

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

UNM RAINFOREST INNOVATIONS,

Plaintiff,

v.

TOYOTA MOTOR NORTH AMERICA,  
INC., TOYOTA MOTOR SALES, U.S.A.,  
INC., and TOYOTA MOTOR  
ENGINEERING & MANUFACTURING  
NORTH AMERICA, INC.,

Defendants

Civil Action No. 2:23-cv-00434-JRG

JURY TRIAL DEMANDED

**PLAINTIFF'S P.R. 3-1 and 3-2 INFRINGEMENT CONTENTIONS**

Pursuant to the November 2, 2023 Order (Dkt. No. 14), Plaintiff UNM Rainforest Innovations ("UNM") serves its P.R. 3-1 and 3-2 Infringement Contentions in the form of the following chart setting forth where in the accused instrumentalities each element of the asserted claims of U.S. Patent No. 8,265,096 are found. Plaintiff incorporates by reference paragraphs 8-10 and 27-29 of its Original Complaint for Patent Infringement (Dkt. 1).

The Accused Instrumentalities include, but are not necessarily limited to, the following products:

<b><u>Exhibit</u></b>	<b><u>U.S. Patent No.</u></b>	<b><u>Asserted Claims</u></b>	<b><u>Accused Instrumentalities</u></b>
1	8,265,096	8	2022 Toyota Tundra and Toyota Tundra Hybrid
2	8,265,096	8	2023 Toyota bZ4X
3	8,265,096	8	2023 Toyota Corolla and Toyota Corolla Hybrid
4	8,265,096	8	2023 Toyota Corolla Cross and Toyota Corolla Cross Hybrid

5	8,265,096	8	2023 Toyota Corolla Hatchback
6	8,265,096	8	2023 Toyota Crown
7	8,265,096	8	2023 Highlander and Highlander Hybrid
8	8,265,096	8	2023 Toyota Mirai
9	8,265,096	8	2023 Toyota Prius
10	8,265,096	8	2023 Toyota Prius Prime
11	8,265,096	8	2023 Toyota RAV4 and Toyota RAV4 Hybrid
12	8,265,096	8	2023 Toyota RAV4 Prime
13	8,265,096	8	2023 Toyota Sequoia Hybrid
14	8,265,096	8	2023 Toyota Tundra and Toyota Tundra Hybrid
15	8,265,096	8	2023 Toyota Venza Hybrid
16	8,265,096	8	2024 Toyota Corolla and Toyota Corolla Hybrid
17	8,265,096	8	2024 Toyota Corolla Hatchback
18	8,265,096	8	2024 Toyota Grand Highlander and Toyota Grand Highlander Hybrid
19	8,265,096	8	2024 Toyota Tundra and Toyota Tundra Hybrid
20	8,265,096	8	Any other automobile configured to operate on or with a Wi-Fi 5/6 Network—regardless of make (e.g., Toyota, Lexus), model year (e.g., 2017–2029), or model (e.g., 4Runner, Avalon, Avalon Hybrid, bZ4X, C-HR, Camry, Camry Hybrid, Corolla, Corolla Cross, Corolla Hatchback, Corolla Hybrid, Grand Highlander, Highlander, Hilander Hybrid, Mirai, Prius, Prius Prime, RAV4, RAV4 Hybrid, RAV4 Prime, Sequoia, Sienna, Sienna Hybrid, Tacoma, Toyota Crown, Tundra, Tundra Hybrid, Venza, ES 250, ES 300H, ES 350, GX 460, IS 300, IS 350, IS 500, LC 500, LC 500C, LC 500H, LS 500, LS 500 AWD, LS 500 AWD F Sport, LS 500 F Sport, LS 500 RWD, LS 500H, LX 600, NX 250, NX 300, NX 300H, NX 350, NX 350H, NX 450H+, RC 350, RC

			F, RX 350, RX 350H, RX 350L, RX 450H, RX 450H+, RX 450HL, RX 500H, RZ450E, TX 350, TX 550H, TX 550H+, UX 200, UX 250H)
--	--	--	--

These contentions are preliminary and based on UNM’s research and investigation to date and materials in the public domain. Discovery has not yet commenced. Preliminary invalidity contentions have not yet been served. Claim construction proceedings have not yet commenced. UNM reserves the right to supplement or amend these contentions in light of discovery, invalidity and prior art, claim construction, and/or any additional information provided by Defendant.

<p>Dated: November 30, 2023</p> <p>Michael W. Shore (TX 18294915) Chijioko E. Offor (TX 24065840) THE SHORE FIRM LLP 901 Main Street, Suite 3300 Dallas, Texas 75202 Tel: (214) 593-9110 mshore@shorefirm.com coffor@shorefirm.com</p> <p><i>Counsel for Plaintiff UNM Rainforest Innovations</i></p>	<p>Respectfully submitted,</p> <p>By: <u>/s/ Chijioko E. Offor</u></p> <p>Charles L. Ainsworth (TX00783521) Robert Christopher Bunt (TX00787165) PARKER, BUNT &amp; AINSWORTH, P.C. 100 East Ferguson, Suite 418 Tyler, Texas 78702 Tel: (903) 531-3535 charley@pbatyler.com rcbunt@pbatyler.com</p> <p><i>Counsel for Plaintiff UNM Rainforest Innovations</i></p>
---	---

**CERTIFICATE OF SERVICE**

I certify that on November 30, 2023, the foregoing was served on Defendants in this action via the mechanism(s) selected below:

- Via the Court’s CM/ECF system.
- By electronic mail, sent to:  
srouth@orrick.com  
sjensen@orrick.com

By: /s/ Chijioko E. Offor