EXHIBIT 3

le's Invalidity Contentions Under Patent Rule 3-3

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INVALIDITY OF U.S. PATENT NO. 9,408,055 (the "'055 patent")

by

FORCE XXI BATTLE COMMAND, BRIGADE AND BELOW ("FBCB2")

xplained in the cover pleading to Apple's invalidity contentions, Plaintiff has not and cannot demonstrate that the '055 patent is entitled to a
rity date earlier than October 31, 2014, the effective filing date of Appl. No. 14/027,410. On information and belief, the FBCB2 system
uding at least FBCB2 software versions 3.2, 3.3, and 3.4 and hardware made by Litton and Paravant) was in public use and/or available to the
ic no later than March 21, 2003, and was made available by the U.S. Army. The FBCB2 system, as set forth in this chart, anticipates the asserted
ns of the '055 patent at least under pre-AIA 35 U.S.C. §§ 102(a) and (g)(2) (and AIA 35 U.S.C. §§ 102(a)(1)), and/or renders the asserted claims
ous under 35 U.S.C. § 103 either alone, in combination with the general knowledge of one of ordinary skill in the art, and/or in combination with
eferences identified in Apple's invalidity contentions, including as set forth in this chart. On information and belief, the FBCB2 system is
ribed at least in the following documents and other materials cited in this chart:

- *Force XXI Battle Command Brigade and Below-Blue Force Tracking (FBCB2-BFT). A Case Study in the Accelerated Acquisition of a Digital Command and Control System during Operations Enduring Freedom and Iraqi Freedom*, by James L. Conatser and Vincent E. Grizio, dated December 2005 and retrieved from http://www.dtic.mil/dtic/tr/fulltext/u2/a443273.pdf on November 21, 2017 ("FBCB2-1") (APL-AGIS_00012804 - APL-AGIS_00012876).

- *Blue Force Tracking The Afghanistan and Iraq Experience and Its Implications for the U.S. Army*, by Richard J. Dunn, III, stamped with a copyright dated 2003 and retrieved from http://www.northropgrumman.com/AboutUs/AnalysisCenter/Documents/pdfs/BFT-Afghanistan-and-Iraq-Exper.pdf on November 21, 2017 ("FBCB2-2") (APL-AGIS_00012877 - APL-AGIS_00012896).

- *FORCE XXI BATTLE COMMAND, BRIGADE AND BELOW (FBCB2)*, retrieved from https://web.archive.org/web/20170204113146/http://www.dote.osd.mil/pub/reports/FY1999/pdf/army/99fbcb2.pdf on November 21, 2017 ("FBCB2-3") (APL-AGIS_00012800 - APL-AGIS_00012803).

- *FBCB2-BFT Family of Products*, Northrop Gruman Space & Mission Systems Corp. (2003) ("FBCB2-4") (SIEGEL000001-SIEGEL000002)

- *FBCB2 Blue Force Tracking* (Promotional Video), Northrop Gruman (2004) ("FBCB2-5") (SIEGEL000003)

- Pamela Bowers, *The TRW Tactical Systems Division Builds the Next Generation of Tactical Army Operations Systems*, CrossTalk: The Journal of Defense Software Engineering (January 2002). ("FBCB2-6") (SIEGEL000004-SIEGEL000008)

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- T. Trent Gegax, *Wired for Battle*, Newsweek (March 3, 2003). ("FBCB2-7") (SIEGEL000009-SIEGEL000010)

- Vernon Loeb, *Digitized Battlefield Puts Friend and Foe in Sight*, Washington Post (March 3, 2003) ("FBCB2-8") (SIEGEL000011-SIEGEL000013)

- Lieutenant Colonel Marc LeGare, *Battle Command and Visualization*, Military Review (September-October 2002) ("FBCB2-9") (SIEGEL000014-SIEGEL000019)

- Neil Siegel, *Organizing Complex Projects Around Critical Skills, and the Mitigation of Risks Arising from System Dynamic Behavior*, Ph.D. Dissertation, University of Southern California (August 2011) ("FBCB2-10") (SIEGEL000020-SIEGEL000300)

- *Personal User Data Terminal*, TRW Systems Ltd. (February 7, 2001) ("FBCB2-11") (SIEGEL000301-SIEGEL000302)

- *Force XXI Battle Command Brigade-and-Below (FBCB2)*, TRW Systems Integration Group (1997) ("FBCB2-12") (SIEGEL000303 - SIEGEL000308)

- *Information Dominance for Combat Power – Force XXI Battle Command Brigade and Below*, TRW Systems & Information Technology Group (2000) ("FBCB2-13") (SIEGEL000309-SIEGEL000312)

- *The World's Only Existing Tactical Internet: The US Army's Force XXI Battle Command Brigade and Below*, Neil Siegel (Presentation at SMi Defense Conferences: Designing and Deploying Tactical Internets (May 24 1999) ("FBCB2-14") (SIEGEL000316-SIEGEL000332)

- U.S. Patent No. 6,212,559 ("FBCB2-15") (SIEGEL000333-SIEGEL000358)

- *US Army shares radios to avoid Gulf fratricide*, Kim Burger, Jane's Defence Weekly (March 12, 2003) ("FBCB2-16") (SIEGEL000359-SIEGEL000361)

- *US Army expands battlefield digitization*, Scott Gourley, Jane's Defence Weekly (September 25, 2002) ("FBCB2-17") (SIEGEL000362-SIEGEL000364)

- *Soldiers in Afghanistan to Receive New Blue Force Tracking System*, Emily Hsu, Inside the Army (October 28, 2002) ("FBCB2-18") (SIEGEL000365-SIEGEL000366)

- *Technology Seeks to Erase Friendly Fire*, David McGuire, Newsbytes (March 27, 2003) ("FBCB2-19") (SIEGEL000367-SIEGEL000368)

- U.S. Patent No. 5,672,840 ("FBCB2-20") (SIEGEL000369-SIEGEL000376)

- U.S. Patent No. 6,904,280 ("FBCB2-21") (SIEGEL000377-SIEGEL000399)

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- U.S. Patent No. 7,278,023 ("FBCB2-22") (SIEGEL000400-SIEGEL000417)

- *U.S. Army Brings Digital Future to Persian Gulf*, Frank Tiboni, Defense News (November 11, 2002) ("FBCB2-23") (SIEGEL000418)

le reserves the right to further supplement its contentions and evidence concerning the FBCB2 system as discovery proceeds, including by
ion to additional materials or other evidence describing the operation of the system.

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Limitation	Prior Art Disclosure
	unit to identify the displayed location and move to its location… Using combinations of enemy template overlay, circular, and direct line-of-sight tools, the commander can visualize the best location, array, and action with which to gain visual and direct-fire contact with the enemy. The picture can be portrayed in an overlay and transmitted to subordinate elements as part of the tactical plan… FBCB2 range sketches can be consolidated at platoon level into a platoon overlay, sent to the company commander and consolidated, then forward to battalion or task force level…. Each platform equipped with FBCB2 can set the system for audible warnings when approaching danger zones. These zones are related to enemy direct fire (tired to the FBCB2 spot-reported location and system administrative settings); reported nuclear, biological, and chemical contamination areas; and reported enemy obstacles… Clearly the FBCB2 display, constantly updated with positions (for FBCB2-equipped platforms); the latest enemy reports, operational graphics; and intelligence from higher echelon assets provide a better venue for identifying risk and opportunity.") *See, e.g.* FBCB2-22 at 5:45-57, 5:60-65, 6:1-25 ("Still referring to FIG. 2, a channel monitoring and filtering module 1000 is illustrated communicating to a local password file 1500. The channel monitoring and filtering module 1000 includes, but is not limited to, operation 650 through operation 710shown in FIG. 7. The channel monitoring and filtering module 1000 is installed on each and every user node, computer system, and military vehicle 30 shown in FIG. 1. The function of the channel monitoring and filtering module 1000 is to monitor for and receive broadcast and multicast messages within the wide area network 10 and determine the privileges or security clearance required by the current user of the computer system in order for that user to view that particular message. … Still referring to FIG. 2, a user login module 1200 is provided in order to permit login of users and determine the user's privileges and security clearance. The user login module displays a login screen to the user, one-way encrypts the password and determines if the local password file 1500 contains a match. … Still referring to FIG. 2, a password management module **1300** is provided to enable updating of all local password files 1500 located within the wide area network 10. Each and every computer system in the wide area network 10 including the systems administrator's or security officer's

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