

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

BILLJCO, LLC,

Plaintiff,

v.

APPLE INC.

Defendant.

Case No. 6:21-cv-528-ADA

JURY TRIAL DEMANDED

DEFENDANT APPLE, INC.'S
FINAL INVALIDITY CONTENTIONS

- **Davies + Berger + Aalto + Kolmel**
- **Davies + Berger + Aalto + Ribaudó**
- **Davies + Berger + Aalto+ Himmelstein**
- **Davies + Berger + Aalto + Haberman**

It would have been obvious to combine *Davies* with one or more of the references identified above, and a person of ordinary skill in the art would have been motivated to combine *Davies* with one or more of the references identified above for the exemplary reasons provided in section III.B.1.

d. '804 Patent

1. Exemplary Combinations Based on Himmelstein (Appendix 804-Himmelstein)

Exemplary combinations based on *Himmelstein* (Chart 804-Himmlstein) include the following:

- **Himmelstein + Knowledge in the Art**
- **Himmelstein + Myr**
- **Himmelstein + Wrappe**
- **Himmelstein + Myr + Wrappe**
- **Himmelstein + Johnson**
- **Himmelstein + Johnson + Myr**
- **Himmelstein + Johnson + Wrappe**
- **Himmelstein + Johnson + Myr + Wrappe**

- **Himmelstein + Wilkes**
- **Himmelstein + Wilkes + Wrappe**
- **Himmelstein + Wilkes + Myr + Wrappe**
- **Himmelstein + Wilkes + Johnson**
- **Himmelstein + Wilkes + Johnson + Myr**
- **Himmelstein + Wilkes + Johnson + Wrappe**
- **Himmelstein + Vincent**
- **Himmelstein + Vincent + Wrappe**
- **Himmelstein + Vincent + Myr + Wrappe**
- **Himmelstein + Vincent + Johnson**
- **Himmelstein + Vincent + Johnson + Myr**
- **Himmelstein + Vincent + Johnson + Wrappe**
- **Himmelstein + Vincent + Wilkes**
- **Himmelstein + Vincent + Wilkes + Wrappe**
- **Himmelstein + Vincent + Wilkes + Johnson**
- **Himmelstein + 802.11**
- **Himmelstein + 802.11 + Myr**
- **Himmelstein + 802.11 + Wrappe**
- **Himmelstein + 802.11 + Myr + Wrappe**
- **Himmelstein + 802.11 + Johnson**
- **Himmelstein + 802.11 + Johnson + Myr**
- **Himmelstein + 802.11 + Johnson + Wrappe**

- **Himmelstein + 802.11 + Wilkes**
- **Himmelstein + 802.11 + Wilkes + Wrappe**
- **Himmelstein + 802.11 + Wilkes + Johnson**
- **Himmelstein + 802.11 + Vincent**
- **Himmelstein + 802.11 + Vincent + Wrappe**
- **Himmelstein + 802.11 + Vincent + Johnson**
- **Himmelstein + 802.11 + Vincent + Wilkes**
- **Himmelstein + Wu**
- **Himmelstein + Wu + Myr**
- **Himmelstein + Wu + Wrappe**
- **Himmelstein + Wu + Myr + Wrappe**
- **Himmelstein + Wu + Johnson**
- **Himmelstein + Wu + Johnson + Myr**
- **Himmelstein + Wu + Johnson + Wrappe**
- **Himmelstein + Wu + Wilkes**
- **Himmelstein + Wu + Wilkes + Wrappe**
- **Himmelstein + Wu + Wilkes + Johnson**
- **Himmelstein + Wu + Vincent**
- **Himmelstein + Wu + Vincent + Wrappe**
- **Himmelstein + Wu + Vincent + Johnson**
- **Himmelstein + Wu + Vincent + Wilkes**
- **Himmelstein + Wu + 802.11**

- **Himmelstein + Wu + 802.11 + Myr**
- **Himmelstein + Wu + 802.11 + Wrappe**
- **Himmelstein + Wu + 802.11 + Johnson**
- **Himmelstein + Wu + 802.11 + Wilkes**
- **Himmelstein + Wu + 802.11 + Vincent**
- **Himmelstein + Gast**
- **Himmelstein + Gast + Myr**
- **Himmelstein + Gast + Wrappe**
- **Himmelstein + Gast + Myr + Wrappe**
- **Himmelstein + Gast + Johnson**
- **Himmelstein + Gast + Johnson + Myr**
- **Himmelstein + Gast + Johnson + Wrappe**
- **Himmelstein + Gast + Wilkes**
- **Himmelstein + Gast + Wilkes + Wrappe**
- **Himmelstein + Gast + Wilkes + Johnson**
- **Himmelstein + Gast + Vincent**
- **Himmelstein + Gast + Vincent + Wrappe**
- **Himmelstein + Gast + Vincent + Johnson**
- **Himmelstein + Gast + Vincent + Wilkes**
- **Himmelstein + Gast + 802.11**
- **Himmelstein + Gast + 802.11 + Myr**
- **Himmelstein + Gast + 802.11 + Wrappe**

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