

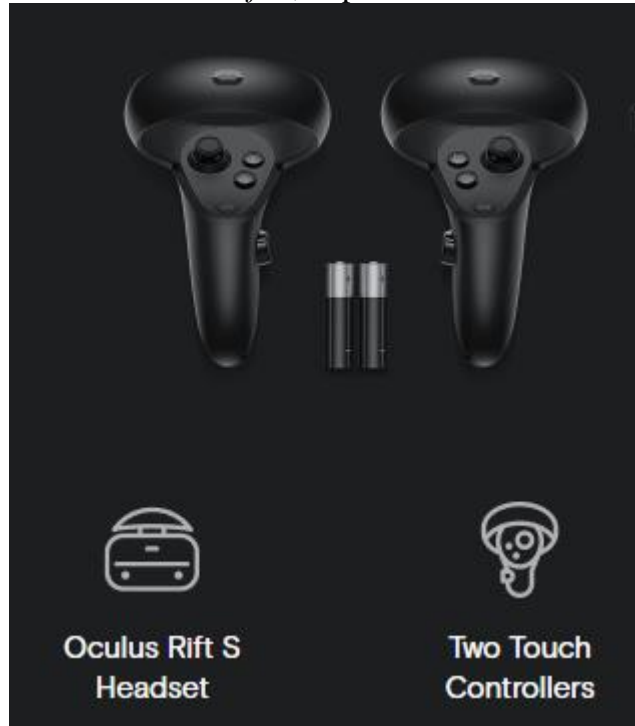
EXHIBIT LL

Gentex Corporation and Indigo Technologies, LLC (collectively, “Gentex”) presently contend that Facebook, Inc. and Facebook Technologies, LLC (collectively, “Facebook”) infringe claims 1-2, 4-5, 7-9, 11-20, 23-33, 35, 41, 45-48, 50, and 54-59 (the “Asserted Claims”) of U.S. Patent No. 6,757,068, directly and/or indirectly, either literally or under the doctrine of equivalents. This chart sets forth Gentex’s preliminary infringement contentions relating to the Asserted Claims and the accused products, i.e., the Oculus Rift S, Oculus Quest, and Oculus Quest 2 (collectively, the “Accused Products”). In the event Facebook releases new products or services that infringe the ’068 patent, or further investigation reveals that other products or services infringe the ’068 patent, Gentex reserves the right to update these contentions as appropriate under the Order Governing Proceedings.

These contentions articulate the structure and acts that constitute direct and/or indirect infringement of the ’068 patent and identify specifically where each element of each asserted claim is found within each Accused Product. Exemplary references to publicly available information concerning the Accused Products is provided where appropriate. Exemplary references to specific Accused Products are not intended and should not be read to exclude Accused Products not exemplified. On information and belief, the Accused Products are materially the same with respect to the claims of the ’068 patent discussed below, except for claim 18 and the contentions below regarding hand tracking, which is performed by the Oculus Quest and Oculus Quest 2, but based on present information, is not performed by the Oculus Rift S. This disclosure is not intended to describe all acts of direct, induced, or contributory infringement Facebook has and continues to commit by making, using, selling, providing, developing, installing, testing, deploying, and/or directing the use of the Accused Products by customers and end users. The parties have not engaged in any discovery. The parties also have not discussed proposed constructions for, and the Court has not yet construed, any of the claims of the ’068 patent. As a result, and consistent with the Order Governing Proceedings, Gentex reserves the right to modify, amend, or otherwise supplement these initial infringement contentions as discovery and the pre-trial phase of the litigation proceed and as additional information comes to light, including with respect to which claims Gentex is asserting, the infringement analysis for one or more of the claims, and whether and how limitations of one or more claims are met literally or under the doctrine of equivalents.

U.S. Patent 6,757,068	
Claim 1	
Claim Limitation	Accused Products
(1pre) A method comprising	Facebook encourages, directs, or promotes users to carry out the claimed method, and Facebook performs the claimed method, as set forth below. The Accused Products are especially adapted to carry out this method, which is a material part of the claimed invention, and have no substantial noninfringing uses. Further, on information and belief, Facebook conditions a user’s use of the Accused Products, and therefore the user’s receipt of the benefits of the Accused Products, upon this method and establishes the manner or timing of that use (e.g., through its software and/or user instructions, which have not been provided at this stage of the litigation). <i>See, e.g., Oculus Quest 2 Instructions.</i>

See also Oculus Rift S, <https://www.oculus.com/rift-s/>.



(1a) mounting a sourceless orientation tracker on a user’s head, and

Facebook encourages, directs, or promotes users to mount a sourceless orientation tracker (e.g., a headset including sourceless orientation tracking functionality in inertial measurement units, or “IMUs,” and cameras) on a user’s head, and Facebook performs such step itself. For example, **the Accused Products include a headset that Facebook and/or a user mounts on the head and which measures, for example, the orientation of a head. The headset measures orientation through multiple IMUs (e.g., accelerometers and gyroscopes), as well as multiple cameras.** The headset is “sourceless,” e.g., it is marketed as “without external sensors.” The Accused Products are especially adapted to carry out this method, which is a material part of the claimed invention, and have no substantial noninfringing uses. Further, on information and belief, Facebook conditions a user’s use of the Accused Products, and therefore the user’s receipt of the benefits of the Accused Products, upon this method and establishes the manner or timing of that use (e.g., through its software and/or user instructions, which have not been provided at this stage of the litigation).

See, e.g., Oculus Quest 2 Instructions.

1.1. To put on your headset



1. Loosen the side straps and then the top strap.
2. Starting from the back, put on your headset.

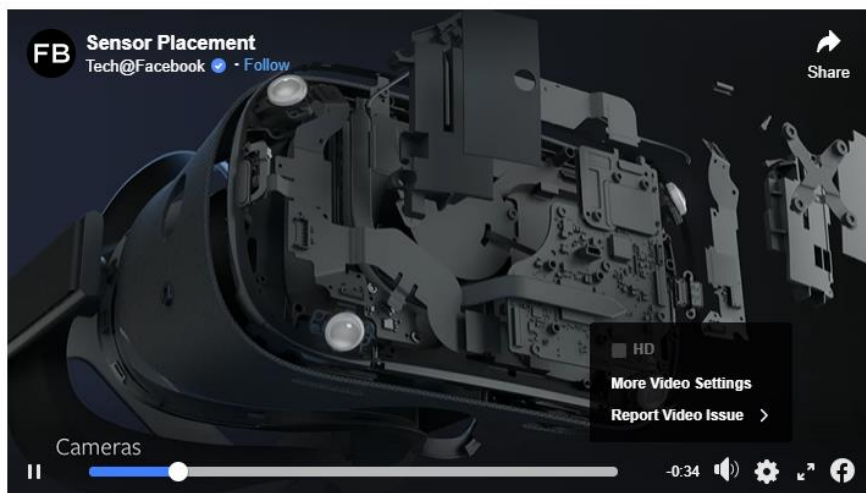
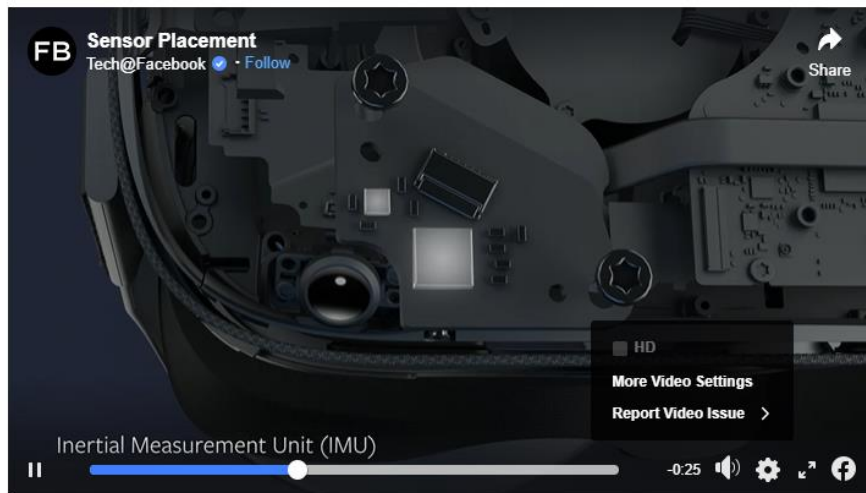
See also *Oculus Quest Features*,

https://web.archive.org/web/20200901154027if_/https://www.oculus.com/quest/features/ (“*Oculus Quest Features*”).



See also Tech@facebook, *From the Lab to the living room: The story behind Facebook's Oculus Insight technology and a new era of consumer VR* (Aug.

22, 2019), <https://tech.fb.com/the-story-behind-oculus-insight-technology/>, Sensor Placement at 0:15 (“*From the Lab*”).



See also Oculus Rift S, https://www.oculus.com/rift-s/?locale=en_US.

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