

U.S. Patent No. 9,941,830 (“’830 Patent”)

Accused Instrumentalities

Apple products with Taptic Engine technology., including without limitation iPhone products (iPhone 6s, 8 Plus, X, XR, XS, XS Max, 11, 11 Pro, 11 Pro Max, SE (second generation), 12, 12 mini, 12 Pro, 12 Pro Max, 13 Pro Max, SE (third generation), 14, 14 Plus, 14 Pro, 14 Pro Max, 15, 15 Plus, 15 Pro, 15 Pro Max), MacBook Pro from 2015, MacBook from 2018, MacBook Air from 2018) and Apple Watch products (1st generation, Series 3, Series 4, Series 5, SE, Series 6, Series 7, SE (second generation), Series 8, Ultra, Series 9, Ultra 2), and all variants thereof (collectively, “Accused Products”), infringe at least Claims 1, 2, 3, 4, 5, 6, 7, 8, 14, 15, 16, 17, 19, and 20.

Each Accused Product infringes the claims in substantially the same way, and the evidence shown in this application to each Accused Product. Each claim limitation is literally infringed by each Accused Product. However, a claim limitation is not met literally, it is nonetheless met under the doctrine of equivalents because the difference between the claim limitation and each Accused Product would be insubstantial, and each Accused Product performs substantially the same way, to achieve the same result as the claimed invention. Notably, Defendant has not yet admitted any, particular claim limitations it believes are not met by the Accused Products.

Claim 1

Claim 1	Accused Products
[1pre]. A vibration module comprising:	To the extent the preamble is limiting, each Accused Product includes or consists of a vibration module. For example, each of the Apple iPhone 14 and the Apple Watch Ultra contain (“Taptic Engine”), haptic controller(s), and associated circuitry, as described in the claim limitations below. <i>See, e.g.:</i>



Photograph of iPhone 14 with rear cover removed, with A15 Bionic SoC at bottom left.
Engine at bottom left.

Claim 1

Accused Products



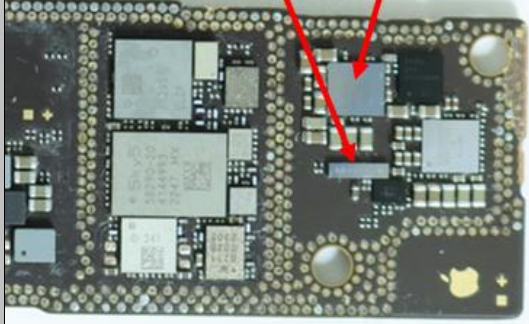
Photograph of Taptic Engine housing from the iPhone 14.



Photograph of Taptic Engine housing from the iPhone 14.

Claim 1

Accused Products



Photograph of Hall sensor controller and motor control driver from the iPhone

Claim 1	Accused Products
	<p>The following devices contain a Taptic Engine:</p> <ul style="list-style-type: none"> • iPhone 14 Pro Max • iPhone 14 Pro • iPhone 14 Plus • iPhone 14 • iPhone SE (3rd generation) • iPhone 13 Pro Max • iPhone 13 Pro • iPhone 13 • iPhone 13 mini • iPhone 12 Pro Max • iPhone 12 Pro • iPhone 12 • iPhone 12 mini • iPhone SE (2nd generation) • iPhone 11 Pro Max • iPhone 11 Pro • iPhone 11 • iPhone XS Max • iPhone XS • iPhone XR • iPhone X • iPhone 8 Plus • iPhone 8 • iPhone 7 Plus • iPhone 7 • iPhone 6s Plus • iPhone 6s <p>Accessory Design Guidelines for Apple Devices, Release R20, available at https://developer.apple.com/accessories/Accessory-Design-Guidelines.pdf</p>

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