 is substantively similar to claim 1. The same exemplary combinations listed above for claim 1 apply to claim 17.

j. Claim 18 Exemplary Combinations

Claim 18 is substantively similar to claim 2. The same exemplary combinations listed above for claim 2 apply to claim 18.

k. Claim 19 Exemplary Combinations

Claim 19 is substantively similar to claim 3. The same exemplary combinations listed above for claim 3 apply to claim 19.

l. Claim 20 Exemplary Combinations

Claim 20 is substantively similar to claim 4. The same exemplary combinations listed above for claim 4 apply to claim 20.

m. Claim 25 Exemplary Combinations

Claim 25 is substantively similar to claim 9. The same exemplary combinations listed above for claim 9 apply to claim 25.

n. Claim 26 Exemplary Combinations

Claim 26 is substantively similar to claim 10. The same exemplary combinations listed above for claim 10 apply to claim 26.

o. Claim 27 Exemplary Combinations

Claim 27 is substantively similar to claim 11. The same exemplary combinations listed above for claim 11 apply to claim 27.

p. Claim 28 Exemplary Combinations

Claim 28 is substantively similar to claim 12. The same exemplary combinations listed above for claim 12 apply to claim 28.

q. Independent Claim 33 Exemplary Combinations

Claim 33 is substantively similar to claim 1. The same exemplary combinations listed above for claim 1 apply to claim 33.

r. Claim 34 Exemplary Combinations

Claim 34 is substantively similar to claim 2. The same exemplary combinations listed above for claim 2 apply to claim 34.

s. Claim 35 Exemplary Combinations

Claim 35 is substantively similar to claim 3. The same exemplary combinations listed above for claim 3 apply to claim 35.

t. Claim 36 Exemplary Combinations

Claim 36 is substantively similar to claim 4. The same exemplary combinations listed above for claim 4 apply to claim 36.

u. Claim 39 Exemplary Combinations

Claim 39 is substantively similar to claim 9. The same exemplary combinations listed above for claim 9 apply to claim 39.

v. Claim 40 Exemplary Combinations

Claim 40 is substantively similar to claim 10. The same exemplary combinations listed above for claim 10 apply to claim 40.

w. Claim 41 Exemplary Combinations

Claim 41 is substantively similar to claim 11. The same exemplary combinations listed above for claim 11 apply to claim 41.

x. Claim 42 Exemplary Combinations

Claim 42 is substantively similar to claim 12. The same exemplary combinations listed above for claim 12 apply to claim 42.

E. Motivations to Combine

No showing of a specific motivation to combine prior art is required to combine the references disclosed above and in the attached charts, as each combination of art would have yielded expected results and at most would simply represent a known alternative to one of skill in the art. *See Apple Inc. v. Samsung Elecs. Co.*, 839 F.3d 1034, 1058 (Fed. Cir. 2016); *Intercontinental Great Brands LLC v. Kellogg N. Am. Co.*, 869 F.3d 1336, 1344 (Fed. Cir. 2017); *KSR Int'l Co. v. Teleflex, Inc.*, 127 S. Ct. 1727, 1739-40 (2007) (rejecting the Federal Circuit's "rigid" application of the teaching, suggestion, or motivation to combine test, and instead applying an "expansive and flexible" approach). Indeed, the Supreme Court held that a POSITA is "a person of ordinary creativity, not an automaton" and "in many cases a person of ordinary skill in the art will be able to fit the teachings of multiple patents together like pieces of a puzzle." *KSR*, 127 S.Ct. at 1742. Nevertheless, in addition to the information contained in the sections immediately above and elsewhere in these contentions, Defendants hereby identify motivations and reasons to combine.

One or more combinations of the prior art references identified above would have been obvious because these references would have been combined using: known methods to yield predictable results; known techniques in the same way; a simple substitution of one known, equivalent element for another to obtain predictable results; and/or a teaching, suggestion, or motivation in the prior art generally. *See Apple*, 839 F.3d at 1077; *Intercontinental Great Brands*, 869 F.3d at 1344. In addition, it would have been obvious to try combining the prior art references identified above because there were only a finite number of predictable solutions and/or because known work in one field of endeavor prompted variations based on predictable design incentives and/or market forces either in the same field or a different one. *See ACCO Brands Corp. v. Fellowes, Inc.*, 813 F.3d 1361, 1367 (Fed. Cir. 2016); *Sanofi-Aventis*

Deutschland GmbH v. Glenmark Pharms. Inc., USA, 748 F.3d 1354, 1360 (Fed. Cir. 2014); *Bayer Pharma AG v. Watson Labs., Inc.*, 874 F.3d 1316, 1329 (Fed. Cir. 2017); *KSR*, 127 S. Ct. at 1742. Further, the combinations of the prior art references identified above and in the claim charts would have been obvious because the combinations represent known potential options with a reasonable expectation of success. *See InTouch Techs., Inc. v. VGo Comms., Inc.*, 751 F.3d 1327, 1347 (Fed. Cir. 2014).

Additional evidence that there would have been a motivation to combine the prior art references identified above includes the interrelated teachings of multiple prior art references; the effects of demands known to the design community or present in the marketplace; the existence of a known problem for which there was an obvious solution encompassed by the Asserted Claims; the existence of a known need or problem in the field of the endeavor at the time of the alleged inventions; and the background knowledge that would have been possessed by a POSITA. *See Arctic Cat Inc. v. Bombardier Recreational Prod. Inc.*, 876 F.3d 1350, 1359 (Fed. Cir. 2017); *Intercontinental Great Brands LLC v. Kellogg N. Am. Co.*, 869 F.3d 1336, 1344 (Fed. Cir. 2017); *Unwired Planet, LLC v. Google Inc.*, 841 F.3d 995, 1003 (Fed. Cir. 2016); *Norgren Inc. v. Int'l Trade Comm'n*, 699 F.3d 1317, 1322-23 (Fed. Cir. 2012).

The motivation to combine the teachings of the prior art references disclosed herein is also found in the references themselves and in: (1) the nature of the problem being solved; (2) the express, implied and inherent teachings of the prior art; (3) the knowledge of POSITAs; (4) the predictable results obtained in combining the different elements of the prior art; (5) the predictable results obtained in simple substitution of one known element for another; (6) the use of a known technique to improve similar devices, methods, or products in the same way; (7) the predictable results obtained in applying a known technique to a known device, method, or

product ready for improvement; (8) the finite number of identified predictable solutions that had a reasonable expectation of success; and (9) known work in various technological fields that could be applied to the same or different technological fields based on design incentives or other market forces.

For example, with respect to the Reissue Patents, the following references (with exemplary citations) are in the same field of endeavor relating to mobile computing relying on a user's location:

- Abowd (or CyberGuide) at 421;
- Baker at [0020], [0027];
- Callegari at [0009], [0035];
- Cockburn (or TELEFREEK) at 36;
- Friedman at 1:47-51;
- De Vries at 4:32-44;
- Dunko at 2:10-17;
- Enzmann at 2:52-60;
- Fernandez at 1:27-38;
- Godefroid at 61;
- O'Neil at [0003];
- Parekh at 3:2-17;
- Poulin at [0005];
- Rouhollahzadeh at 2:46-67;
- Spreitzer at 29;
- Benefon (Brochure) at 2;
- TravTek (Architecture Evaluation) at 12;
- FriendZone (Burak) at 1;
- PARC (Want) at 68;
- SignalSoft (Location Manager) at 1;
- Locatio (Trimble) at 1;
- NavTalk at 53, 59;
- MPS 1998 Release.

See, e.g., Abowd (or CyberGuide) at 421 ("In this paper, we present the Cyberguide project, a series of prototypes of a mobile, hand-held context-aware tour guide. Initially, we are concerned with only a small part of the user's context, specifically location and orientation."); Dunko at 2:10-14 ("When a first member in the affinity group wishes to know the location of a remote

member of the affinity group, the first member instructs his or her mobile terminal to inquire as to the present location of the remote member."); Friedman at 12:60-65 ("Referring to FIG. 10, in one embodiment of the invention, a location tracking module 1010 executed on the portal server 110 will monitor the location of each portal device/user 1050-1052 on the system and transmit the portal device/user location 1020-1022. respectively, in response to certain Specified events."); Poulin at [0005] ("Another object of the present invention is to provide business, entertainment, and meeting Services based on the location of wireless devices relative to one or more of a plurality of pre-defined service areas."); Spreitzer at 29 ("To take full advantage of the promise of mobile/ubiquitous computing requires the availability and use of location information about the various physical objects and persons in an environment."); Benefon (Brochure) at 2 ("Benefon Esc! is equipped with a Global Positioning System (GPS) navigator and maps, which can be used in the mountains, on the sea, or in the city."); TravTek (Architecture Evaluation) at 12 ("A cellular telephone and data radio provided voice and data communications, and a GPS receiver provided vehicle position inputs to the in vehicle navigation system."); FriendZone (Burak) at 1 ("[A] suit of mobile location-based community services."); NavTalk at 59 ("The NavTalk can transmit information about your geographic location to another NavTalk or other type of devices that can interpret DTMF tones to plot your GPS position. You can also record a GPS position from another NavTalk unit and store that location in the GPS receiver data storage."). Accordingly, because each of these references depict, disclose, and/or discuss mobile computing relying on a user's location, a person of ordinary skill in the art would understand the teachings of the references to be applicable to one another. Similarly, a person of ordinary skill in the art would have been motivated to look to these references describing mobile computing relying on a user's location to optimize or improve upon use of a user's location.

As another example, with respect to the Reissue Patents, the following references (with exemplary citations) solve the same problem, i.e., assisting users with communicating and connecting over the Internet:

- Baker at [0051];
- Callegari at [0009], [0032];
- Cockburn (or TELEFREEK) at 31;
- De Vries at 4:45-5:19;
- Dunko at 3:37-44;
- Enzmann at 9:15-30;
- Friedman at 2:43-51;
- Godefroid at 59;
- Poulin at [0006];
- Spreitzer at 30;
- Benefon (Brochure) at 2;
- TravTek (Architecture Evaluation) at 12;
- FriendZone (Burak) at 1;
- PARC (Want) at 54;
- SignalSoft (BFound) at 1;
- Locatio (Trimble) at 1;
- NavTalk at 53, 59;
- MPS 1998 Release, 1999 Release;

See, e.g., Baker at [0051] ("In particular, the Chat Room system 20 enables a plurality of users or chatters to access the System via the Internet 22 or other wide-area network, or via local area network (LAN) connections 24."); Callegari at [0032] ("The System also includes a communication port operably configured with the presence Server to receive an indication of a Second user's location from a consumer device and to present the journal entry to the consumer device if the indication of the Second user's location overlaps with the defined geographic location of interest."); Cockburn (or TELEFREEK) at 31 ("Drawing on resources freely available to the Internet community, TELEFREEK assists people making contact with others, and integrates access to common communication facilities."); Friedman at 13:51-54 ("For example, in the illustrated embodiment, a user named 'Dave' transmits a message asking Jackie

She wants to have 'coffee at 10.'"); Godefroid at 59 ("AOL Instant Messenger, for example, now claims 80 million users who send 750 million messages a day [30]. It allows users to create "buddy lists" of people with whom they frequently communicate."); FriendZone (Burak) at 1 ("FriendZone's social services include Instant Messenger and Locator (IM&L), Locationbased Chat, and Anonymous IM, with supporting Privacy Management."); PARC (Want) at 54 ("[E]xtending an existing LAN to provide wireless nanocellular communication."); SignalSoft (BFound) at 1 ("Young adult users finding and communicating with friends when they are out in social situations."); Locatio (Trimble) at 1 (""The Locatio and i-Point services enable customers to: . . . Communicate with and locate other i-Point subscribers in real time."). Accordingly, because each of these references depict, disclose, and/or discuss assisting users with communicating and connecting over the Internet or cellular data signals, a person of ordinary skill in the art would understand the teachings of the references to be applicable to one another. Similarly, a person of ordinary skill in the art would have been motivated to look to these references describing assisting users with communicating and connecting over the Internet or cellular data signals to optimize or improve upon those communications.

Similarly, with respect to the '554 Patent, the following references (with exemplary citations) are in the same field of endeavor of providing location-based recommendations or media:

- Horowitz at [0023]
- Kalasapur at 2:11-24;
- Landschaft at [0005]
- Phelan at [0017]
- Dureau at 6:14-23;
- Rice at 1:36-46;
- Rosenberg at Abstract
- Sass at 7:66-8:5;
- Lifetrak (Reddy) at 25;
- GeoNotes (Persson) at 1.

- FolkMusic (Wiberg) at 3.
- Customized Internet Radio (Kirshnan) at 1, 8
- CyberGuide (Abowd) at 421
- PARC (Want) at 68
- Nokia Media Terminal (Kaminsky) at [0061]
- SignalSoft (local.info) at 2

See, e.g., Horowitz at [0023] ("The systems and methods described herein provide a user with information regarding media access patterns of a defined consumer base in a pre-selected geographic area"); Kalasapur at 2:11-24 ("The present invention provides a method and system for generating playlists for content items. Such content items may include A/V media items and other information. In one embodiment, a personalized playlist is generated based on certain parameters such as user context and associated user interactions in relation to media items (i.e., user-media interactions). The user context may include current location, date/time and user activities."); Landschaft at [0005] ("The media-location ranker also includes a location relating unit coupled to the media ranking unit and configured to produce a media-location ranking based on relating the media ranking to a location of the mobile electronic device."); Rosenberg at Abstract ("A system is disclosed for selecting musical files from a plurality of available musical media files for play to a user based at least in part upon a current location of the user."). Accordingly, because each of these references discuss providing location-based recommendations or media, a person of ordinary skill in the art would understand the teachings of the references to be applicable to one another. Similarly, a person of ordinary skill in the art would have been motivated to look to these references describing providing location-based recommendations or media to optimize or improve upon such recommendations.

Again, with respect to the '554 Patent, the following references (with exemplary citations) solve the same problem, i.e., providing media recommendations based on a user's current or select geographic location:

- Horowitz at [0023]
- Kalasapur at 2:11-24;
- Landschaft at [0005]
- Phelan at [0017]
- Dureau at 6:14-23;
- Rosenberg at Abstract
- Sass at 7:66-8:5
- Lifetrak (Reddy) at 25;
- GeoNotes (Persson) at 1.
- FolkMusic (Wiberg) at 3.
- Customized Internet Radio (Kirshnan) at 1, 8
- CyberGuide (Abowd) at 421
- PARC (Want) at 68
- Nokia Media Terminal (Kaminsky) at [0061]
- SignalSoft (local.info) at 2

See, e.g., Horowitz at [0023] ("The systems and methods described herein provide a user with information regarding media access patterns of a defined consumer base in a pre-selected geographic area"); Kalasapur at 2:11-24 ("The present invention provides a method and system for generating playlists for content items. Such content items may include A/V media items and other information. In one embodiment, a personalized playlist is generated based on certain parameters such as user context and associated user interactions in relation to media items (i.e., user-media interactions). The user context may include current location, date/time and user activities."); Landschaft at [0005] ("The media-location ranker also includes a location relating unit coupled to the media ranking unit and configured to produce a media-location ranking based on relating the media ranking to a location of the mobile electronic device."); Rosenberg at Abstract ("A system is disclosed for selecting musical files from a plurality of available musical media files for play to a user based at least in part upon a current location of the user."). Accordingly, because each of these references depict, disclose, and/or discuss providing media recommendations based on a user's current or selected geographic location, a person of ordinary skill in the art would understand the teachings of the references to be applicable to one another.

Similarly, a person of ordinary skill in the art would have been motivated to look to these references describing providing media recommendations based on a user's current or selected geographic location to optimize or improve upon those recommendations.

V. INVALIDITY UNDER 35 U.S.C. § 112

The grounds identified below both individually and collectively render certain of the Asserted Claims invalid under the statutory requirements of § 112. By identifying certain claim language below, Defendants do not imply that such language is entitled to any patentable weight when comparing the claim as a whole to the prior art. Defendants' identifications are made based on Defendants' present understanding of the Asserted Claims and Ikorongo's apparent interpretation of these claims as reflected in its Infringement Contentions, and Defendants reserve the right to amend these identifications, including in response to claim constructions and claim interpretations that would render claim limitations not enabled, lacking in written description, or indefinite. To the extent a claim element is contained within an element identified below or encompass an element identified below, that claim element also renders the claim invalid under 35 U.S.C. § 112.

A. Lack of Enablement And Written Description Under 35 U.S.C. § 112 ¶ 1

35 U.S.C. § 112 includes an enablement requirement: "The specification shall contain a written description . . . of the manner and process of making and using [the invention] in such full, clear, concise and exact terms as to enable any person skilled in the art to which it pertains, or with which it is most nearly connected, to make and use the same." 35 U.S.C. § 112, ¶ 1. To satisfy the enablement requirement, the disclosure "must teach those skilled in the art how to make and use the full scope of the claimed invention without 'undue experimentation.'" *Genentech, Inc. v. Novo Nordisk A/S*, 108 F.3d 1361, 1366 (Fed. Cir. 1997); *MagSil Corp. v. Hitachi Glob. Storage Techs., Inc.*, 687 F.3d 1377, 1381 (Fed. Cir. 2012); *Sitrick v. Dreamworks,*

LLC, 516 F.3d 993, 999 (Fed. Cir. 2008). If a specification teaches away from a substantial portion of the claim or does not enable the full scope of the claim, there is no enablement. *AK Steel Corp. v. Sollac*, 344 F.3d 1234 (Fed. Cir. 2003); *see also MagSil Corp.*, 687 F.3d at 1383-84 (Fed. Cir. 2012).

35 U.S.C. § 112 further includes a written description requirement: "The specification shall contain a written description of the invention . . . ." 35 U.S.C. § 112, ¶ 1. "To satisfy the written description requirement, a patent applicant must convey with reasonable clarity to those skilled in the art that, as of the filing date sought, he or she was in possession of the invention." *ICU Medical Inc. v. Alaris Medical Systems, Inc.*, 558 F.3d 1368, 1377 (Fed. Cir. 2009) (internal quotation marks and citations omitted); *see also Synthes USA, LLC v. Spinal Kinetics, Inc.*, 734 F.3d 1332, 1340 (Fed. Cir. 2013). "The test [for written description support] requires an objective inquiry into the four corners of the specification from the perspective of a person of ordinary skill in the art. Based on that inquiry, the specification must describe an invention understandable to that skilled artisan and show that the inventor actually invented the invention claimed." *Ariad Pharmaceuticals, Inc. v. Eli Lilly & Co.*, 598 F.3d 1336, 1351 (Fed. Cir. 2010) (en banc).

The specification must describe the claimed invention in sufficient detail so that a POSITA can recognize what is claimed. "The appearance of mere indistinct words in a specification or a claim, even an original claim, does not necessarily satisfy that requirement." *University of Rochester v. G.D. Searle & Co.*, 358 F.3d 916, 923 (Fed. Cir. 2004) (internal quotation marks and citations omitted).

Based on Defendants' present understanding of the Asserted Claims and Ikorongo's apparent interpretation of these claims as reflected in its Infringement Contentions, the following

limitations of the Asserted Claims may fail to satisfy the requirements of § 112, ¶ 1 because the specification and original patent application fail to provide an enabling disclosure of and written description support for at least the following limitations:

1. '543 Patent

- "lists of other users" / "other users" (claims 39, 45-49, 51, 56, 72)

2. '704 Patent

- "lists of other users" / "other users" (claims 33, 34, 36, 37, 39, 40, 46,48)
- "automatically and passively" (claims 33, 46, 48)

3. '450 Patent

- "lists of other users" (claims 67, 76, 83, 84, 93)
- "automatic and passive" / "automatically and passively" (claim 67)
- "anonymous unique identifier" (claims 74, 75)

B. Indefiniteness Under 35 U.S.C. § 112 ¶ 2

Section 112, ¶ 2 includes a definiteness requirement: "[T]he specification shall conclude with one or more claims particularly pointing out and distinctly claiming the subject matter which the applicant regards as his invention." 35 U.S.C. § 112, ¶ 2. "[A] patent is invalid for indefiniteness if its claims, read in light of the patent's specification and prosecution history, fail to inform, with reasonable certainty, those skilled in the art about the scope of the invention." *Nautilus, Inc. v. Biosig Instruments, Inc.*, 134 S. Ct. 2120, 2124 (2014).

The definiteness requirement requires that the claim must set forth what the applicant regards as the invention, and do so with sufficient particularity and definiteness. *Allen Eng'g Corp. v. Bartell Indus.*, 299 F.3d 1336, 1348 (Fed. Cir. 2002). Where it would be apparent to one of skill in the art, based on the patent specification, that the "invention" set forth in a claim is not what the patent applicant regarded as the invention, the claim is invalid. *Id.*

Based on Defendants' present understanding of the Asserted Claims and Ikorongo's apparent interpretation of these claims as reflected in its Infringement Contentions, the following limitations of the Asserted Claims may fail to satisfy the requirements of § 112, ¶ 2 because the precise scope of at least the terms listed below cannot be determined with reasonable certainty by a POSITA when reading the claims in light of the specification and prosecution history.

1. '704 Patent

- "automatically and passively" (claims 33, 46, 48)

2. '450 Patent

- "automatic and passive" / "automatically and passively" (claim 67)

3. '554 Patent

- "a communication interface component adapted to provide media item information identifying the media item, the communication interface component adapted to provide location information identifying a geographic location associated with the user device at which the media item was interacted with;" (claim 1)

C. Functional Claiming

§ 112 ¶ 6 limits functional claiming. *See Williamson v. Citrix Online, LLC*, 792 F.3d 1339, 1349–51 (Fed. Cir. 2015) (en banc) (imposing new standard of indefiniteness to address "proliferation of functional claiming untethered to § 112, para. 6 and free of the strictures set forth in the statute"); *Function Media, LLC v. Google, Inc.*, 708 F.3d 1310, 1319 (Fed. Cir. 2013). It allows the patentee to claim the invention by the functions it performs, but limits the scope of those claims to the specific solutions disclosed in the specification—because in this country, the patentee cannot claim more than what she invented. *MySpace, Inc. v. GraphOn Corp.*, 672 F.3d 1250, 1256 (Fed. Cir. 2012). The following claim limitations are functional and thus are subject to § 112 ¶ 6 requirements and are indefinite for lack of structures in the specification, and are also not enabled because of the lack of structures:

1. ’554 Patent

- “a communication interface component adapted to provide media item information identifying the media item, the communication interface component adapted to provide location information identifying a geographic location associated with the user device at which the media item was interacted with” (claim 1)

- “the communication interface component adapted to receive information that identifies a second media item, wherein location information associated with the second media item is associated with the identified geographic area” (claim 1)

VI. INVALIDITY UNDER 35 U.S.C. § 251

35 U.S.C. § 251 limits the circumstances where a reissue of a defective patent is available. Defendants contend that the following Asserted Claims fail to satisfy the requirements of 35 U.S.C. § 251.

A. Original Patent Requirement

Under 35 U.S.C. § 251 (a), a reissue patent must be “for the invention disclosed in the original patent.” This means that the reissue claims must be for the “same invention” as the original patent. *Antares Pharma, Inc. v. Medac Pharma Inc.*, 771 F.3d 1354, 1358-59 (Fed. Cir. 2014). The ’450 Patent, ’543 Patent, and ’704 Patent are all reissues of U.S. Patent No. 7,080,139 (“’139 Patent”). The following claims of each of the reissue patents are invalid for not being the invention disclosed in the original patent:

- ’450 Patent: 67, 74, 75, 84, 94, 96

- ’543 Patent: 39, 43-49, 51, 56, 72

- ’704 Patent: 33-38, 40, 45-48

Each of these claims either require accessing one or more “lists of other users” and/or selecting “other users,” or depend from a claim that recites such a limitation. All of the embodiments disclosed in the ’139 Patent, however, relate to sharing locations with individuals the user can message or email; none disclose sharing a location with an individual selected from a generic

"list of other users."

B. Rule Against Recapture

The rule against recapture is violated when a patentee "claim[s] subject matter in a reissue patent that the patentee surrendered while prosecuting a related patent application." *MBO Labs., Inc. v. Becton, Dickinson & Co.*, 602 F.3d 1306, 1316 (Fed. Cir. 2010). Related patent applications refer to "a patent family's entire prosecution history." *Id.* at 1318. The '543 Patent is a reissue of the '139 Patent, and a continuation of the application that resulted in the '450 Patent. Thus, subject matter disclaimed in the file histories of the '139 and '450 Patents cannot be recaptured in the '543 Patent.

All of the '543 Asserted Claims are invalid for violating the rule against recapture. During prosecution of the '139 Patent, the claims were amended to require "communicating with a registration server to register a user for *automatic client-side collection of computer usage experiences for future sharing*" to distinguish the prior art. '139 Patent File History, Jan. 30, 2006 Preliminary Amendment Following RCE at 2, 8 (relevant amendment in italics). Later, during prosecution of the '450 Patent, the claims were amended to require "automatic and passive client side-collection" to "place the present application in condition for allowance." '450 Patent File History, Feb. 10, 2010 Amendment at 2, 11. The '450 Patent's claims ultimately issued with the "and passive" language. The '543 Asserted Claims violate the rule against recapture because none of these claims require automatic or automatic and passive client-side collection.

VII. DOCUMENT PRODUCTION ACCOMPANYING PRELIMINARY INVALIDITY CONTENTIONS

Defendants are producing and/or making available for inspection documents required under the Court's Scheduling Order under a separate letter.

Defendants reserve the right to produce and rely on additional documents relating to their products in view of, for example, additional information revealed during discovery regarding Ikorongo's allegations and/or amendments to Ikorongo's Infringement Contentions.

VIII. OTHER RESERVATIONS AND EXPLANATIONS

These Preliminary Invalidity Contentions and accompanying document productions are preliminary and subject to further revision as follows. Nothing in these contentions constitutes an admission concerning the priority date, conception date, or date of reduction to practice of the Asserted Claims. Defendants reserve the right to modify or supplement these Preliminary Invalidity Contentions, including in response to any positions taken or information disclosed regarding the priority date, conception date, or date of reduction to practice of the Asserted Claims.

For prior art patents and prior art publications identified in these Preliminary Invalidity Contentions, Defendants reserve the right to rely on the public use, offer for sale, sale, and/or actual products embodying the methods and systems described therein uncovered during discovery. Defendants also reserve the right to rely on any related patents and patent applications, foreign patent counterparts and foreign patent applications of U.S. patents identified in these Preliminary Invalidity Contentions, and U.S. counterparts of foreign patents and foreign patent applications identified in these Preliminary Invalidity Contentions.

The Court has not yet construed any of the terms in the Asserted Patents. Accordingly, Defendants' Preliminary Invalidity Contentions are based in part on Defendants' present understanding of the Asserted Claims and Ikorongo's apparent interpretation of these claims as reflected in its Infringement Contentions. By including prior art that anticipates or renders obvious claims based on Ikorongo's apparent claim interpretations, Defendants are not agreeing that Ikorongo's claim interpretations are correct.

The accompanying invalidity claim charts provide examples of prior art that discloses, either expressly or inherently, every limitation of certain claims and/or teachings, suggestions and motivations through which a POSITA at the time of the alleged invention would have considered the limitations obvious in view of the state of the art at the time, the differences between the claimed invention and the state of the art, and the foreseeability from a technical perspective and/or marketing and/or natural and expected evolution of the art. Where Defendants cite to a particular figure in a reference, the citation should be understood to encompass the caption and description of the figure and any text relating to the figure. Conversely, where Defendants cite to particular text referring to a figure, the citation should be understood to include the figure as well. As discovery progresses and the scope and focus of the liability issues become clearer, Defendants may rely on uncited portions of the prior art.

Defendants reserve the right to revise their ultimate contentions concerning the invalidity of asserted the Asserted Claims, which may change depending on discovery taken in the case, the Court's construction of the Asserted Claims, any findings as to the priority date of the Asserted Claims, and/or positions that Ikorongo or expert witness(es) may take concerning claim construction, infringement, and/or invalidity issues.

Defendants may rely on Ikorongo's or any inventor's admissions concerning the scope of prior art relevant to the Asserted Patents; the patent prosecution histories for the Asserted Patents; any deposition testimony of the named inventors on the Asserted Patents; and the papers filed and any evidence submitted by Ikorongo in connection with this litigation. For example, Defendants reserve the right to assert that the Asserted Claims are invalid under 35 U.S.C. § 102(f) in the event that Defendants obtain evidence that the named inventors did not invent (either alone or in conjunction with others) the subject matter claimed in the Asserted Patents.

Should Defendants obtain such evidence, they will provide the name(s) of the person(s) from whom and the circumstances under which the claimed invention or any part of it was derived.

Prior art not included in this disclosure, whether known or not known to Defendants, may become relevant. In particular, Defendants are currently unaware of the extent, if any, to which Ikorongo will contend that limitations of the Asserted Patents are not disclosed in the prior art identified by Defendants. To the extent such an issue arises, Defendants reserve the right to identify other references that would render obvious the allegedly missing limitation(s) of the disclosed device or method. Further, because discovery not yet opened and because Defendants have not yet completed their search for or analysis of relevant prior art, Defendants reserve the right to revise, amend, and/or supplement the information provided herein, including identifying, charting, and relying on additional references, should Defendants' further search and analysis yield additional information or references, consistent with the Federal Rules of Civil Procedure.

Additionally, because third-party discovery is not yet open, Defendants reserve the right to present additional items of prior art under 35 U.S.C. §§ 102(a), (b), (e), and/or (g), and/or § 103, located during the course of such discovery or further investigation, and to assert invalidity under 35 U.S.C. §§ 102(c), (d), or (f), to the extent that such discovery or investigation yields information forming the basis for such invalidity. For example, Defendants expect to issue subpoenas to, and receive information from, third parties believed to have knowledge, documentation, and/or corroborating evidence concerning some of the prior art listed below and/or additional prior art. These third parties include, without limitation, the authors, inventors, vendors, or assignees of the references listed in these disclosures.

Defendants further reserve the right to modify or add additional contentions in the event that Ikorongo provides amended infringement contentions and to the extent the Court orders or allows Ikorongo to amend its infringement contentions.

Pursuant to the August 24, 2020 Scheduling Order (D.I. 24), and in light of Ikorongo's Infringement Contentions and accompanying claim chart, Defendants list in these Preliminary Invalidity Contentions the prior art now known to them that they contend anticipates or renders obvious the Asserted Claims. Although Defendants have identified at least one disclosure of a limitation for each prior art reference, each and every disclosure of the same limitation in the same reference is not necessarily identified. In an effort to focus the issues, Defendants' citations are only representative portions of an identified reference, even where a reference may contain additional support for a particular claim limitation. POSITAs generally read an item of prior art as a whole and in the context of other publications and literature. Thus, to understand and interpret any specific statement or disclosure within a prior art reference, such persons would rely on other information within the reference, along with other publications and their general scientific knowledge. Defendants may rely on uncited portions of the prior art references and on other publications and expert testimony to provide context, and as aids to understanding and interpreting the portions that are cited.

Subject to Defendants' reservation of rights, Defendants identify each item of prior art that anticipates and/or renders obvious the Asserted Claims. The patents/applications, publications, and systems identified are also relevant to show the state of the art and reasons and motivations for making improvements, additions, and combinations.

Defendants also contend that the Asserted Patents are invalid in view of public knowledge and uses and/or offers for sale or sales of products and services that are under 35

U.S.C. § 102(a) and/or 35 U.S.C. § 102(b) and/or prior inventions made in this country by other inventors who had not abandoned, suppressed, or concealed them under 35 U.S.C. § 102(g).

Defendants also reserve the right to rely on any system, public knowledge or use embodying or otherwise incorporating any of the prior art disclosed herein alone or in combination. Defendants further reserve the right to rely on any other documents or references describing any such system, knowledge, or use.

Dated: October 8, 2020

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing document was served on counsel for Plaintiffs Ikorongo Texas LLC and Ikorongo Technology LLC via electronic delivery on October 8, 2020.

/s/ Jeffrey Lau
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