# Exhibit B-15 to HMD's Invalidity Contentions Comparison of U.S. Patent No. 9,665,705 and U.S. Patent Application Publication No. ("Mathiassen")

As described in the following claim chart, asserted claims 1, 10, 11, and 15-17 of U.S. Patent No. 9,665,705 ("'7 in view of U.S. Patent Application Publication No. 2004/0123113 ("Mathiassen"), alone or in combination with references and other arguments identified in HMD's Invalidity Contentions, including, without limitation, as set

Mathiassen was filed on December 18, 2002 and published on June 24, 2004. Mathiassen is accordingly prior under at least pre-AIA § 102(e). Mathiassen anticipates or renders obvious, alone or in combination with other pr of the Asserted Claims of the '705 patent as described in the chart below and in the main Invalidity Contentions of chart is annexed.

Nothing in these claim charts should be construed as an admission regarding infringement, either literally or equivalents, or as an admission regarding HMD's understanding of the proper scope of the Asserted Claims. Government contentions, the exemplary citations herein necessarily account for a variety of possible in and claim constructions, including the claim constructions and interpretations apparently advanced by Plaintiff.

To the extent Plaintiff contends that Mathiassen fails to disclose, teach, or suggest one or more of the claim elem would be obvious to combine Mathiassen with one or more of the prior art references listed in HMD's Invalidity element-by-element in Exhibit C, and with the knowledge of a person of ordinary skill in the art, to render the as As included in the following claim chart, it would be obvious to combine Mathiassen with at least the following or in combination with each other:

- U.S. Patent No. 6,877,097 ("Hamid")
- U.S. Patent No. 7,404,486 ("Sands")
- U.S. Patent No. 7,697,729 ("Howell")
- U.S. Patent Pub. No. 2002/0063154 ("Hoyos")
- U.S. Patent No. 6,766,456 ("McKeeth")
- U.S. Patent No. 6,983,061 ("Ikegami")

<sup>&</sup>lt;sup>1</sup> CPC has indicated that it has dropped previously asserted claims and is now asserting only claims 1, 10, 11, and 15-17 of the '705 par Defendant's Interrogatory No. 21, served February 24, 2022.



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- U.S. Patent No. 5,933,515 ("Pu")
- PCT Pub. No. WO 2005/043451 ("Steinar")
- U.S. Patent No. 6,509,847 ("Anderson")
- U.S. Patent No. 6,088,585 ("Schmitt")
- U.S. Patent No. 6,219,793 ("Li")

This claim chart is a part of HMD's Invalidity Contentions and supports the arguments therein. This claim c combination with the arguments provided in HMD's Invalidity Contentions.

Citations to particular supporting evidence are merely exemplary of where each limitation of each asserted claim disclosed or taught by Mathiassen and/or other prior art. HMD reserves the right to rely on other evidence evidence of how Mathiassen alone or in combination with other prior art renders the '705 patent invalid.

Invalidity Claim Chart - U.S. Pat. No. 9,665,705	
Claim Element	Mathiassen
1 2	To the extent the preamble is limiting, Mathiassen discloses a system for providir controlled item explicitly, inherently, or as a matter of common sense, or it would to add missing aspects of the limitation.  For example, see the following passages and/or figures, as well as all related disc



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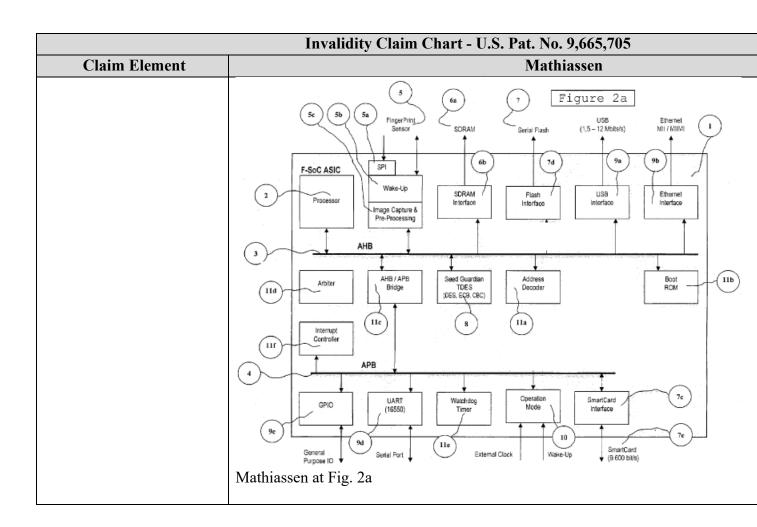


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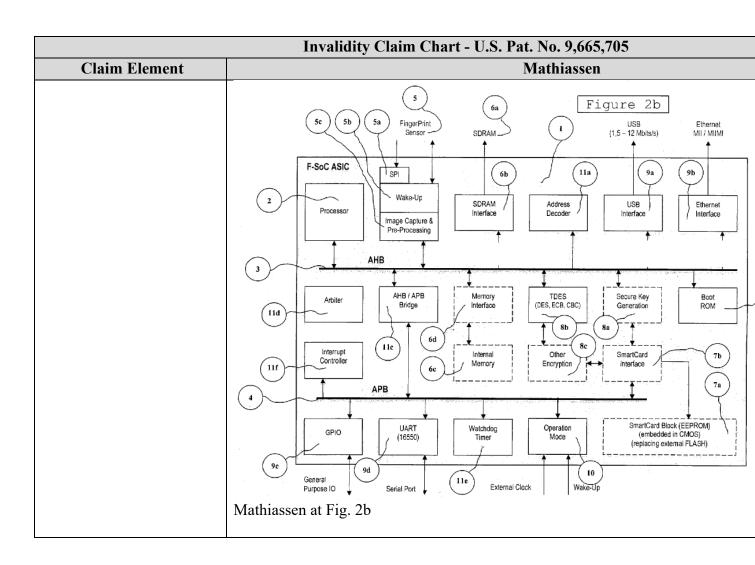
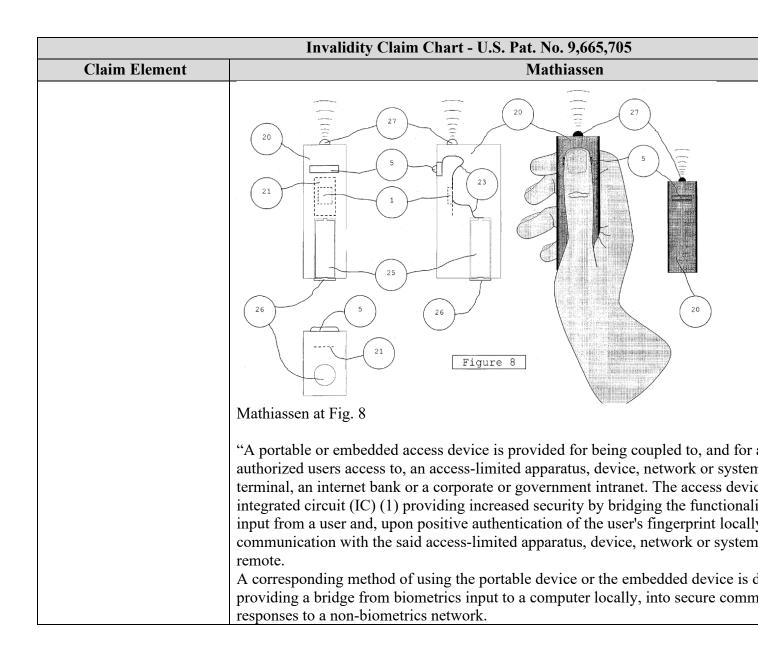


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