
EXHIBIT A

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CYWEE GROUP LTD.,

Plaintiffs,

v.

HTC CORPORATION; and HTC AMERICA,
INC.,

Defendants.

CASE NO.: 2:17-cv-00932-JLR

**DEFENDANTS HTC CORPORATION
AND HTC AMERICA, INC.'S
PRELIMINARY INVALIDITY
CONTENTIONS**

JURY DEMAND

HTC CORPORATION AND HTC AMERICA, INC.'S

1 June 14, 2016, and available at *CyWee Group Ltd. v. Apple Inc.*, No. 4:14-cv-018353-HSG (N.D.
 2 Cal. Nov. 21, 2016), Dkt. 120-3. HTC further incorporates by reference disclosures by any other
 3 defendant in all related cases involving the Asserted Patents, including, but not limited to, Apple
 4 Inc. (Case No. 4-14-cv-01853); Samsung Electronics Co. Ltd. et al (Case No. 2-17-cv-00140);
 5 Huawei Technologies, Co., Inc. (Case No. 2:17-cv-00495); Motorola Mobility LLC (Case No. 1-
 6 17-cv-00780); and ZTE Corporation (Case No. 3-17-cv-02130), which have yet to be produced
 7 by Plaintiff in this case.

8 **C. Indefiniteness**

9 For these preliminary invalidity contentions, HTC identifies the following terms as
 10 indefinite:

11 In claim 10 of the '978 patent, the term "the spatial reference frame" is indefinite.

12 **V. DOCUMENT PRODUCTION PURSUANT TO L.P.R. 122**

13 Pursuant to Local Patent Rule 122, HTC concurrently produces with these preliminary
 14 invalidity contentions a copy of each item of prior art identified pursuant to Local Patent Rule
 15 121(b) which does not appear in the file history of the Asserted Patents. HTC reserves the right
 16 to supplement its production as it learns in the course of discovery of other prior art that would
 17 anticipate and or render the Asserted Claims obvious.

18
 19 Dated: January 19, 2018

Respectfully submitted,

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 21 s/ James C. Yoon

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