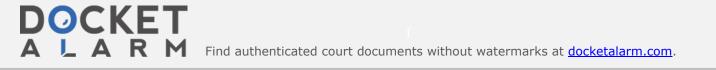
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EXHIBIT B



I	Case 4:11-cv-06357-YGR Document 171-	3 Filed 08/25/15 Page 2 of 74		
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15	UNITED STATES DISTRICT COURT			
16	CENTRAL DISTRICT OF CALIFORNIA			
17	SOUTHER	SOUTHERN DIVISION		
18	ANCORA TECHNOLOGIES, INC.,	Case No. 2:10-cv-10045-AG-MLG		
19	Plaintiff,	APPLE INC.'S N.D. CAL. PATENT		
20	V.	L.R. 3-3 DISCLOSURES		
21	APPLE INC.,			
22	Defendant.			
23	APPLE INC.,			
24	Counterclaimant,			
25	V.			
26	ANCORA TECHNOLOGIES, INC.,			
27	Counterdefendant.			
28				

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Pursuant to the Court's August 29, 2011 Order Re: Stipulated Trial Schedule (D.I. 40), Apple Inc. hereby provides its N.D. Cal. Patent L.R. 3-3 Disclosures ("Invalidity Contentions") for U.S. Patent No. 6,411,941.

4 By providing these Invalidity Contentions, Apple does not waive any 5 applicable privilege or immunity, including the attorney-client privilege or work 6 product doctrine. Apple predicates the Invalidity Contentions, in part, on the claim 7 constructions suggested by Ancora's September 14, 2011 Discovery Order 8 Disclosures and Disclosures Pursuant to Patent Rules 3-1 and 3-2 ("Infringement 9 Contentions"). Accordingly, these Invalidity Contentions should not be read as 10 representing or otherwise reflecting Apple's final positions regarding the proper 11 interpretation of the claims. Ancora has asserted in its Infringement Contentions 12 that Apple's iPhone, iPod Touch, iPad and Apple TV infringe Claims 1-3 and 5-17 13 of the '941 patent ("Asserted Claims"). These Invalidity Contentions address only 14 the Asserted Claims.

15 Apple bases these Invalidity Contentions on information reasonably available 16 to it at this time. The significant deficiencies in Ancora's Infringement Contentions 17 and other discovery responses have made it difficult for Apple to understand 18 Ancora's infringement and claim construction positions, and those positions necessarily inform Apple's invalidity positions.¹ Apple's investigation of Ancora's 19 20 claims and the prior art is ongoing. Apple incorporates by reference the 21 Preliminary Invalidity Contentions of Microsoft and PC Company Defendants in 22 Ancora Technologies, Inc. v. Toshiba Am. Info. Sys., Inc., No. 2:09-cv-00270-MJP 23 (W.D. Wash.), attached as Exhibit A. Apple reserves the right to supplement or 24 amend these Invalidity Contentions in the future, particularly in response to any 25 supplementation by Ancora of its infringement contentions to clarify its theories.

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¹ See October 26, 2011 letter to Ancora's counsel outlining deficiencies.

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1 A. Patent L.R. 3-3(a)

Apple identifies prior art publications and patents that anticipate or render

3 obvious one or more of the limitations of the Asserted Claims in Table A below.

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A /3			
Author	Non-Patent Publication	Publication Date	
White et al.	ABYSS: A Trusted Architecture for	June 1990	
	Software Protection, IEEE Transactions		
	on Software Engineering, Vol. 16, No. 6,		
Treese at al	pp. 38-51 ("White 1990") (Ex. 1)	Mary 4, 1001	
Tygar et al.	Dyad: A System for Using Physically	May 4, 1991	
	Secure Coprocessors, CMU-CS-94-140R,		
	Carnegie Mellon University ("Tygar 1991") (Ex. 2)		
Yee	Using Secure Coprocessors, Carnegie	May 1994	
100	Mellon University, CMU-CS-94-149	Widy 1994	
	("Yee 1994") (Ex. 3)		
Clark et al.	BITS: A Smartcard Protected Operating	Nov. 1994	
Chark of al.	System, Communications of the ACM,		
	Vol. 37, No. 11, pp. 68-70; 94 ("Clark		
	1994") (Ex. 4)		
Yee et al.	Secure Coprocessors in Electronic	July 1995	
	Commerce Applications, Proceedings of		
	the 1st USENIX Workshop on Electronic		
	Commerce, pp. 155-170 ("Yee 1995")		
	(Ex. 5)		
Arbaugh et al.	A Secure and Reliable Bootstrap	1996	
C	Architecture, Dept. of Comp. & Info. Sci.		
	Tech. Reports, U. Penn. ("Arbaugh 1996")		
	(Ex. 6)		
AMI et al.	Desktop Management BIOS Specification,	March 6, 1996	
	Version 2.0 ("DMI BIOS Specification")		
	(Ex. 7)	100-	
Arbaugh et al.	A Secure and Reliable Bootstrap	1997	
	Architecture, SP '97 Proceedings of the		
	1997 IEEE Symposium on Security and		
	Privacy, pp. 66-71 ("Arbaugh 1997") (Ex.		
Invontor	8) Potent Number	Icono Doto	
Inventor Hellman	Patent NumberU.S. 4,658,093 ("Hellman Patent") (Ex. 9)	Issue Date Apr. 14, 1987	
Joshi	U.S. 4,688,169 ("Joshi Patent") (Ex. 9)	Aug. 18, 1987	
Allen et al.	U.S. 4,088,109 (Joshi Patent) (Ex. 10) U.S. 4,757,533 ("Allen Patent") (Ex. 11)	July 12, 1987	
Karp	U.S. 4,866,769 ("Karp Patent") (Ex. 11)	Sep. 12, 1988	
Waite	U.S. 5,103,476 ("Waite 476 Patent) (Ex. 12)	Apr. 7, 1992	
vv alte	13)	[Apr. 7, 1992]	
	1.5)		

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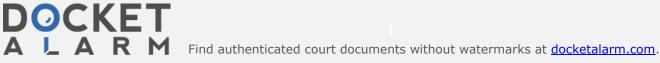
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Waite	U.S. 5,222,134 ("Waite 134 Patent) (Ex. 14)	Jun. 22, 1993
Smyth	U.S. 5,325,430 ("Smyth Patent") (Ex. 15)	June 28, 1994
Ewertz	U.S. 5,371,876 ("Ewertz Patent") (Ex. 16)	Dec. 6, 1994
Davis	U.S. 5,473,692 ("Davis 692 Patent") (Ex.	Dec. 5, 1995
	17)	
Richardson	U.S. 5,490,216 ("Richardson Patent") (Ex. 18)	Feb. 6, 1996
Schull	U.S. 5,509,070 ("Schull Patent") (Ex. 19)	Apr. 16, 1996
Morisawa et al.	U.S. 5,537,544 ("Morisawa Patent") (Ex. 20)	July 16, 1996
Davis et al.	U.S. 5,568,552 ("Davis 552 Patent") (Ex. 21)	Oct. 22, 1996
Christenson et al.	U.S. 5,579,522 ("Christenson Patent") (Ex. 22)	Nov. 26, 1996
McCarty	U.S. 5,666,411 ("McCarty Patent") (Ex. 23)	Sep. 9, 1997
Lewis	U.S. 5,734,819 ("Lewis Patent") (Ex. 24)	Mar. 31, 1998
O'Connor et al.	U.S. 5,745,568 ("O'Connor Patent") (Ex. 25)	Apr. 28, 1998
Davis	U.S. 5,844,986 ("Davis 986 Patent") (Ex. 26)	Dec. 1, 1998
Clark	U.S. 5,892,902 ("Clark Patent") (Ex. 27)	Apr. 6, 1999
Chou et al.	U.S. 5,892,906 ("Chou Patent") (Ex. 28)	Apr. 6, 1999
Labatte et al.	U.S. 5,901,311 ("Labatte 311 Patent") Ex.	May 4, 1999
Labatte et al.	29) U.S. 5,913,057 ("Labatte 057 Patent")	June 15, 1999
Laballe et al.	(Ex. 30)	Julie 13, 1999
Griswold	U.S. 5,940,504 ("Grisworld Patent") (Ex. 31)	
Beelitz	U.S. 5,944,820 ("Beelitz Patent") (Ex. 32)	Aug. 31, 1999
Okada	U.S. 6,049,670 ("Okada Patent") (Ex. 33)	
Osborn	U.S. 6,026,293 ("Osborn Patent") (Ex. 34)	Feb. 15, 2000
Miller	U.S. 6,038,320 ("Miller Patent") (Ex. 35)	Mar. 14, 2000
Mirov et al.	U.S. 6,138,236 ("Mirov Patent") (Ex. 36)	Oct. 24, 2000
Fieres et al.	U.S. 6,148,083 ("Fieres Patent") (Ex. 37)	Nov. 14, 2000
Schwartz et al.	U.S. 6,153,835 ("Schwartz Patent") (Ex. 38)	Nov. 28, 2000
Arbaugh et al.	U.S. 6,185,678 ("Arbaugh Patent") (Ex. 39)	Feb. 6, 2001
Misra et al.	U.S. 6,189,146 ("Misra Patent") (Ex. 40)	Feb. 13, 2001
Saunders	U.S. 6,209,099 ("Saunders Patent") (Ex. 41)	Mar. 27, 2001
Pearce et al.	U.S. 6,243,468 ("Pearce Patent") (Ex. 42)	Jun. 5, 2001
Cotichini et al.	U.S. 6,269,392 ("Cotichini Patent") (Ex. 43)	July 31, 2001

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