

Exhibit 11

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

JAWBONE INNOVATIONS, LLC,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

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Case No. 6:23-cv-00158-ADA

JURY TRIAL DEMANDED

DEFENDANT’S DISCLOSURE OF EXTRINSIC EVIDENCE

Pursuant to the Scheduling Order and the Court’s Order Governing Proceedings (“OGP 4.4”), Defendant Meta Platforms, Inc. (“Meta”) discloses the following extrinsic evidence for U.S. Patent Nos. 10,779,080, 11,122,357, 7,246,058, 8,019,091, 8,321,213, 8,326,611, 8,467,543, and 8,503,691 (the “Patents-in-Suit”). Along with these disclosures, Meta is producing copies of the disclosed extrinsic evidence concurrently. Meta reserves the right to supplement and/or amend its disclosures in light of the disclosures of extrinsic evidence and/or disclosures of bases for proposed claim constructions, including any expert testimony, made by Jawbone Innovations, LLC (“Jawbone”), and/or any other developments in this case.

Meta may rely on the testimony of Dr. Cliff Reader to offer his expert opinion in the form of expert declaration(s) and/or live testimony. A copy of Dr. Reader’s curriculum vitae is being produced herewith. Dr. Reader may be asked to provide background and context regarding the technology related to and needed for an understanding of the patents-in-suit including, but not limited to, the level of ordinary skill in the art at the relevant time. Dr. Reader may be asked to

explain the knowledge of a person having ordinary skill in the art (“POSITA”) at the relevant time including, but not limited to, the requisite education and experience level of a POSITA.

With respect to the disputed claim terms for which the parties have proposed a construction, Dr. Reader may provide testimony to explain how Meta’s proposed constructions are supported by intrinsic evidence, extrinsic evidence, and/or the knowledge of a POSITA at the time. With respect to the claim terms which Meta contends to be indefinite, Dr. Reader may opine on how those claim terms fail to adequately inform, with reasonable certainty, a POSITA about the scope of the claimed invention. Dr. Reader may be asked to respond to Plaintiff’s proposed constructions and supporting evidence. Dr. Reader may also provide testimony to rebut any opinion proffered by a witness upon which Plaintiff relies.

The following disclosures are made based upon information currently available to Meta. To date, Jawbone’s infringement contentions remain insufficient and therefore Meta reserves the right to supplement or amend these disclosures in response to amended or supplemental infringement contentions served by Jawbone. Moreover, Meta’s identification of extrinsic evidence is not exhaustive and is exemplary. Meta has not been apprised of the extent to which Jawbone will rely on extrinsic evidence and reserves the right to rely on additional extrinsic evidence to the extent Jawbone introduces extrinsic evidence that is inconsistent with the plain and ordinary meaning of the terms from the perspective of a person of ordinary skill in the art at the time of filing and/or invention of the claimed subject matter. Subject to these reservations, Meta discloses the below initial extrinsic evidence for the claim terms identified as requiring construction.

Terms Previously Construed¹

¹ The terms listed or terms similar to those listed have been previously construed in Federal Court and/or the United States Patent Trial and Appeal Board (“PTAB”). Unless otherwise

PROPOSED CLAIM TERM	ASSERTED CLAIMS	META'S PROPOSAL
“an adaptive noise removal application . . . generating denoised output signals by forming a plurality of combinations . . . by filtering and summing the plurality of combinations . . . and by a varying linear transfer function between the plurality of combinations”	'080: 1, 7, 14	Meta's proposal is the same as proposed by Samsung in the Samsung 0186 Case. Meta adopts Samsung's evidence relied on in the Samsung 0186 Case. Expert testimony.
“microphone(s)”	'058: 1 '091: 1, 9-11, 15-18 '543: 1, 26	Meta's proposal is the same as adopted by the Court and proposed by Samsung in the Samsung 0186 Case. Meta adopts the parties' evidence relied on in the Samsung 0186 Case. Expert testimony.
“acoustic noise”	'091: 1, 9, 11, 15, 18 '080: 1, 2, 7	Meta's proposal is the same as adopted by the Court in the Samsung 0186 Case, and is the same as proposed by Jawbone in the Google 0985 Case. Meta adopts the parties' evidence relied on in the Samsung 0186 Case and Google 0985 Case. Expert testimony.
“transfer function(s)”	'091: 1, 2, 4, 5, 9, 11, 15, 18 '080: 1, 7, 14 '357: 1, 15	Meta's proposal is the same as agreed between Jawbone and Samsung, in the Samsung 0186 Case. Meta adopts the parties' evidence relied on in the Samsung 0186 Case. Expert testimony.

indicated, for purposes of simplifying the claim construction proceedings in this case and without conceding the constructions of these terms, Meta proposes the parties adopt certain constructions already decided in prior matters involving the asserted and related patents, including but not limited to *Jawbone v. Samsung*, 2-21-00186 (E.D.Tex. May 27, 2021) (“Samsung 0186 Case”); *Jawbone v. Google*, 2-21-00985 (W.D.Tex. Sep. 23, 2021) (“Google 0985 Case”); PTAB matters IPR2022-01027; IPR2023-00275; IPR2022-00623; and any future matters that may bear on the construction of these terms. Meta reserves the right to appeal these constructions, and further reserves the right to adopt defendants' or petitioners' arguments made in any of the aforementioned cases for purposes of appeal.

<p>“approximately similar” / “approximately, dissimilar” / “approximately dissimilar”</p>	<p>’213: 2, 37, 38 ’611: 3, 4, 30</p>	<p>Meta’s proposal is the same as proposed by Google, and adopted by the court, in the Google 0985 Case. Meta adopts the parties’ evidence relied on in the Google 0985 Case.</p> <p>Meta further discloses the following additional extrinsic evidence:</p> <ul style="list-style-type: none"> • <i>Approximately</i>, <u>Collins English Dictionary (7th ed.)</u> (2005) • <i>Approximate</i>, <u>New Oxford American Dictionary (2nd ed.)</u> (2005) • <i>Approximate</i>, <u>Merriam Webster Dictionary (new ed.)</u> (2005) • <i>Approximate</i>, <u>Penguin Complete English Dictionary</u> (2006) • <i>Dissimilar</i>, <u>Collins English Dictionary (7th ed.)</u> (2005) • <i>Dissimilar</i>, <u>New Oxford American Dictionary (2nd ed.)</u> (2005) • <i>Dissimilar</i>, <u>Merriam Webster Dictionary (new ed.)</u> (2005) • <i>Dissimilar</i>, <u>Penguin Complete English Dictionary</u> (2006) • <i>Similar</i>, <u>Collins English Dictionary (7th ed.)</u> (2005) • <i>Similar</i>, <u>New Oxford American Dictionary (2nd ed.)</u> (2005) • <i>Similar</i>, <u>Merriam Webster Dictionary (new ed.)</u> (2005) • <i>Similar</i>, <u>Penguin Complete English Dictionary</u> (2006) • Expert testimony.
<p>“substantially similar” / “substantially dissimilar”</p>	<p>’691: 1, 23, 27-29, 41 ’080: 1, 7, 14 ’357: 1, 15</p>	<p>Meta’s proposal is the same as proposed by Google, and adopted by the court, in the Google 0985 Case. Meta adopts the parties’ evidence relied on in the Google 0985 Case.</p> <p>Meta further discloses the following additional extrinsic evidence:</p>

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