EXHIBIT 1013

<u>***Appendix A – Sony***</u>[1]

The following chart is based on information known to date. Plaintiff Network-1 reserves

the right to amend and update this chart as additional information is obtained and analyzed.

Plaintiff Network-1 contends that Sony (1) directly infringes, (2) contributorily infringes,

and (3) induces infringement of the Asserted Claims. Plaintiff Network-1 contends that Sony:

(1) <u>directly infringes</u> the Asserted Claims by practicing a method for remotely powering access

    equipment in a data network that satisfies all of the claimed elements as described below. In

    directly infringing the Asserted Claims by practicing such a method, (a) the power sourcing

    equipment[2] (data nodes) and powered devices (access devices) used by Sony can both be

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[1]   Consistent with P.R. 3-1(c), Network-1 contends that the following chart provided for Sony is sufficient to "identify[] specifically where each element of each asserted claim is found within each [Sony] Accused Instrumentality" (P.R. 3-1(c)) because the analysis of each element, for purposes of Network-1's contentions relating to Sony's Accused Instrumentalities, "would be identical for each product." *See Juxtacomm Techs., Inc. v. Ascential Software Corp.*, 2008 U.S. Dist. LEXIS 36590 *5-6 (E.D. Tex. May 2, 2008).

[2]   The IEEE 802.3 standards (including 802.3af and 802.3at) use their own terminology to describe what is referred to in the '930 Patent as the (a) data signaling pair, (b) data node, and (c) access device:

"1.4 Definitions …
- <u>1.4.x Twisted Pair Medium Dependent Interface (TP MDI)</u>: The mechanical and electrical interface between the transmission medium and the Medium Attachment Unit (MAU) or PHY, e.g., (10BASE-T, 100BASE-TX, or 1000BASE-T) [the "TP MDI" corresponds to the interface of the "data signaling pair" used in the claims of the '930 Patent].
- <u>1.4.x Power sourcing Equipment (PSE)</u>: A DTE or midspan that provides the power to a single link section. DTE powering is intended to provide a single 10BASE-T, 100BASE-T, or 1000BASE-T device with a unified interface for both the data it requires and the power to process these data [the "PSE" corresponds to the "data node" used in the claims of the '930 Patent].
- <u>1.4.x Powered Device (PD)</u>: A device that is either drawing power or requesting power from a PSE [the "PD" corresponds to the "access device" used in the claims of the '930 Patent]."
  [N12530].

made by others or, (b) the power sourcing equipment (data nodes) can be made by others and the powered devices (access devices) can be made by Sony (*e.g.*, a Sony SNC-CH120).[3]

(2) <u>contributory infringes</u> the Asserted Claims by making, importing, offering to sell, and selling

    (i)   powered devices (access devices) that, when combined and connected to power sourcing equipment (data nodes) are designed, sold, and imported with the knowledge that they are especially made or adapted for use as a material part of combination that practices a method for remotely powering access equipment in a data network that satisfies all of the claimed elements as described below;

(3) <u>actively induces infringement</u> of the Asserted Claims by instructing others to use power sourcing equipment (data nodes), combined with and connected to powered devices (access devices) (made by Sony or others), as suggested by Sony's manuals, advertising, place cards, and other literature, to practice a method for remotely powering access equipment in a data network that satisfies all of the claimed elements as described below.

       Plaintiff Network-1 contends that each of the Sony Accused Instrumentalities is designed and functions consistent with the IEEE 802.3af[4] or IEEE 802.3at[5] Standards.[6] Sample statements

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[3]   In addition to making, using, selling, and offering to sell the identified powered devices (access devices), Sony also makes, uses, sells, and offers to sell other related equipment specifically designed to be used in connection with the power sourcing equipment (data nodes) and powered devices (access devices) in a data network that satisfies all of the claimed elements.

[4]   The IEEE 802.3af Standard extends prior 802.3 Ethernet standards to support devices and interfaces for remotely powering access equipment in a data network. (IEEE 802.3af Standard) [N12517-12649].

[5]   "Abstract: This amendment includes changes to IEEE Std 802.3-2008 to augment the capabilities of IEEE Std 802.3 with higher power levels and improved power management information." (IEEE 802.3at Standard Abstract) [N151839].

[6]   All components of the 802.3af Standard are now integrated into 802.3-2008 Standard.

demonstrating that the Sony Accused Instrumentalities conform to the IEEE 802.3af or IEEE 802.3at Standards include:

- "Power can also be supplied via an Ethernet CAT5 cable from an <u>IEEE 802.3af-compliant power supply system</u>*. AC 24 V, DC 12 V, or PoE (Power-over-Ethernet) is automatically selected according to the power supplied." (SNC-Z20N Brochure) [N210222];

- "The SNC-CS50 offers a choice of three types of power: 24 V AC, 12 V DC, or PoE (Power-over-Ethernet, <u>IEEE 802.3af</u>)." (SNC-RX Series Brochure) [N210210];

- "These cameras offer a choice of three types of power: 24 V AC, 12 V DC, or PoE (Power-over-Ethernet, <u>IEEE 802.3af</u>)." (SNC-DM_DS Brochure) [N210168];

- "Variety of power options: AC24V, DV12V, or <u>IEEE.802.3af PoE Compliant</u>" (SNC-CS11N Overview) [N210090];

- "PoE (<u>IEEE802.3af compliant</u>)" (SNC-CH120 Specs) [N210056];

- "PoE (<u>IEEE802.3af</u>)" (SNC-CH180 Specs) [N210064];

- "PoE (<u>IEEE802.3af</u>)" (SNT-EXP/EP Series Brochure) [N210236];
- "HPoE (<u>IEEE802.3at</u> compliant), AC24V" (SNC-EP520 – DATA) [N210184];

- "<u>IEEE802.3at HPoE</u> (High Power over Ethernet) compliant." (SNC-EP520/580/ER520/550/580 User Guide) [N253091];

- "HPoE LLDP function: <u>Based on 802.3at</u>, select whether to use the power adjustment function by LLDP (Link-Layer-Discovery-Protocol). Select ON in the case of <u>IEEE802.3at compatible power adjustment by PSE</u> (Power Sourcing Equipment)." (SNC-EP520/580/ER-520/550/580 User Guide) [N253127];

- "hPoE (High PoE, <u>IEEE 802.3at</u>)" (Sony Security Products Quick Reference) [N252128].

Claim language	Sony
Claim 6 ('930 Patent)	
Pre: Method for remotely powering access equipment in a data network, comprising	_Sample evidence (Sony statements, depictions, and other documentation) includes_:[7] • _See_ elements [a] – [d] below; • "Power can also be supplied via an Ethernet CAT5 cable from an IEEE 802.3af-compliant power supply system*." (SNC-Z20N Brochure) [N210222]; • "Supporting high Power over Ethernet (hPoE), the <u>SNC-RS44/RS46 can be powered using the same Ethernet cable it uses for data transfer</u>." (SNC-RS Brochure) [N210203];

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[7]   The "_Sample evidence (Sony statements, depictions, and other documentation)_" presented in this Appendix are illustrative examples of statements, depictions, and other documentation that help one understand and put into context the identification presented for each element. The identification presented for each element is in no way indented to be limited to the specific illustrative examples in such statements, depictions, and other documentation. For each claim element, the "sample evidence" identified in the Appendices of each Defendant is incorporated by reference into this Appendix for each corresponding claim element.

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