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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 MOTIVE TECHNOLOGIES, INC.,

20 *Plaintiff-Counterclaim*
21 *Defendant,*

21 v.

22 SAMSARA INC.,

23 *Defendant-Counterclaim*
24 *Plaintiff.*

Case No. 3:24-CV-00902-JD

**SAMSARA INC.'S INVALIDITY
CONTENTIONS**

1 Pursuant to Patent Local Rules 3-3 and 3-4, and the Court’s August 8, 2025 Scheduling Order
2 (D.I. 115), Defendant-Counterclaim Plaintiff Samsara Inc. (“Defendant” or “Samsara”) hereby
3 provides these Invalidity Contentions to Plaintiff-Counterclaim-Defendant Motive Technologies, Inc.
4 (“Plaintiff” or “Motive”) for United States Patent Nos. 11,875,580 (“’580 Patent”), 12,062,243 (“’243
5 Patent”), and 12,136,276 (“’276 Patent”) (collectively, “Asserted Patents”).

6 **I. INTRODUCTION AND RESERVATION OF RIGHTS**

7 Motive asserts claims 1–7 of the ’580 Patent; claims 1–33 the ’243 Patent; and claims 1–20 of
8 the ’276 Patent (collectively, the “Asserted Claims”) as set forth in Plaintiff Motive’s Infringement
9 Contentions and Disclosures served on October 2, 2025 (“Infringement Contentions”). For purposes
10 of these Invalidity Contentions, Samsara addresses only those claims specifically asserted by Motive.
11 Samsara reserves the right to amend or supplement this disclosure as necessary in view of any changes
12 or amendments made, for any reason, to Motive’s infringement theories, infringement contentions, or
13 Asserted Claims, including to Motive’s asserted priority and/or invention date(s).

14 These Invalidity Contentions are based on Samsara’s present understanding of the Asserted
15 Claims, Motive’s apparent construction of the claim terms of the Asserted Claims as shown in the
16 Infringement Contentions, and Samsara’s present understanding of the unconstrued terms in the
17 Asserted Claims. Nothing in Samsara’s disclosures should be regarded as reflecting Samsara’s
18 suggested or proposed interpretation of the claims. Moreover, Samsara disputes Motive’s apparent
19 claim interpretations to the extent they are inconsistent with the Court’s or the parties’ subsequently-
20 ordered or agreed claim constructions.

21 These Invalidity Contentions reflect Samsara’s knowledge, thinking, and contentions as of the
22 date of service. Samsara reserves the right to further supplement these Invalidity Contentions as
23 appropriate and for any permissible reason. Samsara further reserves the right to supplement these
24 Invalidity Contentions in view of subsequent case events, including the Court’s claim construction
25 order, Motive’s disclosures, any amended or supplemental infringement contentions, arguments made
26 and positions taken by Motive during fact and expert discovery, and any forthcoming document
27 productions or other information or testimony produced by Motive or any third parties. Samsara also
28 reserves the right to further supplement these Invalidity Contentions if it becomes aware of additional

1 prior art, becomes aware of additional features of the prior art references cited below, or becomes aware
2 of any other relevant information obtained through discovery or otherwise.

3 Further, Samsara may subsequently amend or supplement these disclosures because Motive’s
4 Infringement Contentions are deficient in numerous respects. For example, Motive has repeatedly
5 failed to specifically identify where each element of each Asserted Claim is found within each accused
6 instrumentality. Because curing such deficiencies may lead to further grounds for invalidity of the
7 Asserted Claims, Samsara specifically reserves the right to modify, amend, or supplement these
8 disclosures should Motive amend or supplement its Infringement Contentions to address any
9 deficiencies.

10 Samsara may also amend this disclosure in response to any positions taken by Motive during
11 the course of the litigation, including without limitation in response to Motive’s positions on claim
12 construction or any contention by Motive that one or more of the prior art references described herein
13 fail to render the Asserted Claims anticipated or obvious. Samsara further reserves the right to amend
14 these Invalidity Contentions to rely upon inventor and party admissions concerning the scope of the
15 Asserted Claims and the teachings of the prior art and in response to any additional claim construction
16 order from the Court. Samsara further reserves the right to address secondary considerations at the
17 appropriate juncture should Motive identify any alleged secondary considerations of nonobviousness.

18 **II. PATENT LOCAL RULE 3-3(A) – IDENTIFICATION OF PRIOR ART¹**

19 **a. Prior Art Patents and Publications**

20

No.	Patent / Publication No.	Date of Issue / Publication ²
1	U.S. Patent No. 11,164,014 (“Ghadiok”)	Nov. 2, 2021
2	U.S. Patent No. 11,195,065 (“Aliamiri”)	Dec. 7, 2021
3	U.S. Patent No. 8,259,174 (“Zhang”)	Sept. 4, 2012

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25 ¹ Samsara also hereby identifies any systems or products that embody the technology described in
26 any patent or publication identified in these Invalidity Contentions. Samsara reserves the right to
rely on any documents or other evidence regarding any such systems.

27 ² The dates in this column are the issue or publication dates of the listed prior art patents and patent
28 publications and do not necessarily reflect the dates used to qualify the respective patents and
patent publications as prior art. Samsara reserves the right to identify earlier dates should such
dates be ascertained through discovery.

No.	Patent / Publication No.	Date of Issue / Publication ²
4	U.S. Patent Publication No. 2018/0056873 A1 (“Lee”)	March 1, 2018
5	U.S. Patent Publication No. 2020/0160561 A1 (“Dai”)	May 21, 2020
6	U.S. Patent Publication No. 2020/0192380 A1 (“Bernstein”)	June 18, 2020
7	U.S. Patent Publication No. 2020/0410704 A1 (“Choe”)	Dec. 31, 2020
8	U.S. Patent Publication No. 2021/0201145 A1 (“Pham”)	July 1, 2021
9	CN 109543627 (“Bin”)	March 29, 2019
10	U.S. Patent No. 11,487,968 (“Arar”)	Nov. 1, 2022
11	U.S. Patent No. 11,636,694 (“Li”)	April 25, 2023
12	U.S. Patent No. 11,643,102 (“Calmer”)	May 9, 2023
13	U.S. Patent Publication No. 2025/0156717 (“Hu”)	May 15, 2025
14	U.S. Patent No. 11,521,396 (“Jain”)	Dec. 6, 2022
15	U.S. Patent Publication No. 2022/0261659 (“Xu”)	Aug. 18, 2022
16	U.S. Patent Publication No. 2020/0242381A1 (“Chao”)	July 30, 2020
17	U.S. Pat. No. 11,485,308 (“Torabi”)	Nov. 1, 2022
18	WO2020186883A1 (“Huang”)	Sept. 24, 2020

b. Prior Art Publications

No.	Title, Author(s), and Publisher	Date of Publication ³
19	Chun et al., NADS-Net: A Nimble Architecture for Driver and Seat Belt Detection via Convolutional Neural Networks, 2019 IEEE/CVF International Conference on Computer Vision Workshop (ICCVW), pp. 2413-2421, 2019 (“Chun”)	2019
20	Dey et al., Context-driven detection of distracted driving using images from in-car cameras, Internet of Things, Vol. 14, 2021 (“Dey”)	Feb. 27, 2021
21	Baheti et al., Detection of Distracted Driver Using Convolutional Neural Network, June 2018 (“Baheti”)	June 2018
22	He et al., Mask R-CNN, IEEE, June 2018 (“He”)	June 2018
23	Majdi et al., Drive-Net: Convolutional Network for Driver Distraction Detection, IEEE Southwest Symposium on Image Analysis and Interpretation, April 2018 (“Majdi”)	April 2018
24	Li et al., Driver Distraction Detection Using Octave-Like Convolutional Neural Network, IEEE Transactions on Intelligent Transportation Systems, June 2021 (“Li”)	June 2021

³ The dates in this column are the latest dates on which the publications were made publicly available. Samsara reserves the right to identify earlier dates should such dates be ascertained through discovery.

c. **Prior Art Sales, Public Use, or Other Public Availability**

No.	Item Offered for Sale and/or Publicly Used or Known ⁴	Date of Offer / Public Use / Knowledge ⁵	Person or Entity Who Made Public Use or Sale
25	AI Dual Dashboard Camera	January 2021	Teletrac Navman
26	AI SafetyCam	December 2020	Azuga
27	Coach Dashcam	2021	Zonar
28	Driver Status Monitor	2018	Denso
29	Driveri	2019	Netradyne
30	Guardian Gen 2	2018	Seeing Machines
31	idrive AI Cam	November 2019	iDrive
32	Nauto 2 system and/or Nauto Driver and Fleet Safety Platform	May 2017	Nauto
33	Rideview	2020	LightMetrics
34	Samsara AI Dashcams, Vehicle Gateways and Dashboard	April 2021	Samsara
35	SmartSense for Inattentive Driving+	June 10, 2021	Omnitracs (Solera)
36	Surfsight Dash Cam	March 2021	Lytx
37	Video Intelligence Dashcam	2021	Platform Science Trimble
38	Vision 2.0	2021	Fleet Complete (Powerfleet)
39	ZenduCam Z6	December 2019	GoFleet

III. PATENT LOCAL RULES 3-3(B), (C) – ANTICIPATION AND OBVIOUSNESS

Each of the Asserted Claims is invalid as anticipated and/or rendered obvious under 35 U.S.C. §§ 102 and/or 103. Samsara’s prior art invalidity charts (attached hereto as Exhibits A1 to A12, B1 to B17, and C1 to C23) are each associated with a primary piece of prior art and identify where specifically in each item of prior art each element of each asserted claim is found, citing particular teachings and

⁴ The models in this column are the models Samsara has identified based on information available to date. Samsara reserves the right to identify different versions of these models or other systems should such information be ascertained through discovery.

⁵ The dates in this column are the latest dates on which the systems were publicly used or known based on information available to date. Samsara reserves the right to identify different dates should such dates be ascertained through discovery.

1 disclosures of the referenced art as applied to features of the Asserted Patents. Obviousness
2 combinations for the primary prior art references are identified throughout these Invalidity Contentions,
3 including directly or by reference in the Exhibits, in Appendixes A to C, and/or below.

4 The citations found in these Invalidity Contentions (including in the Exhibits, Appendixes, and
5 below) are exemplary and not exclusive, and Samsara reserves the right to rely on uncited portions of
6 the prior art references and on other documents or operational systems, and fact and expert testimony,
7 to aid in understanding and interpreting the cited portions, as providing context to them, and as
8 additional evidence that the prior art discloses a claimed feature. Indeed, persons of skill in the art
9 generally would understand an item of prior art in the context of other publications, literature, products,
10 and understanding. Thus, Samsara reserves the right to establish what was known to a person having
11 ordinary skill in the art through other publications, products, and/or testimony. Further, Samsara
12 reserves the right to modify, amend, and/or change its interpretation of the prior art as constructions of
13 the claim terms of the Asserted Claims may be provided by the Court, based on additional analysis by
14 Samsara's technical expert witnesses, or based on other circumstances that may affect the interpretation
15 or application of the claims.

16 Prior art patents or publications included in these contentions may be related (*e.g.*, a divisional,
17 continuation, continuation-in-part, parent, or child) to earlier- or later-filed patents or publications, may
18 have counterparts filed in other jurisdictions, and/or may incorporate (or be incorporated by) other
19 patents or publications by reference. The listed patents or publications are intended to be representative
20 of these other patents or publications to the extent they exist. Samsara accordingly reserves the right
21 to modify, amend, or supplement these contentions with these related patents or publications, as well
22 as other prior art references, upon further investigation.

23 Although Samsara's investigation continues, information available to date indicates that each
24 prior art system disclosed below was in public use, on sale, or otherwise available to the public before
25 at least the effective filing date of the claimed invention. Much of the art identified in these contentions
26 reflects common knowledge and the state of the art prior to at least one of the respective filing or
27 asserted priority dates of the Asserted Patents. As such, the obviousness combinations in these
28 contentions identified below are not intended to be exhaustive, as there are many possible combinations

1 of the disclosed prior art, and the inclusion of certain exemplary combinations does not exclude other
2 combinations. In many instances, where a particular contention calls for combining references, any
3 one of a number of references can be combined.

4 Samsara may rely on uncited portions of the prior art references, other documents or operational
5 systems, and fact and expert testimony to provide context to aid in understanding the cited portions of
6 the references and/or the prior art references. Where Samsara cites a particular figure in a reference,
7 the citation encompasses the caption and description of the figure and any text relating to or discussing
8 the figure. Conversely, where Samsara cites text referring to a figure, the citation includes the figure
9 as well.

10 Throughout the attached Exhibits, Samsara provides examples of where references disclose
11 subject matter recited in preambles, without regard to whether the preambles are properly considered
12 to be limitations of the Asserted Claims. Samsara reserves the right to argue, at the appropriate stage
13 of this case, that the preambles are or are not limitations. Further, the fact that Samsara provides
14 examples of any limitation does not mean that Samsara believes that the limitation is defined, or
15 otherwise enabled, or comports with the requirements of the patent statute, including, but not limited
16 to, 35 U.S.C. § 112.

17 Nothing disclosed herein is an admission or acknowledgement that any Samsara system or
18 process infringes any of the Asserted Claims. Samsara reserves the right to supplement, modify, or
19 otherwise amend these Invalidity Contentions, including based on the Court's claim construction
20 rulings or opinions or the parties' positions or arguments taken in connection with the claim
21 construction process. Moreover, Samsara reserves the right to rely on any disclosures in the
22 accompanying Patent Local Rule 3-4 production as it believes necessary in view of positions Motive
23 may take with respect to the scope and meaning of the Asserted Claims.

24 The subsections that follow identify how the prior art anticipates and/or renders obvious the
25 Asserted Claims. Regarding obviousness, to the extent Motive alleges that any other claimed limitation
26 or limitations are not disclosed in any primary reference, it would have been obvious to combine the
27 teachings of the reference with the background knowledge of a person of ordinary skill in the art and/or
28 it would have been obvious to incorporate the missing limitation(s), including as disclosed in Exhibits

1 A1–A12, B1–B17, C1–C23, and Appendices A-C, into the primary reference for the reasons disclosed
2 herein. Each prior art reference or system may be combined with (1) information known to persons
3 skilled in the art at the time of the alleged invention, at least as evidenced by the disclosures of the
4 references identified in the table and text below; (2) any other anticipatory prior art references or
5 systems, including those identified in the tables above in section II; and (3) any of the additional prior
6 art identified in the prosecution of the Asserted Patents and related applications. In *KSR Int’l Co. v.*
7 *Teleflex Inc.*, 550 U.S. 398, 417-18, 420-21 (2007), the Supreme Court established a flexible, functional
8 approach in which an explicit motivation to combine prior art references is not always necessary to
9 establish obviousness. A motivation to modify a particular reference or system or to combine any two
10 or more references or systems may arise from: (1) the nature of the problem being solved; (2) the
11 teachings of the prior art; (3) the knowledge and common sense of persons of ordinary skill in the art;
12 (4) the fact that all of the references teach systems and methods related to the subject matter of the
13 patents-in-suit; (5) the fact that many of the authors of the references were part of the same academic
14 or research community and presented at many of the same conferences; (6) the existence of similar
15 improvements in similar applications; (7) the number of identified, predictable solutions to the problem
16 addressed by the patents-in-suit; and/or (8) considerations of efficiency, effectiveness, convenience,
17 cost-savings, and accessibility. One of ordinary skill in the art, as of the priority dates of each of the
18 Asserted Patents, would have known to combine the prior art elements disclosed by the references
19 below using known methods and to use these elements according to their established functions in order
20 to achieve a known and predictable result.

21 For example, a person of ordinary skill in the art (“POSITA”) would have been motivated to
22 combine the references and systems in the tables and text below for myriad reasons, including because
23 these references were authored by individuals or organizations involved in common technical
24 organizations, share common subject matter and approaches, discuss related products and technologies,
25 and/or were developed during the same time period. Each of the references disclosed herein as
26 invalidating an Asserted Patent was directed at the same or similar field of technology and the same or
27 similar problem as that Asserted Patent. Additionally, a POSITA would have been motivated to use
28 the methods and instrumentalities disclosed in the references and systems in the tables below in

1 practicing or creating the method and instrumentalities included or otherwise described in the
 2 references identified in the subsections that follow. Additionally, to the extent that any reference
 3 identified in the subsections that follow is found not to include every claim limitation, the claimed
 4 limitation was well known to one of ordinary skill in the art, rendering it obvious, including in view of
 5 references identified above in section II of these Invalidity Contentions. Also, as Samsara is currently
 6 unaware of the extent, if any, to which Motive will contend that limitations of the Asserted Claims are
 7 not disclosed in the art identified herein as anticipatory, Samsara reserves the right to identify other
 8 references and combinations that may render an allegedly missing limitation obvious. In addition, if
 9 and to the extent that Motive challenges the relevance of any of these references with respect to
 10 particular limitations of the Asserted Claims of the Asserted Patents, Defendant reserves its right to
 11 identify further motivation to combine particular references with additional particularity.

12 **a. Anticipation and Obviousness of the '580 Patent**

13 Samsara contends that, at least under Motive's actual and/or apparent application of the
 14 Asserted Claims, each of the primary references and systems identified in the table below, alone or in
 15 combination with each other and/or any of the references and systems identified above in Appendix A
 16 of these Invalidity Contentions, anticipate and/or render obvious the asserted claims of the '580 Patent.

Exhibit No.	Base Prior Art Reference / Prior Art System
A1	Azuga
A2	Denso
A3	GoFleet
A4	IDrive
A5	LightMetrics
A6	Lytx
A7	Nauto
A8	Netradyne
A9	Powerfleet
A10	Samsara
A11	Teletrac Navman
A12	Trimble Platform Science

25 Samsara identifies several exemplary combinations:

- Azuga, Denso, GoFleet, IDrive, LightMetrics, Lytx, Nauto, Netradyne, Powerfleet, Samsara, Teletrac Navman, and/or Trimble Platform Science in combination with one or more references in Appendix A

- Azuga, Denso, GoFleet, IDrive, LightMetrics, Lytx, Nauto, Netradyme, Powerfleet, Samsara, Teletrac Navman, or Trimble Platform Science as the primary reference in combination with any one or more of the others from the preceding

Samsara has identified several exemplary motivations and reasons to combine the various references cited herein. The cited references, considered individually and in combination, would have provided a POSITA with clear reasons to combine their teachings to arrive at the claimed subject matter. Where a particular reference does not expressly disclose a claimed element, it would have been straightforward and predictable for a POSITA to draw upon (i) routine technical knowledge in the field and/or (ii) one or more of the other references charted for that same element. This is the type of combination that reflects the application of known methods to known problems, the substitution of one known element for another, and the use of proven techniques to improve similar systems in the same field. In view of the state of the art, these combinations would have been obvious to try from a finite universe of identified, predictable options, with a reasonable expectation of success.

The record demonstrates that each of the references is analogous art. They address the same field of endeavor, automotive vision and ADAS systems, or are at minimum reasonably pertinent to the same problem the inventors sought to solve: reliable and accurate calibration of camera position and orientation relative to a vehicle frame and/or other sensors. The fact that the references expressly target camera calibration or adjusting parameters confirms that a POSITA would have looked to these teachings when faced with the same calibration challenges. Because these references are directed to the same technical objective and operate in the same technological environment, combining them is consistent with the way a POSITA would routinely synthesize solutions.

The prior art reflects convergent design incentives and industry practice. During the relevant time frame, the automotive and ADAS sector pursued camera and multisensor calibration to enable lane keeping, perception, and sensors. This led to a proliferation of closely related techniques (calibration, installation, setup). Given these parallel developments, a POSITA would have been motivated to integrate complementary disclosures, such as adopting a known calibration configuration from one reference with the adjusting, confirmation, or networking of another, because doing so merely combines familiar elements to yield predictable accuracy and robustness gains.

1 The combinations proposed do not require inventive insight or undue experimentation. The
2 individual elements perform their known functions in the expected way when combined: a calibration
3 method from one reference can be substituted for or augmented by one from another; a known feature
4 detection or alignment strategy can be incorporated into an otherwise conventional calibration routine;
5 and a horizon alignment technique can be applied to any established camera calibration routine. These
6 are routine, interchangeably applied building blocks in the art, and their integration would have been
7 well within the capabilities of a POSITA using standard design choice and engineering judgment.

8 The commonality of goals across the references further supports a reasonable expectation of
9 success. The references aim to increase calibration accuracy, repeatability, and operational robustness
10 in vehicular settings. Because they rely on compatible frameworks and operate over the similar inputs,
11 a POSITA would expect that borrowing and adapting one reference's technique to another's process
12 would predictably improve performance or reduce complexity without creating incompatibilities.

13 Contemporaneity of the references underscores the obviousness of the combinations. The
14 clustering of priority dates reflects active development and a heightened industry focus on the same
15 technical problems. In such circumstances, a POSITA is especially likely to survey neighboring
16 disclosures and incorporate incremental improvements or alternate implementations that address the
17 same calibration steps. Market and design pressures to deploy accurate, maintainable calibration for
18 production vehicles would further motivate the use of known, compatible techniques drawn from
19 multiple sources to meet performance, cost, and integration constraints.

20 No reference teaches away from such combinations, and no specialized or nonstandard interface
21 is required to integrate them. The result is an arrangement that achieves precisely the predictable
22 improvements sought by the art and by the claimed invention using techniques well understood and
23 routinely combined by practitioners at the time.

24 Accordingly, the combined teachings of the cited references, when viewed through the lens of
25 the knowledge and ordinary creativity of a POSITA, as well as the nature of the problem to be solved,
26 would have suggested the claimed invention with a reasonable expectation of success.

27 Samsara's assertion that certain prior art combinations render obvious Asserted Claims is in no
28 way an admission or suggestion that each reference does not independently anticipate or render obvious

1 the Asserted Claims under 35 U.S.C. §§ 102 and/or 103. Nor does the inclusion of the exemplary
 2 combinations exclude other combinations of prior art. Furthermore, to the extent that any one of the
 3 prior art references Samsara contends is anticipatory is found to not disclose every limitation of one or
 4 more Asserted Claims, the Asserted Claim(s) would have been obvious to one of ordinary skill in the
 5 art, and it would similarly have been obvious to a POSITA to combine that reference with any other
 6 references to meet the limitations, and such persons would have been motivated to do so for at least the
 7 same reasons as with respect to the combinations of the references above.

8 **b. Anticipation and Obviousness of '276 Patent**

9 Samsara contends that, at least under Motive's actual and/or apparent application of the
 10 Asserted Claims, each of the primary references and systems identified in the table below, alone or in
 11 combination with each other and/or any of the references and systems identified above in Appendix B
 12 of these Invalidity Contentions, anticipate and/or render obvious the asserted claims of the '276 Patent.

Exhibit No.	Base Prior Art Reference / Prior Art System
B1	Azuga
B2	Denso
B3	GoFleet
B4	IDrive
B5	LightMetrics
B6	Lytx
B7	Nauto
B8	Netradyne
B9	Powerfleet
B10	Samsara
B11	Teletrac Navman
B12	Trimble Platform Science
B13	Ghadiok
B14	Lee
B15	Dai
B16	Bernstein
B17	Choe

24 Samsara identifies several exemplary combinations:

- Azuga, Denso, GoFleet, IDrive, LightMetrics, Lytx, Nauto, Netradyne, Powerfleet, Samsara, Teletrac Navman, and/or Trimble Platform Science in combination with Ghadiok, Lee, Dai, Bernstein, and/or Choe

- 1 • Azuga, Denso, GoFleet, IDrive, LightMetrics, Lytx, Nauto, Netradayne, Powerfleet,
2 Samsara, Teletrac Navman, and/or Trimble Platform Science in combination with
3 one or more references in Appendix B
- 4 • Azuga, Denso, GoFleet, IDrive, LightMetrics, Lytx, Nauto, Netradayne, Powerfleet,
5 Samsara, Teletrac Navman, or Trimble Platform Science as the primary reference
6 in combination with any one or more of the others from the preceding
- 7 • Ghadiok, Lee, Dai, Bernstein, and/or Choe in combination with one or more
8 references in Appendix B
- 9 • Ghadiok, Lee, Dai, Bernstein, and/or Choe as the primary reference in combination
10 with any one or more of the others from the preceding

11 Samsara has identified several exemplary motivations and reasons to combine the various
12 references cited herein. The cited references, considered individually and in combination, would have
13 provided a POSITA with clear reasons to combine their teachings to arrive at the claimed subject
14 matter. Where a particular reference does not expressly disclose a claimed element, it would have been
15 straightforward and predictable for a POSITA to draw upon (i) routine technical knowledge in the field
16 and/or (ii) one or more of the other references charted for that same element. This is the type of
17 combination that reflects the application of known methods to known problems, the substitution of one
18 known element for another, and the use of proven techniques to improve similar systems in the same
19 field. In view of the state of the art, these combinations would have been obvious to try from a finite
20 universe of identified, predictable options, with a reasonable expectation of success.

21 The record demonstrates that each of the references is analogous art. They address the same
22 field of endeavor, automotive vision and ADAS systems, or are at minimum reasonably pertinent to
23 the same problem the inventors sought to solve: reliable and accurate calibration of camera position
24 and orientation relative to a vehicle frame and/or other sensors. The fact that the references expressly
25 target camera calibration or adjusting parameters confirms that a POSITA would have looked to these
26 teachings when faced with the same calibration challenges. Because these references are directed to
27 the same technical objective and operate in the same technological environment, combining them is
28 consistent with the way a POSITA would routinely synthesize solutions.

1 The prior art reflects convergent design incentives and industry practice. During the relevant
2 time frame, the automotive and ADAS sector pursued camera and multisensor calibration to enable
3 lane keeping, perception, and sensors. This led to a proliferation of closely related techniques
4 (calibration, installation, set up). Given these parallel developments, a POSITA would have been
5 motivated to integrate complementary disclosures, such as adopting a known calibration configuration
6 from one reference with the adjusting, confirmation, or networking of another, because doing so merely
7 combines familiar elements to yield predictable accuracy and robustness gains.

8 The combinations proposed do not require inventive insight or undue experimentation. The
9 individual elements perform their known functions in the expected way when combined: a calibration
10 method from one reference can be substituted for or augmented by one from another; a known feature
11 detection or alignment strategy can be incorporated into an otherwise conventional calibration routine;
12 and a horizon alignment technique can be applied to any established camera calibration routine. These
13 are routine, interchangeably applied building blocks in the art, and their integration would have been
14 well within the capabilities of a POSITA using standard design choice and engineering judgment.

15 The commonality of goals across the references further supports a reasonable expectation of
16 success. The references aim to increase calibration accuracy, repeatability, and operational robustness
17 in vehicular settings. Because they rely on compatible frameworks and operate over the similar inputs,
18 a POSITA would expect that borrowing and adapting one reference's technique to another's process
19 would predictably improve performance or reduce complexity without creating incompatibilities.

20 Contemporaneity of the references underscores the obviousness of the combinations. The
21 clustering of priority dates reflects active development and a heightened industry focus on the same
22 technical problems. In such circumstances, a POSITA is especially likely to survey neighboring
23 disclosures and incorporate incremental improvements or alternate implementations that address the
24 same calibration steps. Market and design pressures to deploy accurate, maintainable calibration for
25 production vehicles would further motivate the use of known, compatible techniques drawn from
26 multiple sources to meet performance, cost, and integration constraints.

27 No reference teaches away from such combinations, and no specialized or nonstandard interface
28 is required to integrate them. The result is an arrangement that achieves precisely the predictable

1 improvements sought by the art and by the claimed invention using techniques well understood and
2 routinely combined by practitioners at the time.

3 Accordingly, the combined teachings of the cited references, when viewed through the lens of
4 the knowledge and ordinary creativity of a POSITA, as well as the nature of the problem to be solved,
5 would have suggested the claimed invention with a reasonable expectation of success.

6 Samsara's assertion that certain prior art combinations render obvious Asserted Claims are in
7 no way an admission or suggestion that each reference does not independently anticipate or render
8 obvious the Asserted Claims under 35 U.S.C. §§ 102 and/or 103. Nor does the inclusion of the
9 exemplary combinations exclude other combinations of prior art. Furthermore, to the extent that any
10 one of the prior art references Samsara contends is anticipatory is found to not disclose every limitation
11 of one or more Asserted Claims, the Asserted Claim(s) would have been obvious to one of ordinary
12 skill in the art, and it would similarly have been obvious to a POSITA to combine that reference with
13 any other references to meet the limitations, and such persons would have been motivated to do so for
14 at least the same reasons as with respect to the combinations of the references above.

15 **c. Anticipation and Obviousness of the '243 Patent**

16 Samsara contends that, at least under Motive's actual and/or apparent application of the
17 Asserted Claims, each of the primary references and systems identified in the table below, alone or in
18 combination with each other and/or any of the references and systems identified above in Appendix C
19 of these Invalidity Contentions, anticipate and/or render obvious the asserted claims of the '243 Patent.

20

Exhibit No.	Base Prior Art Reference / Prior Art System
C1	Azuga
C2	Denso
C3	GoFleet
C4	IDrive
C5	LightMetrics
C6	Lytx
C7	Nauto
C8	Netradyne
C9	Powerfleet
C10	Samsara
C11	Seeing Machines
C12	Solera
C13	Teletrac Navman

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Exhibit No.	Base Prior Art Reference / Prior Art System
C14	Trimble Platform Science
C15	Bin
C16	Dey
C17	Arar
C18	Li
C19	Calmer
C20	Chun
C21	Chao
C22	Torabi
C23	Huang

Samsara identifies several exemplary combinations:

- Azuga, Denso, GoFleet, IDrive, LightMetrics, Lytx, Nauto, Netradyne, Powerfleet, Samsara, Seeing Machines, Solera, Teletrac Navman, and/or Trimble Platform Science in combination with Bin, Dey, Arar, Li, Calmer, Chun, Chao, Torabi, and/or Huang
- Azuga, Denso, GoFleet, IDrive, LightMetrics, Lytx, Nauto, Netradyne, Powerfleet, Samsara, Seeing Machines, Solera, Teletrac Navman, and/or Trimble Platform Science in combination with one or more references in Appendix C
- Azuga, Denso, GoFleet, IDrive, LightMetrics, Lytx, Nauto, Netradyne, Powerfleet, Samsara, Seeing Machines, Solera, Teletrac Navman, or Trimble Platform Science as the primary reference in combination with any one or more of the others from the preceding
- Bin, Dey, Arar, Li, Calmer, Chun, Chao, Torabi, and/or Huang in combination with one or more references in Appendix C
- Bin, Dey, Arar, Li, Calmer, Chun, Chao, Torabi, or Huang as the primary reference in combination with any one or more of the others from the preceding

Samsara has identified several exemplary motivations and reasons to combine the various references cited herein. There are multiple, independent reasons why a POSITA would have been motivated to combine the cited references and would have reasonably expected success in doing so. Consistent with the flexible, common-sense approach to obviousness, these combinations reflect

1 routine integration of well-understood, predictable elements to address recognized needs in the field of
2 machine learning model development and deployment.

3 The references are directed to analogous art and address the same overarching problem:
4 improving the performance of machine-learning systems to detect and classify defined event types with
5 greater accuracy, robustness, and efficiency. Each reference contributes complementary, field-
6 consistent teachings, such as feature extraction strategies, model architectures, training objectives, loss
7 functions, and deployment optimizations that are inherently modular and routinely integrated by
8 practitioners. A POSITA, confronted with the well-recognized challenge of increasing detection
9 accuracy while managing resource constraints, would have looked to these closely related teachings as
10 ready building blocks to achieve incremental performance gains.

11 The combinations reflect a finite universe of identified, predictable solutions. The art
12 contemporaneously explored: (i) substituting or augmenting model components (e.g., swapping
13 classifiers, adding intermediate feature layers, or incorporating attention mechanisms), (ii) adjusting
14 training processes, and (iii) optimizing parameters. These approaches were well-documented, widely
15 implemented, and understood to yield incremental, predictable improvements when combined, thereby
16 providing a clear, limited set of options that a POSITA would have found obvious to try with a
17 reasonable expectation of success.

18 There were also clear design incentives and market pressures encouraging the integration of the
19 cited techniques. Improving model precision directly reduces false positives and false negatives,
20 outcomes tied to customer experience, safety assurance, regulatory compliance, and operational cost.
21 Similarly, reducing latency and overhead improves real-time responsiveness and deployment
22 feasibility at the edge. These concrete performance and cost imperatives would have motivated a
23 POSITA to combine known architectural and training refinements from closely related references to
24 meet well-understood product and system requirements.

25 The references disclose technologies that are technically compatible and commonly combined
26 in the art. Modern machine-learning pipelines are designed for modular interchangeability of data
27 preprocessing, feature engineering, model backbones, and post-processing stages. Techniques such as
28 multi-task learning are expressly intended to integrate across models and datasets. The interoperability

1 of common frameworks and toolchains further facilitates such combinations without undue
2 experimentation, reinforcing a reasonable expectation of success in implementing the claimed
3 configurations.

4 The art as a whole evidences a contemporaneous trend toward the very integrations at issue.
5 Many references share similar priority dates and address the same problem, reflecting a recognized
6 trajectory in the field. A POSITA would have perceived these solutions as complementary variations
7 and would have been drawn to combine them to meet application-specific targets for accuracy,
8 robustness, and efficiency.

9 None of the references teaches away from the proposed combinations. To the contrary, the
10 references collectively encourage model improvement through incremental modifications and cross-
11 pollination of known techniques. Where a particular reference omits an element claimed here, other
12 cited references offer that element expressly, and a POSITA would have recognized that incorporating
13 it would predictably enhance the overall system. Routine optimization provides ample motivation to
14 combine.

15 To the extent any single reference lacks explicit disclosure of a particular claim element, the
16 missing element would have been supplied by the ordinary creativity of a POSITA applying well-
17 known options within a finite design space or by straightforward incorporation of an element disclosed
18 in a related reference. Such substitutions were conventional, predictable, and aimed at the very
19 improvements articulated in the prior art, thereby providing both motivation and expectation of success.

20 The nature of the problem to be solved would itself have prompted the combinations. The cited
21 art uniformly acknowledges the need for improved detection of specified event types across varying
22 conditions and data distributions. The combined teachings, viewed through the lens of a POSITA and
23 in light of the common objectives and modularity of the field, would have suggested the claimed
24 invention with a reasonable likelihood of success.

25 In sum, a POSITA would have been motivated to combine the cited references because they
26 address the same problem, disclose compatible and modular techniques, and collectively present a
27 finite set of predictable, performance-improving modifications. The well-understood design
28 incentives, the absence of teaching away, the ordinary creativity of a POSITA, and the routine nature

1 of these integrations together establish a clear motivation to combine with a reasonable expectation of
2 success.

3 Samsara's assertion that certain prior art combinations render obvious Asserted Claims are in
4 no way an admission or suggestion that each reference does not independently anticipate or render
5 obvious the Asserted Claims under 35 U.S.C. §§ 102 and/or 103. Nor does the inclusion of the
6 exemplary combinations exclude other combinations of prior art. Furthermore, to the extent that any
7 one of the prior art references Samsara contends is anticipatory is found to not disclose every limitation
8 of one or more Asserted Claims, the Asserted Claim(s) would have been obvious to one of ordinary
9 skill in the art, and it would similarly have been obvious to a POSITA to combine that reference with
10 any other references to meet the limitations, and such persons would have been motivated to do so for
11 at least the same reasons as with respect to the combinations of the references above.

12 **IV. PATENT LOCAL RULE 3-3(D) – INVALIDITY UNDER 35 U.S.C. § 112**

13 Samsara further contends that, at least under Motive's actual and/or apparent application of the
14 claims, the claims are invalid based on inadequate written description and enablement under 35 U.S.C.
15 § 112(a) and/or based on indefiniteness under 35 U.S.C. § 112(b). Samsara reserves the right to
16 supplement these contentions to further identify bases for invalidity under 35 U.S.C. § 112 after
17 subsequent case events, including the Court's claim construction order and Motive's disclosure of any
18 amended or supplemental infringement contentions in this action. In addition, Samsara's investigation
19 is ongoing, as is discovery in this action. Samsara may accordingly supplement these contentions to
20 further identify bases for invalidity under 35 U.S.C. § 112 as additional information becomes available.

21 **a. Lack of Adequate Written Description and Enablement**

22 The Asserted Claims are invalid for failure to comply with the written description or enablement
23 requirements of section 112(a). The written description requirement of 35 U.S.C. §112(a) mandates
24 that the "specification objectively demonstrate that the applicant actually invented—was in possession
25 of—the claimed subject matter." *Ariad Pharm., Inc. v. Eli Lilly & Co.*, 598 F.3d 1336, 1349 (Fed. Cir.
26 2010). Furthermore, "actual 'possession' or reduction to practice outside of the specification is not
27 enough." *Id.* at 1352. A "description that merely renders the invention obvious does not satisfy the
28 requirement" because "it is the specification itself that must demonstrate possession." *Id.*

1 Section 112 likewise requires that a patent specification “enable any person skilled in the art to
2 which it pertains, or with which it is most nearly connected, to make and use the” claimed invention.
3 35 U.S.C. § 112(a). A claim is not enabled if, “at the effective filing date of the patent, one of ordinary
4 skill in the art could not practice their full scope without undue experimentation.” *Wyeth & Cordis*
5 *Corp. v. Abbott Labs.*, 720 F.3d 1380, 1384 (Fed. Cir. 2013). “This important doctrine prevents both
6 inadequate disclosure of an invention and overbroad claiming that might otherwise attempt to cover
7 more than was actually invented.” *MagSil Corp. v. Hitachi Glob. Storage Techs., Inc.*, 687 F.3d 1377,
8 1381 (Fed. Cir. 2012).

9 Under at least the claim interpretations upon which Motive apparently relies for its infringement
10 assertions, the Asserted Claims would be invalid for failure to satisfy the written description and/or
11 enablement requirements because they would be drawn to subject matter that exceeds or otherwise
12 differs from that which one of ordinary skill in the art would understand the named inventors to have
13 had in their possession. Plaintiff’s infringement allegations require numerous claim terms to be
14 interpreted more broadly than the Asserted Patents disclose or enable. A POSITA, upon reviewing the
15 patents and the claims, would not consider the technology that Plaintiff seeks to cover in its
16 infringement contentions to be in the possession of the inventors.

17 **i. ’580 Patent**

18 Limitations regarding “camera device”:

19 The Asserted Claims of the ’580 Patent recite “camera device.” Motive’s Infringement
20 Contentions allege that this limitation is satisfied by Samsara’s use of “AI Dash Cams, vehicle
21 gateways, and the Samsara Dashboard.” Samsara disagrees that the claims’ recitation of “camera
22 device” may be satisfied by any combination of “AI Dash Cams, vehicle gateways, and the Samsara
23 Dashboard.” However, if Motive is correct that claims are broad enough to encompass all three items,
24 then the Asserted Claims are invalid for lack of written description. The specification does not provide
25 support for a camera device being AI Dash Cams, vehicle gateways, and the Samsara Dashboard. A
26 POSITA would understand vehicle gateways and a Dashboard to be distinct from a camera device. “A
27 patent applicant cannot disclose and claim an invention narrowly and then, in the course of an
28 infringement suit, argue effectively that the claims should be construed to cover that which is neither

1 described nor enabled in the patent.” *N. Am. Vaccine, Inc. v. Am. Cyanamid Co.*, 7 F.3d 1571, 1577
2 (Fed. Cir. 1993). However, that is effectively what Motive is attempting to do by alleging that the
3 claims’ recitation of “camera device” can be satisfied by “AI Dash Cams, vehicle gateways, and the
4 Samsara Dashboard.” Accordingly, the claims are invalid for lack of written description.

5 Limitation regarding “horizon line”:

6 The Asserted Claims of the ’580 Patent recite “horizon line.” Motive’s Infringement
7 Contentions allege that this limitation is satisfied by Samsara’s use of “vanishing point.” Samsara
8 disagrees that the claims’ recitation of “horizon line” may be satisfied by a vanishing point. However,
9 if Motive is correct that claims are broad enough to encompass a vanishing point, then the Asserted
10 Claims are invalid for lack of written description. The specification does not provide support for a
11 horizon line being a vanishing point. A POSITA would understand a vanishing point to be distinct
12 from a horizon line. Accordingly, the claims are invalid for lack of written description.

13 Limitation regarding “receiving a confirmation from the annotator device, the confirmation indicating
14 that the one or more lines are accurate”:

15 The Asserted Claims of the ’580 Patent recite “receiving a confirmation from the annotator
16 device, the confirmation indicating that the one or more lines are accurate.” Motive’s Infringement
17 Contentions allege that this limitation is satisfied by Samsara’s use of menu options that recite “Reset”
18 and “Edit.” Samsara disagrees that the claims’ recitation of “receiving a confirmation from the
19 annotator device, the confirmation indicating that the one or more lines are accurate” may be satisfied
20 by these menu options. However, if Motive is correct that claims are broad enough to encompass these
21 menu options, then the Asserted Claims are invalid for lack of written description. The specification
22 does not provide support for these menu options being a confirmation from the annotator device, the
23 confirmation indicating that one or more lines are accurate. A POSITA would understand these to be
24 distinct. Accordingly, the claims are invalid for lack of written description.

25 **ii. ’276 Patent**

26 Limitations regarding “camera device”:

27 The Asserted Claims of the ’276 Patent recite “camera device.” Motive’s Infringement
28 Contentions allege that this limitation is satisfied by Samsara’s use of “AI Dash Cams, vehicle

1 gateways, and the Samsara Dashboard.” Samsara disagrees that the claims’ recitation of “camera
2 device” may be satisfied by any combination of “AI Dash Cams, vehicle gateways, and the Samsara
3 Dashboard.” However, if Motive is correct that claims are broad enough to encompass all three items,
4 then the Asserted Claims are invalid for lack of written description. The specification does not provide
5 support for a camera device being AI Dash Cams, vehicle gateways, and the Samsara Dashboard. A
6 POSITA would understand vehicle gateways and a Dashboard to be distinct from a camera device. “A
7 patent applicant cannot disclose and claim an invention narrowly and then, in the course of an
8 infringement suit, argue effectively that the claims should be construed to cover that which is neither
9 described nor enabled in the patent.” *N. Am. Vaccine, Inc. v. Am. Cyanamid Co.*, 7 F.3d 1571, 1577
10 (Fed. Cir. 1993). However, that is effectively what Motive is attempting to do by alleging that the
11 claims’ recitation of “camera device” can be satisfied by “AI Dash Cams, vehicle gateways, and the
12 Samsara Dashboard.” Accordingly, the claims are invalid for lack of written description.

13 Limitation regarding “horizon line”:

14 The Asserted Claims of the ’276 Patent recite “horizon line.” Motive’s Infringement
15 Contentions allege that this limitation is satisfied by Samsara’s use of “vanishing point.” Samsara
16 disagrees that the claims’ recitation of “horizon line” may be satisfied by a vanishing point. However,
17 if Motive is correct that claims are broad enough to encompass a vanishing point, then the Asserted
18 Claims are invalid for lack of written description. The specification does not provide support for a
19 horizon line being a vanishing point. A POSITA would understand a vanishing point to be distinct
20 from a horizon line. Accordingly, the claims are invalid for lack of written description.

21 **iii. ’243 Patent**

22 Limitations regarding “labeled examples”:

23 The Asserted Claims of the ’243 Patent recite “labeled examples.” If Motive is correct that the
24 claims are broad enough to encompass its infringement contentions, then the Asserted Claims are
25 invalid for lack of written description. “A patent applicant cannot disclose and claim an invention
26 narrowly and then, in the course of an infringement suit, argue effectively that the claims should be
27 construed to cover that which is neither described nor enabled in the patent.” *N. Am. Vaccine, Inc. v.*
28 *Am. Cyanamid Co.*, 7 F.3d 1571, 1577 (Fed. Cir. 1993). However, that is effectively what Motive is

1 attempting to do by alleging that the claims’ recitation of “labeled examples” can be satisfied by its
2 infringement contentions. Accordingly, the claims are invalid for lack of written description.

3 Limitation regarding “minimizing a loss based on outputs of the one or more prediction heads
4 causing a change in parameters of the backbone network”:

5 The Asserted Claims of the ’243 Patent recite “minimizing a loss based on outputs of the one
6 or more prediction heads causing a change in parameters of the backbone network.” If Motive is correct
7 that the claims are broad enough to encompass its infringement contentions, then the Asserted Claims
8 are invalid for lack of written description. “A patent applicant cannot disclose and claim an invention
9 narrowly and then, in the course of an infringement suit, argue effectively that the claims should be
10 construed to cover that which is neither described nor enabled in the patent.” *N. Am. Vaccine, Inc. v.*
11 *Am. Cyanamid Co.*, 7 F.3d 1571, 1577 (Fed. Cir. 1993). However, that is effectively what Motive is
12 attempting to do by alleging that the claims’ recitation of “minimizing a loss based on outputs of the
13 one or more prediction heads causing a change in parameters of the backbone network” can be satisfied
14 by its infringement contentions. Accordingly, the claims are invalid for lack of written description.

15 Limitation regarding “distraction classification model”:

16 The Asserted Claims of the ’243 Patent recite “distraction classification model.” If Motive is
17 correct that the claims are broad enough to encompass its infringement contentions, then the Asserted
18 Claims are invalid for lack of written description. “A patent applicant cannot disclose and claim an
19 invention narrowly and then, in the course of an infringement suit, argue effectively that the claims
20 should be construed to cover that which is neither described nor enabled in the patent.” *N. Am. Vaccine,*
21 *Inc. v. Am. Cyanamid Co.*, 7 F.3d 1571, 1577 (Fed. Cir. 1993). However, that is effectively what
22 Motive is attempting to do by alleging that the claims’ recitation of “distraction classification model”
23 can be satisfied by its infringement contentions. Accordingly, the claims are invalid for lack of written
24 description.

25 **b. Indefiniteness**

26 Samsara contends that the Asserted Claims are invalid as set forth below under 35 U.S.C.
27 § 112(b) for failing to particularly point out and distinctly claim the subject matter which the applicants
28 regard as the alleged invention. The Asserted Claims are invalid for indefiniteness under section 112

1 because they fail to inform, with reasonable certainty, those skilled in the art about the scope of the
2 claimed invention. *See Nautilus, Inc. v. Biosig Instruments, Inc.*, 134 S. Ct. 2120 (2014). The
3 definiteness requirement “mandates clarity” and is not satisfied merely because a patent claim is
4 “amenable to construction.” *Id.* at 2129-30. Nor is it satisfied by a showing that a patent’s claims are
5 not “insolubly ambiguous.” *Id.* As the Court explained, “To tolerate imprecision just short of that
6 rendering a claim insolubly ambiguous would diminish the definiteness requirement’s public-notice
7 function and foster the innovation-discouraging zone of uncertainty against which th[e] Court has
8 warned.” *Id.* (internal quotations and citations omitted). Instead, “a patent must be precise enough to
9 afford clear notice of what is claimed, thereby appris[ing] the public of what is still open to them.” *Id.*

10 **i. ’580 Patent**

11 The term “horizon line” is indefinite.

12 The Asserted Claims of the ’580 Patent, read in light of the specification, fail to inform a
13 POSITA with “reasonable certainty” of the scope of the limitation “horizon line.” *Nautilus, Inc. v.*
14 *Biosig Instruments, Inc.*, 572 U.S. 898, 901 (2014). If these terms are interpreted broadly enough to
15 support Motive’s Infringement Contentions, then the claims will be indefinite, as the ’580 Patent does
16 not provide or support any definition for the term “horizon line” that would support Motive’s
17 Infringement Contentions and simultaneously inform a POSITA of the bounds of the claims with
18 reasonable certainty.

19 The term “camera parameter” is indefinite.

20 The Asserted Claims of the ’580 Patent, read in light of the specification, fail to inform a
21 POSITA with “reasonable certainty” of the scope of the limitation “camera parameter.” *Nautilus, Inc.*
22 *v. Biosig Instruments, Inc.*, 572 U.S. 898, 901 (2014). If these terms are interpreted broadly enough to
23 support Motive’s Infringement Contentions, then the claims will be indefinite, as the ’580 Patent does
24 not provide or support any definition for the term “camera parameter” that would support Motive’s
25 Infringement Contentions and simultaneously inform a POSITA of the bounds of the claims with
26 reasonable certainty.

27 The term “receiving a confirmation from the annotator device, the confirmation indicating that the one
28 or more lines are accurate” is indefinite.

1 The Asserted Claims of the '580 Patent, read in light of the specification, fail to inform a
2 POSITA with “reasonable certainty” of the scope of the limitation “receiving a confirmation from the
3 annotator device, the confirmation indicating that the one or more lines are accurate.” *Nautilus, Inc. v.*
4 *Biosig Instruments, Inc.*, 572 U.S. 898, 901 (2014). If these terms are interpreted broadly enough to
5 support Motive’s Infringement Contentions, then the claims will be indefinite, as the '580 Patent does
6 not provide or support any definition for the term “receiving a confirmation from the annotator device,
7 the confirmation indicating that the one or more lines are accurate” that would support Motive’s
8 Infringement Contentions and simultaneously inform a POSITA of the bounds of the claims with
9 reasonable certainty.

10 The term “the one or more lines” is indefinite.

11 Claim 2 of the '580 Patent, read in light of the specification, fails to inform a POSITA with
12 “reasonable certainty” of the scope of the limitation “the one or more lines.” *Nautilus, Inc. v. Biosig*
13 *Instruments, Inc.*, 572 U.S. 898, 901 (2014). The claim language refers to “the one or more lines,” but
14 Claim 1 recites “one or more lines” in two different places. Accordingly, Claim 1 is invalid for
15 indefiniteness because a POSITA would not know with reasonable certainty whether “the one or more
16 lines” refers to the “identifying” step or the “overlying” step of claim 1.

17 **ii. '276 Patent**

18 The term “horizon line” is indefinite.

19 The Asserted Claims of the '276 Patent, read in light of the specification, fail to inform a
20 POSITA with “reasonable certainty” of the scope of the limitation “horizon line.” *Nautilus, Inc. v.*
21 *Biosig Instruments, Inc.*, 572 U.S. 898, 901 (2014). If these terms are interpreted broadly enough to
22 support Motive’s Infringement Contentions, then the claims will be indefinite, as the '276 Patent does
23 not provide or support any definition for the term “horizon line” that would support Motive’s
24 Infringement Contentions and simultaneously inform a POSITA of the bounds of the claims with
25 reasonable certainty.

26 The term “camera parameter” is indefinite.

27 The Asserted Claims of the '276 Patent, read in light of the specification, fail to inform a
28 POSITA with “reasonable certainty” of the scope of the limitation “camera parameter.” *Nautilus, Inc.*

1 *v. Biosig Instruments, Inc.*, 572 U.S. 898, 901 (2014). If these terms are interpreted broadly enough to
2 support Motive’s Infringement Contentions, then the claims will be indefinite, as the ’276 Patent does
3 not provide or support any definition for the term “camera parameter” that would support Motive’s
4 Infringement Contentions and simultaneously inform a POSITA of the bounds of the claims with
5 reasonable certainty.

6 The term “receiving a confirmation from the annotator device, the confirmation indicating that the one
7 or more lines are accurate” is indefinite.

8 The Asserted Claims of the ’276 Patent, read in light of the specification, fail to inform a
9 POSITA with “reasonable certainty” of the scope of the limitation “receiving a confirmation from the
10 annotator device, the confirmation indicating that the one or more lines are accurate.” *Nautilus, Inc. v.*
11 *Biosig Instruments, Inc.*, 572 U.S. 898, 901 (2014). If these terms are interpreted broadly enough to
12 support Motive’s Infringement Contentions, then the claims will be indefinite, as the ’276 Patent does
13 not provide or support any definition for the term “receiving a confirmation from the annotator device,
14 the confirmation indicating that the one or more lines are accurate” that would support Motive’s
15 Infringement Contentions and simultaneously inform a POSITA of the bounds of the claims with
16 reasonable certainty.

17 **iii. ’243 Patent**

18 The term “labeled examples” is indefinite.

19 The Asserted Claims of the ’243 Patent, read in light of the specification, fail to inform a
20 POSITA with “reasonable certainty” of the scope of the limitation “labeled examples.” *Nautilus, Inc.*
21 *v. Biosig Instruments, Inc.*, 572 U.S. 898, 901 (2014). If these terms are interpreted broadly enough to
22 support Motive’s Infringement Contentions, then the claims will be indefinite, as the ’243 Patent does
23 not provide or support any definition for the term “labeled examples” that would support Motive’s
24 Infringement Contentions and simultaneously inform a POSITA of the bounds of the claims with
25 reasonable certainty.

26 The term “minimizing a loss based on outputs of the one or more prediction heads causing a change in
27 parameters of the backbone network” is indefinite.

28 The Asserted Claims of the ’243 Patent, read in light of the specification, fail to inform a
POSITA with “reasonable certainty” of the scope of the limitation “minimizing a loss based on outputs

1 of the one or more prediction heads causing a change in parameters of the backbone network.”
2 *Nautilus, Inc. v. Biosig Instruments, Inc.*, 572 U.S. 898, 901 (2014). If these terms are interpreted
3 broadly enough to support Motive’s Infringement Contentions, then the claims will be indefinite, as
4 the ’243 Patent does not provide or support any definition for the term “minimizing a loss based on
5 outputs of the one or more prediction heads causing a change in parameters of the backbone network”
6 that would support Motive’s Infringement Contentions and simultaneously inform a POSITA of the
7 bounds of the claims with reasonable certainty.

8 The term “distraction classification model” is indefinite.

9 The Asserted Claims of the ’243 Patent, read in light of the specification, fail to inform a
10 POSITA with “reasonable certainty” of the scope of the limitation “distraction classification model.”
11 *Nautilus, Inc. v. Biosig Instruments, Inc.*, 572 U.S. 898, 901 (2014). If these terms are interpreted
12 broadly enough to support Motive’s Infringement Contentions, then the claims will be indefinite, as
13 the ’243 Patent does not provide or support any definition for the term “distraction classification
14 model” that would support Motive’s Infringement Contentions and simultaneously inform a POSITA
15 of the bounds of the claims with reasonable certainty.

16 **V. NON-PATENTABLE SUBJECT MATTER**

17 Samsara contends that at least some of the Asserted Claims are further invalid for failure to
18 meet the eligibility requirements of 35 U.S.C. § 101. The Asserted Claims of the Asserted Patents are
19 invalid under section 101 because they are directed to patent-ineligible concepts. The limitations of
20 each of the Asserted Claims, considered individually and as an ordered combination, add nothing to
21 transform the nature of the claim into a patent-eligible application (e.g., they only recite abstract ideas,
22 insignificant post-solution activity, and/or conventional and obvious steps or generic components) and
23 fail to provide an inventive concept to confer patentability. *Alice Corp. v. CLS Bank Int’l*, 573 U.S.
24 208, 217 (2014); *Elec. Power Grp., LLC v. Alstom S.A.*, 830 F.3d 1350, 1353 (Fed. Cir. 2016).

25 The Supreme Court in *Alice* set forth a two-step test for “distinguishing patents that claim laws
26 of nature, natural phenomena, and abstract ideas from those that claim patent-eligible applications of
27 those concepts.” *Alice*, 134 S. Ct. at 2355.

1 1. First, the Court must “determine whether the claims at issue are directed to one of those
2 patent-ineligible concepts,” such as an abstract idea. *Id.* If the Court determines that the claims are
3 directed to a patent-ineligible concept such as an abstract idea, then:

4 2. The Court must “consider the elements of each claim both individually and as an order
5 combination to determine whether the additional elements transform the nature of the claim into a
6 patent-eligible application.” *Id.* (citation and quotation marks omitted). The Supreme Court describes
7 this second step “as a search for an inventive concept—*i.e.*, an element or combination of elements
8 that is sufficient to ensure that the patent in practice amounts to significantly more than a patent upon
9 the ineligible concept itself.” *Id.* (quotation marks and brackets omitted). For example, “Stating an
10 abstract idea while adding the words ‘apply it’ is not enough for patent eligibility. Nor is limiting the
11 use of an abstract idea ‘to a particular technological environment.’” *Id.* at 2358 (internal citations and
12 quotations omitted).

13 **i. ’580 Patent**

14 **Alice Step One:** The Asserted Claims of the ’580 Patent are directed to the patent-ineligible
15 abstract idea of detecting a horizon line, using the line to make a measurement, letting the user check
16 the line, and transmitting the measurement to the camera. This is an age-old practice, e.g., when
17 someone wishes to hang a picture on a wall, they use a leveler and mark (“detect”) a line to ensure the
18 image is hung straight and at the desired height. The claim is directed to applying this abstract concept
19 with only conventional devices (e.g., a camera) and steps. Each limitation is also purely functional and
20 focuses on a result, lacking any detail about how the claimed function is achieved. Claims reciting
21 functions/results without detail are drawn to abstract ideas. *Longitude Licensing Ltd. v. Google LLC*,
22 2024-1202, 2025 WL 1249136, at *2 (Fed. Cir. Apr. 30, 2025).

23 **Alice Step Two:** The Asserted Claims of the ’580 Patent also fail *Alice* step two because the
24 claims recite no inventive concept and instead merely invoke “well-understood, routine [and]
25 conventional” technology to carry out the abstract ideas. *See Alice*, 573 U.S. at 225 (citation omitted).
26 None of these components or concepts is new or unconventional. The conventional actions recited by
27 the claim may be performed with a conventional combination of components without requiring
28

1 anything inventive. *See Ultramercial, Inc. v. Hulu, LLC*, 772 F.3d 709, 715–16 (Fed. Cir. 2014). Thus,
2 there is no “inventive concept,” and the Asserted Claims of the ’580 Patent are ineligible.

3 **ii. ’276 Patent**

4 Samsara incorporates its briefing related to Samsara’s Partial Motion to Dismiss Motive’s
5 Second Amended Complaint. *See* D.I. 112, 116.

6 **Alice Step One:** The Asserted Claims of the ’276 Patent are directed to the patent-ineligible
7 abstract idea of detecting a horizon line, letting the user check and adjust the line, using the line to
8 make a measurement, and transmitting the measurement to the camera. This is an age-old practice,
9 e.g., when someone wishes to hang a picture on a wall, they use a leveler and mark (“detect”) a line to
10 ensure the image is hung straight and at the desired height. The claim is directed to applying this
11 abstract concept with only conventional devices (e.g., a camera) and steps. Each limitation is also
12 purely functional and focuses on a result, lacking any detail about how the claimed function is achieved.
13 Claims reciting functions/results without detail are drawn to abstract ideas. *Longitude Licensing Ltd.*
14 *v. Google LLC*, 2024-1202, 2025 WL 1249136, at *2 (Fed. Cir. Apr. 30, 2025).

15 **Alice Step Two:** The Asserted Claims of the ’276 Patent also fail *Alice* step two because the
16 claims recite no inventive concept and instead merely invoke “well-understood, routine [and]
17 conventional” technology to carry out the abstract ideas. *See Alice*, 573 U.S. at 225 (citation omitted).
18 None of these components or concepts is new or unconventional. The conventional actions recited by
19 the claim may be performed with a conventional combination of components without requiring
20 anything inventive. *See Ultramercial, Inc. v. Hulu, LLC*, 772 F.3d 709, 715–16 (Fed. Cir. 2014). Thus,
21 there is no “inventive concept,” and the Asserted Claims of the ’276 Patent are ineligible.

22 **iii. ’243 Patent**

23 Samsara incorporates its briefing related to Samsara’s Partial Motion to Dismiss Motive’s
24 Second Amended Complaint. *See* D.I. 112, 116.

25 **Alice Step One:** The Asserted Claims of the ’243 Patent are directed to the patent-ineligible
26 abstract idea of training a “neural network” by presenting it with examples, minimizing error based on
27 the examples, altering parameters based on the minimization, and storing parameters (in other words,
28 doing math, checking your work, and learning from your mistakes). The claim bears the hallmark of

1 an abstract idea due to its purely functional language, with each functional step reciting a well-known
2 action on known neural network infrastructure and lacking any detail as to how the desired function is
3 achieved. *Recentive Analytics, Inc. v. Fox Corp.*, 134 F.4th 1205, 1213-15 (Fed. Cir. 2025).

4 **Alice Step Two:** The Asserted Claims of the '243 Patent also fail *Alice* step two because its
5 elements, individually and as an ordered combination, lack inventive concept. The Asserted Claims
6 invoke “well-understood, routine [and] conventional” technology to carry out the abstract ideas. *See*
7 *Alice*, 573 U.S. at 225 (citation omitted). None of these components or concepts is new or
8 unconventional. The conventional actions recited by the claim may be performed with a conventional
9 combination of components without requiring anything inventive. *See Ultramercial, Inc. v. Hulu, LLC*,
10 772 F.3d 709, 715–16 (Fed. Cir. 2014). Thus, there is no “inventive concept,” and the Asserted Claims
11 of the '580 Patent are ineligible.

12 **VI. PATENT LOCAL RULE 3-4 – DOCUMENT PRODUCTION**

13 Pursuant to Patent Local Rule 3-4(a), Samsara has produced or will produce, make available
14 for inspection, or identify publicly available information sufficient to show the operation of any
15 specifically identified aspects or elements of an Accused Instrumentality identified by Motive in its
16 Patent Local Rule 3-1 charts to the extent such information is in Defendant’s possession, custody or
17 control. This includes documents found at SAM-NDCA-24CV902-000004903-5002. In addition,
18 Samsara has made source code available for Motive’s review.

19 Pursuant to Patent Local Rule 3-4(b), Samsara has produced or will produce or make available
20 for inspection copies of each item of prior art identified pursuant to Patent Local Rule 3-3(a) which
21 does not appear in the file history of the Asserted Patent. Samsara reserves the right to identify and
22 produce additional documents pursuant to the Patent Local Rules and the orders of the Court. This
23 includes documents found at SAM-NDCA-24CV902-000005003-6188.

24 Samsara does not currently have in its possession documents responsive to Patent Local Rules
25 3-4(c).

26 Pursuant to Patent Local Rule 3-4(d), Samsara has produced or will produce, make available
27 for inspection, or identify publicly available information sufficient to show the financial information
28 for accused instrumentalities identified by Motive in its Patent L.R. 3-1(b) disclosures for any period

1 of alleged infringement to the extent such information is in Defendant's possession, custody or control.
2 This includes documents found at SAM-NDCA-24CV902-000000596, SAM-NDCA-24CV902-
3 000000598 - SAM-NDCA-24CV902-000000599, SAM-NDCA-24CV902-000000602 - SAM-NDCA-
4 24CV902-000000605.

5 Samsara does not currently have in its possession documents responsive to Patent Local Rules
6 3-4(e).

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1 DATED: November 18, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on November 18, 2025, with a copy of this document via electronic mail.

/s/ Josh A. Krevitt
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