


**Exhibit K - Infringement of U.S. Patent No. 10,027,619**

Claim	Exemplary Infringement Evidence <sup>1</sup>
22. A device comprising:	<p>To the extent the preamble is limiting, the '619 accused products satisfy this limitation. As shown below by the exemplary evidence, the '619 accused products are devices comprising a radio, a processor, and memory.</p> <p>When Apple or its customers and/or users turn on and use the '619 accused products, or when the '619 accused products are tested, the claimed apparatus is used and directly infringed. Technical and/or user documentation is generally provided with the '619 accused products themselves, available on Apple's website, provided at Apple conferences and trade shows, or otherwise provided directly or indirectly to the user that instruct, describe, educate, encourage, and/or explain how to operate '619 accused products in an infringing manner, as shown for example by the exemplary documentation cited in this chart. By way of example, Apple's user manuals and documentation instruct, promote, and encourage the use of the accused products' capability in an infringing manner, including setting up the Apple Watch. See, e.g., <a href="https://support.apple.com/en-us/HT204505">https://support.apple.com/en-us/HT204505</a>. The claimed apparatus is used when the '619 accused products are activated as part of design and development activities (e.g. interoperability, compliance, certification, reliability and quality control testing), and/or otherwise operated by Apple or other users of the '619 accused products. In addition, Apple makes, sells, offers for sale, and/or imports into the United States the claimed apparatus. Apple is liable, directly and indirectly, including for inducement, for infringement of the asserted apparatus claims.</p>
22.1 a radio;	The '619 accused products satisfy this limitation. As shown by the exemplary evidence below, the '619 accused products include a radio. Appendix A, which is incorporated here by reference, provides further evidence and support that the '619 accused products include a radio.

<sup>1</sup> These infringement contentions are prepared with publicly available information. SEVEN's investigation is ongoing and discovery is in its preliminary stages. SEVEN hereby incorporates by reference the cover pleading to which this claim chart is attached. SEVEN reserves the right to amend or supplement these contentions after further investigation and discovery from SEVEN and non-parties. Such supplemental information may include, but is not limited to, source code, data sheets, design specifications, deposition testimony, testing information, reference designs, implementation and utilization information, and/or schematics. SEVEN also reserves the right to assert additional claims of the SEVEN patents-in-suit, accuse different products, or find alternative literal and/or equivalent infringing elements in Defendant's products. Under the proper construction of the asserted claims and their claim terms, each limitation of the asserted claims is literally present in the accused products or acts accused of infringing the claim. Any and all elements found not to be literally infringed are infringed under the doctrine of equivalents because the differences between the claimed inventions and the accused instrumentalities, if any, are insubstantial. SEVEN further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Defendant's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting. In addition, Defendant has not yet advised SEVEN of any non-infringement arguments, as to this or any other claim limitation. If and when Defendant does so, SEVEN will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Defendant's argument concerning non-infringement.


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	<div data-bbox="305 718 878 982" style="background-color: black; color: white; padding: 10px;"> <p><b>Cellular and Wireless</b></p> <p>Model A1984*</p> <p>FDD-LTE (Bands 1, 2, 3, 4, 5, 7, 8, 12, 13, 14, 17, 18, 19, 20, 25, 26, 29, 30, 32, 66, 71)</p> <p>TD-LTE (Bands 34, 38, 39, 40, 41)</p> <p>CDMA EV-DO Rev. A (800, 1900 MHz)</p> <p>UMTS/HSPA+/DC-HSDPA (850, 900, 1700/2100, 1900, 2100 MHz)</p> <p>GSM/EDGE (850, 900, 1800, 1900 MHz)</p>   <p>All models</p> <p>LTE Advanced*</p> <p>802.11ac Wi-Fi with 2x2 MIMO</p> <p>Bluetooth 5.0 wireless technology</p> <p>NFC with reader mode</p> <p>Express Cards with power reserve</p> </div> <p><a href="https://www.apple.com/iphone-xr/specs/">https://www.apple.com/iphone-xr/specs/</a></p>
<p>22.2 a processor and memory containing instructions executable by the processor whereby the device is operable to:</p>	<p>The '619 accused products satisfy this limitation. As shown by the exemplary evidence below, the '619 accused products include a processor and memory containing instructions executable by the processor. Appendix A, which is incorporated here by reference, provides further evidence and support that the '619 accused products include a processor and memory containing instructions executable by the processor.</p> <div data-bbox="305 1115 716 1266" style="background-color: black; color: white; padding: 10px;"> <p><b>Capacity<sup>1</sup></b></p> <p align="right"><b>64GB</b></p> <p align="right"><b>128GB</b></p> <p align="right"><b>256GB</b></p> </div> <p><a href="https://www.apple.com/iphone-xr/specs/">https://www.apple.com/iphone-xr/specs/</a></p> <div data-bbox="305 1310 735 1400" style="background-color: black; color: white; padding: 10px;"> <p><b>Chip</b></p> <div style="display: flex; align-items: center; justify-content: center;">  <p>A12 Bionic chip Next-generation Neural Engine</p> </div> </div>

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<p>22.3 optically receive information including a displayed service activation code from a remote device;</p>	<p>The '619 accused products satisfy this limitation. The '619 accused products include a processor and memory containing instructions executable by the processor whereby the device is operable to optically receive information including a displayed service activation code from a remote device. For example, the '619 accused products optically receive a service activation code from a remote device, such as for example an Apple Watch, as shown by the exemplary documentation below.</p> <div data-bbox="321 892 682 1144"> <p><b>3 Hold your iPhone over the animation</b></p> <p>Center the watch face in the viewfinder on your iPhone. Wait for a message to say that your Apple Watch is paired.</p> <p>If you can't use the camera, tap Pair Apple Watch Manually, then follow the steps that appear. <a href="#">Learn what to do if you don't see the "i" icon.</a></p> </div> <div data-bbox="735 898 1047 1360"> </div> <p><a href="https://support.apple.com/en-us/HT204505">https://support.apple.com/en-us/HT204505</a></p>

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	<p>Pairing Apple Watch with iPhone is secured using an out-of-band (OOB) process to exchange public keys, followed by the Bluetooth Low Energy (BLE) link shared secret. Apple Watch displays an animated pattern, which is captured by the camera on iPhone. The pattern contains an encoded secret that is used for BLE 4.1 out-of-band pairing. Standard BLE Passkey Entry is used as a fallback pairing method, if necessary.</p> <p><a href="https://www.apple.com/business/site/docs/iOS_Security_Guide.pdf">https://www.apple.com/business/site/docs/iOS_Security_Guide.pdf</a></p>
<p>22.4 register the remote device for access to a messaging account using the service activation code;</p>	<p>The '619 accused products satisfy this limitation. The '619 accused products include a processor and memory containing instructions executable by the processor whereby the device is operable to register the remote device for access to a messaging account using the service activation code. The '619 accused products register, for example an Apple Watch, for access to for example text messages and/or email, as shown by the exemplary documentation below.</p> <p><b>Read and reply to messages with your Apple Watch</b></p> <p>Apple Watch gives you a gentle tap to let you know when you have a new message. Just raise your wrist to read it and reply.</p> <p><b>Read a message</b></p> <p>To open Messages, press the Digital Crown to see all your apps, then tap . You can also <a href="#">open Messages from the Dock</a>.</p> <p>If you get a notification about a message, raise your wrist to see it or swipe down on the watch face.</p> <p><a href="https://support.apple.com/en-us/HT205783">https://support.apple.com/en-us/HT205783</a></p>

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	<p><b>Read mail on Apple Watch</b></p> <p>Read mail on your Apple Watch, then reply using Dictate, Scribble, or a prepared response, or switch to your iPhone to type a response.</p> <p><a href="https://support.apple.com/guide/watch/read-mail-apddca457a4f/watchos">https://support.apple.com/guide/watch/read-mail-apddca457a4f/watchos</a></p>
22.5 receive a message for the messaging account;	<p>The '619 accused products satisfy this limitation. The '619 accused products include a processor and memory containing instructions executable by the processor whereby the device is operable to receive a message for the messaging account. For example, the '619 accused products receive a message for the messaging account, as shown by the exemplary documentation below.</p> <p><b>Use Messages on your iPhone, iPad, or iPod touch</b></p> <p>You can use Messages to send texts, photos, videos, and audio messages. You can even personalize your messages with animated effects, iMessage apps, and more — all within the Messages app.</p> <p><a href="https://support.apple.com/en-us/HT201287">https://support.apple.com/en-us/HT201287</a></p>

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