

Claim 5 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Commander, Jeep Grand Cherokee, Jeep Cherokee, RAM 1500/2500/3500, RAM Promaster, RAM Chassis and RAM Cargo Van;

Claim 7 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee and Jeep Cherokee;

Claim 8 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee and Jeep Cherokee;

Claim 10 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee and Jeep Cherokee;

Claim 12 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee and Jeep Cherokee

Claim 13 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee and Jeep Cherokee;

Claim 15 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee and Jeep Cherokee;

Claim 17 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee, Jeep Cherokee and RAM Cargo Van;

Claim 18 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee, Jeep Cherokee and RAM Cargo Van;

Claim 19 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee, Jeep Cherokee and RAM Cargo Van;

Claim 20 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Chrysler Sebring,

Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee, Jeep Cherokee and RAM Cargo Van;

Claim 21 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee, Jeep Cherokee and RAM Cargo Van;

Claim 22 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee and Jeep Cherokee;

Claim 23 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee, Jeep Cherokee and RAM Cargo Van;

Claim 24 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee, Jeep Cherokee and RAM Cargo Van;

Claim 25 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee, Jeep Cherokee and RAM Cargo Van;

Claim 26 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee and Jeep Cherokee;

Claim 27 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee and Jeep Cherokee;

Claim 28 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Dodge Aspen, Dodge Aspen Hybrid, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Commander, Jeep Grand Cherokee, Jeep Cherokee, RAM 1500/2500/3500, RAM Promaster, RAM Chassis and RAM Cargo Van;

Claim 29 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Dodge Aspen, Dodge Aspen Hybrid, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Commander, Jeep Grand Cherokee, Jeep Cherokee, RAM 1500/2500/3500, RAM Promaster, RAM Chassis and RAM Cargo Van;

Claim 30 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Dodge Aspen, Dodge Aspen Hybrid, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Commander, Jeep Grand Cherokee, Jeep Cherokee, RAM 1500/2500/3500, RAM Promaster, RAM Chassis and RAM Cargo Van;

Claim 31 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee, Jeep Cherokee and RAM Cargo Van;

Claim 32 - Dodge Challenger, Dodge Journey, Dodge Dart, Dodge Nitro, Dodge Magnum, Dodge Grand Caravan, Dodge Charger, Dodge Durango, Chrysler Sebring, Chrysler Town & Country, Chrysler 300, Jeep Wrangler, Jeep Grand Cherokee, Jeep Cherokee and RAM Cargo Van.

C. Claim Chart Comparing Each Element of the Asserted Claims to the Accused Instrumentalities

A claim chart identifying where each element of each asserted claim is found within each Accused Chrysler vehicle is attached.

D. Identification of Whether Each Element of Each Asserted Claim is Present in the Accused Instrumentalities Literally or Under the Doctrine of Equivalent

Unless otherwise noted in the attached chart, Velocity asserts that all of the asserted claim elements are literally present in the Accused Chrysler vehicles. Where applicable, Velocity has identified alternative doctrine of equivalents assertions in the attached claim chart.

At this time, sections (e)-(f) of Local Patent Rule 2.2 are not applicable. Velocity expressly reserves the right to revise, amend and supplement these contentions as discovery progresses and new information becomes available.

Dated: March 12, 2014

Respectfully submitted,

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PROOF OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on March 12, 2014, by electronic mail to:

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Velocity Patent LLC Preliminary Infringement Contentions Against Chrysler Pursuant to N.D. Ill. LPR 2.1

Claim 1	Corresponding Element in Chrysler Vehicles ¹
<p>1A. Apparatus for optimizing operation of a vehicle, comprising:²</p>	<p>The accused Chrysler vehicles³ include an apparatus for optimizing operation of a vehicle.</p> <p>For example, the accused Chrysler vehicles include computer-controlled vehicle systems with one or more computer processors that monitor various vehicle systems and optimize the fuel economy, safety and performance of the vehicle.</p> <p>ONBOARD DIAGNOSTIC SYSTEM — OBD II</p> <p>Your vehicle is equipped with a sophisticated onboard diagnostic system called OBD II. This system monitors the performance of the emissions, engine, and automatic transmission control systems. When these systems are operating properly, your vehicle will provide excellent performance and fuel economy, as well as engine emissions well within current government regulations.</p>

¹ Velocity contends that each element of the asserted claims is literally and directly infringed by the accused vehicles. Additionally, where noted below, Velocity alternatively contends that certain elements are infringed under the doctrine of equivalents.


² Velocity's citations related to any claim preamble in this claim chart should not be interpreted as an admission that the preamble is limiting.

³ The accused features and vehicles identified in these preliminary contentions are representative only. Velocity accuses all Chrysler vehicle models for model years 2007 to 2014 that incorporate features that are similar to the accused features identified in these preliminary contentions. The accused Chrysler vehicles identified in these preliminary contentions are representative only, and include: (1) Dodge Challenger, Charger, Dart, Durango, Grand Caravan, Journey, Magnum, Nitro, Sprinter, Sprinter Cargo Van, and Viper, including all associated SRT models; (2) Chrysler 300, Aspen, Aspen Hybrid, Sebring, and Town & Country, including all associated SRT models; (3) Jeep Grand Cherokee, Cherokee, Wrangler, and Commander including all associated unlimited and SRT models; and (4) RAM 1500, 2500, 3500, Chassis, Promaster, and Cargo Van. Discovery has just begun in this case. Velocity reserves the right to supplement and identify additional infringing models (e.g., 2015 models currently being tested) as it learns facts through discovery.

Claim 1	Corresponding Element in Chrysler Vehicles
	<p>Diagnostic Procedure Manuals</p> <p>Diagnostic Procedure Manuals are filled with diagrams, charts and detailed illustrations. These practical manuals make it easy for students and technicians to find and fix problems on computer-controlled vehicle systems and features. They show exactly how to find and correct problems the first time, using step-by-step troubleshooting and drivability procedures, proven diagnostic tests and a complete list of all tools and equipment</p> <p>(See, e.g., Ex. Dodge-1A, 2014 Dodge Challenger Owner's Manual at 431, 502; Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual [CHRY_VEL0001698] at 541, 612; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 594, 656; Ex. Dodge-1D, 2014 Dodge Journey Owner's Manual at 545, 618; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 560, 626; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual [CHRY_VEL0003641] at 561, 630; Ex. Dodge-1G, 2011 Dodge Nitro Owner's Manual at 403, 470; Ex. Dodge-1H, 2008 Dodge Magnum Owner's Manual at 387, 455.)</p> <p>(See, e.g., Ex. RAM-1A, 2014 RAM 1500/2500/3500 Owner's Manual at 681, 766; Ex. RAM-1B, 2014 RAM Promaster Owner's Manual at 314, 376; Ex. RAM 1C, 2014 RAM Chassis Owner's Manual at 443, 520; Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 576, 640.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual [CHRY_VEL0000001] at 521; Ex. Chrysler-1B, 2010 Chrysler Sebring Owner's Manual at 344; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 618.)</p> <p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual [CHRY_VEL0004297] at 569; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual [CHRY_VEL0002946] at 589; Ex. Jeep-1C, 2014 Jeep Wrangler Owner's Manual at 576; Ex. Jeep-1D, 2010 Jeep Commander Owner's Manual at 359.)</p>

Claim 1	Corresponding Element in Chrysler Vehicles ¹
<p>IB. a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, an engine speed sensor, a manifold pressure sensor and a throttle position sensor.</p>	<p>The accused Chrysler vehicles include a plurality of sensors coupled to the vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, an engine speed sensor, a manifold pressure sensor and a throttle position sensor.</p> <p><i>See, e.g.</i>, citations for claim element 1A (describing processor controlled vehicle systems that monitor vehicle system characteristics and operations).</p> <p>IB1. The accused Chrysler vehicles include one or more road speed sensors</p>
<p>3. <i>Speedometer</i></p>	<p>Indicates vehicle speed.</p>
<p>(<i>See, e.g.</i>, Ex. Dodge-1A, 2014 Dodge Challenger Owner's Manual at 206; Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 324; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 313; Ex. Dodge-1D, 2014 Dodge Journey Owner's Manual at 305; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 314; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 291; Ex. Dodge-1G, 2011 Dodge Nitro Owner's Manual at 200; Ex. Dodge-1H, 2008 Dodge Magnum Owner's Manual at 174.)</p>	<p>(<i>See, e.g.</i>, Ex. RAM-1A, 2014 RAM 1500/2500/3500 Owner's Manual at 181, 283; Ex. RAM-1B, 2014 RAM Promaster Owner's Manual at 92, 118; Ex. RAM 1C, 2014 RAM Chassis Owner's Manual at 167, 201; Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 219, 302.)</p>
<p>(<i>See, e.g.</i>, Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 316; Ex. Chrysler-1B, 2010 Chrysler Sebring Owner's Manual at 145; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 328.)</p>	<p>(<i>See, e.g.</i>, Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 316; Ex. Chrysler-1B, 2010 Chrysler Sebring Owner's Manual at 145; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 328.)</p>

Claim 1	Corresponding Element in Chrysler Vehicles ¹
	<p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 289; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 325; Ex. Jeep-1C, 2014 Jeep Wrangler Owner's Manual at 302; Ex. Jeep-ID, 2010 Jeep Commander Owner's Manual at 160.)</p> <p>1B2. The accused Chrysler vehicles include one or more engine speed sensors:</p> <p style="padding-left: 40px;">5. <i>Tachometer</i></p> <p style="padding-left: 40px;">The red segments indicate the maximum permissible engine revolutions per minute (RPM x 1000) for each gear range. Ease up on the accelerator before reaching the red area.</p> <p>(See, e.g., Ex. Dodge-1A, 2014 Dodge Challenger Owner's Manual at 206; Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 324; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 306; Ex. Dodge-ID, 2014 Dodge Journey Owner's Manual at 298; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 308; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 290; Ex. Dodge-1G, 2011 Dodge Nitro Owner's Manual at 206; Ex. Dodge-1H, 2008 Dodge Magnum Owner's Manual at 174.)</p> <p>(See, e.g., Ex. RAM-1A, 2014 RAM 1500/2500/3500 Owner's Manual at 278; Ex. RAM-1B, 2014 RAM Promaster Owner's Manual at 121; Ex. RAM 1C, 2014 RAM Chassis Owner's Manual at 196; Ex. RAM-ID, 2014 RAM Cargo Van Owner's Manual at 295.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 312; Ex. Chrysler-1B, 2010 Chrysler Sebring Owner's Manual at 149; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 321.)</p> <p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 288; Ex. Jeep-1B, 2014</p>

Claim 1	Corresponding Element in Chrysler Vehicles ¹
	<p>Jeep Cherokee Owner's Manual at 320; Ex. Jeep-1C, 2014 Jeep Wrangler Owner's Manual at 306; Ex. Jeep-1D, 2010 Jeep Commander Owner's Manual at 163.)</p> <p>IB3. Upon information and belief, Chrysler uses manifold pressure sensors for the electronic fuel injection (EFI) system included in all of the accused Chrysler vehicles. See, e.g. Ex. Chrysler-3, Steve V. Hatch, Computerized Engine Controls (2012) at 475. See also, e.g., http://www.mopar.com listing various MAP sensor related parts for the accused vehicles.</p> <p>IB4. The accused Chrysler vehicles include one or more throttle position sensors. For example, the accused Chrysler vehicles include a throttle position sensor that provides information to the Electronic Throttle Control (ETC) system.</p> <p>7. <i>Electronic Throttle Control (ETC) Warning Light</i></p>  <p>This light will turn on briefly as a bulb check when the ignition switch is placed in the ON/RUN position. This light will also turn on while the engine is running if there is a problem with the Electronic Throttle Control (ETC) system.</p> <p>(See, e.g., Ex. Dodge-1A, 2014 Dodge Challenger Owner's Manual at 207; Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 336; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 320; Ex. Dodge-1D, 2014 Dodge Journey Owner's Manual at 314; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 315; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 309; Ex. Dodge-1G, 2011 Dodge Nitro Owner's Manual at 203; Ex. Dodge-1H, 2008 Dodge Magnum Owner's Manual at 175.)</p> <p>(See, e.g., Ex. RAM-1A, 2014 RAM 1500/2500/3500 Owner's Manual at 310; Ex. RAM-1B,</p>

Claim 1	Corresponding Element in Chrysler Vehicles ¹
<p>1C. a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom;</p>	<p>2014 RAM Promaster Owner's Manual at 126; Ex. RAM 1C, 2014 RAM Chassis Owner's Manual at 206; Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 307.) (<i>See, e.g.</i>, Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 329; Ex. Chrysler-1B, 2010 Chrysler Sebring Owner's Manual at 152; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 334.) (<i>See, e.g.</i>, Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 308; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 343; Ex. Jeep-1C, 2014 Jeep Wrangler Owner's Manual at 316; Ex. Jeep-1D, 2010 Jeep Commander Owner's Manual at 169.)</p>
<p>1D. a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point, and present and prior levels for each one of said plurality of sensors;</p>	<p>The accused Chrysler vehicles include a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom. <i>See, e.g.</i>, citations for claim elements 1A (describing processor controlled vehicle systems that monitor vehicle system characteristics and operations) and 1B (describing sensors that measure system characteristics).</p>
<p>1E. a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle.</p>	<p>On information and belief, the accused Chrysler vehicles have a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point, an RPM set point, and present and prior levels for each one of said plurality of sensors. For example, the accused Chrysler vehicles include one or more memories that form a memory subsystem for storing information relating to vehicle system operations and features described in the vehicle manuals. <i>See, e.g.</i>, citations for claim elements 1A-C.</p>

Claim 1

notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle;

Corresponding Element in Chrysler Vehicles¹

For example, the accused Chrysler vehicles include one or more fuel overinjection notification circuits coupled to said processor subsystem:

ECD

- The ECD message will appear in your EVIC display whenever you are driving in a fuel efficient manner.
- This feature allows you to monitor when you are driving in a fuel efficient manner, and it can be used to modify driving habits in order to increase fuel economy.


(See, e.g., Ex. Dodge-2A, 2014 Dodge Challenger/Challenger SRT User's Guide at 71; Ex. Dodge-2B, 2014 Dodge Charger/Charger SRT User's Guide at 65; Ex. Dodge-2F, 2014 Dodge Durango User's Guide at 109; Ex. Dodge-2G, 2011 Dodge Nitro User's Guide at 40.)

- Average Fuel Economy/Fuel Saver Mode — If Equipped

- Shows the average fuel economy since the last reset. When the fuel economy is reset, the display will read "RESET" or show dashes for two seconds. Then, the history information will be erased, and the averaging will continue from the last fuel average reading before the reset.

- The FUEL SAVER MODE message will display above the average fuel economy in the EVIC display. This message will appear whenever the Multi-Displacement System (MDS) (if equipped) allows the engine to operate on four cylinders, or if you are driving in a fuel efficient manner.

EXAMPLE ONLY





FUEL SAVER MODE
Average MPG
23.5 ▲ Reset

04100207

Fuel Saver Mode—On

- This feature allows you to monitor when you are driving in a fuel efficient manner, and it can be used to modify driving habits in order to increase fuel economy.

(See, e.g., Ex. Dodge-1A, 2014 Dodge Challenger Owner's Manual at 223-24; Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 340; Ex. Dodge-ID, 2014 Dodge Journey Owner's

Claim 1	Corresponding Element in Chrysler Vehicles ¹														
<p data-bbox="300 388 332 1480">Manual at 335; Ex. Dodge-1H, 2008 Dodge Magnum Owner's Manual at 189-90.)</p> <div data-bbox="446 1060 738 1291" style="border: 1px solid black; padding: 5px; margin: 10px auto; width: fit-content;"> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20px; text-align: center;">N</td> <td style="width: 40px; text-align: center;">72°F</td> </tr> <tr> <td colspan="2" style="text-align: center;">Fuel Economy</td> </tr> <tr> <td style="text-align: center;">AVG: 99.9</td> <td style="text-align: center;">RESID</td> </tr> <tr> <td colspan="2" style="text-align: center;">DTE-LOW FUEL</td> </tr> <tr> <td style="text-align: center;">MPG 15</td> <td style="text-align: center;">30</td> </tr> <tr> <td colspan="2" style="text-align: center;">  </td> </tr> <tr> <td colspan="2" style="text-align: right;">9mi</td> </tr> </table> </div> <p data-bbox="755 1008 836 1354" style="text-align: center;">Average Fuel Economy Display Miles Per Gallon (MPG)</p> <p data-bbox="852 787 966 1375">This display shows the instantaneous MPG in bar graph form while driving. This will monitor the gas mileage in real-time as you drive and can be used to modify driving habits in order to increase fuel economy.</p> <p data-bbox="1015 388 1144 1480">(Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 340; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 330-31; Ex. Dodge-1D, 2014 Dodge Journey Owner's Manual at 317; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 344, 349; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 315-316.)</p> <p data-bbox="1177 367 1274 1480">(See, e.g., Ex. RAM-2A, 2014 RAM 1500/2500/3500 User's Guide at 119; Ex. RAM-1B, 2014 RAM Promaster Owner's Manual at 136-37; Ex. RAM 1C, 2014 RAM Chassis Owner's Manual at 245; Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 320. See also, e.g.,</p>	N	72°F	Fuel Economy		AVG: 99.9	RESID	DTE-LOW FUEL		MPG 15	30			9mi		
N	72°F														
Fuel Economy															
AVG: 99.9	RESID														
DTE-LOW FUEL															
MPG 15	30														
															
9mi															

Claim 1	Corresponding Element in Chrysler Vehicles ¹
	<p>Ex. RAM-3A, 2010 RAM 1500/2500/3500 Owner's Manual at 207-208; Ex. RAM-4A, 2010 RAM 1500/2500/3500 User's Guide at 7.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 334; Ex. Chrysler-1B, 2010 Chrysler Sebring Owner's Manual at 162; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 347.)</p> <p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 312; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 364; Ex. Jeep-1C, 2014 Jeep Wrangler Owner's Manual at 328; Ex. Jeep-1D, 2010 Jeep Commander Owner's Manual at 177.)</p>
<p>1F. an upshift notification circuit coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed;</p>	<p>The accused Chrysler vehicles include an upshift notification circuit coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed.</p> <p>For example, the accused Chrysler vehicles include one or more upshift notification circuits coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed.</p>

Claim 1

Corresponding Element in Chrysler Vehicles¹

- Key Not Programmed
 - Vehicle Not in Park
 - Key Fob Not Detected
 - Press Brake & Push Button to Start
 - Push Button or Insert Key/Turn To Run (refer to "Remote Starting System" in "Things To Know Before Starting Your Vehicle")
 - 1-4 SKIPSHIFT
- Gear Shift Indicator (GSI) — If Equipped**
- The Gear Shift Indicator (GSI) system is enabled on vehicles with a manual transmission, or when a vehicle with an automatic transmission is in manual shift mode. The GSI provides the driver with a visual indication within the EVIC when the recommended gear shift point has been reached. This indication notifies the driver that changing gear will allow a reduction in fuel consumption.
- Engine Oil Change Indicator System**
- Oil Change Required**
- Your vehicle is equipped with an engine oil change indicator system. The "Oil Change Required" message will flash in the EVIC display for approximately 10 seconds after a single chime has sounded, to indicate the next scheduled oil change interval. The engine oil change

(See, e.g., Ex. Dodge-1A, 2014 Dodge Challenger Owner's Manual at 221; Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 337-338.)

(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 321-22.)

Claim 1	Corresponding Element in Chrysler Vehicles										
	<p>When the shift up indicator (+) is shown on the display, the CSI is advising the driver to engage a higher gear.</p> <div data-bbox="365 1081 592 1260" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>NE 1567289, ml. 102</p> <table style="width: 100%; text-align: center; border-collapse: collapse;"> <tr><td style="border: none;">P</td></tr> <tr><td style="border: none;">R</td></tr> <tr><td style="border: none;">N</td></tr> <tr><td style="border: 1px solid black; padding: 2px;">2+</td></tr> <tr><td style="border: none;">L</td></tr> </table> </div> <p>CSI Shift Up (+) Indicator</p> <p>When the shift down indicator (-) is shown on the display, the CSI is advising the driver to engage a lower gear.</p> <div data-bbox="316 640 544 819" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>NE 1567289, ml. 102</p> <table style="width: 100%; text-align: center; border-collapse: collapse;"> <tr><td style="border: none;">P</td></tr> <tr><td style="border: none;">R</td></tr> <tr><td style="border: none;">N</td></tr> <tr><td style="border: 1px solid black; padding: 2px;">2-</td></tr> <tr><td style="border: none;">L</td></tr> </table> </div> <p>CSI Shift Down (-) Indicator</p> <p>The CSI indicator in the EVIC remains illuminated until the driver changes gear, or the driving conditions return to a situation where changing gear is not required to improve fuel consumption.</p>	P	R	N	2+	L	P	R	N	2-	L
P											
R											
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2+											
L											
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2-											
L											
<p>(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 338.)</p>											
<p>As another example, the accused Chrysler vehicles include one or more upshift notification circuits coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed.</p>											

Claim 1	Corresponding Element in Chrysler Vehicles ¹
	<p>AutoStick® mode will retain the current gear. When AutoStick® is active, the current transmission gear is displayed in the instrument cluster. In AutoStick® mode, the transmission will shift up or down when (+/-) is manually selected by the driver (using the shift lever, or the shift paddles [if equipped]), unless an engine lugging or overspeed condition would result. It will remain in the selected gear until another upshift or downshift is chosen, except as described below.</p> <ul style="list-style-type: none"> • If AutoStick® is engaged while in DRIVE mode, the transmission will automatically shift up when maximum engine speed is reached. • If AutoStick® is engaged while in SPORT mode, the transmission will remain in the selected gear even when maximum engine speed is reached. The transmission will upshift only when commanded by the driver. Engine overspeed protection will be provided by fuel cut off at or near redline. <p>(See, e.g., Ex. Dodge-1A, 2014 Dodge Challenger Owner's Manual at 310; Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 421, 423; Ex. Dodge-1D, 2014 Dodge Journey Owner's Manual at 312, 424-425; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 438, 317; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 420-21; Ex. Dodge-1G, 2011 Dodge Nitro Owner's Manual at 301; Ex. Dodge-1H, 2008 Dodge Magnum Owner's Manual at 286.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 401-2, Ex. Chrysler-1B, 2010 Chrysler Sebring Owner's Manual at 248-9.)</p> <p>(See, e.g., Ex. Jeep-1C, 2014 Jeep Wrangler Owner's Manual at 432.)</p>

Claim 1

Corresponding Element in Chrysler Vehicles¹

- An "UPSHIFT" message will appear in the Electronic Vehicle Information Center (EVIC) portion of the instrument cluster when using AutoStick[®], to alert the driver to upshift to the next gear. The "UPSHIFT" message will appear when approaching the maximum engine speed.

(See, e.g., Ex. Dodge-1A12, 2012 Dodge Challenger Owner's Manual at 274.)

(See, e.g., Ex. Chrysler-2A12, 2012 Chrysler 300 User's Guide at 63.)

- An UPSHIFT message will appear in the Electronic Vehicle Information Center (EVIC) portion of the instrument cluster when using AutoStick[®]. This message appears in order to alert the driver to upshift to the next gear. The UPSHIFT message will display while operating the vehicle at higher engine revolutions per minute (RPM).

(See, e.g., Ex. Dodge-1A08, 2008 Dodge Challenger SRT8 Owner's Manual at 228; Ex. Dodge-1B07, 2007 Dodge Charger SRT8 Owner's Manual at 201.)

As another example, the accused Chrysler vehicles include one or more upshift notification circuits coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed.

• *Electronic Range Select (ERS) Status*

The shift lever status "5,4,3,2,1" are displayed indicating the shift lever position. Telltales "5,4,3,2,1" indicate the Electronic Range Select (ERS) feature has been engaged and the gear selected is displayed. For further information on ERS, refer to "Starting And Operating".

The transmission shift lever has only PARK, REVERSE, NEUTRAL, and DRIVE shift positions. Manual downshifts can be made using the Electronic Range Select (ERS) shift control (described later in this section). Moving the shift lever to the left or right (-/+) while in the DRIVE position will select the highest available transmission gear, and will display that gear in the instrument cluster as 1, 2, 3, etc.

NOTE: Even if the transmission can be reset, we recommend that you visit your authorized dealer at your earliest possible convenience. Your authorized dealer has diagnostic equipment to determine if the problem could recur.

If the transmission cannot be reset, authorized dealer service is required.

Electronic Range Select (ERS) Operation

The Electronic Range Select (ERS) shift control allows the driver to limit the highest available gear when the shift lever is in the DRIVE position. For example, if you shift the transmission into 3 (third gear), the transmission will not shift above third gear (except to prevent engine overspeed), but will shift down into second and first gears normally.

You can switch between DRIVE and ERS mode at any vehicle speed. When the shift lever is in the DRIVE

position, the transmission will operate automatically, shifting between all available gears. Tapping the shift lever to the left (-) will activate ERS mode, display the current gear in the instrument cluster, and maintain that gear as the top available gear. Once in ERS mode, tapping the shift lever to the left (-) or right (+) will change the top available gear.

To exit ERS mode, simply press and hold the shift lever to the right (+) until "D" is once again displayed in the instrument cluster.

WARNING!

Do not downshift for additional engine braking on a slippery surface. The drive wheels could lose their grip and the vehicle could skid, causing a collision or personal injury.

Claim 1	Corresponding Element in Chrysler Vehicles ¹
	<p>(See, e.g., Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 325, 459, 465; Ex. Dodge-1G, 2011 Dodge Nitro Owner's Manual at 301.)</p> <p>(See, e.g., Ex. RAM-1A, 2014 RAM 1500/2500/3500 Owner's Manual at 294, 413-415; Ex. RAM-1B, 2014 RAM Promaster Owner's Manual at 119, 194; Ex. RAM-1C, 2014 RAM Chassis Owner's Manual at 212, 304; Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 314, 455.)</p> <p>(See, e.g., Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 343, 484-5.)</p> <p>(See, e.g., Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 429-30; Ex. Jeep-1D, 2010 Jeep Commander Owner's Manual at 250-1.)</p> <p>As another example, the accused Chrysler vehicles include one or more upshift notification circuits coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed.</p> <p>1-4 Skip Shift</p> <p>There are times when you must shift the transmission directly from first gear to fourth gear instead of from first gear to second gear. This is to help you get the best possible fuel economy from your vehicle. This occurs when the engine coolant (antifreeze) is higher than 106°F (41°C), vehicle speed is greater than 19 mph (30 km/h) but less than 21 mph (34 km/h), and the transmission is in first gear, and the accelerator is at ¼ throttle or less. The "1-4 Skip Shift Indicator Message" will be displayed during these times.</p>

(See, e.g., Ex. Dodge-1A, 2014 Dodge Challenger Owner's Manual at 298.)

As another example, the accused Chrysler vehicles include one or more upshift notification circuits coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed.

Operation:

When the transmission is in DRIVE or SPORT mode, it will operate automatically, shifting between the eight available gears. To engage Paddle Shift mode, simply tap one of the steering wheel-mounted shift paddles (+/-) while in DRIVE or SPORT mode. Tapping (-) to enter Paddle Shift mode will downshift the transmission to the next lower gear, while using (+) to enter Paddle Shift mode will retain the current gear. When Paddle Shift mode is active, the current transmission gear is displayed in the instrument cluster.

In Paddle Shift mode, the transmission will shift up or down when (+/-) is manually selected by the driver, unless an engine lugging or overspeed condition would result. It will remain in the selected gear until another upshift or downshift is chosen, except as described below.

- The transmission will automatically downshift as the vehicle slows (to prevent engine lugging) and will display the current gear.
- The transmission will automatically downshift to first gear when coming to a stop. After a stop, the driver should manually upshift (+) the transmission as the vehicle is accelerated.

- You can start out from a stop, in first or second gear (or third gear, in 4LO range, Snow mode, or Sand mode). Tapping (+) at a stop will allow starting in second gear. Starting out in second gear is helpful in snowy or icy conditions.

- If a requested downshift would cause the engine to over-speed, that shift will not occur.
- The system will ignore attempts to upshift at too low of a vehicle speed.
- Holding the (-) paddle depressed will progressively downshift the transmission to the lowest gear possible at the current speed.
- Transmission shifting will be more noticeable when Paddle Shift mode is enabled.
- The system may revert to automatic shift mode if a fault or overheat condition is detected.

NOTE: When Selec-Speed or Hill Descent Control is enabled, Paddle Shift mode is not active. Pressing the (+/-) shift paddles in Selec-Speed or Hill Descent Control simply limits the highest allowed gear. Shifts below and up to that gear will occur automatically.

Claim 1	Corresponding Element in Chrysler Vehicles ¹
<p>1G. said processor subsystem determining, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said upshift notification circuit.</p>	<p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 416-417.)</p> <p>On information and belief, the accused Chrysler vehicles include a processor subsystem that determines based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said upshift notification circuit.</p> <p>See, e.g., citations for elements 1A-1F.</p>

Corresponding Element in Chrysler Vehicles	
Claim 2	
2A. Apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises: <i>See, e.g., citations for claim 1.</i>
2B. means for determining when road speed for said vehicle is increasing;	The accused Chrysler vehicles include a means for determining when road speed for said vehicle is increasing. <i>See, e.g., citations for claim elements IB-ID.</i> To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when road speed for said vehicle is increasing” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to Road Speed Sensor 18, Memory Subsystem 14, and Processor Subsystem 12.
2C. means for determining when throttle position for said vehicle is increasing; and	The accused Chrysler vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g., citations for claim elements IB-ID.</i> To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when throttle position for said vehicle is increasing” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to Throttle Sensor 24, Memory Subsystem 14, and Processor Subsystem 12.
2D. means for comparing	The accused Chrysler vehicles include a means for comparing manifold pressure to said

Claim 2	Corresponding Element in Chrysler Vehicles
<p>manifold pressure to said manifold pressure set point;</p>	<p>manifold pressure set point.</p> <p><i>See, e.g.</i>, citations for claim elements 1B-1D.</p> <p>To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “comparing manifold pressure to said manifold pressure set point” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to Manifold PSI Sensor 22, Memory Subsystem 14, and Processor Subsystem 12.</p>
<p>2E. said processor subsystem activating said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is above said manifold pressure set point.</p>	<p>On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is above said manifold pressure set point.</p> <p><i>See, e.g.</i>, citations for claim elements 1E, 1G.</p>

Claim 4	Corresponding Element in Chrysler Vehicles
4A. Apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises:	<p>The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises:</p> <p><i>See, e.g., citations for claim 1.</i></p>
4B. means for determining when road speed for said vehicle is decreasing;	<p>The accused Chrysler vehicles include a means for determining when road speed for said vehicle is decreasing.</p> <p><i>See, e.g., citations for claim element 2B.</i></p> <p>To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when road speed for said vehicle is decreasing” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to Road Speed Sensor 18, Memory Subsystem 14, and Processor Subsystem 12.</p>
4C. means for determining when throttle position for said vehicle is increasing; and	<p>The accused Chrysler vehicles include a means for determining when throttle position for said vehicle is increasing.</p> <p><i>See, e.g., citations for claim element 2C.</i></p>
4D. means for determining when manifold pressure for said vehicle is increasing; and	<p>The accused Chrysler vehicles include a means for determining when manifold pressure for said vehicle is increasing.</p> <p><i>See, e.g., citations for claim elements 1B-1D.</i></p>

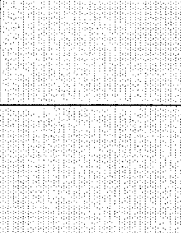
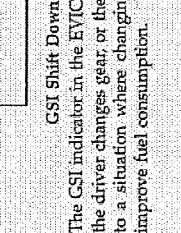
Claim 4	Corresponding Element in Chrysler Vehicles
	<p>To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when manifold pressure for said vehicle is increasing” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to Manifold PSI Sensor 22, Memory Subsystem 14, and Processor Subsystem 12.</p>
<p>4E. means for determining when engine speed for said vehicle is decreasing;</p>	<p>The accused Chrysler vehicles include a means for determining when engine speed for said vehicle is decreasing.</p> <p><i>See, e.g.,</i> citations for claim elements IB-ID.</p> <p>To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when engine speed for said vehicle is decreasing” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to RPM Sensor 20, Memory Subsystem 14, and Processor Subsystem 12.</p>
<p>4F. said processor subsystem activating said fuel overinjection notification circuit if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing.</p>	<p>On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said fuel overinjection notification circuit if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing.</p> <p><i>See, e.g.,</i> citations for claim elements IE, IG.</p>

Claim 5	Corresponding Element in Chrysler Vehicles
<p>5A. Apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises:</p>	<p>The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises: <i>See, e.g., citations for claim 1.</i></p>
<p>5B. means for determining when road speed for said vehicle is increasing;</p>	<p>The accused Chrysler vehicles include a means for determining when road speed for said vehicle is increasing. <i>See, e.g., citations for claim element 2B.</i></p>
<p>5C. means for determining when throttle position for said vehicle is increasing; and</p>	<p>The accused Chrysler vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g., citations for claim element 2C.</i></p>
<p>5D. means for comparing manifold pressure to said manifold pressure set point;</p>	<p>The accused Chrysler vehicles include a means for comparing manifold pressure to said manifold pressure set point. <i>See, e.g., citations for claim element 2D.</i></p>
<p>5E. means for comparing engine speed to said RPM set point;</p>	<p>The accused Chrysler vehicles include a means for comparing engine speed to said RPM set point. <i>See, e.g., citations for claim elements 1B-1D.</i></p>

Corresponding Element in Chrysler Vehicles	
Claim 5	<p>To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when engine speed for said vehicle is decreasing” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to RPM Sensor 20, Memory Subsystem 14, and Processor Subsystem 12.</p>
<p>5F. said processor subsystem activating said upshift notification circuit if both road speed and throttle position for said vehicle are increasing, manifold pressure for said vehicle is at or below said manifold pressure set point and engine speed for said vehicle is at or above said RPM set point.</p>	<p>On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said upshift notification circuit if both road speed and throttle position for said vehicle are increasing, manifold pressure for said vehicle is at or below said manifold pressure set point and engine speed for said vehicle is at or above said RPM set point.</p> <p><i>See, e.g., citations for claim elements 1F, 1G.</i></p>

Claim 7	Corresponding Element in Chrysler Vehicles
7A. Apparatus for optimizing operation of a vehicle, comprising:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle. <i>See, e.g.,</i> citations for claim 1.
7B. a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, a manifold pressure sensor and a throttle position sensor;	The accused Chrysler vehicles include a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, a manifold pressure sensor and a throttle position sensor; <i>See, e.g.,</i> citations for claim element 1B.
7C. a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom;	The accused Chrysler vehicles include a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom. <i>See, e.g.,</i> citations for claim element 1C.
7D. a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point and present and prior levels for each one of said plurality of sensors;	The accused Chrysler vehicles include a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point and present and prior levels for each one of said plurality of sensors; <i>See, e.g.,</i> citations for claim element 1D.
7E. a fuel overinjection notification circuit coupled	The accused Chrysler vehicles include a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that

Claim 7		Corresponding Element in Chrysler Vehicles
<p>to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle;</p>	<p>excessive fuel is being supplied to said engine of said vehicle;</p> <p>See, e.g., citations for claim element 1E.</p>	<p>When the shift up indicator (+) is shown on the display, the CSI is advising the driver to engage a higher gear.</p> <p>When the shift down indicator (-) is shown on the display, the CSI is advising the driver to engage a lower gear.</p> <p>The CSI indicator in the EVIC remains illuminated until the driver changes gear, or the driving conditions return to a situation where changing gear is not required to improve fuel consumption.</p> <p>Engine Oil Change Indicator System Oil Change Required</p> <p>Your vehicle is equipped with an engine oil change indicator system. The "Oil Change Required" message will flash in the EVIC display for approximately 10 seconds after a single chime has sounded, to indicate the next scheduled oil change interval. The engine oil change gear will allow a reduction in fuel consumption.</p>
<p>7F. a downshift notification circuit coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed, and</p>	<p>The accused Chrysler vehicles include a downshift notification circuit coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed; and</p> <p>For example, the accused Chrysler vehicles include one or more downshift notification circuits coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient speed.</p>	<ul style="list-style-type: none"> • Key not Programmed • Vehicle Not in Park • Key Fob Not Detected • Press Brake & Push Button to Start • Push Button or Insert Key/Turn To Run (refer to "Remote Starting System" in "Things To Know Before Starting Your Vehicle") • 1-4 5KIPSHIFT <p>Gear Shift Indicator (GSI) — If Equipped</p> <p>The Gear Shift Indicator (GSI) system is enabled on vehicles with a manual transmission, or when a vehicle with an automatic transmission is in manual shift mode. The CSI provides the driver with a visual indication within the EVIC when the recommended gear shift point has been reached. This indication notifies the driver that changing gear will allow a reduction in fuel consumption.</p>

Claim 7	<p align="center">Corresponding Element in Chrysler Vehicles</p> <p>(See, e.g., Ex. Dodge-1A, 2014 Dodge Challenger Owner's Manual at 221; Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 337-338.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 321-22.)</p>
	<p>When the shift up indicator (+) is shown on the display, the GSI is advising the driver to engage a higher gear.</p>  <p>NE_156789.mt_102'</p> <p align="right">040910654</p>
	<p>When the shift down indicator (-) is shown on the display, the GSI is advising the driver to engage a lower gear.</p>  <p>NE_156789.mt_102'</p> <p align="right">040910655</p>
	<p>GSI Shift Up (+) Indicator</p> <p>The GSI indicator in the EVIC remains illuminated until the driver changes gear, or the driving conditions return to a situation where changing gear is not required to improve fuel consumption.</p>
	<p>GSI Shift Down (-) Indicator</p> <p>The GSI indicator in the EVIC remains illuminated until the driver changes gear, or the driving conditions return to a situation where changing gear is not required to improve fuel consumption.</p>

(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 338.)

Claim 7

Corresponding Element in Chrysler Vehicles

As another example, the accused Chrysler vehicles include one or more downshift notification circuits coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient speed.

- AutoStick® mode will retain the current gear. When AutoStick® is active, the current transmission gear is displayed in the instrument cluster. In AutoStick® mode, the transmission will shift up or down when (+/-) is manually selected by the driver (using the shift lever, or the shift paddles [if equipped]), unless an engine lugging or overspeed condition would result. It will remain in the selected gear until another upshift or downshift is chosen, except as described below.
- If AutoStick® is engaged while in DRIVE mode, the transmission will automatically shift up when maximum engine speed is reached.
- If AutoStick® is engaged while in SPORT mode, the transmission will remain in the selected gear even when maximum engine speed is reached. The transmission will upshift only when commanded by the driver. Engine overspeed protection will be provided by fuel cut off at or near redline.

- The transmission will automatically downshift as the vehicle slows (to prevent engine lugging) and will display the current gear.
- The transmission will automatically downshift to first gear when coming to a stop. After a stop, the driver should manually upshift (+) the transmission as the vehicle is accelerated.
- You can start out, from a stop, in first or second gear. Tapping (+) (at a stop) will allow starting in second gear. Starting out in second gear is helpful in snowy or icy conditions.
- The system will ignore attempts to upshift at too low of a vehicle speed.
- Avoid using speed control when AutoStick® is engaged.
- Transmission shifting will be more noticeable when AutoStick® is engaged.

(See, e.g., Ex. Dodge-1A, 2014 Dodge Challenger Owner's Manual at 310; Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 421, 423-24; Ex. Dodge-1D, 2014 Dodge Journey Owner's Manual at 312, 424-425; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 438-439, 317; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 420-21; Ex. Dodge-1G, 2011 Dodge Nitro Owner's Manual at 301; Ex. Dodge-1H, 2008 Dodge Magnum Owner's

Claim 7	Corresponding Element in Chrysler Vehicles
	<p>Manual at 286.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 401-2; Ex. Chrysler-1B, 2010 Chrysler Sebring Owner's Manual at 248-9.)</p> <p>(See, e.g., Ex. Jeep-1C, 2014 Jeep Wrangler Owner's Manual at 432.)</p> <p>As another example, the accused Chrysler vehicles include one or more downshift notification circuits coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient speed.</p> <p>Operation</p> <p>When the transmission is in DRIVE or SPORT mode, it will operate automatically, shifting between the eight available gears. To engage Paddle Shift mode, simply tap one of the steering wheel-mounted shift paddles (+/-) while in DRIVE or SPORT mode. Tapping (-) to enter Paddle Shift mode will downshift the transmission to the next lower gear, while using (+) to enter Paddle Shift mode will retain the current gear. When Paddle Shift mode is active, the current transmission gear is displayed in the instrument cluster.</p>

Claim 7	Corresponding Element in Chrysler Vehicles
<p>In Paddle Shift mode, the transmission will shift up or down when (+/-) is manually selected by the driver, unless an engine lugging or overspeed condition would result. It will remain in the selected gear until another upshift or downshift is chosen, except as described below.</p> <ul style="list-style-type: none"> The transmission will automatically downshift as the vehicle slows (to prevent engine lugging) and will display the current gear. The transmission will automatically downshift to first gear when coming to a stop. After a stop, the driver should manually upshift (+) the transmission as the vehicle is accelerated. You can start out, from a stop, in first or second gear (or third gear, in 4LO range, Snow mode, or Sand mode). Tapping (+) at a stop will allow starting in second gear. Starting out in second gear is helpful in snowy or icy conditions. <p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 416-417.)</p>	<ul style="list-style-type: none"> If a requested downshift would cause the engine to over-speed, that shift will not occur. The system will ignore attempts to upshift at too low of a vehicle speed. Holding the (-) paddle depressed will progressively downshift the transmission to the lowest gear possible at the current speed. Transmission shifting will be more noticeable when Paddle Shift mode is enabled. The system may revert to automatic shift mode if a fault or overheat condition is detected. <p>NOTE: When Selec-Speed or Hill Descent Control is enabled, Paddle Shift mode is not active. Pressing the (+/-) shift paddles in Selec-Speed or Hill Descent Control simply limits the highest allowed gear. Shifts below and up to that gear will occur automatically.</p>
<p>7G. said processor subsystem determining, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said downshift notification circuit.</p>	<p>On information and belief, the accused Chrysler vehicles include a processor subsystem that determines, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said downshift notification circuit.</p> <p>See, e.g., citations for elements 1G, 7F.</p>

Claim 8	Corresponding Element in Chrysler Vehicles
8A. Apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises: <i>See, e.g., citations for claim 1.</i>
8B. means for determining when road speed for said vehicle is increasing;	The accused Chrysler vehicles include a means for determining when road speed for said vehicle is increasing. <i>See, e.g., citations for claim element 2B.</i>
8C. means for determining when throttle position for said vehicle is increasing; and	The accused Chrysler vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g., citations for claim element 2C.</i>
8D. means for comparing manifold pressure to said manifold pressure set point;	The accused Chrysler vehicles include a means for comparing manifold pressure to said manifold pressure set point. <i>See, e.g., citations for claim element 2D.</i>
8E. said processor subsystem activating said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold	On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is above said manifold pressure set point. <i>See, e.g., citations for claim element 2E.</i>

Claim 8	Corresponding Element in Chrysler Vehicles
pressure for said vehicle is above said manifold pressure set point.	

Claim 10	Corresponding Element in Chrysler Vehicles
<p>10A. Apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises:</p>	<p>The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises: <i>See, e.g.</i>, citations for claim element 1.</p>
<p>10B. means for determining when road speed for said vehicle is decreasing;</p>	<p>The accused Chrysler vehicles include a means for determining when road speed for said vehicle is decreasing. <i>See, e.g.</i>, citations for claim element 4B.</p>
<p>10C. means for determining when throttle position for said vehicle is increasing; and</p>	<p>The accused Chrysler vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g.</i>, citations for claim element 2C.</p>
<p>10D. means for determining when manifold pressure for said vehicle is increasing; and</p>	<p>The accused Chrysler vehicles include a means for determining when manifold pressure for said vehicle is increasing. <i>See, e.g.</i>, citations for claim element 4D.</p>
<p>10E. means for determining when engine speed for said vehicle is decreasing;</p>	<p>The accused Chrysler vehicles include a means for determining when engine speed for said vehicle is decreasing. <i>See, e.g.</i>, citations for claim element 4E.</p>

Claim 10	Corresponding Element in Chrysler Vehicles
<p>10F. said processor subsystem activating said downshift notification circuit if both road speed and engine speed are decreasing and both throttle position and manifold pressure for said vehicle are increasing.</p>	<p>On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said downshift notification circuit if both road speed and engine speed are decreasing and both throttle position and manifold pressure for said vehicle are increasing.</p> <p><i>See, e.g., citations for claim elements 1G, 7F.</i></p>

Claim 12	Corresponding Element in Chrysler Vehicles
12A. Apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises: <i>See, e.g., citations for claim 1.</i>
12B. means for determining when road speed for said vehicle is decreasing;	The accused Chrysler vehicles include a means for determining when road speed for said vehicle is decreasing. <i>See, e.g., citations for claim element 4B.</i>
12C. means for determining when throttle position for said vehicle is increasing; and	The accused Chrysler vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g., citations for claim element 2C.</i>
12D. means for determining when manifold pressure for said vehicle is increasing; and	The accused Chrysler vehicles include a means for determining when manifold pressure for said vehicle is increasing. <i>See, e.g., citations for claim element 4D.</i>
12E. means for determining when engine speed for said vehicle is decreasing;	The accused Chrysler vehicles include a means for determining when engine speed for said vehicle is decreasing. <i>See, e.g., citations for claim element 4E.</i>
12F. said processor	On information and belief, the accused Chrysler vehicles include a processor subsystem that

Claim 12	Corresponding Element in Chrysler Vehicles
<p>subsystem activating said fuel overinjection notification circuit if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing.</p>	<p>activates said fuel overinjection notification circuit if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing.</p> <p><i>See, e.g., citations for claim elements 1E, 1G.</i></p>

Claim 13	Corresponding Element in Chrysler Vehicles
13A. Apparatus for optimizing operation of a vehicle, comprising:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle. <i>See, e.g.,</i> citations for claim 1.
13B. a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, an engine speed sensor, a manifold pressure sensor and a throttle position sensor;	The accused Chrysler vehicles include a plurality of sensors coupled to the vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, an engine speed sensor, a manifold pressure sensor and a throttle position sensor <i>See, e.g.,</i> citations for claim element 1B.
13C. a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom;	The accused Chrysler vehicles include a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom. <i>See, e.g.,</i> citations for claim element 1C.
13D. a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point, an engine speed set point, and present and prior levels for each one of said plurality of sensors;	The accused Chrysler vehicles have a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point, an engine speed set point, and present and prior levels for each one of said plurality of sensors. <i>See, e.g.,</i> citations for claim element 1D.
13E. a fuel overinjection	The accused Chrysler vehicles include a fuel overinjection notification circuit coupled to said

Claim 13	Corresponding Element in Chrysler Vehicles
<p>notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle;</p> <p>13F. an upshift notification circuit coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed.</p>	<p>processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle.</p> <p><i>See, e.g.</i>, citations for claim element 1E.</p>
<p>13G. a downshift notification circuit coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed; and</p>	<p>The accused Chrysler vehicles include an upshift notification circuit coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed.</p> <p><i>See, e.g.</i>, citations for claim element 1F.</p>
<p>13H. said processor subsystem determining, based upon data received from said plurality of sensors, when to activate said fuel overinjection</p>	<p>The accused Chrysler vehicles include a downshift notification circuit coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed; and</p> <p><i>See, e.g.</i>, citations for claim element 7F.</p>
<p>13I. said processor subsystem determining, based upon data received from said plurality of sensors, when to activate said fuel overinjection</p>	<p>The accused Chrysler vehicles include a processor subsystem that determines based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit, said upshift notification circuit and said downshift notification circuit.</p> <p><i>See, e.g.</i>, citations for claim element 1G.</p>

	Corresponding Element in Chrysler Vehicles
Claim 13 circuit, said upshift notification circuit and said downshift notification circuit.	

Claim 15	Corresponding Element in Chrysler Vehicles
15A. Apparatus for optimizing operation of a vehicle according to claim 13 wherein said processor subsystem further comprises:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 13 wherein said processor subsystem further comprises: <i>See, e.g.</i> , citations for claim 1.
15B. means for determining when road speed for said vehicle is increasing or decreasing;	The accused Chrysler vehicles include a means for determining when road speed for said vehicle is increasing or decreasing. <i>See, e.g.</i> , citations for claim element 2B. To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when road speed for said vehicle is increasing or decreasing” are described in, for example, Figures 1 and 2 and associated text of the ’781 patent relating to Road Speed Sensor 18, Memory Subsystem 14, and Processor Subsystem 12.
15C. means for determining when throttle position for said vehicle is increasing;	The accused Chrysler vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g.</i> , citations for claim element 2C.
15D. means for comparing manifold pressure to said manifold pressure set point;	The accused Chrysler vehicles include a means for comparing manifold pressure to said manifold pressure set point. <i>See, e.g.</i> , citations for claim element 2D.
15E. means for comparing	The accused Chrysler vehicles include a means for comparing engine speed to said RPM set

Claim 15	Corresponding Element in Chrysler Vehicles
<p>engine speed to said RPM set point;</p>	<p>point. <i>See, e.g.</i>, citations for claim element 5E.</p>
<p>15F. means for determining when manifold pressure is increasing;</p>	<p>The accused Chrysler vehicles include a means for determining when manifold pressure is increasing. <i>See, e.g.</i>, citations for claim element 4D.</p>
<p>15G. means for determining when engine speed is increasing or decreasing;</p>	<p>The accused Chrysler vehicles include a means for determining when engine speed is increasing or decreasing. <i>See, e.g.</i>, citations for claim element 4E. To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when engine speed for said vehicle is increasing or decreasing” are described in, for example, Figures 1 and 2 and associated text of the ’781 patent relating to RPM Sensor 20, Memory Subsystem 14, and Processor Subsystem 12.</p>
<p>15H. said processor subsystem activating said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is</p>	<p>On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is above said manifold pressure set or if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing. <i>See, e.g.</i>, citations for claim elements 1E, 1G.</p>

	Corresponding Element in Chrysler Vehicles
<p>Claim 15 above said manifold pressure set or if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing;</p>	
<p>15I. said processor subsystem activating said upshift notification circuit if both road speed and throttle position for said vehicle are increasing, manifold pressure for said vehicle is at or below said manifold pressure set point and engine speed for said vehicle is at or above said RPM set point; and</p>	<p>On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said upshift notification circuit if both road speed and throttle position for said vehicle are increasing, manifold pressure for said vehicle is at or below said manifold pressure set point and engine speed for said vehicle is at or above said RPM set point.</p> <p><i>See, e.g., citations for claim elements 1F, 1G.</i></p>
<p>15J. said processor subsystem activating said downshift notification circuit if both road speed and engine speed are decreasing and both throttle position and manifold pressure for said vehicle are increasing.</p>	<p>On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said downshift notification circuit if both road speed and engine speed are decreasing and both throttle position and manifold pressure for said vehicle are increasing.</p> <p><i>See, e.g., citations for claim element 10F.</i></p>

Claim 17	Corresponding Element in Chrysler Vehicles
17A. Apparatus for optimizing operation of a vehicle, comprising:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle. <i>See, e.g., citations for claim 1.</i>
17B. a radar detector, said radar detector determining a distance separating a vehicle having an engine and an object in front of said vehicle,	The accused Chrysler vehicles include a radar detector that determines a distance separating a vehicle having an engine and another object in front of the accused vehicles. For example, the accused Chrysler vehicles include one or more systems with radar detectors that determine a distance separating a vehicle having an engine and another object in front of the accused vehicles. 17B 1. Adaptive Cruise Control (ACC): ACC will allow you to keep cruise control engaged in light to moderate traffic conditions without the constant need to reset your cruise control. ACC utilizes a radar sensor designed to detect a vehicle directly ahead of you. NOTE: <ul style="list-style-type: none"> • If the sensor does not detect a vehicle ahead of you, ACC will maintain a fixed set speed. • If the ACC sensor detects a vehicle ahead, ACC will apply limited braking or acceleration (not to exceed the original set speed) automatically to maintain a preset following distance, while matching the speed of the vehicle ahead. (<i>See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 247; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 197.</i>) (<i>See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 226.</i>) (<i>See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 190; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 189.</i>)

17B2. Forward Collision Warning (FCW):

- You turn off the ignition.
- You switch off ESC.

If the Cruise Control system is turned off and reactivated, the system will return to the last driver setting (ACC or Normal Cruise Control).

Forward Collision Warning — If Equipped

The Forward Collision Warning (FCW) system provides the driver with audible and visual warnings (within the EVIC) when it detects a potential frontal collision. The warnings are intended to provide the driver with enough time to react and avoid the potential collision.

FCW monitors the information from the forward looking sensor as well as the Electronic Brake Controller (EBC), wheel speed sensors, i.e., to calculate a probable rear-end collision. When the system determines that a rear-end collision is probable a warning message (both audible and visual) will be displayed on the EVIC. When the

system determines a collision with the vehicle in front of you is no longer probable, the warning message will be deactivated.

NOTE: The minimum speed for FCW activation is 10 mph (16 km/h).

WARNING!

Forward Collision Warning (FCW) is not intended to avoid a collision on its own, nor can FCW detect every type of potential collision. The driver has the responsibility to avoid a collision by controlling the vehicle via braking and steering. Failure to follow this warning could lead to serious injury or death.

- **Forward Collision Warning (FCW) OFF**

This telltale informs the driver that the Forward Collision Warning feature is Off. The telltale is On when the front radar sensor is blocked and requires cleaning, the ACC/FCW sensors require service, or the ACC/FCW system is unavailable because of a system error. For further information, refer to "Adaptive Cruise Control (ACC)" in "Understanding The Features Of Your Vehicle."

(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 272, 334; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 212, 222-23.)

(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 252.)

(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 205; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 215.)

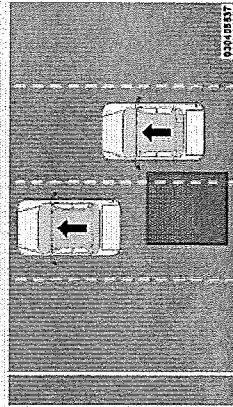
Claim 17

Corresponding Element in Chrysler Vehicles

17B3. Blind Spot Monitoring (BSM):

BLIND SPOT MONITORING (BSM) – IF EQUIPPED

The Blind Spot Monitoring (BSM) system uses two radar-based sensors, located inside the rear bumper fascia, to detect highway licensable vehicles (automobiles, trucks, motorcycles, etc.) that enter the blind spot zones from the rear/front/side of the vehicle.



(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 116, 118, 120; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 134, 136; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 124, 127; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 131, 135.)

(See, e.g., Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 120.)

(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 118; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 142.)

(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 132; Ex. Jeep-1B, 2014

Claim 17	Corresponding Element in Chrysler Vehicles
	<p>Jeep Cherokee Owner's Manual at 138.)</p> <p>17B4. Rear Cross Path (RCP):</p> <p>Rear Cross Path</p> <p>The Rear Cross Path (RCP) feature is intended to aid the drivers when backing out of parking spaces where their vision of oncoming vehicles may be blocked. Proceed slowly and cautiously out of the parking space until the rear end of the vehicle is exposed. The RCP system will then have a clear view of the cross traffic and if an oncoming vehicle is detected, alert the driver.</p> <p>(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 122; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 140; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 130; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 137.)</p> <p>(See, e.g., Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 126.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 124; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 149.)</p> <p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 138; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 144.)</p> <p>In the alternative, for each of the above proximity alert systems, the limitation is at least satisfied under the doctrine of equivalents. For example, on information and belief, these systems include detectors that are insubstantially different from the claimed radar detector; that perform substantially the same function (determining a distance separating a vehicle having an engine and another object in the path of the vehicle) in substantially the same way (e.g., using a radar sensor to determine distance) to achieve the same result (identification of an object in the path of</p>

Claim 17	Corresponding Element in Chrysler Vehicles
<p>17C. at least one sensor coupled to said vehicle for monitoring operation thereof, said at least one sensor including a road speed sensor, a manifold pressure sensor, a throttle position sensor and an engine speed sensor;</p>	<p>a vehicle).</p> <p>The accused Chrysler vehicles include at least one sensor coupled to said vehicle for monitoring operation thereof, said at least one sensor including a road speed sensor, a manifold pressure sensor, a throttle position sensor and an engine speed sensor.</p> <p><i>See, e.g.,</i> citations for claim element 1B.</p>
<p>17D. a processor subsystem, coupled to said radar detector and said at least one sensor, to receive data therefrom;</p>	<p>The accused Chrysler vehicles include a processor subsystem, coupled to said radar detector and said at least one sensor, to receive data therefrom.</p> <p><i>See, e.g.,</i> citations for claim element 1C.</p>
<p>17E. a memory subsystem, coupled to said processor subsystem, said memory subsystem storing a first vehicle speed/stopping distance table, a manifold pressure set point, an RPM set point, a present level for each one of said at least one sensor and a prior level for each one of said at least one sensor;</p>	<p>The accused Chrysler vehicles include a memory subsystem, coupled to said processor subsystem, said memory subsystem storing a first vehicle speed/stopping distance table, a manifold pressure set point, an RPM set point, a present level for each one of said at least one sensor and a prior level for each one of said at least one sensor.</p> <p><i>See, e.g.,</i> citations for claim elements 1A-1D.</p> <p>For example, on information and belief, the accused Chrysler vehicles include one or more systems that use one or more vehicle speed/stopping distance tables stored in one or more memories.</p>

Corresponding Element in Chrysler Vehicles

17E1. Adaptive Cruise Control (ACC):

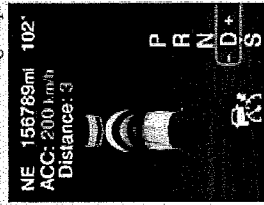
ACC will allow you to keep cruise control engaged in light to moderate traffic conditions without the constant need to reset your cruise control. ACC utilizes a radar sensor designed to detect a vehicle directly ahead of you.

NOTE:

- If the sensor does not detect a vehicle ahead of you, ACC will maintain a fixed set speed.
- If the ACC sensor detects a vehicle ahead, ACC will apply limited braking or acceleration (not to exceed the original set speed) automatically to maintain a preset following distance, while matching the speed of the vehicle ahead.

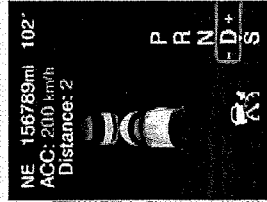
Setting The Following Distance In ACC

The specified following distance for ACC can be set by varying the distance setting between 3 (long), 2 (medium), and 1 (short). Using this distance setting and the vehicle speed, ACC calculates and sets the distance to the vehicle ahead. This distance setting displays in the EVIC.



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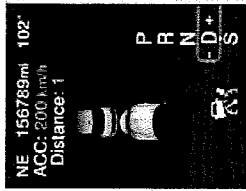
Distance Set 3 (long)



021243708

Distance Set 2 (medium)

Corresponding Element in Chrysler Vehicles



92230769

Distance Set 1 (short)

To change the distance setting, press the Distance button and release. Each time the button is pressed, the distance setting adjusts between 3 (long), 2 (medium), and 1 (short).

If there is no vehicle ahead, the vehicle will maintain the set speed. If a slower moving vehicle is detected in the

same lane, the EVIC displays the "Sensed Vehicle Indicator" icon, and the system adjusts vehicle speed automatically to maintain the distance setting, regardless of the set speed.

The vehicle will then maintain the set distance until:

- The vehicle ahead accelerates to a speed above the set speed.
- The vehicle ahead moves out of your lane or view of the sensor.
- The vehicle ahead slows to a speed below 15 mph (25 km/h) and the system automatically disengages itself.
- The distance setting is changed.
- The system disengages. (Refer to the information on ACC Activation).

NOTE: The brake lights will illuminate whenever the ACC system applies the brakes.

A Proximity Warning will alert the driver if ACC predicts that its maximum braking level is not sufficient to maintain the set distance. If this occurs, a visual alert "BRAKE" will flash in the EVIC and a chime will sound while ACC continues to apply its maximum braking capacity. When this occurs, you should immediately apply the brakes as needed to maintain a safe distance from the vehicle ahead.

(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 247, 257-259; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 197, 206-212.)

(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 236.)

(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 199; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 198.)

Corresponding Element in Chrysler Vehicles

17E2. Forward Collision Warning (FCW):

Changing FCW Status

The FCW feature can be set to far, set to near or turned off using the Uconnect® System, refer to "Uconnect® Settings" in "Understanding Your Instrument Panel" for further information. The FCW Status Off, Near or Far will be displayed in the Uconnect® display.

The default status of FCW is the "Far" setting, this allows the system to warn you of a possible collision with the vehicle in front of you when you are further away. This gives you the most reaction time.

Changing the FCW status to the "Near" setting, allows the system to warn you of a possible collision with the vehicle in front of you when you are much closer. This setting provides less reaction time than the "Far" setting, which allows for a more dynamic driving experience.

Changing the FCW status to "Off" prevents the system from warning you of a possible collision with the vehicle in front of you.

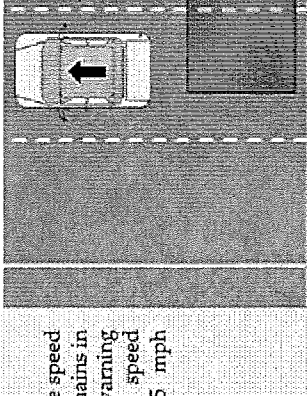
NOTE:

- In the "Off" setting FCW OFF will be displayed on the Uconnect® display.
- The system will retain the last setting selected by the driver after ignition shut down.
- FCW will not react to irrelevant objects such as overhead objects, ground reflections, objects not in the path of the car, stationary objects that are far away, oncoming traffic, or leading vehicles with the same or higher rate of speed.
- If the FCW becomes disabled then a warning will display on the EVIC screen.

(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 273; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 226.)

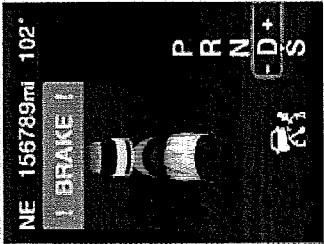
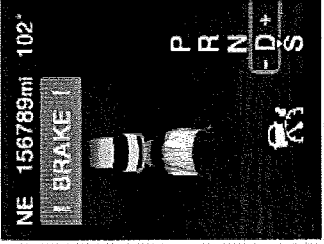
(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 253.)

(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 218; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 218.)

Claim 17	Corresponding Element in Chrysler Vehicles
<p>17E3. Blind Spot Monitoring (BSM):</p> <p>Overtaking Traffic</p> <p>If you pass another vehicle slowly (with a relative speed of less than 15 mph (24 km/h) and the vehicle remains in the blind spot for approximately 1.5 seconds, the warning light will be illuminated. If the difference in speed between the two vehicles is greater than 15 mph (24 km/h), the warning light will not illuminate.</p> <p>Overtaking/Approaching</p>  <p>(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 116, 118, 120; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 134, 136; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 124, 127; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 131, 135.)</p> <p>(See, e.g., Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 124.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 118; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 142.)</p> <p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 132; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 139.)</p>	

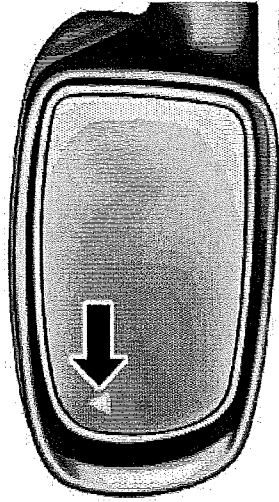
Claim 17	Corresponding Element in Chrysler Vehicles
17E4. Rear Cross Path (RCP).	<div data-bbox="378 957 574 1304" data-label="Image"> </div> <div data-bbox="581 957 699 1304" data-label="Caption"> <p>RCP monitors the rear detection zones on both sides of the vehicle, for objects that are moving toward the side of the vehicle with a minimum speed of approximately 3 mph (5 km/h), to objects moving a maximum of approximately 20 mph (32 km/h), such as in parking lot situations.</p> </div> <p data-bbox="743 394 841 1486">(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 123; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 140-41; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 130-1; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 137-8.)</p> <p data-bbox="878 625 911 1486">(See, e.g., Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 127.)</p> <p data-bbox="943 380 1008 1486">(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 124; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 149.)</p> <p data-bbox="1040 380 1105 1486">(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 138; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 145.)</p> <p data-bbox="1138 394 1268 1486">On information and belief, additional vehicle systems, including but not limited to electronic brake control systems (e.g., ABS, TCS, BAS, ESC, etc.) and speed control systems (e.g., electronic speed control (ESC) systems) included in the accused Chrysler vehicles, and safety and performance testing systems use vehicle speed/stopping distance tables stored in memory.</p> <p data-bbox="1279 464 1312 1486">The accused Chrysler vehicles include a vehicle proximity alarm circuit coupled to said</p>
17F. a vehicle proximity	

<p>Claim 17</p> <p>alarm circuit coupled to said processor subsystem, said vehicle proximity alarm circuit issuing an alarm that said vehicle is too close to an object;</p>	<p>Corresponding Element in Chrysler Vehicles</p> <p>processor subsystem, said vehicle proximity alarm circuit issuing an alarm that said vehicle is too close to an object.</p> <p>For example, the accused Chrysler vehicles include one or more systems that include circuits that issue an alarm to indicate that the vehicle is too close to an object.</p> <p>17F1. Adaptive Cruise Control (ACC):</p> <p>The maximum braking applied by ACC is limited; however, the driver can always apply the brakes manually, if necessary.</p> <p>NOTE: The brake lights will illuminate whenever the ACC system applies the brakes.</p> <p>A Proximity Warning will alert the driver if ACC predicts that its maximum braking level is not sufficient to maintain the set distance. If this occurs, a visual alert "BRAKE" will flash in the EVIC and a chime will sound while ACC continues to apply its maximum braking capacity. When this occurs, you should immediately apply the brakes as needed to maintain a safe distance from the vehicle ahead.</p> <div data-bbox="597 422 911 659" data-label="Image"> </div> <p style="text-align: right;">012 Brake Alert 3</p>
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Claim 17	Corresponding Element in Chrysler Vehicles
	<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p>012303711</p> <p>Brake Alert 2</p> </div> <div style="text-align: center;">  <p>012303712</p> <p>Brake Alert 1</p> </div> </div> <p>(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 259-60; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 197.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 228.)</p> <p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 202; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 201.)</p>

Claim 17	Corresponding Element in Chrysler Vehicles
<p>17F2. Forward Collision Warning (FCW).</p> <p>Forward Collision Warning – if Equipped</p> <p>The Forward Collision Warning (FCW) system provides the driver with audible and visual warnings (within the EVIC) when it detects a potential frontal collision. The warnings are intended to provide the driver with enough time to react and avoid the potential collision.</p> <p>(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 272; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 223.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 253.)</p> <p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 215; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 215.)</p>	

17F3. Blind Spot Monitoring (BSM):



BSM Warning Light

The BSM detection zone covers approximately one lane on both sides of the vehicle (12 ft or 3.8 m). The zone starts at the outside rear view mirror and extends approximately 23 ft (7 m) to the rear of the vehicle. The BSM system monitors the detection zones on both sides of the

The BSM system notifies the driver of objects in the detection zones by illuminating the BSM warning light located in the outside mirrors in addition to sounding an audible (chime) alert and reducing the radio volume. Refer to "Modes Of Operation" for further information.

The BSM system monitors the detection zone from three different entry points (side, rear, front) while driving to see if an alert is necessary. The BSM system will issue an alert during these types of zone entries.

(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 117-118; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 135-136; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 125-26; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 133.)

Claim 17	Corresponding Element in Chrysler Vehicles
	<p>(See, e.g., Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 122-123.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 119-20; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 144.)</p> <p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 323; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 139.)</p> <p>17F4. Rear Cross Path (RCP):</p> <p>Rear Cross Path</p> <p>The Rear Cross Path (RCP) feature is intended to aid the drivers when backing out of parking spaces where their vision of oncoming vehicles may be blocked. Proceed slowly and cautiously out of the parking space until the rear end of the vehicle is exposed. The RCP system will then have a clear view of the cross traffic and if an oncoming vehicle is detected, alert the driver.</p> <p>When RCP is on and the vehicle is in REVERSE, the driver is alerted using both the visual and audible alarms, including reducing the radio volume.</p> <p>(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 122-23; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 140; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 130; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 137-8.)</p> <p>(See, e.g., Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 127.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 125; Ex. Chrysler-1C, 2014</p>

Claim 17	Corresponding Element in Chrysler Vehicles
	<p>Chrysler Town & Country Owner's Manual at 148-9.)</p> <p>(<i>See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 139; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 145.</i>)</p>
<p>17G. a fuel overinjection circuit coupled to said processor subsystem, said fuel overinjection circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle;</p>	<p>The accused Chrysler vehicles include a fuel overinjection circuit coupled to said processor subsystem, said fuel overinjection circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle.</p> <p><i>See, e.g., citations for claim element 1E.</i></p>
<p>17H. an upshift notification circuit coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed;</p>	<p>The accused Chrysler vehicles include an upshift notification circuit coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed.</p> <p><i>See, e.g., citations for claim element 1F.</i></p>
<p>17I. said processor subsystem determining, based upon data received from said radar detector, said at least one sensor and said memory subsystem, when to activate said vehicle proximity alarm circuit, when to activate said fuel overinjection circuit, and when to activate said upshift notification circuit.</p>	<p>On information and belief, the accused Chrysler vehicles include a processor subsystem determining, based upon data received from said radar detector, said at least one sensor and said memory subsystem, when to activate said vehicle proximity alarm circuit, when to activate said fuel overinjection circuit, and when to activate said upshift notification circuit.</p> <p><i>See, e.g., citations for claim elements 1G, 17F.</i></p>

Claim 17	Corresponding Element in Chrysler Vehicles
circuit, when to activate said fuel overinjection circuit, and when to activate said upshift notification circuit.	

Claim 18	Corresponding Element in Chrysler Vehicles
<p>18A. Apparatus for optimizing operation of a vehicle according to claim 17 wherein:</p>	<p>The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 17.</p> <p><i>See, e.g., citations for claim 17.</i></p>
<p>18B. said at least one sensor further includes a windshield wiper sensor for indicating whether a windshield wiper of said vehicle is activated;</p>	<p>The accused Chrysler vehicles include at least one sensor further including a windshield wiper sensor for indicating whether a windshield wiper of said vehicle is activated.</p> <p>For example, the accused Chrysler vehicles include a windshield wiper sensor that determines when the wipers are turned on.</p>
	<p>Headlights On With Wipers (Available With Automatic Headlights Only)</p> <p>When this feature is active, the headlights will turn on approximately 10 seconds after the wipers are turned on if the headlight switch is placed in the AUTO position. In addition, the headlights will turn off when the wipers are turned off if they were turned on by this feature.</p>
	<p>(<i>See, e.g., Ex. Dodge-1A, 2014 Dodge Challenger Owner's Manual at 160; Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 350; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 340; Ex. Dodge-1D, 2014 Dodge Journey Owner's Manual at 223-4; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 235; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 329.</i>)</p>
	<p>(<i>See, e.g., Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 205.</i>)</p>
	<p>(<i>See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 213; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 227.</i>)</p>
	<p>(<i>See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 167, 325; Ex. Jeep-1B,</i></p>

Claim 18	Corresponding Element in Chrysler Vehicles
18C. said memory subsystem further storing a second vehicle speed/stopping distance table.	<p>2014 Jeep Cherokee Owner's Manual at 376.)</p> <p>The accused Chrysler vehicles include a memory subsystem further storing a second vehicle speed/stopping distance table.</p> <p>On information and belief, the accused Chrysler vehicles store a second vehicle speed/stopping distance table.</p> <p><i>See, e.g.,</i> citations for claim element 17E.</p>

Claim 19	Corresponding Element in Chrysler Vehicles
19A. Apparatus for optimizing operation of a vehicle according to claim 17 and further comprising:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 17. <i>See, e.g., citations for claim 17.</i>
19B. a throttle controller for controlling a throttle of said engine of said vehicle; and	The accused Chrysler vehicles include a throttle controller for controlling a throttle of said engine of said vehicle. <i>See, e.g., citations for claim element 1B.</i>
19C. said processor subsystem selectively reducing said throttle based upon data received from said radar detector, said at least one sensor and said memory subsystem.	On information and belief, the accused Chrysler vehicles include a processor subsystem that selectively reduces said throttle based upon data received from said radar detector, said at least one sensor and said memory subsystem. <i>See, e.g., citations for claim element 1G and 17E1.</i>

Claim 20	Corresponding Element in Chrysler Vehicles
<p>20. Apparatus for optimizing operation of a vehicle according to claim 19 wherein said at least one sensor further includes a brake sensor for indicating whether a brake system of said vehicle is activated.</p>	<p>The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 19 wherein said at least one sensor further includes a brake sensor for indicating whether a brake system of said vehicle is activated.</p> <p>For example, the accused Chrysler vehicles include a brake sensor that determines when the brake system is activated (e.g., as indicated by brake lights.)</p> <p>Lights</p> <p>Have someone observe the operation of brake lights and exterior lights while you work the controls. Check turn signal and high beam indicator lights on the instrument panel.</p> <p>(See, e.g., Ex. Dodge-1B, 2014 Dodge Charger Owner's Manual at 101; Ex. Dodge-1C, 2014 Dodge Grand Caravan Owner's Manual at 119; Ex. Dodge-1E, 2014 Dodge Dart Owner's Manual at 111; Ex. Dodge-1F, 2014 Dodge Durango Owner's Manual at 114.)</p> <p>(See, e.g., Ex. RAM-1D, 2014 RAM Cargo Van Owner's Manual at 105.)</p> <p>(See, e.g., Ex. Chrysler-1A, 2014 Chrysler 300 Owner's Manual at 104; Ex. Chrysler-1C, 2014 Chrysler Town & Country Owner's Manual at 128.)</p> <p>(See, e.g., Ex. Jeep-1A, 2014 Jeep Grand Cherokee Owner's Manual at 111; Ex. Jeep-1B, 2014 Jeep Cherokee Owner's Manual at 145.)</p>

Corresponding Element in Chrysler Vehicles	
Claim 21	
21A. Apparatus for optimizing operation of a vehicle according to claim 19 wherein said processor subsystem further comprises:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 19 wherein said processor subsystem further comprises: <i>See, e.g.,</i> citations for claims 1, 19.
21B. means for counting a total number of vehicle proximity alarms determined by said processor subsystem;	On information and belief, the accused Chrysler vehicles include a means for counting a total number of vehicle proximity alarms determined by said processor subsystem. To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “counting a total number of vehicle proximity alarms determined by said processor subsystem” are described in, for example, Figures 1 and 2 and associated text relating to the expression programmed in the Processor Subsystem 12.
21C. means for selectively reducing said throttle based upon said total number of vehicle proximity alarms.	On information and belief, the accused Chrysler vehicles include a means for selectively reducing said throttle based upon said total number of vehicle proximity alarms. To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “selectively reducing said throttle based upon said total number of vehicle proximity alarms” are described in, for example, Figures 1 and 2 and associated text relating to the Processor Subsystem 12 and Throttle Controller 26.

Claim 22	Corresponding Element in Chrysler Vehicles
22A. Apparatus for optimizing operation of a vehicle according to claim 17 and further comprising:	<p>The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 17 and further comprising:</p> <p><i>See, e.g., citations for claim 17.</i></p>
22B. a downshift notification circuit coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed; and	<p>The accused Chrysler vehicles include a downshift notification circuit coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed.</p> <p><i>See, e.g., citations for claim element 7F.</i></p>
22C. said processor subsystem determining, based upon data received from said plurality of sensors, when to activate said downshift notification circuit.	<p>The accused Chrysler vehicles include a processor subsystem that determines, based upon data received from said plurality of sensors, when to activate said downshift notification circuit. selectively reduces said throttle based upon data received from said radar detector, said at least one sensor and said memory subsystem.</p> <p><i>See, e.g., citations for claim elements 1B, 1G.</i></p>

Corresponding Element in Chrysler Vehicles	
Claim 23 23A. Apparatus for optimizing operation of a vehicle, comprising:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle. <i>See, e.g., citations for claims 1, 17.</i>
23B. a radar detector, said radar detector determining a distance separating a vehicle having an engine and an object in front of said vehicle;	The accused Chrysler vehicles include a radar detector that determines a distance separating a vehicle having an engine and another object in front of the accused vehicles. <i>See, e.g., citations for claim element 17B.</i>
23C. a plurality of sensors coupled to a vehicle having an engine, said plurality of an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, and engine speed sensor, a manifold pressure sensor and a throttle position sensor;	The accused Chrysler vehicles include a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, and engine speed sensor, a manifold pressure sensor and a throttle position sensor <i>See, e.g., citations for claim element 1B.</i>
23D. a processor subsystem, coupled to said radar detector and each one of said plurality of sensors, to receive data therefrom;	The accused Chrysler vehicles include a processor subsystem, coupled to said radar detector and each one of said plurality of sensors, to receive data therefrom; <i>See, e.g., citations for claim element 1C.</i>
23E. a memory subsystem, coupled to said processor	The accused Chrysler vehicles include a memory subsystem, coupled to said processor

Claim 23	Corresponding Element in Chrysler Vehicles
<p>subsystem, said memory subsystem storing therein a first vehicle speed/stopping distance table, a manifold pressure set point, an RPM set point, and present and prior levels for each one of said plurality of sensors;</p>	<p>subsystem, said memory subsystem storing therein a first vehicle speed/stopping distance table, a manifold pressure set point, an RPM set point, and present and prior levels for each one of said plurality of sensors.</p> <p><i>See, e.g., citations for claim element 17E.</i></p>
<p>23F. a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle;</p>	<p>The accused Chrysler vehicles include a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle.</p> <p><i>See, e.g., citations for claim element 1E.</i></p>
<p>23G. an upshift notification circuit coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed;</p>	<p>The accused Chrysler vehicles include an upshift notification circuit coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed.</p> <p><i>See, e.g., citations for claim element 1F.</i></p>
<p>23H. said processor subsystem determining, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said upshift notification circuit.</p>	<p>The accused Chrysler vehicles include a processor subsystem that determines, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said upshift notification circuit.</p>

Claim 23	Corresponding Element in Chrysler Vehicles
<p>sensors, when to activate said fuel overinjection circuit and when to activate said upshift notification circuit;</p>	<p><i>See, e.g., citations for claim element 1G.</i></p>
<p>23I. a vehicle proximity alarm circuit coupled to said processor subsystem, said vehicle proximity alarm circuit issuing an alarm that said vehicle is too close to said object;</p>	<p>The accused Chrysler vehicles include a vehicle proximity alarm circuit coupled to said processor subsystem, said vehicle proximity alarm circuit issuing an alarm that said vehicle is too close to said object.</p> <p><i>See, e.g., citations for claim 17F.</i></p>
<p>23J. said processor subsystem determining, based upon data received from said radar detector, said at least one sensor and said memory subsystem, when to activate said vehicle proximity alarm circuit.</p>	<p>The accused Chrysler vehicles includes a processor subsystem that determines, based upon data received from said radar detector, said at least one sensor and said memory subsystem, when to activate said vehicle proximity alarm circuit.</p> <p><i>See, e.g., citations for claim element 17I.</i></p>

Claim 24	Corresponding Element in Chrysler Vehicles
24A. Apparatus for optimizing operation of a vehicle according to claim 23 wherein said processor subsystem further comprises:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 23 wherein said processor subsystem further comprises: <i>See, e.g., citations for claim 23.</i>
24B. means for determining when road speed for said vehicle is increasing or decreasing;	The accused Chrysler vehicles include a means for determining when road speed for said vehicle is increasing or decreasing. <i>See, e.g., citations for claim element 15B.</i>
24C. means for determining when throttle position for said vehicle is increasing or decreasing; and	The accused Chrysler vehicles include a means for determining when throttle position for said vehicle is increasing or decreasing. <i>See, e.g., citations for claim element 2C.</i> To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of "determining when throttle position for said vehicle is increasing or decreasing" are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to Throttle Sensor 24, Memory Subsystem 14, and Processor Subsystem 12.
24D. means for comparing manifold pressure to said manifold pressure set point;	The accused Chrysler vehicles include a means for comparing manifold pressure to said manifold pressure set point. <i>See, e.g., citations for claim element 2D.</i>
24E. means for determining	The accused Chrysler vehicles include a means for determining when manifold pressure for said

Claim 24	Corresponding Element in Chrysler Vehicles
<p>when manifold pressure for said vehicle is increasing or decreasing; and</p>	<p>vehicle is increasing or decreasing.</p> <p><i>See, e.g.,</i> citations for claim element 4D.</p> <p>To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when manifold pressure for said vehicle is increasing or decreasing” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to Manifold PSI Sensor 22, Memory Subsystem 14, and Processor Subsystem 12.</p>
<p>24F. means for determining when engine speed for said vehicle is increasing or decreasing;</p>	<p>The accused Chrysler vehicles include a means for determining when engine speed for said vehicle is increasing or decreasing.</p> <p><i>See, e.g.,</i> citations for claim element 15G.</p>
<p>24G. said processor subsystem activating said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is above said manifold pressure set point or if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing.</p>	<p>On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is above said manifold pressure set point or if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing.</p> <p><i>See, e.g.,</i> citations for claim element 1G.</p>

Claim 24	Corresponding Element in Chrysler Vehicles
decreasing.	
Claim 25	Corresponding Element in Chrysler Vehicles
25A. Apparatus for optimizing operation of a vehicle according to claim 23 wherein said processor subsystem further comprises:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 23 wherein said processor subsystem further comprises: <i>See, e.g., citations for claim 23.</i>
25B. means for determining when road speed for said vehicle is increasing;	The accused Chrysler vehicles include a means for determining when road speed for said vehicle is increasing. <i>See, e.g., citations for claim element 2B.</i>
25C. means for determining when throttle position for said vehicle is increasing; and	The accused Chrysler vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g., citations for claim element 2C.</i>
25D. means for comparing manifold pressure to said manifold pressure set point;	The accused Chrysler vehicles include a means for comparing manifold pressure to said manifold pressure set point. <i>See, e.g., citations for claim element 2D.</i>
25E. means for comparing engine speed to said RPM set point;	The accused Chrysler vehicles include a means for comparing engine speed to said RPM set point.

Claim 25	Corresponding Element in Chrysler Vehicles
<p>25F. said processor subsystem activating said upshift notification circuit if both road speed and throttle position for said vehicle are increasing, manifold pressure for said vehicle is at or below said manifold pressure set point and engine speed for said vehicle is at or above said RPM set point.</p>	<p><i>See, e.g., citations for claim element 5E.</i></p> <p>On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said upshift notification circuit if both road speed and throttle position for said vehicle are increasing, manifold pressure for said vehicle is at or below said manifold pressure set point and engine speed for said vehicle is at or above said RPM set point.</p> <p><i>See, e.g., citations for claim element 5F.</i></p>

Claim 26	Corresponding Element in Chrysler Vehicles
26A. Apparatus for optimizing operation of a vehicle, comprising:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle. <i>See, e.g., citations for claims 1, 17.</i>
26B. a radar detector, said radar detector determining a distance separating a vehicle having an engine and an object in front of said vehicle;	The accused Chrysler vehicles include a radar detector that determines a distance separating a vehicle having an engine and another object in front of the accused vehicles. <i>See, e.g., citations for claim element 17B.</i>
26C. a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, and engine speed sensor, a manifold pressure sensor and a throttle position sensor;	The accused Chrysler vehicles include a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, and engine speed sensor, a manifold pressure sensor and a throttle position sensor. <i>See, e.g., citations for claim element 1B.</i>
26D. a processor subsystem, coupled to said radar detector and each one of said plurality of sensors, to receive data therefrom;	The accused Chrysler vehicles include a processor subsystem, coupled to said radar detector and each one of said plurality of sensors, to receive data therefrom; <i>See, e.g., citations for claim element 1C.</i>
26E. a memory subsystem, coupled to said processor	The accused Chrysler vehicles include a memory subsystem, coupled to said processor

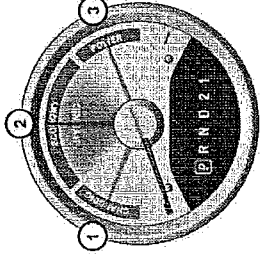
Claim 26	Corresponding Element in Chrysler Vehicles
<p>subsystem, said memory subsystem storing therein a first vehicle speed/stopping distance table, a manifold pressure set point, RPM set point, and present and prior levels for each one of said plurality of sensors;</p>	<p>subsystem, said memory subsystem storing therein a first vehicle speed/stopping distance table, a manifold pressure set point, RPM set point, and present and prior levels for each one of said plurality of sensors. <i>See, e.g., citations for claim element 17E.</i></p>
<p>26F. a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle;</p>	<p>The accused Chrysler vehicles include a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle. <i>See, e.g., citations for claim element 1E.</i></p>
<p>26G. a downshift notification circuit coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed;</p>	<p>The accused Chrysler vehicles include a downshift notification circuit coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed; <i>See, e.g., citations for claim element 7F.</i></p>
<p>26H. said processor subsystem determining, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said downshift notification circuit.</p>	<p>The accused Chrysler vehicles include a processor subsystem that determines, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said downshift notification circuit.</p>

Claim 26	Corresponding Element in Chrysler Vehicles
<p>sensors, when to activate said fuel overinjection circuit and when to activate said downshift notification circuit;</p>	<p><i>See, e.g.</i>, citations for claim element 7G.</p>
<p>26I. a vehicle proximity alarm circuit coupled to said processor subsystem, said vehicle proximity alarm circuit issuing an alarm that said vehicle is too close to said object;</p>	<p>The accused Chrysler vehicles include a vehicle proximity alarm circuit coupled to said processor subsystem, said vehicle proximity alarm circuit issuing an alarm that said vehicle is too close to said object.</p> <p><i>See, e.g.</i>, citations for claim element 17F.</p>
<p>26J. said processor subsystem determining, based upon data received from said radar detector, said at least one sensor and said memory subsystem, when to activate said vehicle proximity alarm circuit.</p>	<p>The accused Chrysler vehicles includes a processor subsystem that determines, based upon data received from said radar detector, said at least one sensor and said memory subsystem, when to activate said vehicle proximity alarm circuit.</p> <p><i>See, e.g.</i>, citations for claim element 17I.</p>

Claim 27	Corresponding Element in Chrysler Vehicles
27A. Apparatus for optimizing operation of a vehicle according to claim 26 wherein said processor subsystem further comprises:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 26 wherein said processor subsystem further comprises: <i>See, e.g., citations for claims 1, 26.</i>
27B. means for determining when road speed for said vehicle is decreasing;	The accused Chrysler vehicles include a means for determining when road speed for said vehicle is decreasing. <i>See, e.g., citations for claim element 4B.</i>
27C. means for determining when throttle position for said vehicle is increasing; and	The accused Chrysler vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g., citations for claim element 4C.</i>
27D. means for determining when manifold pressure for said vehicle is increasing; and	The accused Chrysler vehicles include a means for determining when manifold pressure for said vehicle is increasing. <i>See, e.g., citations for claim element 4D.</i>
27E. means for determining when engine speed for said vehicle is decreasing;	The accused Chrysler vehicles include a means for determining when engine speed for said vehicle is decreasing. <i>See, e.g., citations for claim element 4E.</i>
27F. said processor subsystem activating said	On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said downshift notification circuit if both road speed and engine speed are decreasing

<p>Claim 27 downshift notification circuit if both road speed and engine speed are decreasing and both throttle position and manifold pressure for said vehicle are increasing.</p>	<p style="text-align: center;">Corresponding Element in Chrysler Vehicles</p> <p>and both throttle position and manifold pressure for said vehicle are increasing. <i>See, e.g., citations for claim element 10F.</i></p>
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Claim 28	Corresponding Element in Chrysler Vehicles
28A. Apparatus for optimizing operation of a vehicle, comprising:	<p>The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle.</p> <p><i>See, e.g.,</i> citations for claim 1.</p> <p><i>See, also, e.g.,</i> Ex. Chrysler-1D, 2009 Aspen Owner's Manual at 387; Ex. Chrysler-1E, 2009 Aspen Hybrid Owner's Manual at 31.</p>
28B. a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, an engine speed sensor, a manifold pressure sensor and a throttle position sensor;	<p>The accused Chrysler vehicles include a plurality of sensors coupled to the vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, an engine speed sensor, a manifold pressure sensor and a throttle position sensor</p> <p><i>See, e.g.,</i> citations for claim element 1B.</p> <p><i>See, also, e.g.,</i> Ex. Chrysler-1D, 2009 Aspen Owner's Manual at 206, 207, 2010; Ex. Chrysler-1E, 2009 Aspen Hybrid Owner's Manual at 24, 25, 30.</p>
28C. a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom;	<p>The accused Chrysler vehicles include a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom.</p> <p><i>See, e.g.,</i> citations for claim element 1C.</p> <p><i>See, also, e.g.,</i> Ex. Chrysler-1D, 2009 Aspen Owner's Manual at 387; Ex. Chrysler-1E, 2009 Aspen Hybrid Owner's Manual at 31.</p>
28D. a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle.	<p>The accused Chrysler vehicles include a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle.</p> <p><i>See, e.g.,</i> citations for claim element 1E.</p>

Corresponding Element in Chrysler Vehicles	
<p>Claim 28</p> <p>notification that excessive fuel is being supplied to said engine of said vehicle;</p>	<p><i>See, also, e.g., Ex. Chrysler-1D, 2009 Aspen Owner's Manual at 168; Ex. Chrysler-1E, 2009 Aspen Hybrid Owner's Manual at 35.</i></p> <p>31. TOW/HAUL The TOW/HAUL button is located at the end of the shift lever. This light will illuminate when the TOW/HAUL button has been selected. Refer to "When To Use TOW/HAUL Mode" under "2-Mode Hybrid Transmission Ranges" in Section 5 of this supplement for further information.</p> <p>32. Odometer/Trip Odometer Button Press this button to toggle between the odometer and the trip odometer display. Holding the button in resets the trip odometer reading.</p> <p>HYBRID GAUGE The Hybrid Gauge, located on the instrument cluster, has three different zones to indicate how the vehicle is being operated in the sense of fuel savings.</p> <p>NOTE: Driving with the gauge pointer in the 12 O'clock (ECONOMY) position is the optimal Hybrid location.</p> <div style="text-align: center;">  <p style="text-align: right;">9193278</p> </div> <p style="text-align: center;">Hybrid Gauge</p> <p>1 — CHARGING — Indicates that the high voltage battery is being charged during braking or certain driving conditions. 2 — ECONOMY — Indicates the HEV vehicle is being propelled without in electric mode, Hybrid mode or Fuel Saver mode (MDS). 3 — POWER — Indicates that the accelerator pedal is being applied for additional power which is not the most fuel efficient mode of operation.</p>
<p>Claim 29</p> <p>28E. said processor subsystem determining whether to activate said fuel overinjection notification sensor based upon data received from said road speed sensor, said throttle position sensor and said manifold pressure sensor.</p>	<p>The accused Chrysler vehicles include a processor subsystem that determines whether to activate said fuel overinjection notification sensor based upon data received from said road speed sensor, said throttle position sensor and said manifold pressure sensor.</p> <p><i>See, e.g., citations for claim element 1G.</i></p> <p><i>See, also, e.g., Ex. Chrysler-1D, 2009 Aspen Owner's Manual at 387; Ex. Chrysler-1E, 2009 Aspen Hybrid Owner's Manual at 31; citations for claim elements 28A-28D.</i></p>
Corresponding Element in Chrysler Vehicles	

Claim 29	Corresponding Element in Chrysler Vehicles
29A. Apparatus according to claim 28 and further comprising:	The accused Chrysler vehicles include an apparatus according to claim 28 and further comprising: <i>See, e.g., citations for claim 1, 28.</i>
29B. a memory subsystem, coupled to said processor subsystem, said memory subsystem maintaining a manifold pressure set point;	The accused Chrysler vehicles include a memory subsystem, coupled to said processor subsystem, said memory subsystem maintaining a manifold pressure set point. <i>See, e.g., citations for claim element 1D and claim 28.</i>
29C. said processor subsystem activating said fuel overinjection notification circuit upon determining that: (1) based upon data received from said road speed sensor, road speed of said vehicle is increasing; (2) based upon data received from said throttle position sensor, throttle position for said vehicle is increasing; and (3) based upon data received from said manifold pressure sensor, manifold pressure for said vehicle exceeds said manifold pressure set point;	On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said fuel overinjection notification circuit upon determining that: (1) based upon data received from said road speed sensor, road speed of said vehicle is increasing; (2) based upon data received from said throttle position sensor, throttle position for said vehicle is increasing; and (3) based upon data received from said manifold pressure sensor, manifold pressure for said vehicle exceeds said manifold pressure set point. <i>See, e.g., citations for claim element 1G and claim 28.</i>

Claim 30	Corresponding Element in Chrysler Vehicles
30A. Apparatus according to claim 28, wherein:	<p>The accused Chrysler vehicles include an apparatus according to claim 28.</p> <p><i>See, e.g.</i>, citations for claims 1, 28.</p>
30B. said plurality of sensors coupled to said vehicle further include an engine speed sensor;	<p>The accused Chrysler vehicles include a plurality of sensors coupled to said vehicle further including an engine speed sensor;</p> <p><i>See, e.g.</i>, citations for claim element 1B and claim 28.</p>
30C. said processor subsystem activating said fuel overinjection notification circuit upon determining that: (1) based upon data received from said road speed sensor, road speed of said vehicle is decreasing; (2) based upon data received from said throttle position sensor, throttle position for said vehicle is increasing; (3) based upon data received from said manifold pressure sensor, manifold pressure for said vehicle is increasing; and (4) based upon data received from said engine speed sensor, engine speed for said vehicle is decreasing.	<p>On information and belief, the accused Chrysler vehicles include a processor subsystem that activates said fuel overinjection notification circuit upon determining that: (1) based upon data received from said road speed sensor, road speed of said vehicle is decreasing; (2) based upon data received from said throttle position sensor, throttle position for said vehicle is increasing; (3) based upon data received from said manifold pressure sensor, manifold pressure for said vehicle is increasing; and (4) based upon data received from said engine speed sensor, engine speed for said vehicle is decreasing.</p> <p><i>See, e.g.</i>, citations for claim element 1G and claim 28.</p>

	Corresponding Element in Chrysler Vehicles
<p>Claim 30 sensor, manifold pressure for said vehicle is increasing; and (4) based upon data received from said engine speed sensor, engine speed for said vehicle is decreasing.</p>	

Claim 31	Corresponding Element in Chrysler Vehicles
31A. Apparatus for optimizing operation of a vehicle, comprising:	The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle. <i>See, e.g.,</i> citations for claims 1, 17.
31B. a radar detector, said radar detector determining a distance separating a vehicle having an engine and an object in front of said vehicle;	The accused Chrysler vehicles include a radar detector that determines a distance separating a vehicle having an engine and another object in front of the accused vehicles. <i>See, e.g.,</i> citations for claim element 17B.
31C. at least one sensor coupled to said vehicle for monitoring operation thereof, said at least one sensor including a road speed sensor.	The accused Chrysler vehicles include at least one sensor coupled to said vehicle for monitoring operation thereof, said at least one sensor including a road speed sensor. <i>See, e.g.,</i> citations for claim element 1B.
31D. a processor subsystem, coupled to said radar detector and said at least one sensor, to receive data therefrom;	The accused Chrysler vehicles include a processor subsystem, coupled to said radar detector and said at least one sensor, to receive data therefrom. <i>See, e.g.,</i> citations for claim element 17D.
31E. a memory subsystem, coupled to said processor subsystem, said memory	The accused Chrysler vehicles include a memory subsystem, coupled to said processor subsystem, said memory subsystem storing a first vehicle speed/stopping distance table.

Claim 31	Corresponding Element in Chrysler Vehicles
<p>subsystem storing a first vehicle speed/stopping distance table.</p>	<p><i>See, e.g.</i>, citations for claim element 17E.</p>
<p>31F. a vehicle proximity alarm circuit coupled to said processor subsystem, said vehicle proximity alarm circuit issuing an alarm that said vehicle is too close to said object;</p>	<p>The accused Chrysler vehicles include a vehicle proximity alarm circuit coupled to said processor subsystem, said vehicle proximity alarm circuit issuing an alarm that said vehicle is too close to said object.</p> <p><i>See, e.g.</i>, citations for claim element 17F.</p>
<p>31G. said processor subsystem determining whether to activate said vehicle proximity alarm circuit based upon separation distance data received from said radar detector, vehicle speed data received from said road speed sensor and said first vehicle speed/stopping distance table stored in said memory subsystem.</p>	<p>On information and belief, The accused Chrysler vehicles includes a processor subsystem that determines whether to activate said vehicle proximity alarm circuit based upon separation distance data received from said radar detector, vehicle speed data received from said road speed sensor and said first vehicle speed/stopping distance table stored in said memory subsystem.</p> <p><i>See, e.g.</i>, citations for claim element 17I.</p>

Claim 32	Corresponding Element in Chrysler Vehicles
32A. Apparatus for optimizing operation of a vehicle according to claim 31 wherein:	<p>The accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 31.</p> <p><i>See, e.g., citations for claim 31.</i></p>
32B. said at least one sensor further includes a windshield wiper sensor for indicating whether a windshield wiper of said vehicle is activated; and	<p>The accused Chrysler vehicles include at least one sensor further including a windshield wiper sensor for indicating whether a windshield wiper of said vehicle is activated.</p> <p><i>See, e.g., citations for claim element 18B.</i></p>
32C. said memory subsystem further storing a second vehicle speed/stopping distance table.	<p>The accused Chrysler vehicles include a memory subsystem further storing a second vehicle speed/stopping distance table.</p> <p><i>See, e.g., citations for claim element 18C.</i></p>
32D. if said windshield wiper sensor indicates that said windshield wiper is deactivated, said processor subsystem determining whether to activate said vehicle proximity alarm circuit based upon data received from said radar detector, said road speed sensor and said first vehicle speed/stopping distance	<p>On information and belief, the accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 31 wherein if said windshield wiper sensor indicates that said windshield wiper is deactivated, said processor subsystem determining whether to activate said vehicle proximity alarm circuit based upon data received from said radar detector, said road speed sensor and said first vehicle speed/stopping distance table stored in said memory subsystem.</p> <p><i>See, e.g., citations for claim element 17I.</i></p>

Claim 32	Corresponding Element in Chrysler Vehicles
<p>table stored in said memory subsystem;</p> <p>32E. if said windshield wiper sensor indicates that said windshield wiper is activated, said processor subsystem determining whether to activate said vehicle proximity alarm circuit based upon data received from said radar detector, said road speed sensor and said second vehicle speed/stopping distance table stored in said memory subsystem.</p>	<p>On information and belief, the accused Chrysler vehicles include an apparatus for optimizing operation of a vehicle according to claim 31 wherein if said windshield wiper sensor indicates that said windshield wiper is activated, said processor subsystem determining whether to activate said vehicle proximity alarm circuit based upon data received from said radar detector, said road speed sensor and said second vehicle speed/stopping distance table stored in said memory subsystem.</p> <p><i>See, e.g., citations for claim element 17I.</i></p>

EXHIBIT 9

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

EASTERN DIVISION

VELOCITY PATENT LLC,)	
)	
<i>Plaintiff,</i>)	Civil Action No. 1:13-cv-08421
)	
v.)	Hon. John W. Darrah
)	
JAGUAR LAND ROVER NORTH AMERICA, LLC)	JURY TRIAL DEMANDED
)	
)	
<i>Defendant.</i>)	
)	

**VELOCITY PATENT LLC'S INITIAL INFRINGEMENT CONTENTIONS PURSUANT
TO LOCAL PATENT RULE 2.2**

Plaintiff Velocity Patent LLC ("Velocity") hereby provides, pursuant to N.D. Ill. Local Patent Rule 2.2 of the Northern District of Illinois, the following Initial Infringement Contentions. Velocity contends that each of the identified claims is infringed by Jaguar Land Rover North America, LLC ("JLR"). The following contentions are based on knowledge and information in Velocity's possession, custody and control after a reasonable investigation of publicly-available sources and the limited number of documents produced by JLR pursuant to Local Patent Rule 2.1. The accused JLR products implement some of the infringing functionality in whole or in part using circuitry and associated programs, which are neither publicly available nor described in JLR's production to date. Therefore, Velocity reserves the right to revise, amend and supplement these contentions as discovery progresses and new information becomes available.

A. Identification of Infringed Claims and Applicable Statutory Section of 35 U.S.C. § 271

Claims 1-2, 4-5, 7-8, 10, 12-13, 15, and 17-32 of U.S. Patent No. 5,954,781 are directly infringed under 35 U.S.C § 271(a) by the accused JLR vehicles identified below.

B. Identification of Accused Instrumentalities By Claim

As set forth in the accompanying claim chart, Jaguar X150, X250, X351 and F-Type and Land Rover L319, L320, L322, L405, L494 and L538 vehicles that include the identified features, infringe one or more of the claims identified above. On a claim-by-claim basis, the following JLR vehicles are accused of infringement by Velocity:

Claim 1 – Land Rover’s L405, L494 and L538;

Claim 2 - Land Rover’s L405, L494 and L538;

Claim 4 - Land Rover’s L405, L494 and L538;

Claim 5 - Land Rover’s L405, L494 and L538;

Claim 7 - Land Rover’s L405, L494 and L538;

Claim 8 - Land Rover’s L405, L494 and L538;

Claim 10 - Land Rover’s L405, L494 and L538;

Claim 12 - Land Rover’s L405, L494 and L538;

Claim 13 - Land Rover’s L405, L494 and L538;

Claim 15 - Land Rover’s L405, L494 and L538;

Claim 17 - Land Rover’s L405, L494 and L538;

Claim 18 - Land Rover’s L405, L494 and L538;

Claim 19 - Land Rover’s L405, L494 and L538;

Claim 20 - Land Rover’s L405, L494 and L538;

Claim 21 - Land Rover’s L405, L494 and L538;

Claim 22 - Land Rover's L405, L494 and L538;

Claim 23 - Land Rover's L405, L494 and L538;

Claim 24 - Land Rover's L405, L494 and L538;

Claim 25 - Land Rover's L405, L494 and L538;

Claim 26 - Land Rover's L405, L494 and L538;

Claim 27 - Land Rover's L405, L494 and L538;

Claim 28 - Land Rover's L405, L494 and L538;

Claim 29 - Land Rover's L405, L494 and L538;

Claim 30 - Land Rover's L405, L494 and L538;

Claim 31 - Jaguar's X150, X250, X351 and F-Type; Land Rover's L319, L320, L322, L405, L494 and L538;

Claim 32 - Jaguar's X150, X250, X351 and F-Type; Land Rover's L319, L320, L322, L405, L494 and L538.

C. Claim Chart Comparing Each Element of the Asserted Claims to the Accused Instrumentalities

Claim charts identifying where each element of each asserted claim is found within each Accused JLR vehicle is attached.

D. Identification of Whether Each Element of Each Asserted Claim is Present in the Accused Instrumentalities Literally or Under the Doctrine of Equivalents

Unless specifically noted in the attached claim charts, Velocity asserts that all of the asserted claim elements are literally present in the Accused JLR vehicles.

At this time, sections (e)-(f) of Local Patent Rule 2.2 are not applicable. Velocity expressly reserves the right to revise, amend and supplement these contentions as discovery progresses and new information becomes available.

Dated: March 12, 2014

Respectfully submitted,

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PROOF OF SERVICE

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Velocity Patent LLC Preliminary Infringement Contentions Against Jaguar Land Rover Pursuant to N.D. Ill. LPR 2.1 – Jaguar Vehicles

Claim 31	Corresponding Element in Jaguar Vehicles ¹
31A. Apparatus for optimizing operation of a vehicle, comprising. ²	<p>The accused Jaguar vehicles³ include an apparatus for optimizing operation of a vehicle.</p> <p>For example, upon information and belief, the accused Jaguar vehicles include computer-controlled vehicle systems with one or more processors that monitor various vehicle systems and optimize fuel economy, safety and performance of the vehicle. For example, the Jaguar vehicles include an onboard diagnostic system called OBD II that monitors the performance of multiple components of the vehicle.</p>
31B. a radar detector, said radar detector determining a distance separating a vehicle having an engine and an object in front of said vehicle;	<p>The accused Jaguar vehicles include a radar detector that determines a distance separating a vehicle having an engine and another object in front of the accused vehicles.</p> <p>For example, the accused Jaguar vehicles include one or more systems (e.g., Adaptive Cruise Control, Forward Collision Alert, Blind Spot Monitoring, etc.) with radar detectors that determine a distance separating a vehicle having an engine and another object in front of the accused vehicles.</p> <p>31B1. Adaptive Cruise Control (ACC):</p>

¹ Velocity contends that each element of the asserted claims is literally and directly infringed by the accused vehicles. Additionally, where noted below, Velocity alternatively contends that certain elements are infringed under the doctrine of equivalents.

² Velocity's citations related to any claim preamble in this claim chart should not be interpreted as an admission that the preamble is limiting.

³ The accused features and vehicles identified in these preliminary contentions are representative only. Velocity accuses all Jaguar vehicle models for model years 2007 to 2014 that incorporate features that are similar to the accused features identified in these preliminary contentions. The accused Jaguar vehicles identified in these preliminary contentions are representative only, and include the Jaguar X150, X250, X351 and F-Type. Discovery has just begun in this case. Velocity reserves the right to supplement and identify additional infringing models (e.g., 2015 models currently being tested) as it learns facts through discovery.

Claim 31	Corresponding Element in Jaguar Vehicles ¹
	<p>The ACC system uses a radar sensor, which projects a beam directly forward of the vehicle to detect objects ahead.</p> <p>(See, e.g., Ex. 1, 2014 Jaguar X150 Owner's Handbook, at 93; Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 92; Ex. 3, Jaguar X351 Owner's Handbook, at 104.)</p> <p>31B2. Forward Collision Alert (FCA):</p> <p>Limited detection and warning of objects ahead, is provided during ACC operation by the ACC Forward Alert warning. The enhanced forward alert feature additionally provides warnings when ACC is not engaged; if an object is detected close ahead, then the warning tone and message will be issued. The brakes will not be applied.</p> <p>(See, e.g., Ex. 1, 2014 Jaguar X150 Owner's Handbook, at 97; Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 96; Ex. 3, Jaguar X351 Owner's Handbook.)</p> <p>31B3. Blind Spot Monitoring (BSM):</p>

The Blind Spot Monitor (BSM) is designed to operate most effectively when driving on multi-lane highways. It uses radar on each side of the vehicle to monitor blind spot areas (1) that are not easily visible to the driver.

(See, e.g., Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 58; Ex. 3, Jaguar X351 Owner's Handbook, at 62; Ex. 4, 2014 Jaguar F-Type Owner's Handbook, at 48.)

31B4. Closing Vehicle Detection (CVD)

The radar sensors may be impaired by mud, rain, frost, ice, snow or road spray. This may affect the system's ability to reliably detect an approaching vehicle.

(See, e.g., Ex. 4, 2014 F-Type Owner's Handbook, at 50.)

In the alternative, for each of the above proximity alert systems, the limitation is at least satisfied under the doctrine of equivalents. For example, on information and belief, these systems include detectors that are insubstantially different from the claimed radar detector, that perform substantially the same function (determining a distance separating a vehicle having an engine and another object in the path of the vehicle) in substantially the same way (e.g., using a radar sensor to determine distance) to achieve the same result (identification of an object in the path of a vehicle).

Claim 31	Corresponding Element in Jaguar Vehicles
<p>31C. at least one sensor coupled to said vehicle for monitoring operation thereof, said at least one sensor including a road speed sensor.</p>	<p>The accused Jaguar vehicles include at least one sensor coupled to said vehicle for monitoring operation thereof, said at least one sensor including a road speed sensor.</p> <p>The accused Jaguar vehicles include one or more road speed sensors. For example, certain Jaguar vehicles include an AJ133 engine.</p> <p>The ECM uses a torque-based strategy to generate the torque required by driver demand and the other vehicle control modules, using input from various sensors to calculate the required torque. The ECM also interfaces with other vehicle electronic control modules to obtain additional information (road speed from the ABS control module, for example). The ECM processes these signals and determines how much torque to generate, using various actuators to supply air, fuel, and spark to the engine (electronic throttle, injectors, coils, etc.).</p> <p>(Ex. 5, AJ133 Technical Introduction, at 3-2.) Upon information and belief, all Jaguar engine similarly include one or more road speed sensors that are inputs to the ABS, ECM, etc.</p> <p>Further, upon information and belief, road speed is an input to the ACC, FCA, BSM and CVD algorithms. Upon information and belief, one or more road speed sensors supply that input.</p>
<p>31D. a processor subsystem, coupled to said radar detector and said at least one sensor, to receive</p>	<p>The accused Jaguar vehicles include a processor subsystem, coupled to said radar detector and said at least one sensor, to receive data therefrom.</p>

Claim 31	Corresponding Element in Jaguar Vehicles ¹
<p>data therefrom;</p>	<p>Upon information and belief, the ACC, FCA, BSM and CVD features are controlled by the onboard computer that includes one or more processors.</p> <p>(See, e.g., Ex. 1, 2014 Jaguar X150 Owner's Handbook, at 97; Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 96; Ex. 3, Jaguar X351 Owner's Handbook, at 108; Ex. 4, 2014 Jaguar F-Type Owner's Handbook, at 48 & 50.)</p>
<p>31E. a memory subsystem, coupled to said processor subsystem, said memory subsystem storing a first vehicle speed/stopping distance table.</p>	<p>The accused Jaguar vehicles include a memory subsystem, coupled to said processor subsystem, said memory subsystem storing a first vehicle speed/stopping distance table.</p> <p>31E1. Adaptive Cruise Control (ACC):</p> <p>It is the driver's responsibility to select a gap appropriate to the driving conditions.</p> <p>4 gap settings are available and the selected gap setting will be displayed in the Message center when the gap adjustment thumbwheel is used.</p> <p>(See, e.g., Ex. 1, 2014 Jaguar X150 Owner's Handbook, at 94; Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 93-94; Ex. 3, Jaguar X351 Owner's Handbook, at 104.)</p> <p>31E2. Forward Collision Alert (FCA):</p>

Claim 31	Corresponding Element in Jaguar Vehicles ¹
	<p>The sensitivity of the warning can only be adjusted with ACC disengaged. Adjust as follows:</p> <ul style="list-style-type: none"> • Roll the gap adjustment control downwards to decrease the sensitivity of the alert. • Roll the gap adjustment control upwards to increase the sensitivity of the alert. <p>(See, e.g., Ex. 1, 2014 Jaguar X150 Owner's Handbook, at 97; Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 96; Ex. 3, Jaguar X351 Owner's Handbook, at 108.)</p> <p>31E3. Blind Spot Monitoring (BSM)</p> <p>Upon information and belief, the memory in the Jaguar vehicles stores a speed/stopping distance table used in association with the Blind Spot Monitoring feature.</p> <p>(See, e.g., Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 58-59; Ex. 3, Jaguar X351 Owner's Handbook, at 62; Ex. 4, 2014 Jaguar F-Type Owner's Handbook, at 48.)</p> <p>31E4. Closing Vehicle Detection (CVD)</p>

Claim 31	Corresponding Element in Jaguar Vehicles ¹
<p>31F. a vehicle proximity alarm circuit coupled to said processor subsystem, said vehicle proximity alarm circuit issuing an alarm that said vehicle is too close to said object;</p>	<p>2. If a vehicle is detected approaching rapidly, an amber warning icon will flash in the relevant exterior mirror to indicate that there is a potential danger.</p> <p>(See, e.g., Ex. 4, 2014 F-Type Owner's Handbook, at 50.)</p>
<p>31F. a vehicle proximity alarm circuit coupled to said processor subsystem, said vehicle proximity alarm circuit issuing an alarm that said vehicle is too close to said object;</p>	<p>The accused Jaguar vehicles include a vehicle proximity alarm circuit coupled to said processor subsystem, said vehicle proximity alarm circuit issuing an alarm that said vehicle is too close to said object.</p> <p>31F1. Adaptive Cruise Control (ACC):</p> <p>If ACC predicts that its maximum braking level will not be sufficient, then an audible warning will sound while ACC continues to brake. DRIVER INTERVENE will be displayed in the Message center. Take immediate action.</p> <p>(See, e.g., Ex. 1, 2014 Jaguar X150 Owner's Handbook, at 94; Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 93; Ex. 3, Jaguar X351 Owner's Handbook, at 105.)</p> <p>31F2. Forward Collision Alert (FCA):</p>

Claim 31

Corresponding Element in Jaguar Vehicles

The forward alert system does not initiate any action. The driver must take appropriate action when the **Forward Alert** message is displayed. However, the system monitors driver actions (e.g. braking, steering or indicating) and may not initiate the warning display if the appropriate action has been taken early enough.

(See, e.g., Ex. 1, 2014 Jaguar X150 Owner's Handbook, at 97; Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 96; Ex. 3, Jaguar X351 Owner's Handbook, at 108.)

31F3. Blind Spot Monitor (BSM):

If an overtaking vehicle/object is identified on either side, an amber warning icon (2) will illuminate in the relevant exterior mirror. This alerts the driver to a potential hazard in the relevant blind spot area and a lane change may be dangerous.

(See, e.g., Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 58-59; Ex. 3, Jaguar X351 Owner's Handbook, at 62; Ex. 4, 2014 Jaguar F-Type Owner's Handbook, at 48.)

Claim 31	Corresponding Element in Jaguar Vehicles ¹
<p>31G. said processor subsystem determining whether to activate said vehicle proximity alarm circuit based upon separation distance data received from said radar detector, vehicle speed data received from said road speed sensor and said first vehicle speed/stopping distance table stored in said memory subsystem.</p>	<p>31F4. Closing Vehicle Detection (CVD):</p> <p>2. If a vehicle is detected approaching rapidly, an amber warning icon will flash in the relevant exterior mirror to indicate that there is a potential danger.</p> <p>(See, e.g., Ex. 4, 2014 F-Type Owner's Handbook, at 50.)</p> <p>On information and belief, The accused Jaguar vehicles includes a processor subsystem that determines whether to activate the multiple vehicle proximity alarm circuits based upon separation distance data received from said radar detector, vehicle speed data received from said road speed sensor and said first vehicle speed/stopping distance table stored in said memory subsystem.</p> <p>(See, e.g., Ex. 1, 2014 X150 Owner's Handbook, at 93-94 & 97; Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 58-59, 93 & 97; Ex. 3, Jaguar X351 Owner's Handbook, at 62, 104-105 & 108; Ex. 4, 2014 Jaguar F-Type Owner's Handbook, at 48 & 50.)</p>

Claim 32	Corresponding Element in Jaguar Vehicles
<p>32A. Apparatus for optimizing operation of a vehicle according to claim 31 wherein:</p>	<p>The accused Jaguar vehicles include an apparatus for optimizing operation of a vehicle according to claim 31.</p> <p>See, e.g., citations for claim 31.</p>
<p>32B. said at least one sensor further includes a windshield wiper sensor for indicating whether a windshield wiper of said vehicle is activated; and</p>	<p>The accused Jaguar vehicles include at least one sensor further including a windshield wiper sensor for indicating whether a windshield wiper of said vehicle is activated.</p> <p>For example, the Jaguar vehicles include rain sensing wipers that automatically activate when moisture is detected. Upon information and belief, the Jaguar vehicles include a windshield wiper sensor that indicates whether the wipers of the Jaguar vehicles have been activated.</p> <p>The Rain sensor is mounted on the inside of the windshield, behind the rear-view mirror. The sensor is able to detect the presence and amount of water on the windshield, and automatically activate the windshield wipers accordingly.</p> <p>(See, e.g., Ex. 1, 2014 X150 Owner's Handbook, at 41-42; Ex. 2, 2014 Jaguar X250 Owner's Handbook, at 56; Ex. 3, Jaguar X351 Owner's Handbook, at 59; Ex. 4, 2014 Jaguar F-Type Owner's Handbook, at 44-45.)</p>

Claim 32	Corresponding Element in Jaguar Vehicles
<p>32C. said memory subsystem further storing a second vehicle speed/stopping distance table.</p>	<p>The accused Jaguar vehicles include a memory subsystem further storing a second vehicle speed/stopping distance table.</p> <p>On information and belief, the accused Land Rover vehicles store a second vehicle speed/stopping distance table.</p> <p><i>See, e.g.,</i> citations for claim element 31E.</p>
<p>32D. if said windshield wiper sensor indicates that said windshield wiper is deactivated, said processor subsystem determining whether to activate said vehicle proximity alarm circuit based upon data received from said radar detector, said road speed sensor and said first vehicle speed/stopping distance table stored in said memory subsystem;</p>	<p>On information and belief, the accused Jaguar vehicles include an apparatus for optimizing operation of a vehicle according to claim 31 wherein if said windshield wiper sensor indicates that said windshield wiper is deactivated, said processor subsystem determining whether to activate said vehicle proximity alarm circuit based upon data received from said radar detector, said road speed sensor and said first vehicle speed/stopping distance table stored in said memory subsystem.</p> <p><i>See, e.g.,</i> citations for claim element 31G.</p>
<p>32E. if said windshield wiper sensor indicates that said windshield wiper is activated, said processor subsystem determining whether to activate said vehicle proximity alarm circuit based upon data received from said radar detector, said road speed sensor and said second vehicle speed/stopping distance table stored in said memory subsystem.</p>	<p>On information and belief, the accused Jaguar vehicles include an apparatus for optimizing operation of a vehicle according to claim 31 wherein if said windshield wiper sensor indicates that said windshield wiper is activated, said processor subsystem determining whether to activate said vehicle proximity alarm circuit based upon data received from said radar detector, said road speed sensor and said second vehicle speed/stopping distance table stored in said memory subsystem.</p> <p><i>See, e.g.,</i> citations for claim element 31G.</p>

**Velocity Patent LLC Preliminary Infringement Contentions Against
Jaguar Land Rover Defendants Pursuant to N.D. III. LPR 2.1 – Land Rover Vehicles**

Claim 1	Corresponding Element in Land Rover Vehicles¹
<p>1A. Apparatus for optimizing operation of a vehicle, comprising:²</p>	<p>The accused Land Rover vehicles³ include an apparatus for optimizing operation of a vehicle.</p> <p>For example, upon information and belief, the accused Land Rover vehicles include computer-controlled vehicle systems with one or more computer processors that monitor various vehicle systems and optimize the fuel economy, safety and performance of the vehicle. For example, the Land Rover vehicles includes an onboard diagnostic system called OBD II that monitors the performance of multiple components of the vehicle.</p>
<p>1B. a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, an engine speed sensor, a manifold pressure sensor and a throttle position sensor,</p>	<p>The accused Land Rover vehicles include a plurality of sensors coupled to the vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, an engine speed sensor, a manifold pressure sensor and a throttle position sensor.</p> <p>Upon information and belief, the Land Rover vehicles include an engine. More specifically, upon information and belief, the Land Rover engines are a 4.2L supercharged V8, a 4.4 L V8, a 5.0L V8, a 5.0L supercharged V8 (designated “AJ</p>


¹ Velocity contends that each element of the asserted claims is literally and directly infringed by the accused vehicles. Additionally, where noted below, Velocity alternatively contends that certain elements are infringed under the doctrine of equivalents.

² Velocity’s citations related to any claim preamble in this claim chart should not be interpreted as an admission that the preamble is limiting.

³ The accused features and vehicles identified in these preliminary contentions are representative only. Velocity accuses all Land Rover vehicle models for model years 2007 to 2014 that incorporate features that are similar to the accused features identified in these preliminary contentions. The accused Land Rover vehicles identified in these preliminary contentions are representative only, and include the Land Rover L319, L320, L322, L405, L494 and L538. Discovery has just begun in this case. Velocity reserves the right to supplement and identify additional infringing models (e.g., 2015 models currently being tested) as it learns facts through discovery.

Claim 1	Corresponding Element in Land Rover Vehicles ¹
	<p>133”) and a 2.0L EcoBoost. Further, upon information and belief, all the Land Rover vehicles include a road speed sensor, a manifold pressure sensor, a throttle position sensor and an engine speed sensor.</p> <p>1B1. The accused Land Rover vehicles include one or more road speed sensors:</p> <p>The ECM uses a torque-based strategy to generate the torque required by driver demand and the other vehicle control modules, using input from various sensors to calculate the required torque. The ECM also interfaces with other vehicle electronic control modules to obtain additional information (road speed from the ABS control module, for example). The ECM processes these signals and determines how much torque to generate, using various actuators to supply air, fuel, and spark to the engine (electronic throttle, injectors, coils, etc.).</p> <p>(Ex. 1, AJ133 Technical Introduction, at 3-2.)</p> <p>1B2. The accused Land Rover vehicles include one or more engine speed sensors. For example, the Technical Training Manual for the AJ133 states that the Engine Control Module (“ECM”) accepts inputs from a crankshaft position sensor that measures engine speed. (See Ex. 1, AJ133 Technical Introduction, at 3-11 & 3-12.)</p> <p>1B3. The accused Land Rover vehicles include one or more manifold pressure sensors. For example, the Technical Training Manual for the AJ133 states that the Engine Control Module (“ECM”) accepts inputs from a manifold pressure sensor (“MAP”). (See Ex. 1, AJ133 Technical Introduction, at 3-16.)</p>

Claim 1	Corresponding Element in Land Rover Vehicles ¹
	<p>1B4. The accused Land Rover vehicles include one or more throttle position sensors. For example, the Technical Training Manual for the AJ133 states that the Engine Control Module ("ECM") accepts inputs from a manifold pressure sensor ("MAP"). (See Ex. 1, AJ133 Technical Introduction, at 3-19.)</p>
<p>1C. a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom;</p>	<p>The accused Land Rover vehicles include a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom. (See, e.g., Ex. 1, AJ133 Technical Introduction, at 3-2.)</p>
<p>1D. a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point, an RPM set point, and present and prior levels for each one of said plurality of sensors;</p>	<p>On information and belief, the accused Land Rover vehicles have a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point, an RPM set point, and present and prior levels for each one of said plurality of sensors. For example, the accused Land Rover vehicles include one or more memories that form a memory subsystem for storing information relating to vehicle system operations and features described in the vehicle manuals. See, e.g., citations for claim elements 1A-C.</p>
<p>1E. a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle;</p>	<p>The accused Land Rover vehicles include a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle. For example, the accused Land Rover vehicles include one or more fuel overinjection notification circuits coupled to said processor subsystem. More specifically, the Rover includes an Eco Data System that displays the following information:</p>

Claim 1	Corresponding Element in Land Rover Vehicles
<p>IF, an upshift notification circuit coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed;</p>	<ul style="list-style-type: none"> • Impact on fuel: This option displays the impact electrical loads are having on fuel economy. • Driving style: This option displays the impact driving style is having on fuel economy. • Advanced trip: This option displays details on the last 3 trips. • Eco tips: This option displays hints and tips on how to improve fuel economy. <p>(Ex. 2, 2014 Land Rover L405 Owner's Guide, at 111; Ex. 3, Land Rover L494 Owner's Guide, at 102; Ex. 4, Land Rover L538 Owner's Guide, at 90.)</p>
<p>IF, an upshift notification circuit coupled to said processor subsystem, said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed. Specifically, the Rover includes an gear shift indicator that is active in the manual mode of the automatic transmission, which tells the driver to shift up to a fuel efficient gear.</p>	<p>GEAR SHIFT (GREEN)</p>  <p>The gear shift indicator illuminates briefly at the recommended gear change point (upshift).</p> <p>(Ex. 2, 2014 Land Rover L405 Owner's Guide, at 59 & 114; Ex. 3, Land Rover L494 Owner's Guide, at 58 & 104-105; Ex. 4, Land Rover L538 Owner's Guide, at 49 & 92.)</p>

Claim 1	Corresponding Element in Land Rover Vehicles ¹
<p>1G. said processor subsystem determining, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said upshift notification circuit.</p>	<p>As a further example, the accused Land Rover vehicles include one or more upshift notification circuits coupled to said processor subsystem, upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed.</p> <ul style="list-style-type: none"> • Continuous illumination confirms the driver's gear change request has been recognized and selected. • On/off flashing confirms the driver's gear change request has been recognized, but not selected. <p>(Ex. 3 Land Rover L494 Owner's Guide, at 105.)</p>
<p>1G. said processor subsystem determining, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said upshift notification circuit.</p>	<p>On information and belief, the accused Land Rover vehicles include a processor subsystem that determines based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said upshift notification circuit.</p> <p>See, e.g., citations for elements 1A-1F.</p>

Claim 2	Corresponding Element in Land Rover Vehicles
<p>2A. Apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises:</p>	<p>The accused Land Rover vehicles include an apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises: <i>See, e.g.,</i> citations for claim 1.</p>
<p>2B. means for determining when road speed for said vehicle is increasing;</p>	<p>The accused Land Rover vehicles include a means for determining when road speed for said vehicle is increasing. <i>See, e.g.,</i> citations for claim elements 1B-1D.</p>
<p>2C. means for determining when throttle position for said vehicle is increasing; and</p>	<p>To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when road speed for said vehicle is increasing” are described in, for example, Figures 1 and 2 and associated text of the ’781 patent relating to Road Speed Sensor 18, Memory Subsystem 14, and Processor Subsystem 12. The accused Land Rover vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g.,</i> citations for claim elements 1B-1D.</p>
<p>2D. means for comparing manifold pressure to said manifold pressure set point;</p>	<p>To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when throttle position for said vehicle is increasing” are described in, for example, Figures 1 and 2 and associated text of the ’781 patent relating to Throttle Sensor 24, Memory Subsystem 14, and Processor Subsystem 12. The accused Land Rover vehicles include a means for comparing manifold pressure to said manifold pressure set point. <i>See, e.g.,</i> citations for claim elements 1B-1D.</p>

Claim 2	Corresponding Element in Land Rover Vehicles
<p>2E. said processor subsystem activating said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is above said manifold pressure set point.</p>	<p>To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or material(s) that perform the claimed function of “comparing manifold pressure to said manifold pressure set point” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to Manifold PSI Sensor 22, Memory Subsystem 14, and Processor Subsystem 12.</p>
<p>2E. said processor subsystem activating said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is above said manifold pressure set point.</p>	<p>On information and belief, the accused Land Rover vehicles include a processor subsystem that activates said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is above said manifold pressure set point.</p> <p><i>See, e.g., citations for claim elements IE, IG.</i></p>

Claim 4	Corresponding Element in Land Rover Vehicles
4A. Apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises:	The accused Land Rover vehicles include an apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises: <i>See, e.g.,</i> citations for claim 1.
4B. means for determining when road speed for said vehicle is decreasing;	The accused Land Rover vehicles include a means for determining when road speed for said vehicle is decreasing. <i>See, e.g.,</i> citations for claim element 2B. To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or material(s) that perform the claimed function of “determining when road speed for said vehicle is decreasing” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to Road Speed Sensor 18, Memory Subsystem 14, and Processor Subsystem 12.
4C. means for determining when throttle position for said vehicle is increasing; and	The accused Land Rover vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g.,</i> citations for claim element 2C.
4D. means for determining when manifold pressure for said vehicle is increasing; and	The accused Land Rover vehicles include a means for determining when manifold pressure for said vehicle is increasing. <i>See, e.g.,</i> citations for claim elements 1B-1D. To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or material(s) that perform the claimed function of

Claim 4	Corresponding Element in Land Rover Vehicles
	<p>“determining when manifold pressure for said vehicle is increasing” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to Manifold PSI Sensor 22, Memory Subsystem 14, and Processor Subsystem 12.</p>
<p>4E. means for determining when engine speed for said vehicle is decreasing;</p>	<p>The accused Land Rover vehicles include a means for determining when engine speed for said vehicle is decreasing.</p> <p><i>See, e.g.,</i> citations for claim elements IB-1D.</p> <p>To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or materials(s) that perform the claimed function of “determining when engine speed for said vehicle is decreasing” are described in, for example, Figures 1 and 2 and associated text of the '781 patent relating to RPM Sensor 20, Memory Subsystem 14, and Processor Subsystem 12.</p>
<p>4F. said processor subsystem activating said fuel overinjection notification circuit if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing.</p>	<p>On information and belief, the accused Land Rover vehicles include a processor subsystem that activates said fuel overinjection notification circuit if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing.</p> <p><i>See, e.g.,</i> citations for claim elements IE, 1G.</p>

Claim 5	Corresponding Element in Land Rover Vehicles
5A. Apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises:	The accused Land Rover vehicles include an apparatus for optimizing operation of a vehicle according to claim 1 wherein said processor subsystem further comprises: <i>See, e.g., citations for claim 1.</i>
5B. means for determining when road speed for said vehicle is increasing;	The accused Land Rover vehicles include a means for determining when road speed for said vehicle is increasing. <i>See, e.g., citations for claim element 2B.</i>
5C. means for determining when throttle position for said vehicle is increasing; and	The accused Land Rover vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g., citations for claim element 2C.</i>
5D. means for comparing manifold pressure to said manifold pressure set point;	The accused Land Rover vehicles include a means for comparing manifold pressure to said manifold pressure set point. <i>See, e.g., citations for claim element 2D.</i>
5E. means for comparing engine speed to said RPM set point;	The accused Land Rover vehicles include a means for comparing engine speed to said RPM set point. <i>See, e.g., citations for claim elements 1B-1D.</i> To the extent that 35 U.S.C. §112(6) applies to this claim limitation, the structure(s), act(s), or material(s) that perform the claimed function of “determining when engine speed for said vehicle is decreasing” are described in, for example, Figures 1 and 2 and associated text of the ’781 patent relating to RPM Sensor 20, Memory Subsystem 14, and Processor Subsystem 12.
5F. said processor subsystem activating said upshift notification circuit if both	On information and belief, the accused Land Rover vehicles include a processor subsystem that activates said upshift notification circuit if both road speed and

<p>Claim 5</p>	<p>Corresponding Element in Land Rover Vehicles</p>
<p>road speed and throttle position for said vehicle are increasing, manifold pressure for said vehicle is at or below said manifold pressure set point and engine speed for said vehicle is at or above said RPM set point.</p>	<p>throttle position for said vehicle are increasing, manifold pressure for said vehicle is at or below said manifold pressure set point and engine speed for said vehicle is at or above said RPM set point. <i>See, e.g., citations for claim elements 1F, 1G.</i></p>

Claim 7	Corresponding Element in Land Rover Vehicles
7A. Apparatus for optimizing operation of a vehicle, comprising:	The accused Land Rover vehicles include an apparatus for optimizing operation of a vehicle. <i>See, e.g.,</i> citations for claim 1.
7B. a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, a manifold pressure sensor and a throttle position sensor;	The accused Land Rover vehicles include a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, a manifold pressure sensor and a throttle position sensor; <i>See, e.g.,</i> citations for claim element 1B.
7C. a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom;	The accused Land Rover vehicles include a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom. <i>See, e.g.,</i> citations for claim element 1C.
7D. a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point and present and prior levels for each one of said plurality of sensors;	The accused Land Rover vehicles include a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point and present and prior levels for each one of said plurality of sensors; <i>See, e.g.,</i> citations for claim element 1D.
7E. a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle;	The accused Land Rover vehicles include a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle; <i>See, e.g.,</i> citations for claim element 1E.
7F. a downshift notification circuit	The accused Land Rover vehicles include a downshift notification circuit coupled

<p>Claim 7</p>	<p>Corresponding Element in Land Rover Vehicles</p>
<p>coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed, and</p>	<p>to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed. For example, the accused Land Rover vehicles include one or more downshift notification circuits coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient speed.</p> <ul style="list-style-type: none"> • Continuous illumination confirms the driver's gear change request has been recognized and selected. • On/off flashing confirms the driver's gear change request has been recognized, but not selected.
<p>7G. said processor subsystem determining, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said downshift notification circuit.</p>	<p>(Ex. 3, Land Rover L494 Owner's Guide, at 105.)</p> <p>On information and belief, the accused Land Rover vehicles include a processor subsystem that determines, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit and when to activate said downshift notification circuit.</p> <p>See, e.g., citations for elements 1G, 7F</p>

Claim 8	Corresponding Element in Land Rover Vehicles
8A. Apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises:	The accused Land Rover vehicles include an apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises: <i>See, e.g., citations for claim 1.</i>
8B. means for determining when road speed for said vehicle is increasing;	The accused Land Rover vehicles include a means for determining when road speed for said vehicle is increasing. <i>See, e.g., citations for claim element 2B.</i>
8C. means for determining when throttle position for said vehicle is increasing; and	The accused Land Rover vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g., citations for claim element 2C.</i>
8D. means for comparing manifold pressure to said manifold pressure set point;	The accused Land Rover vehicles include a means for comparing manifold pressure to said manifold pressure set point. <i>See, e.g., citations for claim element 2D.</i>
8E. said processor subsystem activating said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is above said manifold pressure set point.	On information and belief, the accused Land Rover vehicles include a processor subsystem that activates said fuel overinjection notification circuit if both road speed and throttle position for said vehicle are increasing and manifold pressure for said vehicle is above said manifold pressure set point. <i>See, e.g., citations for claim element 2E.</i>

Claim 10	Corresponding Element in Land Rover Vehicles
10A. Apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises:	The accused Land Rover vehicles include an apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises: <i>See, e.g.,</i> citations for claim element 1.
10B. means for determining when road speed for said vehicle is decreasing;	The accused Land Rover vehicles include a means for determining when road speed for said vehicle is decreasing. <i>See, e.g.,</i> citations for claim element 4B.
10C. means for determining when throttle position for said vehicle is increasing; and	The accused Land Rover vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g.,</i> citations for claim element 2C.
10D. means for determining when manifold pressure for said vehicle is increasing; and	The accused Land Rover vehicles include a means for determining when manifold pressure for said vehicle is increasing. <i>See, e.g.,</i> citations for claim element 4D.
10E. means for determining when engine speed for said vehicle is decreasing;	The accused Land Rover vehicles include a means for determining when engine speed for said vehicle is decreasing. <i>See, e.g.,</i> citations for claim element 4E.
10F. said processor subsystem activating said downshift notification circuit if both road speed and engine speed are decreasing and both throttle position and manifold pressure for said vehicle are increasing.	On information and belief, the accused Land Rover vehicles include a processor subsystem that activates said downshift notification circuit if both road speed and engine speed are decreasing and both throttle position and manifold pressure for said vehicle are increasing. <i>See, e.g.,</i> citations for claim elements 1G, 7F.

Claim 12	Corresponding Element in Land Rover Vehicles
12A. Apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises:	The accused Land Rover vehicles include an apparatus for optimizing operation of a vehicle according to claim 7 wherein said processor subsystem further comprises: <i>See, e.g.,</i> citations for claim 1.
12B. means for determining when road speed for said vehicle is decreasing;	The accused Land Rover vehicles include a means for determining when road speed for said vehicle is decreasing. <i>See, e.g.,</i> citations for claim element 4B.
12C. means for determining when throttle position for said vehicle is increasing; and	The accused Land Rover vehicles include a means for determining when throttle position for said vehicle is increasing. <i>See, e.g.,</i> citations for claim element 2C.
12D. means for determining when manifold pressure for said vehicle is increasing; and	The accused Land Rover vehicles include a means for determining when manifold pressure for said vehicle is increasing. <i>See, e.g.,</i> citations for claim element 4D.
12E. means for determining when engine speed for said vehicle is decreasing;	The accused Land Rover vehicles include a means for determining when engine speed for said vehicle is decreasing. <i>See, e.g.,</i> citations for claim element 4E.
12F. said processor subsystem activating said fuel overinjection notification circuit if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing.	On information and belief, the accused Land Rover vehicles include a processor subsystem that activates said fuel overinjection notification circuit if both throttle position and manifold pressure for said vehicle are increasing and road speed and engine speed for said vehicle are decreasing. <i>See, e.g.,</i> citations for claim elements 1E, 1G.

Claim 13	Corresponding Element in Land Rover Vehicles
13A. Apparatus for optimizing operation of a vehicle, comprising:	The accused Land Rover vehicles include an apparatus for optimizing operation of a vehicle. <i>See, e.g., citations for claim 1.</i>
13B. a plurality of sensors coupled to a vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, an engine speed sensor, a manifold pressure sensor and a throttle position sensor;	The accused Land Rover vehicles include a plurality of sensors coupled to the vehicle having an engine, said plurality of sensors, which collectively monitor operation of said vehicle, including a road speed sensor, an engine speed sensor, a manifold pressure sensor and a throttle position sensor. <i>See, e.g., citations for claim element 1B.</i>
13C. a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom;	The accused Land Rover vehicles include a processor subsystem, coupled to each one of said plurality of sensors, to receive data therefrom. <i>See, e.g., citations for claim element 1C.</i>
13D. a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point, an engine speed set point, and present and prior levels for each one of said plurality of sensors;	The accused Land Rover vehicles have a memory subsystem, coupled to said processor subsystem, said memory subsystem storing therein a manifold pressure set point, an engine speed set point, and present and prior levels for each one of said plurality of sensors. <i>See, e.g., citations for claim element 1D.</i>
13E. a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle;	The accused Land Rover vehicles include a fuel overinjection notification circuit coupled to said processor subsystem, said fuel overinjection notification circuit issuing a notification that excessive fuel is being supplied to said engine of said vehicle. <i>See, e.g., citations for claim element 1E.</i>
13F. an upshift notification circuit coupled to said processor subsystem,	The accused Land Rover vehicles include an upshift notification circuit coupled to said processor subsystem, said upshift notification circuit issuing a notification

Claim 13	Corresponding Element in Land Rover Vehicles
<p>said upshift notification circuit issuing a notification that said engine of said vehicle is being operated at an excessive speed;</p> <p>13G. a downshift notification circuit coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed; and</p> <p>13H. said processor subsystem determining, based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit, said upshift notification circuit and said downshift notification circuit.</p>	<p>that said engine of said vehicle is being operated at an excessive speed. <i>See, e.g.</i>, citations for claim element 1F.</p> <p>The accused Land Rover vehicles include a downshift notification circuit coupled to said processor subsystem, said downshift notification circuit issuing a notification that said engine of said vehicle is being operated at an insufficient engine speed; and <i>See, e.g.</i>, citations for claim element 7F.</p> <p>The accused Land Rover vehicles include a processor subsystem that determines based upon data received from said plurality of sensors, when to activate said fuel overinjection circuit, said upshift notification circuit and said downshift notification circuit. <i>See, e.g.</i>, citations for claim element 1G.</p>