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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

CASE NO. 3:14-cv-00423--Mosman

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MAYFONK ATHLETIC LLC.,

Plaintiff,

v.

NIKE, INC.,

Defendant.

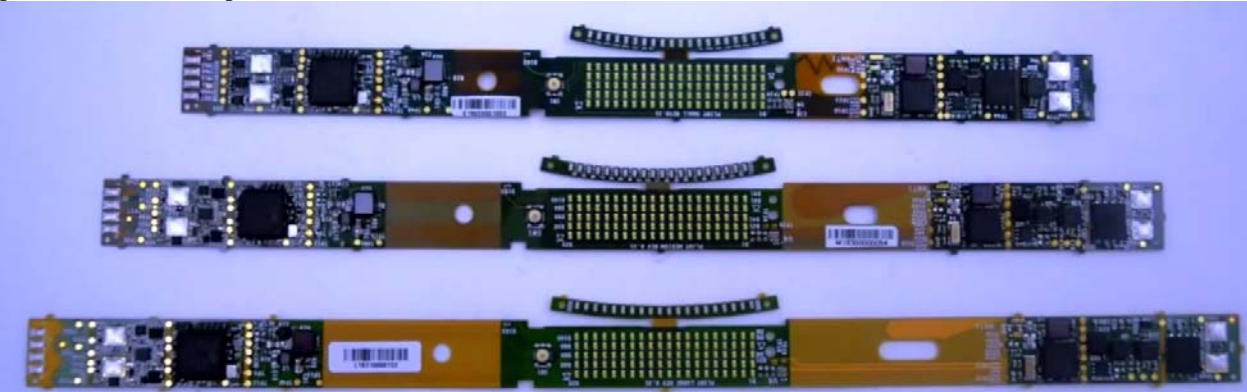

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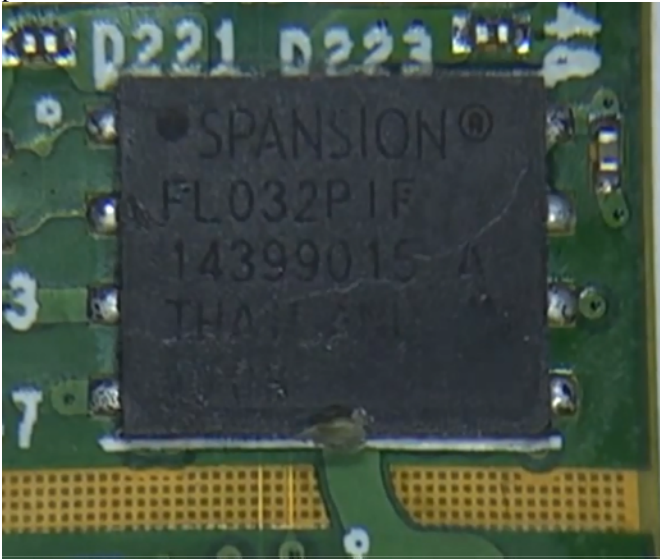
**PLAINTIFF MAYFONK ATHLETIC LLC'S NDCA LOCAL PATENT RULE 3-1(c) CHART**

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Plaintiff Mayfonk Athletic LLC. ("Mayfonk") hereby submits the following Disclosure of Asserted Claims and Preliminary Infringement Contentions for U.S. Patent No. 8,860,584. Mayfonk's investigation regarding infringement of the '584 patent is ongoing, and thus Mayfonk submits these contentions without prejudice to or waiver of its right under the Federal Rules of Civil Procedure to revise/supplement, these contentions, including but not limited to the asserted claims, as new information becomes available.

<b>U.S. PATENT NO. 8,860,584</b> <b>ASSERTED CLAIM/CLAIM ELEMENT</b>	<b>NIKE'S INFRINGEMENT</b>
<p>A system for tracking athletic movements comprising:</p>	<p>Nike provides a system, such as the Nike+ FuelBand system, for tracking athletic movements. For example, the Nike+ FuelBand system may include a wearable Nike FuelBand, a Nike FuelBand application on an external computing device, and a Nike+ account on a Nike-controlled server.</p> <p>For example:</p> <p><b>Welcome</b></p> <p>Welcome to your Nike+ FuelBand SE, a device that measures your everyday activity and turns it into NikeFuel. NikeFuel reflects your level of effort throughout the day. It's calculated the same way for everyone, so you can compare and compete with friends and other Nike+ members. Plug your Nike+ FuelBandSE into your approved computer's USB port or sync wirelessly through Bluetooth LE with our mobile app to Nike+, where you can track your performance, see results and get motivated to do more.</p> <p><b>System Requirements</b></p> <hr/> <p><b>TO USE YOUR NIKE+ FUEL BAND SE, YOU MUST HAVE:</b></p> <ul style="list-style-type: none"> <li>• One of the following two operating systems:             <ul style="list-style-type: none"> <li>◦ Mac (OS v10.6 and above)</li> <li>◦ PC (Windows XP, Vista, 7 or 8)</li> </ul> </li> <li>• A USB port</li> <li>• Internet access (broadband recommended, fees may apply)</li> <li>• Approximately 25 MB free space for Nike+ Connect installation</li> <li>• Optional mobile app available for iOS 6.1 and above, in English, French, German, or Japanese; iPhone 4gs and above, iPod Touch 5th gen and above (For the latest compatible handsets check <a href="http://nikeplus.com/support">nikeplus.com/support</a>)</li> </ul> <p><i>See e.g., The Nike+ FuelBand SE user's Guide, page 3 <a href="https://support-en-us.nikeplus.com/ci/fattach/get/853467/1406073309/redirect/1d">https://support-en-us.nikeplus.com/ci/fattach/get/853467/1406073309/redirect/1d</a></i></p>
<p>computing unit configured to transmit and</p>	<p>Nike provides a computing unit configured to transmit and receive electrical signals relating to athletic performance</p>

U.S. PATENT NO. 8,860,584 ASSERTED CLAIM/CLAIM ELEMENT	NIKE'S INFRINGEMENT
<p>ceive electrical signals relating to athletic performance parameters;</p>	<p>parameters, for example, inside the Nike Fuelband:</p>  <p>See Nike+ FuelBand's internals get splayed at the FCC, <a href="http://www.engadget.com/2012/02/03/nike-fuelband-fcc/">http://www.engadget.com/2012/02/03/nike-fuelband-fcc/</a></p> <p>As an example, the Nike computing unit may include a microcontroller, such as ST's STM32L1 series of ultra-low-power MCU, configured to transmit and receive electrical signals relating to athletic performance parameters:</p>  <p><a href="http://www.st.com/web/en/catalog/mmc/FM141/SC1169/SS1295?sc=stm32l1">http://www.st.com/web/en/catalog/mmc/FM141/SC1169/SS1295?sc=stm32l1</a></p> <p>As an example, the Nike computing unit may include a Flash memory device, such as the Spansion single-power-</p>

U.S. PATENT NO. 8,860,584 ASSERTED CLAIM/CLAIM ELEMENT	NIKE'S INFRINGEMENT
	<p>supply Flash memory device, configured to transmit and receive electrical signals relating to athletic performance parameters:</p>  <p>See e.g., <i>Spansion S25FL032P Data Sheet</i>, <a href="https://www.spansion.com/Support/Datasheets/S25FL032P_00.pdf">https://www.spansion.com/Support/Datasheets/S25FL032P_00.pdf</a></p> <p>As an example, the Nike computing unit may include a Bluetooth chipset, such as Texas Instrument Bluetooth chipset (e.g., CC256X-TIWI-UB2 and MSP430F5328IZQE Microcontroller), configured to transmit and receive electrical signals relating to athletic performance parameters:</p>

U.S. PATENT NO. 8,860,584 ASSERTED CLAIM/CLAIM ELEMENT	NIKE'S INFRINGEMENT
	 <p>See e.g., <i>Texas Instrument Product Descriptions</i>, <a href="http://www.ti.com/product/msp430f5328">http://www.ti.com/product/msp430f5328</a>, <a href="http://www.ti.com/product/cc2564-tiwi-ub2">http://www.ti.com/product/cc2564-tiwi-ub2</a></p>
<p>at least one sensor configured to generate electrical signals relating to athletic performance parameters from physical movement, wherein said at least one sensor and said computing unit are communicatively connected to enable the computing unit to receive electrical signals generated by said at least one sensor in real time;</p>	<p>Nike provides at least one sensor configured to generate electrical signals relating to athletic performance parameters from physical movement.</p> <p>For example:</p> <p><b>SENSORS</b> A built-in 3 axis accelerometer measures your motion all day long.</p> <p>See e.g., <i>The Nike+ FuelBand SE user's Guide</i>, page 24 <a href="https://support-en-us.nikeplus.com/ci/fattach/get/853467/1406073309/redirect/1d">https://support-en-us.nikeplus.com/ci/fattach/get/853467/1406073309/redirect/1d</a></p> <p>As an example, the at least one Nike sensor may be, for example, a STMicroelectronics 3 axis accelerometer (e.g., C3H accelerometer)</p>

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