

accuse different products, or find alternative literal and/or equivalent infringing elements in Defendants' products.

I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO PATENT LOCAL RULE 3-1

A. ASSERTED CLAIMS

Defendants Hyundai Motor Company and Kia Corporation (collectively, “Hyundai” or “Defendants”) have infringed and/or continue to infringe one or more of the following claims of the Asserted Patents in connection with the Accused Products set forth below:

- Claims 1 through 17 of the ’803 Patent;
- Claims 1 through 29 of the ’002 Patent;
- Claims 1 through 14 of the ’238 Patent;
- Claims 1 through 18 of the ’353 Patent;
- Claims 21-23, 25-27, 29-34, 36-38, and 40-43 of the ’331 Patent; and
- Claims 1 through 14 of the ’101 Patent.

B. ACCUSED INSTRUMENTALITIES

1. Accused Products

LAG is currently aware that all versions and variants of Hyundai vehicles, systems, applications, and software, made, sold, offered for sale, used, or imported in the United States since 2018 (“Accused Products”) infringe the Asserted Patents. LAG is currently aware that certain of Defendants’ products infringe one or more of the Asserted Patents. Upon information and belief, these Accused Products include Hyundai vehicles, systems, applications, and software that include technology which infringe the Asserted Patents. For example, and without limitation, exemplar infringing Hyundai products, include at least the following: Hyundai Veloster Turbo, Hyundai Elantra Sport, Hyundai Tucson, Kia Soul Turbo, Kia Forte5 (Kia Cerato5 in some regions), Kia Forte Koup, Kia Ceed GT, Hyundai Creta Hyundai Accent, Hyundai Venue, Hyundai Kona, Hyundai Santa Cruz, Hyundai Tucson, Hyundai Tucson Hybrid, Hyundai Plug-in Hybrid,

Hyundai Santa Fe, Hyundai Santa Fe Hybrid, Hyundai Santa Fe Plug-in Hybrid, Hyundai Palisade, Hyundai Fuel Cell, Hyundai Elantra, Hyundai Elantra Hybrid, Hyundai Elantra N, Hyundai Sonata, Hyundai Sonata N, Hyundai Sonata Hybrid, Hyundai Veloster, Hyundai Creta, Kia Soul, Kia Seltos, Kia Sportage, Kia Sorento, Kia Carnival MPV, Kia Telluride, Kia Niro, Kia Sportage Hybrid, Kia Miro Plug-in Hybrid, Kia Sorento Hybrid, Hyundai Accent, Kia Sportage Plug-in Hybrid, Kia Sorento Plug-in Hybrid, Kia Rio, Kia Rio 5-Door, Kia Forte, Kia K5, Kia Stinger, Genesis GV60, Genesis GV70, Genesis GV80, Genesis G70, Genesis G80, Genesis, Electrified G80, and Genesis G90, among other vehicles and other infringing technology, as identified in the accompanying claim charts, sold, imported, or used by Hyundai in the United States since 2018, and vehicles sold, systems, applications, and software, sold, imported, or used by Hyundai in the United States since 2018 by Hyundai customers.²

2. Claim Charts

A claim chart identifying a location of every element of every asserted claim of the '803 Patent within the Accused Products is attached hereto as **Appendix A**. LAG believes that the Accused Products cited in the claim charts are representative of the Accused Products, including all generations and versions.

A claim chart identifying a location of every element of every asserted claim of the '002 Patent within the Accused Products is attached hereto as **Appendices B**. LAG believes that the Accused Products cited in the claim charts are representative of the Accused Products, including all generations and versions.

² LAG has provided additional information regarding certain aspects of the Accused Products in the attached claim charts of **Appendices A-F**.

A claim chart identifying a location of every element of every asserted claim of the '238 Patent within the Accused Products is attached hereto as **Appendix C**. LAG believes that the Accused Products cited in the claim charts are representative of the Accused Products, including all generations and versions.

A claim chart identifying a location of every element of every asserted claim of the '353 Patent within the Accused Products is attached hereto as **Appendix D**. LAG believes that the Accused Products cited in the claim charts are representative of the Accused Products, including all generations and versions.

A claim chart identifying a location of every element of every asserted claim of the '331 Patent within the Accused Products is attached hereto as **Appendix E**. LAG believes that the Accused Products cited in the claim charts are representative of the Accused Products, including all generations and versions.

A claim chart identifying a location of every element of every asserted claim of the '101 Patent within the Accused Products is attached hereto as **Appendix F**. LAG believes that the Accused Products cited in the claim charts are representative of the Accused Products, including all generations and versions.

LAG reserves the right to amend these claim charts, as well as other information contained in this document and the Appendices attached hereto, to incorporate new information learned during the course of discovery including, but not limited to, information that is not publicly available or readily discernible without discovery. LAG further reserves the right to amend these claim charts, as well as other information contained in this document and the exhibits attached hereto, pursuant to Patent Local Rules 3-1 and 3-6, and the Court's Standing Proposed Discovery Order Section 3(a)(i).

C. LITERAL INFRINGEMENT AND DOCTRINE OF EQUIVALENTS

LAG asserts that, under the proper construction of the asserted claims and their claim terms, the limitations of the asserted claims of the LAG patents are literally present in the Accused Products, as set forth in the claim charts attached hereto as **Appendices A-F**. LAG contends that any and all elements found not to be literally infringed are infringed under the doctrine of equivalents because the differences between the claimed inventions and the accused instrumentalities, if any, are insubstantial.

LAG also contends that Defendants have directly infringed and/or continue to directly infringe the asserted claims by making, using offering for sale, selling, and importing into the United States the accused instrumentalities. Moreover, Defendants have directly infringed and/or continue to directly infringe the asserted method claims by using (*i.e.*, Defendants' employees testing and/or servicing the accused instrumentalities) in the United States. Furthermore, Defendants have indirectly infringed and/or continue to indirectly infringe by contributing to and/or inducing others (*e.g.*, Defendants' suppliers, Defendants' customers or their customers' customers) to directly infringe those claims by making, using, offering for sale, or selling the Accused Products. Such indirect infringement is further evidenced by Defendants' technical materials and marketing materials including, but not limited to, marketing materials, product briefs, product specifications, troubleshooting guides, technical support websites, reference manuals, and other business documents and communications conveyed to Defendants' customers.

LAG also contends that Defendants have contributorily infringed and/or continue to contributorily infringe with the knowledge that the Accused Products, or the use thereof, infringe the Asserted Patents. Defendants have knowingly and intentionally contributed to the direct infringement of the Asserted Patents by others, by supplying the Accused Products and/or

associated software, that embody a material part of the claimed invention of the Asserted Patents, that are known by Defendants to be specially made or adapted for use in an infringing manner, and are not staple articles with substantial non-infringing uses.

Pursuant to Patent Local Rule 3-6(a)(1), LAG reserves the right to amend its infringement contentions as to literal infringement or infringement under the doctrine of equivalents in light of the Court's claim construction.

D. APPLICATION PRIORITY DATES

Each of the asserted claims of the '803 Patent claim priority to U.S. Application No. 12/269,849, filed on November 12, 2008.

Each of the asserted claims of the '002 Patent claim priority to International Application PCT/SE04/001540, filed on October 25, 2004.

Each of the asserted claims of the '238 Patent claim priority to International Application PCT/EP2004/011637, filed October 15, 2004.

Each of the asserted claims of the '353 Patent are entitled to the priority to the date of its own U.S. Patent Application No. 10/955,037, filed on September 20, 2004.

Each of the asserted claims of the '331 Patent claim priority to International Application PCT/SE2005/000135, filed on February 2, 2005.

Each of the asserted claims of the '101 Patent claim priority to International Application PCT/EPO3FO6694, filed on June 25, 2003.

E. PRODUCTS THAT PRACTICE THE ASSERTED PATENTS

LAG is continuing to investigate what products and/or historical products may practice the claimed inventions, including those products of third parties (*e.g.*, previous assignees) of the Asserted Patents. At the present time LAG is not currently aware of any past products that practice

its patents. LAG's investigation is ongoing, and LAG will supplement these contentions following its investigation (and claim construction as necessary).

II. PRODUCTION OF DOCUMENTS PURSUANT TO PATENT LOCAL RULE 3-2

LAG is producing or making available for inspection documents that are in LAG's possession, custody, or control as set forth in Patent Local Rule 3-2. An LAG 3-2 Production Index identifying these documents is attached hereto.

This preliminary identification of documents is for convenience and is not an admission that each document falls within any exemplary categories in the Patent Local Rules, or that any document qualifies as prior art. Thus, LAG reserves its right to add to, delete from, or otherwise modify its disclosures in this section as its investigation proceeds.

Production of these documents is governed by Patent Local Rule 2-2 and, with the exception of documents produced pursuant to P.R. 3.2(c) and public documents listed in the infringement charts, are considered "Confidential – Outside Attorneys Eyes Only" and disclosure of the confidential document or information, shall be limited to each parties' outside attorney(s) of record and the employees of such outside attorney(s).

Dated: July 25, 2025

Respectfully submitted,

/s/ Vincent J. Rubino, III

Alfred R. Fabricant

NY Bar No. 2219392

Email: ffabricant@fabricantllp.com

Peter Lambrianakos

NY Bar No. 2894392

Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III

NY Bar No. 4557435

Email: vrubino@fabricantllp.com

FABRICANT LLP

411 Theodore Fremd Avenue

Suite 206 South

Rye, New York 10580

Telephone: (212) 257-5797
Facsimile: (212) 257-5796

John Andrew Rubino
NY Bar No. 5020797
Email: jarubino@rubinoip.com
Michael Mondelli III
NY Bar No. 5805114
Email: mmondelli@rubinoip.com

RUBINO IP
51 J.F.K. Parkway
Short Hills, NJ 07078
Telephone: (201) 341-9445
Facsimile: (973) 535-0921

Justin Kurt Truelove
Texas Bar No. 24013653
Email: kurt@truelovelawfirm.com
TRUELOVE LAW FIRM, PLLC
100 West Houston Street
Marshall, Texas 75670
Telephone: (903) 938-8321
Facsimile: (903) 215-8510

***ATTORNEYS FOR PLAINTIFF,
LONGHORN AUTOMOTIVE GROUP
LLC***

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2025, a true and correct copy of the above and foregoing document has been served by email on:

Nancy Lynn Schroeder
Ryan K. Yagura
Nichloas Whilt
O'MELVENY & MYERS LLP
400 S. Hope Street, 19th Floor
Los Angeles, California 90071
Telephone: (213) 430-6819

Daniel S. Trainor
O'MELVENY & MYERS LLP
1625 Eye Street, NW
Washington, D.C. 20006
Telephone: (202) 383-5300

Melissa R. Smith
Texas Bar No. 24001351
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

melissa@gillamsmithlaw.com
nschroeder@omm.com
ryagura@omm.com
dstrainor@omm.com
nwhilt@omm.com

***Attorneys for Defendants
Hyundai Motor Company and Kia Corporation***

/s/ Vincent J. Rubino, III
Vincent J. Rubino, III

LAG 3-2 PRODUCTION INDEX

3-2(c)

Bates Start	Bates End
LAG-HYUNDAI0000001	LAG-HYUNDAI0003868