

# 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

WILSON SONSINI GOODRICH & ROSATI  
701 Fifth Avenue, Suite 5100

1 upon treatises, published industry standards, and similar documents to demonstrate the  
2 knowledge of one of ordinary skill in the relevant art. Where HTC cites to a particular drawing  
3 or figure, the citation encompasses the description of the drawing or figure as well as any text  
4 associated with the drawing or figure. Similarly, where HTC cites to particular text concerning a  
5 drawing or figure, the citation encompasses that drawing or figure as well. Also, where HTC  
6 cites to any portion of prior art as disclosing a particular limitation, that citation applies with  
7 equal force to all similar or identical limitations in each of the Asserted Claims.

8 In addition to the prior art identified herein and in the accompanying invalidity claim  
9 charts, HTC also incorporates by reference any additional invalidity contentions, identified prior  
10 art, and/or invalidity claim charts previously disclosed by any party to any other pending or prior  
11 litigation or U.S. Patent & Trademark Office proceeding involving the Asserted Patents or any  
12 related patent, including any invalidity contentions yet to be produced by Plaintiff from prior  
13 litigations and proceedings. HTC also incorporates by reference any additional invalidity  
14 contentions, identified prior art, and/or invalidity claim charts disclosed at any later date by any  
15 party to any other litigation or U.S. Patent & Trademark Office proceeding involving the  
16 Asserted Patents or any related patent, including, but not limited to, invalidity contentions from  
17 Apple Inc. (Case No. 4-14-cv-01853); Samsung Electronics Co. Ltd. et al (Case No. 2-17-cv-  
18 00140); LG Electronics, Inc. et al (Case No. 3-17-cv-01102); Huawei Technologies, Co., Inc.  
19 (Case No. 2:17-cv-00495); Motorola Mobility LLC (Case No. 1-17-cv-00780); and ZTE  
20 Corporation (Case No. 3-17-cv-02130).

21 Furthermore, the identification of anticipatory references and obviousness combinations  
22 of references provided below under 35 U.S.C. §§ 102 and 103 is merely exemplary and is not  
23 intended to be exhaustive. In particular, HTC is currently unaware of the extent to which  
24 Plaintiff may contend that limitations of the claims at issue are not disclosed in the art identified  
25 by HTC as anticipatory. To the extent that an issue arises with any such limitation, HTC  
26 reserves the right to identify other references which make obvious the addition of the allegedly  
27

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

CYWEE GROUP LTD.,	§	
	§	
Plaintiff	§	
v.	§	NO. 2:17-CV-00140-RWS-RSP
	§	
SAMSUNG ELECTRONICS CO. LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.,	§	
	§	
Defendants.	§	

**DEFENDANTS’ INVALIDITY CONTENTIONS**

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Defendants”), by their attorneys, make these Invalidity Contentions concerning U.S. Patent Nos. 8,441,438 (“the ’438 Patent”) and 8,552,978 (“the ’978 Patent”) (collectively, “Asserted Patents”), to Plaintiff CyWee Group Ltd. (“Plaintiff” or “CyWee”) in connection with the above-referenced action, pursuant to the Docket Control Order entered by the Court (Dkt. No. 34) and Local Patent Rule (P.R.) 3-3. The citation of prior art herein and the accompanying Exhibits are not intended to reflect Defendants’ claim construction contentions, which will be disclosed in due course in accordance with the Docket Control Order, and may instead reflect Plaintiff’s apparent (and potentially erroneous) claim constructions based on its Infringement Contentions.

Defendants’ Invalidity Contentions herein reflect Defendants’ knowledge as of this early date in the present action. Defendants reserve the right, to the extent permitted by the Court and the applicable statutes and rules, to modify and/or supplement their Invalidity Contentions in response to becoming aware of additional prior art or information regarding prior art, any modification or supplementation of Plaintiff’s Infringement Contentions, any claim construction

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