

# **EXHIBIT A**

**Ancora Technologies First Supplemental Infringement Conte  
With Respect To U.S. Patent No. 6,411,941**

**Ancora Technologies First Supplemental Infringement Contentions  
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Claim Element of the '941 Patent	iOS Devices
<p>1. A method of restricting software operation within a license for use with a computer including an erasable, non-volatile memory area of a BIOS of the computer, and a volatile memory area; the method comprising the steps of:</p>	<p>For devices operating on the iOS platform (“iOS devices”), Apple uses a secure boot procedure that restricts non-verified programs from operating. (ANCA 902, 925, 937.) The secure boot procedure includes: a Secure Bootloader (LLB) and an iBoot. (ANCA 854-960.) Devices operating on the iOS platform are designed to include: (1) volatile RAM memory (<i>e.g.</i>, ANCA 875, ¶ 0067); (2) non-volatile, erasable memory such as Read Only Memory (ROM) or flash memory (<i>e.g.</i>, ANCA 875, ¶ 0083; ANCA 921-9222, ¶ 0067 &amp; ¶ 0068) (<i>See also</i>, ANCA 756-787, 788-789, 880, 994, 926) The volatile memory “may store firmware for the [iOS device], such as a basic input/output system (BIOS).” (ANCC 1027 ¶ 0080) The secure booting procedure is alleged to include: (1) manufacture of an iOS device and (2) recovery, update and/or repair of an iOS device. (ANCA 916.) (APL10102-10117)</p>
<p>selecting a program residing in the volatile memory,</p>	<p>Kernel cache is loaded into volatile RAM memory and “causes a set of system components to be loaded into [volatile RAM memory] memory.” (ANCA 875, ¶ 0082; ANCA 921, ¶ 0067; ANCA 952.) (APL10102-10117)</p>
<p>using an agent to set up a verification structure in the erasable, non-volatile memory of the BIOS, the verification structure accommodating data that includes at least one license record,</p>	<p>The agent, for example, includes a “ticket retrieving module 217,” and a “ticket server” (“Apple Server”) as well as any other additional Apple software used to set-up the “ticket” within the erasable, non-volatile memory. (ANCA 917, ¶ 0042) (APL10102-10117)</p> <p>The “ticket retrieving module 217” first sends a “ticket request” requesting the boot components used for the secure boot procedure.</p>

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	0042) The Apple Server generates a “signed ticket” that operates as a license record for the iOS device. Each “signed ticket” includes a cryptographic digest and “signed identifiers” which are a license record used to verify the program. (ANCA 854-855; 912, 916-923.) The “signed ticket” is returned to the iOS device and is validated. If the returned “signed ticket” matches the “ticket request” sent. (ANCA 854-855; 912, 916-923.) If validated, the “signed ticket” is stored as a “local ticket” in the memory of the BIOS. <i>Id.</i> (APL10102-10117)
verifying the program using at least the verification structure from the erasable non-volatile memory of the BIOS, and	During the boot procedure for the iOS device, the cryptographic digest is verified against the “signed ticket” that is stored in the erasable, non-volatile memory of the BIOS. (ANCA 854-855; 918-920.) (APL10102-10117)
acting on the program according to the verification.	If the program’s digest is verified, the program is allowed to operate. If the digest is not verified, the program is determined to be invalid and the iOS device is booted under an alternative operating mode ( <i>e.g.</i> , DFU). (ANCA 854-855; 918-920.) (APL10102-10117)
<b>Claim: 2</b>	
2. A method according to claim 1, further comprising the steps of:  establishing a license authentication bureau.	Apple has established an Apple Server for the iOS devices. (ANCA 854-855; 918-920.) (APL10102-10117)
<b>Claim: 3</b>	

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<p>3. A method according to claim 2, wherein setting up a verification structure further comprising the steps of:</p> <p>establishing, between the computer and the bureau, a two-way data-communications linkage;</p>	<p>A “ticket retrieving module” located on the iOS device establishes a communication link between the iOS device and the Apple Server. (ANCA 854-855, 904, 912, 916-923.) (APL10102-10117)</p>
<p>transferring, from the computer to the bureau, a request-for-license including an identification of the computer and the license-record's contents from the selected program;</p>	<p>The iOS device transfer a “ticket request” or Plist file to the Apple Server. The “ticket request” include: (1) a cryptographic digest of each program, (2) a nonce value, and (3) a unique identifier (<i>i.e.</i>, UID, ECID or GID) that is a unique identification of a program. (ANCA 854-855, 904, 912, 916-923.) (APL7846-49) (APL10102-10117)</p>
<p>forming an encrypted license-record at the bureau by encrypting parts of the request-for-license using part of the identification as an encryption key;</p>	<p>The Apple Server validates the “ticket request” and transfers a signed license-record to the iOS device. The signed license-record includes a “signed ticket” having a digest corresponding to the unique identifier identified in the request. Each digest may be “a unique cryptographic digest of the program.” (ANCA 854-855, 904, 912, 916-923.) (APL7846-49) (APL10102-10117) Each “signed ticket” may further include a “signature cryptographic digest of the license-record.” (ANCA 918, ¶ 0046) (APL10102-10117)</p>
<p>transferring, from the bureau to the computer, the encrypted license-record; and</p>	<p>The “signed ticket” is then transferred from the Apple server to the iOS device. (ANCA 918, ¶ 0048) (APL10102-10117)</p>

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storing the encrypted license record in the erasable non-volatile memory area of the BIOS.	The "signed ticket is "validated" to verify it matches the "ticket required for the iOS device. (ANCA 918, ¶ 0048) (APL10102-10117)Once validated, the ticket is stored as a "local ticket" in the erasable, non-volatile memory of the device.
<b>Claim: 5</b>	
5. A method according to claim 3 wherein the identification of the computer includes the unique key.	The iOS devices include unique keys, such as "UID," "ECID" and "GID." (ANCA 854-855, 912, 917, 951-952.) (APL7846-49) (APL10102-10117)
<b>Claim: 6</b>	
6. A method according to claim 1 wherein selecting a program includes the steps of:  establishing a licensed-software-program in the volatile memory of the computer wherein said licensed-software-program includes contents used to form the license-record.	Loading the OS in volatile RAM (ANCA 875, ¶ 0082; ANCA 918, ¶ 0048) and establishing the contents of the OS used to form the "signed ticket." (APL10102-10117)
<b>Claim: 7</b>	
7. A method according to claim 6 wherein using an agent to set up the verification structure includes the steps of:	The iOS devices establish or certify pseudo-unique keys stored in memory area, such as a "GID," "ECID," or "UID." (ANCA 854-855, 951-952.) (APL7846-49) (APL10102-10117)

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