

rely on the prior art identified in these Invalidity Contentions. Pursuant to the OGP, and subject to Google's reservation of rights as stated herein, Google identifies each item of prior art by: (1) each patent by its patent number, country of origin, and date of issue; (2) each non-patent publication by its title, date of publication, and, where feasible, author and publisher; (3) 35 U.S.C. § 102(b) prior art by the item offered for sale or publicly used or known, the date the offer or use took place or the information became known, and the identity of the person or entity which made the use or which made and received the offer, or the person or entity which made the information known or to whom it was made known; (4) 35 U.S.C. § 102(f) prior art by the name of the person or persons from whom and the circumstances under which the invention or any part of it was derived; and (5) 35 U.S.C. § 102(g) prior art by the identities of the person or persons or entities involved in and the circumstances surrounding the making of the invention before the applicant, based on currently available information.

Google's identification of prior art in these Invalidity Contentions includes the publications themselves as well as the products, devices, and systems described therein. Google reserves the right to rely on additional art and references for other purposes, including but not limited to: describing a POSITA; providing relevant background information on the technology at issue in this case; describing the state of the art and general knowledge as of the relevant time; providing a motivation to combine; responding to expert reports or expert opinion testimony offered by K.Mizra and/or responding to K.Mizra's arguments regarding objective indicia of nonobviousness.

A. Prior Art Patents and Publications

Google contends the following prior art patents, patent application publications, printed publications, and systems in the table below anticipate or render obvious one or more Asserted Claims of the Asserted Patents under 35 U.S.C. § 102(a), (b), (e), or (g) or 35 U.S.C. § 103. On information and belief, each listed reference qualifies as prior art to the Asserted Patents.

To the extent that any of the following are prior art, Google reserves the right to rely upon foreign counterparts of the U.S. patents identified herein; U.S. counterparts of foreign patents and foreign patent applications identified herein; and U.S. and foreign patents and patent applications corresponding to articles and publications identified herein. Google also reserves the right to rely upon parent or ancestor patents or patent applications from which any of the patents or patent applications identified herein claim priority to as continuation, divisional, or continuation-in-part applications. Identification of dates of publication are made based on currently available information, and Google reserves the right to rely upon an earlier date should evidence supporting an earlier date be discovered.

Title & Defined Term	Author/Inventor	Issue/Publication Date	Country of Origin
Patents			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
U.S. Patent No. 7,533,407 ("Lewis '407")	Elliot D. Lewis	5/12/2009	United States
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Title & Defined Term	Author/Inventor	Issue/Publication Date	Country of Origin
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Patent Publications			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
U.S. Patent Appl. Publ. No. 2003/0055962 ("Freund")	Gregor P. Freund	3/20/2003	United States
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

B. Prior Art Under 35 U.S.C. § 102(e) and 35 U.S.C. § 102(g)

K.Mizra has neither alleged nor provided sufficient evidence of a conception date for the Asserted Claims earlier than the claimed priority date on the face of the Asserted Patents. Should the Court permit K.Mizra to provide evidence of an earlier conception date, Google may assert that any of the § 102(a) prior art is § 102(e) or § 102(g) prior art.

V. INVALIDITY UNDER 35 U.S.C. §§ 102 AND 103

Each of the Asserted Claims are invalid under 35 U.S.C. §§ 102 or 103 in view of one or more of the references identified above in Section IV, alone or in combination. Pursuant to the OGP, and subject to Google's reservation of rights, Google attaches claim charts hereto that are direct to the prior art references that anticipate each of the Asserted Claims under 35 U.S.C. §§ 102(a), (b), (e), and/or (g) either expressly or inherently, and/or the prior art references that, in the alternative, would have rendered the Asserted Claims obvious under 35 U.S.C. § 103. *See* Exhibits 1-17. Some claim charts also contain explanations about the motivation to combine the references. Additional explanations regarding the motivation to combine the references is below in Section VI. Any combinations contained or reference cited herein may be combined with any other reference to demonstrate the invalidity of any of the Asserted Claims, as set forth below and in Exhibits 1-17.

To the extent any claim limitation is construed to have a similar meaning, or to encompass similar feature(s) and/or function(s), as any other claim limitation, the citations to prior art references for each of those claim limitations in Google's claim charts are incorporated by reference with respect to each other.

Pursuant to the OGP, Google has attached exhibits containing claim charts setting forth where in the prior art references each element of the asserted claim(s) are found and identifying examples of prior art that anticipate or render obvious each of the Asserted Claims.

Ex.	Invalidity Charts
1	[REDACTED]
2	[REDACTED]
3	Freund
4	[REDACTED]
5	[REDACTED]
6	[REDACTED]
7	[REDACTED]
8	[REDACTED]
9	Lewis '407 Patent & '997 Publication
10	[REDACTED]
11	[REDACTED]
12	[REDACTED]
13	[REDACTED]
14	[REDACTED]
15	[REDACTED]
[REDACTED]	[REDACTED]
17	Secondary References

The attached claim charts are based, in whole or in part, on K.Mizra's asserted theories of infringement in this case, to the extent discernible from K.Mizra's Infringement Contentions. As an initial matter, all portions of each prior art reference cited in each of the attached claim charts are relied upon to support the disclosure of each patent claim limitation, as all portions provide general support. Representative descriptions and supporting citations are nevertheless provided, but are merely exemplary; they do not necessarily reflect every instance where a particular claim

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on July 15, 2025, I served the foregoing by electronic mail on counsel of record.

/s/ Tharan Gregory Lanier
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