EXHIBIT 30

Defendant's Invalidity Contentions
Exhibit A21

Invalidity of U.S. Patent No. 6,580,999 by U.S. Patent No. 6,067,502 to Hayashida ("Hayashida")

U.S. Patent No. 6,580,999 (the "'999 Patent") was filed June 18, 2002 and issued June 17, 2003. The '999 Patent claims priority to JP11-197010, filed July 12, 1999. For the purposes of these invalidity contentions, Defendant applies the July 12, 1999 priority date for the '999 Application. However, Defendant reserves the right to contest Plaintiff's reliance on the July 12, 1999 priority date should the priority date become an issue in this proceeding.

The excerpts cited herein are exemplary. For any claim limitation, Defendant may rely on excerpts cited for any other limitation and/or additional excerpts not set forth fully herein to the extent necessary to provide a more comprehensive explanation for a reference's disclosure of a limitation. Where an excerpt refers to or discusses a figure or figure items, that figure and any additional descriptions of that figure should be understood to be incorporated by reference as if set forth fully therein.

Except where specifically noted otherwise, this chart applies the apparent constructions of claim terms as used by Plaintiff in its infringement contentions; such use, however, does not imply that Defendant adopts or agrees with Plaintiff's constructions in any way.

U.S. Patent No. 6,067,502 to Hayashida ("Hayashida") was filed August 21, 1997 and issued May 23, 2000. Hayashida therefore qualifies as prior art with regard to the '999 patent under 35 U.S.C. § 102(e).

Upon information and belief, the Garmin NavTalk (the "NavTalk") was made publicly available in January of 1999. The features and functionalities of the NavTalk product are described in the NavTalk Owner's Manual and Reference Guide (Rev. A). Because the NavTalk product itself was known and used by others prior to the '999 Patent's priority date, it constitutes prior art under 35 U.S.C. § 102(a) (pre-AIA). Defendant reserves the right to supplement its theories with additional discovered details describing the features and functionalities of the NavTalk product that were known or used by others prior to the '999 Patent's priority date. Additionally, because the NavTalk Owner's Manual and Reference Guide is a printed publication that was publicly available prior to the '999 Patent's priority date, it independently constitutes prior art under 35 U.S.C. § 102(a) (pre-AIA).

Upon information and belief, the Seiko Epson Locatio (the "Locatio") was made publicly available in June of 1999. Therefore, the Locatio qualifies as prior art with regard to the '999 patent under 35 U.S.C. § 102(a) (pre-AIA).

U.S. Patent No. 5,781,150 to Norris ("Norris") was filed on October 13, 1995 and issued on July 14, 1998 and therefore qualifies as prior art with regard to the '999 patent under at least 35 U.S.C. § 102(e) and (a).

JPH05-264711 ("the '711 Patent") published on October 12, 1993 and therefore qualifies as prior art with regard to the '999 patent under 35 U.S.C. § 102(b).[1]

JPH10-197277 to Maruyama et al. ("Maruyama") published on July 31, 1998 and therefore qualifies as prior art with regard to the '999 Patent under 35 U.S.C. § 102(a).

U.S. Patent No. 6,525,768 to Obradovich ("Obradovich") was filed on October 21, 1999 and issued February 25, 2003. Obradovich claims the benefit of Provisional Application 60/105/050 and therefore qualifies as prior art to the '999 Patent under 35 U.S.C. § 102(e).

Hayashida (or Hayashida in view of the Cyberguide/Want) in view of Norris/the NavTalk/the Locatio/the Cyberguide/Maruyama/Obradovich renders Claims 1-6 obvious under 35 U.S.C. § 103.

Hayashida (or Hayashida in view of the Cyberguide/Want) in view of Norris/the NavTalk/the Locatio/the Cyberguide/Maruyama/Obradovich in further view of the '711 Patent renders Claim 4 obvious under 35 U.S.C. § 103.

U.S. Patent No. 6,580,999	**Hayashida**
Claim 1	
1[P]. A portable terminal with the function of walking navigation, comprising:	Hayashida discloses a portable terminal with the function of walking navigation. *This invention is related to a map display device to guiding and searching a movement route of a vehicle based on a map information, especially this invention is relate with the improvement of the display of the map information.* *Hayashida* at 1:5-8. *Then this navigation processing can be also executed by this computer device, if the device which can detect the present position by GPS reception device 25 and this information memory part 37 are connected with the carrying-type computer device. Moreover this invention can be applied as the vehicle except the car and the navigation device of the shipping, the aircraft and the map*

[1] Defendant relies on a machine translation of this foreign reference, but will supplement these contentions upon receipt of a certified English translation.

	which is used for the navigation may be a chart and a submarine map and so on in addition to the road map. Moreover again this invention may be applied to the carrying-type navigation device in addition to the navigation device which is attached to the movement bodies such as the car. In other words, this invention may be applied to the small navigation device which can be accompanied by the human and which is used in a cycling, a travel, a mountaineering, a hike, a fishing or so on. *Hayashida* at 76:5-20.
[1(a)] a device for getting location information denoting a present place of said portable terminal;	To the extent this limitation is governed by 35 U.S.C. § 112(6), and based on Defendant's understanding of Plaintiff's infringement contentions, Hayashida discloses a device (i.e., CPU 2 and present position detector 20, including GPS receiver unit 25 and beacon receiver unit 26) that perform the claimed function of getting location information denoting a present place of said portable terminal. *FIG. 1 illustrates the overall circuitry of the navigation device. A central processor 1 controls the operation of the whole navigation device. The central processor 1 is comprised with a CPU 2, a flush memory 3, a RAM 5, a ROM 4, a sensor input interface 7, a communication interface 8, an image (picture) processor 9, a image (picture) memory 10, a voice processor 11 and a clock (clock generator) 6. The CPU 2 and the devices through up to the clock 6 are connected together through a CPU local bus 15, and the data are exchanged among these devices.* *Hayashida* at 2:46-55. *The sensor input interface 7 comprises an A/D converter circuit or a buffer circuit. The sensor input interface 7 receives analog or digital sensor data from the sensors 21 to 24 of a present position detector 20. The present position detector 20 includes an absolute direction sensor 21, a relative direction sensor 22, a distance sensor 23 and a vehicle speed sensor 24.* *Hayashida* at 7:24-30.

	An I/O data bus 28 is connected to the communication interface 8 of the central processor 1. To the I/O data bus 28 are connected the GPS receiver unit 25, the beacon receiver unit 26 and the data transmitter/receiver unit 27 of the present position detector 20. To the I/O data bus 28 are further connected a touch switch 34 and a printer 35 of the input/output unit 30, and an information memory unit 37. That is, a variety of data are exchanged between the external accessory equipment and the CPU local bus 15 through the communication interface 8. *The present position detector 20 outputs data for detecting the present position of the car. In other words, the absolute direction sensor 21 detects the absolute direction. The relative direction sensor 22 detects the relative direction with respect to the absolute direction. Furthermore, the distance sensor 23 detects the distance travelled. The vehicle speed sensor 24 detects the running speed of the car. The GPS receiver unit 25 receives GPS (Global Positioning System) signals to detect position data such as longitude and latitude of the car. The GPS signals are microwaves transmitted from a plurality of satellites orbiting round the earth.* *Similarly the beacon receiver unit 26 receives beacon from a data offering system such as VICS (Vehicle Information and Communication System) or the like, and the received data and the corrected data of GPS are output to the I/O data bus 28.* *The data transmitter/receiver unit 27 exchanges a variety of information related to the present position or the road conditions near the car relative to the bi-directional present position information offering system or the ATIS (advanced traffic information service), etc. by utilizing a cellular phone, FM multiplex signals or a telephone circuit. These information are used as a detecting information of the car position or a support information of movement. The beacon receiver unit 26 and the data transmitter/receiver unit 27 may not be provided. As for this data sending and the data transmitter/receiver unit 27, a*

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