

I. Disclosure of Asserted Claims and Infringement Contentions

a. Identification of Asserted Claims and Accused Products

The asserted claim(s) of each patent are as follows:

| U.S. Patent No. | Asserted Claim(s) |
|-----------------|-----------------------------------|
| 8,148,962 | 1, 7-11, 14 |
| 8,327,051 | 1-2, 4-6, 8, 16-17, 21, 23-25, 27 |
| 8,996,838 | 1-20 |
| 9,281,314 | 1, 3, 5-6, 13, 17-18 |
| 9,524,974 | 1-2, 4, 6, 11, 12-16 |

The Accused Products for the above patents include those identified in Exhibits A-E and listed in their associated Appendices, and any other similar products that include the elements of the asserted claims identified in the accompanying charts.

Plaintiff's identification of Accused Products is based on its reasonable efforts to date to prepare preliminary infringement contentions based on publicly available information and its ability to obtain and reverse-engineer select models. Discovery has not yet begun, and Plaintiff reserves the right to supplement its identification of the Accused Products in light of discovery or other new information.

Charts identifying where each element of the asserted claims is found within the Accused Products are included as Exhibits A-E accompanying this document. Based on publicly available information and Plaintiff's research, Plaintiff asserts that each of the Accused Products infringe the asserted claims of the patents-in-suit in the same or substantially similar manner. Plaintiff believes that the charted elements are common to each of the Accused Products. On information and belief, Plaintiff contends that each of the Accused Products include the same or substantially

same structures and functions as those identified for each asserted claim element in the accompanying charts. Thus, the attached claim charts are representative of the manner and theory of infringement pertaining to the Accused Products for each of the asserted patents. The accused features and functionalities of the Accused Products include non-public elements based on Plaintiff's research. As such, Plaintiff reserves the right to amend or supplement the list of Accused Products and/or claim charts after receiving discovery in this matter, as permitted by the Court, its Order Governing Proceedings, and/or the Federal Rules of Civil Procedure.

b. Identification of Priority Date for Each Asserted Claim

Each asserted claim in each of the patents-in-suit is entitled to a priority date no later than the filing date of the earliest application to which it claims priority. To date, Plaintiff believes the asserted claims have the following priority dates. Plaintiff reserves the right to amend its list of priority dates as additional information becomes available, such as in response to discovery from third parties.

The asserted claims of the '962 patent are entitled to a priority date at least as early as May 12, 2009.

The asserted claims of the '051 patent are entitled to a priority date at least as early as Nov. 20, 2007.

The asserted claims of the '838 patent are entitled to a priority date at least as early as May 8, 2014.

The asserted claims of the '314 patent are entitled to a priority date at least as early as October 10, 2014.

The asserted claims of the '974 patent are entitled to a priority date at least as early as July 22, 2015.

II. Document Production

(1) Plaintiff is not presently aware of any non-privileged documents that evidence conception and reduction to practice for each claimed invention that were created on or before the above referenced dates for each of the patents-in-suit. Plaintiff notes that documents relevant to these issues may be in the possession of the inventors and/or original assignees of the patents-in-suit. In the event that discovery leads to documents that evidence conception and reduction to practice of any claimed invention that were created on or before the date of application for the patents-in-suit, Plaintiff reserves the right to claim such date and supplement its production accordingly.

(2) Copies of the file histories for the patents-in-suit are produced herewith and bear production numbers as follows: PALISADE_00000001 – PALISADE_00001237.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all counsel of record on
April 16, 2025 via email.

/s/ Patrick J. Conroy