

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

SRC LABS, LLC & SAINT REGIS  
MOHAWK TRIBE,

Plaintiffs,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 1:17-cv-01172 (LO/JFA)  
JURY TRIAL DEMANDED

**PLAINTIFFS' PRELIMINARY INFRINGEMENT CONTENTIONS**

Pursuant to Joint Proposed Discovery Plan, Plaintiffs hereby provide their preliminary infringement contentions. No discovery or claim construction has taken place yet in this case. As a result, Plaintiffs reserve the right to amend its contentions after claim construction and discovery has taken place.

**A. Identification of accused products, systems, or methods.**

The following table shows all products currently accused of infringing each asserted claim.

<b>Patent Number</b>	<b>Asserted Claims</b>	<b>Accused Products</b>
6,076,152	1-7, 11, 12, 15, 21	Office 365, Bing, and Azure
6,247,110	1-7, 11, 12, 15, 21	Office 365, Bing, and Azure
6,434,687	1-5, 10-13, 18, 25	Office 365, Bing, and Azure
7,225,324	1, 8, 9, 17, 18, 21, 22, 23	Bing and Microsoft's Deep Convolution Neural Networks
7,421,524	1, 2, 13, 15	Office 365, Bing, and Azure
7,620,800	1, 8, 9, 17, 18, 21, 22, 23	Bing and Microsoft's Deep Convolution Neural Networks

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

SRC LABS, LLC & SAINT REGIS  
MOHAWK TRIBE,

Plaintiffs,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 1:17-cv-01172 (LO/JFA)  
JURY TRIAL DEMANDED

**PLAINTIFFS' PRELIMINARY INFRINGEMENT CONTENTIONS**

Pursuant to Joint Proposed Discovery Plan, Plaintiffs hereby provide their preliminary infringement contentions. No discovery or claim construction has taken place yet in this case. As a result, Plaintiffs reserve the right to amend its contentions after claim construction and discovery has taken place.

**A. Identification of accused products, systems, or methods.**

The following table shows all products currently accused of infringing each asserted claim.

<b>Patent Number</b>	<b>Asserted Claims</b>	<b>Accused Products</b>
6,076,152	1-7, 11, 12, 15, 21	Office 365, Bing, and Azure
6,247,110	1-7, 11, 12, 15, 21	Office 365, Bing, and Azure
6,434,687	1-5, 10-13, 18, 25	Office 365, Bing, and Azure
7,225,324	1, 8, 9, 17, 18, 21, 22, 23	Bing and Microsoft's Deep Convolution Neural Networks
7,421,524	1, 2, 13, 15	Office 365, Bing, and Azure
7,620,800	1, 8, 9, 17, 18, 21, 22, 23	Bing and Microsoft's Deep Convolution Neural Networks

**B. Claim charts identifying how Plaintiffs contend each accused instrumentality meets the requirements of each asserted claim.**

The claim charts are attached as Exhibits G-L to the Complaint. Dkts. 1-7, 1-8, 1-9, 1-10, 1-11, 1-12, incorporated herein by reference. Nothing in these claim charts is intended to prevent Plaintiffs from presenting additional evidence of infringement at trial. Plaintiffs reserve the right to amend or supplement these charts based on information received in discovery and/or claim construction rulings by the Court.

**C. Whether each limitation is alleged to be literally present or present under the doctrine of equivalents.**

The doctrine of equivalents may apply to the following limitations:

Patent Number	Claim	Term
6,076,152	1, 3, 11	Memory bank
6,247,110	1, 3, 11	Memory bank
7,421,524	1, 15	Memory module bus

All other claim elements are currently alleged to be literally present. Plaintiffs reserve the right to amend or supplement this answer after the Court rules on claim construction.

**D. Identification of Direct Infringers for claims of indirect infringement.**

Plaintiffs currently assert claims of indirect infringement of U.S. Patent Nos. 7,225,324 and 7,620,800. The direct infringers for the claims are Yahoo! and Apple.

**E. Identification of each claim element Plaintiffs contend is governed by 35 U.S.C. § 112(6) and corresponding structure disclosed in the specification.**

Plaintiffs do not currently believe that any claim elements are governed by 35 U.S.C. § 112(6).

**F. The Priority date each asserted claim is entitled.**

Patent Number	Asserted Claims	Priority Date
6,076,152	1-7, 11, 12, 15, 21	December 17, 1997
6,247,110	1-7, 11, 12, 15, 21	December 17, 1997
6,434,687	1-5, 10-13, 18, 25	June 22, 2001

7,225,324	1, 8, 9, 17, 18, 21, 22, 23	October 31, 2002
7,421,524	1, 2, 13, 15	December 17, 1997
7,620,800	1, 8, 9, 17, 18, 21, 22, 23	October 31, 2002

#### **G. Document Productions.**

The file histories of each asserted patent were produced as Bates numbers SRC\_MSFT000126 – SRC\_MSFT001046 and SRC\_MSFT001063 – SRC\_MSFT002321.

Agreements to license or otherwise convey rights to the patents-in-suit have been produced as Bates numbers SRC\_MSFT001047 – SRC\_MSFT001062 and SRC\_MSFT002443 – SRC\_MSFT002453.

DATED: January 19, 2018

/s/ Christopher L. Evans

Charles B. Molster, III, Virginia Bar No. 23613  
cmolster@molsterlaw.com  
LAW OFFICES OF CHARLES B. MOLSTER, III PLLC  
2141 Wisconsin Ave, N.W., Ste. M  
Washington, D.C. 20007  
Telephone: (703) 346-1505

Michael W. Shore, Texas Bar No. 18294915\*  
mshore@shorechan.com  
Alfonso Garcia Chan, Texas Bar No. 24012408\*  
achan@shorechan.com  
Christopher L. Evans, Texas Bar No. 24058901\*  
cevans@shorechan.com  
Andrew M. Howard, Texas Bar No. 24059973\*  
ahoward@shorechan.com

SHORE CHAN DEPUMPO LLP  
901 Main Street, Suite 3300  
Dallas, Texas 75202  
Telephone: 214-593-9110  
Facsimile: 214-593-9111  
\* Admitted *pro hac vice*

**ATTORNEYS FOR PLAINTIFFS  
SRC LABS, LLC AND  
SAINT REGIS MOHAWK TRIBE**

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.