EXHIBIT B

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

ANCORA TECHNOLOGIES, INC.,

Plaintiff,

v.

APPLE INC.,

Defendant.

APPLE INC.,

Counterclaimant,

v.

ANCORA TECHNOLOGIES, INC.,

Counterdefendant.

Case No. 2:10-cv-10045-AG-MLG

APPLE INC.'S N.D. CAL. PATENT L.R. 3-3 DISCLOSURES

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.

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

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

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

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

Apple identifies prior art publications and patents that anticipate or render obvious one or more of the limitations of the Asserted Claims in Table A below.

Author	Non-Patent Publication	Publication Date
White et al.	ABYSS: A Trusted Architecture for Software Protection, IEEE Transactions on Software Engineering, Vol. 16, No. 6, pp. 38-51 ("White 1990") (Ex. 1)	June 1990
Tygar et al.	Dyad: A System for Using Physically Secure Coprocessors, CMU-CS-94-140R, Carnegie Mellon University ("Tygar 1991") (Ex. 2)	May 4, 1991
Yee	Using Secure Coprocessors, Carnegie Mellon University, CMU-CS-94-149 ("Yee 1994") (Ex. 3)	May 1994
Clark et al.	BITS: A Smartcard Protected Operating System, Communications of the ACM, Vol. 37, No. 11, pp. 68-70; 94 ("Clark 1994") (Ex. 4)	Nov. 1994
Yee et al.	Secure Coprocessors in Electronic Commerce Applications, Proceedings of the 1st USENIX Workshop on Electronic Commerce, pp. 155-170 ("Yee 1995") (Ex. 5)	July 1995
Arbaugh et al.	A Secure and Reliable Bootstrap Architecture, Dept. of Comp. & Info. Sci. Tech. Reports, U. Penn. ("Arbaugh 1996") (Ex. 6)	1996
AMI et al.	Desktop Management BIOS Specification, Version 2.0 ("DMI BIOS Specification") (Ex. 7)	March 6, 1996
Arbaugh et al.	A Secure and Reliable Bootstrap Architecture, SP '97 Proceedings of the 1997 IEEE Symposium on Security and Privacy, pp. 66-71 ("Arbaugh 1997") (Ex. 8)	1997
Inventor	**Patent Number**	**Issue Date**
Hellman	U.S. 4,658,093 ("Hellman Patent") (Ex. 9)	Apr. 14, 1987
Joshi	U.S. 4,688,169 ("Joshi Patent") (Ex. 10)	Aug. 18, 1987
Allen et al.	U.S. 4,757,533 ("Allen Patent") (Ex. 11)	July 12, 1988
Karp	U.S. 4,866,769 ("Karp Patent") (Ex. 12)	Sep. 12, 1989
Waite	U.S. 5,103,476 ("Waite 476 Patent) (Ex. 13)	Apr. 7, 1992

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. 17)	Dec. 5, 1995
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. 29)	May 4, 1999
Labatte et al.	U.S. 5,913,057 ("Labatte 057 Patent") (Ex. 30)	June 15, 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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