

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MEMORY INTEGRITY, LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Action No. 1:13-cv-01796-GMS

JURY TRIAL DEMANDED

**PLAINTIFF MEMORY INTEGRITY, LLC'S  
INITIAL IDENTIFICATION OF ASSERTED CLAIMS AND ACCUSED PRODUCTS**

Plaintiff Memory Integrity, LLC (“MI” “Memory Integrity” or “Plaintiff”) provides the following preliminary identification of the asserted claims and accused products to Defendant Apple Inc. (“Apple”) in accordance with paragraph 5(b) of this Court’s October 1, 2014 Scheduling Order.

The preliminary identifications contained herein are based upon information reasonably and currently available to Plaintiff. However, Plaintiff anticipates that discovery and other pretrial preparation will uncover additional relevant information, which may lead to, for example, the identification of additional accused products. Plaintiff reserves the right to clarify, amend, modify, and supplement the information contained in these identifications as information becomes available through discovery or investigation during this action, and as permitted by the Federal Rules of Civil Procedure and this Court’s Scheduling Order.

**I. ASSERTED CLAIMS AND ACCUSED PRODUCTS**

Plaintiff identifies the following accused products which are alleged to infringe at least claims 1-3, 8, 11-12, and 14-25 of U.S. Patent No. 7,296,121 (the “’121 Patent” or the “Patent-in-Suit”):

All Apple products containing a multi-core, ARM-based processor<sup>1</sup> with a snoop control unit (or similar snoop-filtering unit).

The foregoing includes but is not limited to:

- Apple’s iPad 2, iPad 3, iPad 4, iPad Mini, iPad Mini 2, iPad Air products;
- Apple’s iPhone 4S, iPhone 5, iPhone 5C, iPhone 5S, iPhone 6, iPhone 6 Plus products;
- Apple’s iPod Touch (5<sup>th</sup> Generation) products;
- All versions, variations, models, and upgrades of the foregoing; and any products that are reasonably similar to any of the above-identified products.

## **II. FILE HISTORY**

The file history of the Patent-in-Suit is being produced with Bates numbers MI\_ALL\_000001-000188.

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<sup>1</sup> “ARM-based processor” refers to any processor compatible, in whole or in part, with an ARM instruction set, regardless of whether the processor itself was designed by ARM.

Dated: October 13, 2014

Respectfully submitted,

/s/ Jonathan D. Baker

Jonathan D. Baker (*pro hac vice*)

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*Attorneys for Plaintiff Memory Integrity, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2014, I caused a copy of this document to be served by transmitting it via e-mail or electronic transmission to counsel of record for Defendant.

*/s/ Jonathan Baker*

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Jonathan Baker

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MEMORY INTEGRITY, LLC,

Plaintiff,

v.

HTC CORPORATION AND  
HTC AMERICA, INC.,

Defendants.

Civil Action No. 1:13-cv-01802-GMS

JURY TRIAL DEMANDED

**PLAINTIFF MEMORY INTEGRITY, LLC'S  
INITIAL IDENTIFICATION OF ASSERTED CLAIMS AND ACCUSED PRODUCTS**

Plaintiff Memory Integrity, LLC (“MI” “Memory Integrity” or “Plaintiff”) provides the following preliminary identification of the asserted claims and accused products to Defendants HTC Corporation and HTC America, Inc. (collectively, “HTC”) in accordance with paragraph 5(b) of this Court’s October 1, 2014 Scheduling Order.

The preliminary identifications contained herein are based upon information reasonably and currently available to Plaintiff. However, Plaintiff anticipates that discovery and other pretrial preparation will uncover additional relevant information, which may lead to, for example, the identification of additional accused products. Plaintiff reserves the right to clarify, amend, modify, and supplement the information contained in these identifications as information becomes available through discovery or investigation during this action, and as permitted by the Federal Rules of Civil Procedure and this Court’s Scheduling Order.

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