

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LITL LLC,

Plaintiff,

v.

DELL TECHNOLOGIES INC. and DELL
INC.,

Defendants.

Civil Action No. 1:23-cv-00121-RGA

MICROSOFT CORPORATION,

Intervenor-Plaintiff,

v.

LITL LLC,

Intervenor-Defendant.

LITL LLC,

Intervenor-Defendant /
Counterclaim Plaintiff in
Intervention,

v.

MICROSOFT CORPORATION,

Intervenor-Plaintiff /
Counterclaim Defendant in
Intervention.

PLAINTIFF'S INITIAL CLAIM CHARTS REGARDING DELL'S INFRINGEMENT

Pursuant to the Court's Scheduling Order (D.I. 37) and Delaware Default ESI Rule 4.c, Plaintiff LiTL LLC ("Plaintiff" or "LiTL") hereby serves the attached initial claim charts regarding infringement by Dell of U.S. Patent Nos. 8,289,688, 8,624,844, 9,563,229, 10,289,154, 9,003,315, 9,880,715, 10,564,818, and 8,612,888 (collectively, the "Asserted Patents").

LiTL's claim charts are based upon the documents that Defendants Dell Technologies Inc. and Dell Inc. (collectively "Defendants" or "Dell") provided to LiTL pursuant to the Scheduling Order and Delaware Default ESI Rule 4.b and information reasonably available to LiTL. To date, Defendants have failed to provide LiTL with the "core technical documents" required under the Scheduling Order and Delaware Default ESI Rule 4.b. As detailed in LiTL's letters to Dell dated March 15 and 18, 2024, and as discussed during our meet and confer on March 28, 2024, Dell's core technical document production to date suffers numerous deficiencies. Dell's production consists entirely of service manuals and owner's manuals, which contain materials available on Dell's website. Dell has failed to provide documents sufficient to show how the accused products operate, and in particular, how different physical configurations detect and cause transitions on the user interface between one configuration and another. Dell was obligated to produce these documents as part of its core technical document production and in response to LiTL's Request Nos. 2-4 and 23-25 of its First Set of Requests for Production of Documents. LiTL reserves the right to supplement its initial claim charts to incorporate additional information regarding the accused products as additional information becomes available.

In the claim charts attached as Exhibits A-H, LiTL identifies the following asserted claims from the Asserted Patents:

Asserted Patent	Asserted Claims	Exhibit
8,289,688	11, 17-19, 21, 22, 27, 28, 30-32	A
8,624,844	10, 16, 17	B
9,563,229	1-6, 8-11, 16-21, 23, 25	C
10,289,154	1-9	D
9,003,315	1-16, 18, 23, 24, 27-29, 53-57	E
9,880,715	1, 2, 4-9, 12, 14-17, 19, 20	F
10,564,818	1-20	G
8,612,888	1, 2, 4-9, 18, 19, 22-27	H

LiTL accuses Defendants of infringing the Asserted Patents with respect to the following products (collectively, the “Accused Products”):

No.	Product Line	Product Name
1	Latitude	Latitude 3120 2-in-1
2	Latitude	Latitude 3140 2-in-1
3	Latitude	Latitude 3189 2-in-1
4	Latitude	Latitude 3190 2-in-1
5	Latitude	Latitude 3310 2-in-1
6	Latitude	Latitude 3330 2-in-1
7	Latitude	Latitude 3379 2-in-1
8	Latitude	Latitude 3390 2-in-1
9	Latitude	Latitude 5289 2-in-1
10	Latitude	Latitude 5300 2-in-1
11	Latitude	Latitude 5310 2-in-1
12	Latitude	Latitude 5320 2-in-1
13	Latitude	Latitude 5330 2-in-1
14	Latitude	Latitude 7310 2-in-1
15	Latitude	Latitude 7330 2-in-1
16	Latitude	Latitude 7389 2-in-1
17	Latitude	Latitude 7390 2-in-1
18	Latitude	Latitude 7400 2-in-1
19	Latitude	Latitude 7410 2-in-1
20	Latitude	Latitude 7420 2-in-1
21	Latitude	Latitude 7430 2-in-1
22	Latitude	Latitude 9330 2-in-1
23	Latitude	Latitude 9410 2-in-1
24	Latitude	Latitude 9420 2-in-1
25	Latitude	Latitude 9430 2-in-1
26	Latitude	Latitude 9440 2-in-1
27	Latitude	Latitude 9510 2-in-1

No.	Product Line	Product Name
28	Latitude	Latitude 9520 2-in-1
29	Inspiron	Inspiron 3153 2-in-1
30	Inspiron	Inspiron 3158 2-in-1
31	Inspiron	Inspiron 3168 2-in-1
32	Inspiron	Inspiron 3169 2-in-1
33	Inspiron	Inspiron 3179 2-in-1
34	Inspiron	Inspiron 3185 2-in-1
35	Inspiron	Inspiron 3195 2-in-1
36	Inspiron	Inspiron 5368 2-in-1
37	Inspiron	Inspiron 5378 2-in-1
38	Inspiron	Inspiron 5379 2-in-1
39	Inspiron	Inspiron 5400 2-in-1
40	Inspiron	Inspiron 5406 2-in-1
41	Inspiron	Inspiron 5410 2-in-1
42	Inspiron	Inspiron 5481 2-in-1
43	Inspiron	Inspiron 5482 2-in-1
44	Inspiron	Inspiron 5485 2-in-1
45	Inspiron	Inspiron 5491 2-in-1
46	Inspiron	Inspiron 5568 2-in-1
47	Inspiron	Inspiron 5578 2-in-1
48	Inspiron	Inspiron 5579 2-in-1
49	Inspiron	Inspiron 5582 2-in-1
50	Inspiron	Inspiron 5591 2-in-1
51	Inspiron	Inspiron 7300 2-in-1
52	Inspiron	Inspiron 7306 2-in-1
53	Inspiron	Inspiron 7353 2-in-1
54	Inspiron	Inspiron 7359 2-in-1

No.	Product Line	Product Name
55	Inspiron	Inspiron 7368 2-in-1
56	Inspiron	Inspiron 7373 2-in-1
57	Inspiron	Inspiron 7375 2-in-1
58	Inspiron	Inspiron 7378 2-in-1
59	Inspiron	Inspiron 7386 2-in-1
60	Inspiron	Inspiron 7390 2-in-1
61	Inspiron	Inspiron 7391 2-in-1
62	Inspiron	Inspiron 7405 2-in-1
63	Inspiron	Inspiron 7415 2-in-1
64	Inspiron	Inspiron 7420 2-in-1
65	Inspiron	Inspiron 7425 2-in-1
66	Inspiron	Inspiron 7430 2-in-1
67	Inspiron	Inspiron 7435 2-in-1
68	Inspiron	Inspiron 7500 2-in-1
69	Inspiron	Inspiron 7506 2-in-1
70	Inspiron	Inspiron 7568 2-in-1
71	Inspiron	Inspiron 7569 2-in-1
72	Inspiron	Inspiron 7573 2-in-1
73	Inspiron	Inspiron 7579 2-in-1
74	Inspiron	Inspiron 7586 2-in-1
75	Inspiron	Inspiron 7590 2-in-1

No.	Product Line	Product Name
76	Inspiron	Inspiron 7591 2-in-1
77	Inspiron	Inspiron 7620 2-in-1
78	Inspiron	Inspiron 7630 2-in-1
79	Inspiron	Inspiron 7635 2-in-1
80	Inspiron	Inspiron 7706 2-in-1
81	Inspiron	Inspiron 7773 2-in-1
82	Inspiron	Inspiron 7778 2-in-1
83	Inspiron	Inspiron 7779 2-in-1
84	Inspiron	Inspiron 7786 2-in-1
85	Inspiron	Inspiron 7791 2-in-1
86	XPS	XPS 13 7390 2-in-1
87	XPS	XPS 13 9310 2-in-1
88	XPS	XPS 13 9365 2-in-1
89	XPS	XPS 15 9575 2-in-1
90	Latitude	Latitude 5340 2-in-1
91	Latitude	Latitude 3340 2-in-1
92	Latitude	Latitude 7340 2-in-1
93	Latitude	Latitude 7320 2-in-1
94	Inspiron	Inspiron 3152 2-in-1
95	Inspiron	Inspiron 3157 2-in-1
96	Inspiron	Inspiron 7348 2-in-1

The claim charts attached as Exhibits A-H identify where each element of each Asserted Claim is found within the Latitude 5330 2-in-1. Based upon the information reasonably available to LiTL and the limited documents that Dell has produced to date, LiTL contends that the Latitude 5330 2-in-1 is representative of each Accused Product because each Accused Product operates in substantially the same manner as the Latitude 5330 2-in-1 insofar as the limitations of the asserted claims of the Asserted Patents are concerned. LiTL reserves the right to amend its identification of a representative product pending Dell's production of the additional documents that it is obligated to produce.

LiTL contends that for each asserted claim, unless otherwise specified in the claim charts, each claim limitation is literally present in each of the Accused Products identified above. LiTL reserves the right to supplement its initial claim charts in light of Dell's discovery responses and in

light of additional information identified in discovery. To the extent that Dell contends that the Accused Products do not infringe any claim elements literally, Dell infringes under the Doctrine of Equivalents (“DOE”). LiTL reserves the right to supplement its initial claim charts to detail how the Accused Products infringe the Asserted Patents under DOE.

Date: April 1, 2024

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