

PLAINTIFF'S INITIAL INFRINGEMENT CONTENTIONS CLAIM CHART

This is a preliminary comparison, based on the information currently available to Continental of the claims of U.S. Patent No. 6,998,973 and Schrader tire pressure monitoring sensor No. 20161 ("Schrader 20161"). Continental reserves the right to amend or supplement this disclosure as additional information becomes available through discovery, and/or the claims of the '973 Patent are construed by the Court. This chart should not be interpreted as providing Continental's claim construction positions, which will be set forth in separate documents at the appropriate times according to the schedule provided by the Court.

Claim 1	Schrader 20161
<p>A data transmission method for a tire-pressure monitoring system (10) of a vehicle, said data being transmitted by wheel units (12) to a central computer (13) located in the vehicle, said method comprising:</p>	<p>The Schrader 20161 is a tire pressure monitoring sensor designed for installation in the wheel of a vehicle, and designed to, among other things, detect and air pressure drop in a tire . It transmits data wirelessly to a tire pressure monitoring receiver located in a vehicle. See <i>generally</i> Exhibit A, Figure A.</p>
<p>a data transmission phase in parking mode, over a first period; and</p>	<p>The Schrader 20161 transmits data periodically when stationary (i.e., when the sensor is in a "parking mode"). Wireless data was collected from a stationary Schrader 20161 over the course of approximately 4 hours. Each transmission consisted of 4 data bursts of 8 data frames each, and occurred approximately every hour.</p>
<p>a data transmission phase in running mode, over a second period shorter than the first period; said method being characterized in that:</p>	<p>The Schrader 20161 transmits data periodically when in motion (i.e., when the sensor is in a "running mode"). Wireless data was collected from a rotating Schrader 20161 operating over the course of approximately 2 minutes. Each transmission consisted of 4 data bursts of 4 data frames each, and occurred approximately every 30.9 seconds - 31.0 seconds. The period for this data transmission phase (30.9 seconds - 31.0 seconds) is shorter than the period for the data transmission phase in parking mode (approximately every hour).</p>
<p>a natural time lag between various internal clocks with which each wheel unit (12) is equipped is used to prevent collisions between transmissions from the various wheel units of one and the same vehicle.</p>	<p>Testing of the Schrader 20161 showed that the sensor transmits asynchronously whether the sensor is stationary or rotating. Wireless data was collected from a stationary Schrader 20161 operating over approximately 4 hours. The data shows that the time between the start of each transmission varied from 1 hour, 6.6 seconds to 1 hour, 6.8 seconds. Wireless data was collected from a rotating Schrader 20161 operating over approximately 2 minutes. The data shows that the time between the start of each transmission varied from 30.9 seconds - 31.0 seconds. These variations in time enable the prevention of data collisions between transmissions from tire pressure monitoring system sensors installed in different wheels of a</p>

	<p>vehicle.</p> <p>Upon information and belief, the Schrader 20161 accomplishes these asynchronous transmission periods, at least in part, through the use of an internal clock with a natural time lag.</p>
Claim 2	
The method as claimed in claim 1,	
characterized in that the internal time lag between the various clocks of each wheel unit is preferably determined by the precision of an RC-type oscillator mounted in each wheel unit.	Upon information and belief, the Schrader 20161 uses an RC oscillator to generate clock signals, and therefore that the internal time lag is determined by the precision of an RC oscillator, because only an RC oscillator would allow the Schrader 20161 to function properly while still meeting the service life requirements imposed by original equipment manufacturers.
Claim 4	
The method as claimed in claim 1,	
characterized in that each wheel unit transmits several frames for each data item to be transmitted.	The Schrader 20161 transmits several frames during each transmission whether the sensor is stationary or rotating. Wireless data was collected from a stationary Schrader 20161 operating over approximately 4 hours. Each transmission consisted of 4 data bursts of 8 data frames each. Wireless data was collected from a rotating Schrader 20161 operating over approximately 2 minutes. Each transmission consisted of 4 data bursts of 4 data frames each.
Claim 5	
The method as claimed in claim 4,	
characterized in that three frames are transmitted for each data item to be transmitted.	The Schrader 20161 transmits at least three frames during each transmission whether the sensor is stationary or rotating. Wireless data was collected from a stationary Schrader 20161 operating over approximately 4 hours. Each transmission consisted of 4 data bursts of 8 data frames each. Wireless data was collected from a rotating Schrader 20161 operating over approximately 2 minutes. Each transmission consisted of 4 data bursts of 4 data frames each. In each case, the Schrader 20161 transmitted 3 frames of data.
Claim 9	
The method as claimed in claim 2,	

characterized in that each wheel unit transmits several frames for each data item to be transmitted.

The Schrader 20161 transmits several frames during each transmission whether the sensor is stationary or rotating. Wireless data was collected from a stationary Schrader 20161 operating over approximately 4 hours. Each transmission consisted of 4 data bursts of 8 data frames each. Wireless data was collected from a rotating Schrader 20161 operating over approximately 2 minutes. Each transmission consisted of 4 data bursts of 4 data frames each.

EXHIBIT A



Figure A

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