

18	4/7/2008	Motorola Lapdock for Atrix 1 and Atrix 1	literal
20	4/7/2008	Motorola Lapdock for Atrix 1 and Atrix 1	literal

The following chart identifies where each element of the asserted patent is found within each accused product:

Claim 1 of Patent 7,516,484	
1. A reader configured to interact with a portable computer without input and output means for interacting directly therewith, the reader comprising:	Assuming, <i>arguendo</i> , the claim preamble limits the claim, all Lapdocks are configured to interact with a portable computer without input and output means
a housing that is at least one of an input or an output device; and	all Lapdocks have a housing that includes a monitor and keyboard
a connector for connecting to the portable computer;	all Lapdocks have either a connector behind the monitor or a cable for connecting to a portable computer
wherein the housing is configured to provide direct user interaction with the portable computer when the portable computer and reader are connected, and	the monitor and keyboard of all Lapdock housings provide direct user interaction with a portable computer when connected to the Lapdock
wherein the reader is configured to be a non-functioning shell when not connected to the portable computer, and	when all Lapdocks are not connected to the portable computer the Lapdocks are a non-functioning shell
wherein the readers are configured so that they will not operate with a computer other than a portable computer of the system.	all Lapdocks are configured so that they will not operate with a computer other than a portable computer of the system
Claim 3 of Patent 7,516,484	
3. The reader of Claim 1, wherein the input device is selected from the group consisting of: a keyboard, a keypad, a webcam, a touch screen, a microphone, a PDA and a video recorder and the output device selected from the group consisting of: a display and speakers.	all Lapdocks have at least a keyboard and a display
Claim 7 of Patent 7,516,484	
7. The reader of claim 1, wherein the computer comprises storage and an operating system and the reader does not comprise an operating system.	no Lapdocks have an operating system

Claim 15 of Patent 7,516,484	
15. A computing system comprising:	
at least one portable computer, each comprising: storage; and at least one connector for connecting to at least one reader;	the Atrix 1 has storage and at least one connector for connecting to the Lapdock
at least one reader, each comprising: an input device; an output device; and a connector for connecting to the at least one portable computer,	the Lapdock for the Atrix 1, which has an input device (e.g., keyboard), an output device (e.g., monitor), and a connector for connecting to the Atrix 1
wherein the portable computer excludes means for a user to interact directly with the portable computer,	when docked, the Atrix 1 excludes means for a user to interact directly with the Atrix 1
wherein the reader and portable computer are configured to become a fully functioning computer when connected,	the Atrix 1 and Lapdock become a fully functioning computer when connected
wherein the readers are configured so that they will not operate with a computer other than a portable computer of the system, and	the Lapdock will not operate with a computer other than a portable computer of the system, which is not necessarily an Atrix 1
wherein the reader is configured to be a non-functioning shell when not connected to the portable computer.	the Lapdock is a non-functioning shell when not connected to the Atrix 1
Claim 16 of Patent 7,516,484	
16. The computing system of claim 15, wherein the input device of the reader comprises a keyboard and the connector of the reader is contained on the keyboard.	the Lapdock includes a keyboard and the connector is contained on the keyboard
Claim 18 of Patent 7,516,484	
18. The computing system of claim 15, wherein the computer comprises substantially all of the components of a fully functional general purpose computer excluding means for a user to interact with the computer.	the Atrix 1 comprises substantially all of the components of a fully functional general purpose computer except that, when docked on the Lapdock, it excludes means for a user to interact therewith
Claim 20 of Patent 7,516,484	
20. The computing system of claim 15, wherein the reader further comprises a housing connected to the input device and the output device, wherein the housing comprises the connector configured to connect to the computer.	the Lapdock has a housing connected to the input device (e.g., keyboard) and the output device (e.g., monitor), and the connector for the Atrix 1 is attached to the housing

Plaintiff's infringement contentions are based on what it believes to be a reasonable construction of terms that Plaintiff believes require construction, and Plaintiff's current knowledge of the accused products formed from review of Motorola products it acquired, information contained on Defendant's website, and information provided by Defendant in its counterclaims. Plaintiff reserves the right to identify additional products and to modify this statement of contention as necessary to accommodate newly discovered facts as the case progresses.

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UNITED STATES DISTRICT COURT

DISTRICT OF VERMONT

I hereby certify that on March 26, 2012, I electronically filed Plaintiff Arnouse Digital Devices Corp.'s Infringement Contentions with the Clerk of Court using the CM/ECF system, which will send notification of such filing(s) to all counsel of record.

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