

EXHIBIT L

Exhibit A21

U.S. Pat. Pub. No. 2006/0223518 published October 5, 2006 (“Haney ’518”)

U.S. Pat. Pub. No. 2006/0223518 (“Haney ’518”) is entitled “Location Sharing and Tracking Using Mobile Phones or Other Wireless Devices.” Haney ’518 was published on October 5, 2006 from an application filed on April 4, 2005. Haney’518 discloses and/or renders obvious Claims 2 and 10-13 of U.S. Patent No. 8,213,970 alone and/or in combination with other references, as set forth in the chart below. Defendants incorporate in this chart all applicable qualifications, clarifications, and other statements made in Defendants’ Invalidation Contentions. This invalidity claim chart is based on Defendants’ present understanding of Claims 2 and 10-13 and AGIS’s apparent construction of the claims, as set forth in AGIS’s Infringement Contentions. Defendants are not adopting AGIS’s apparent constructions, nor do Defendants admit the accuracy of any particular construction. To the extent the Court finds that this reference does not expressly disclose certain limitations in the asserted claims, such limitations would have been inherent and/or obvious. By mapping claim language to this reference, Defendants do not imply or admit that the claim language satisfies 35 U.S.C. § 112. To the extent any cell lacks citations to the charted reference, this should not be taken as an admission that the reference does not disclose the corresponding limitation but rather indicates that Defendants do not presently intend to rely on the reference as disclosing the limitation based on Defendants’ present understanding of the claim limitation.

U.S. Patent No. 8,213,970	Haney
<p>[2.pre] A communication system for transmitting, receiving, confirming receipt, and responding to an electronic message, comprising;</p>	<p>Haney '518 discloses and renders obvious a communication system for transmitting, receiving, confirming receipt, and responding to an electronic message, comprising:</p> <p><i>See e.g., Haney '518</i> at Abstract (“A system for exchanging GPS or other position data between wireless devices for purposes of group activities, child location monitoring, work group coordination, dispatching of employees, etc. Cell phones and other wireless devices with GPS receivers have loaded therein a Buddy Watch Application and a TalkControl application. The Buddy Watch application communicates with the GPS receiver and other wireless devices operated by buddies registered in the users phone as part of buddy groups or individually. GPS position data and historical GPS position data can be exchanged between cell phones of buddies and instant buddies such as tow truck drivers via a buddy watch server. Emergency monitoring services can be set up with notifications to programmable individuals in case an individual does not respond. Positions and tracks can be displayed. TalkControl simplifies and automates the process of joining talk groups for walkie talkie services such as that provided by Nextel.”).</p> <p><i>See e.g., id.</i> at FIG. 2A, ¶ 59 (“FIG. 2A is a block diagram of the Buddy Watch system. A Buddy Watch or Rubicon server communicates with wireless devices 2 through 6 via the internet and wireless carrier systems 7 and 8. In the claims, the Buddy Tracker software is called the GPS position data sharing software application and it is resident on each of wireless devices 2 through 6. Generally, communication between the handsets and the Rubicon (Buddy Watch) server occurs as follows. Each handset communicates data packets through its local cellular carrier network via TCP/IP compliant data packets encapsulated in cell system packets. The carrier network tower receives the packets and strips off the cellular encapsulation and forwards the TCP/IP packet to an appropriate gateways connected to the internet 9. Routers in the internet route the packet to its destination, generally the Buddy Watch server 1. The receiving server validates the content of the IP packet to authenticate the sender as a register Rubicon user and to verify that the sending phone EIN matches the phone EIN stored in the server. Once authenticated, the packet content is processed by the server. A response to the request in the packet is prepared using information from a database main-tained by the Rubicon server and any associated map needed for the response is requested from a map server. The complete response is compiled, including any data needed to</p>

render a map on the recipient wireless device display and packetized into a TCP/IP packet and sent back to the originator of the request via internet routers and carrier gateways that couple the wireless carrier systems to the internet. The gateway of the carrier identifies the correct tower for the cell in which the recipient's phone is currently resident and the packet is encapsulated in a cell system packet and forwarded to the appropriate tower where it is transmitted wirelessly to the cell phone or other wireless device of the recipient. The wireless device then recovers the data in the TC/IP packet and the port address in the TCP/IP packet header causes the packet to be routed to the Buddy Watch software where it is processed.”).

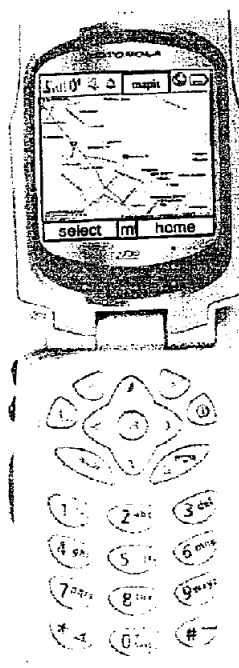


FIG. 2D

[2.a] a predetermined network of participants, wherein each participant has a similarly equipped PDA/cell phone that includes a

Haney '518 discloses and renders obvious a predetermined network of participants, wherein each participant has a similarly equipped PDA/cell phone that includes a CPU and a touch screen display a CPU and memory.

See e.g., Haney '518 at Abstract (“A system for exchanging GPS or other position data between wireless devices for purposes of group activities, child location monitoring, work group coordination, dispatching of employees, etc. Cell phones and other wireless devices with GPS receivers have loaded therein a Buddy Watch Application

<p>CPU and a touch screen display a CPU and memory;</p>	<p>and a TalkControl application. The Buddy Watch application communicates with the GPS receiver and other wireless devices operated by buddies registered in the users phone as part of buddy groups or individually. GPS position data and historical GPS position data can be exchanged between cell phones of buddies and instant buddies such as tow truck drivers via a buddy watch server. Emergency monitoring services can be set up with notifications to programmable individuals in case an individual does not respond. Positions and tracks can be displayed. TalkControl simplifies and automates the process of joining talk groups for walkie talkie services such as that provided by Nextel.”).</p> <p><i>See e.g., id.</i> at FIG. 2A, ¶ 59 (“FIG. 2A is a block diagram of the Buddy Watch system. A Buddy Watch or Rubicon server communicates with wireless devices 2 through 6 via the internet and wireless carrier systems 7 and 8. In the claims, the Buddy Tracker software is called the GPS position data sharing software application and it is resident on each of wireless devices 2 through 6. Generally, communication between the handsets and the Rubicon (Buddy Watch) server occurs as follows. Each handset communicates data packets through its local cellular carrier network via TCP/IP compliant data packets encapsulated in cell system packets. The carrier network tower receives the packets and strips off the cellular encapsulation and forwards the TCP/IP packet to an appropriate gateways connected to the internet 9. Routers in the internet route the packet to its destination, generally the Buddy Watch server 1. The receiving server validates the content of the IP packet to authenticate the sender as a register Rubicon user and to verify that the sending phone EIN matches the phone EIN stored in the server. Once authenticated, the packet content is processed by the server. A response to the request in the packet is prepared using information from a database main-tained by the Rubicon server and any associated map needed for the response is requested from a map server. The complete response is compiled, including any data needed to render a map on the recipient wireless device display and packetized into a TCP/IP packet and sent back to the originator of the request via internet routers and carrier gateways that couple the wireless carrier systems to the internet. The gateway of the carrier identifies the correct tower for the cell in which the recipient's phone is currently resident and the packet is encapsulated in a cell system packet and forwarded to the appropriate tower where it is transmitted wirelessly to the cell phone or other wireless device of the recipient. The wireless device then recovers the data in the TC/IP packet and the port address in the</p>
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