

**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.

Patent Number	Asserted Claims	Accused Products
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

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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.

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/s/ Christopher L. Evans

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