

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

INGENIOSHARE, LLC,

Plaintiff,

v.

EPIC GAMES, INC.,

Defendant.

Civil Action No. 6:21-cv-00663-ADA

PLAINTIFF’S PRELIMINARY INFRINGEMENT CONTENTIONS

Pursuant to the Court’s Order Governing Proceedings – Patent Cases, Plaintiff IngenioShare, LLC hereby provides its Preliminary Infringement Contentions to Defendant.

These infringement contentions are based upon publicly available information. The references contained in the appended claim chart are intended to be exemplary rather than exhaustive. Furthermore, certain technical information concerning the Accused Instrumentalities is not publicly available. Such technical information may provide additional support for Plaintiff’s infringement contentions. Plaintiff reserves the right to amend its infringement contentions and asserted claims as discovery progresses based, for example, upon information obtained through discovery or in response to claim-construction rulings in this case or in any related case.

As shown in the appended charts, Plaintiff asserts that Defendant infringes the following claims: claims 1, 2, 3, 6, 7, 8, 9, and 15-17 of U.S. Patent No. 10,708,727 (Claim Chart attached hereto as Exhibit A); claims 7-12, 22-24, and 33-62, 64, 65, and 67 of U.S. Patent No.

10,492,038 (Claim Chart attached hereto as Exhibit B); Claims 1-6, 11-15, 17, 19, and 20 of U.S. Patent No. 10,142,810 (Claim Chart attached hereto as Exhibit C); and claims 53, 54, and 56 of U.S. Patent No. 8,744,407 (Claim Chart attached hereto as Exhibit D).

All asserted claims are entitled to an effective filing date of June 10, 2005. All asserted claims are also entitled to a priority date from conception and/or reduction to practice of at least as early as April 27, 2005.

Plaintiff produces herewith documents numbered IS 000001-IS 001676, which includes a copy of the file histories for the asserted patents and all documents evidencing conception and reduction to practice for each claimed invention currently known to Plaintiff. Should Plaintiff later discover additional documents evidencing conception or reduction to practice, it will supplement its production accordingly.

This 16th day of September, 2021.

/s/ Cortney S. Alexander

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that Plaintiff's Preliminary Infringement Contentions and Document Production Accompanying Disclosure was served on Defendant's counsel of record via-email this 16th day of September, 2021.

/s/ Cortney S. Alexander

Cortney S. Alexander