

EXHIBIT 1

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

WIRELESS RECOGNITION)	
TECHNOLOGIES LLC,)	
)	CIVIL NO. 2:10-CV-00364-TJW-CE
Plaintiff,)	
)	
vs.)	
)	
A9.COM, INC., AMAZON.COM, INC.,)	
GOOGLE INC., NOKIA, INC., and)	
RICOH INNOVATIONS, INC.,)	
)	
Defendants.)	
)	

**DEFENDANTS' PRELIMINARY INVALIDITY
CONTENTIONS PURSUANT TO PATENT RULES 3-3 AND 3-4**

Pursuant to Rules 3-3 and 3-4 of the Rules of Practice for Patent Cases before the Eastern District of Texas and the Court's March 24, 2011 Order (Dkt. No. 64), Defendants in the above-captioned action hereby submit the following Preliminary Invalidity Contentions ("Invalidity Contentions") regarding U.S. Patent No. 7,392,287 ("the '287 patent"). This preliminary disclosure is based upon information available to Defendants as of the date hereof, and Defendants reserve the right to supplement and/or amend their contentions to the full extent consistent with P.R. 3-6.

INTRODUCTION

In its Infringement Contentions, Plaintiff Wireless Recognition Technologies LLC's ("WRT") asserts that Defendants A9.com, Inc., Amazon.com, Inc., Nokia Inc., and Ricoh Innovations, Inc. infringe, directly or indirectly, claims 1-3, 5-7, 9, 11, 13, 17, 19-21, 23-25, 27-29, and 31-36 of the '287 patent. WRT asserts that Defendant Google Inc. infringes, directly or indirectly, claims 1-3, 5-7, 9, 11, 13-17, 19-21, 23-25, 27-29, and 31-36 of the '287 patent. Therefore, Defendant has limited its Invalidity Contentions to those claims.

Defendants reserve the right to prove the invalidity of the asserted claims on bases other than those required to be disclosed in these Invalidity Contentions pursuant to P.R. 3-3. Defendants' investigation and discovery is ongoing and may uncover additional prior art and/or additional bases of invalidity not presently known. Defendants reserve all rights to supplement and/or modify these Invalidity Contentions based upon further discovery and/or investigation, rulings by the Court, modified or supplemental infringement contentions by WRT, fact discovery, expert discovery and/or third-party discovery.

The information provided in Defendants' Invalidity Contentions shall not be deemed an admission regarding the scope of any claims or the proper construction of those claims or any

terms contained therein. There has been no claim construction in the above-captioned case. These Invalidity Contentions do not attempt to predict the Court's claim construction, but are based in whole or in part on Defendants' present understanding of the asserted claims and/or apply the apparent construction set forth or implied in WRT's Infringement Contentions and are based on the level of detail disclosed therein. Accordingly, Defendants' Invalidity Contentions, including the attached invalidity claim charts, may reflect alternative positions as to claim construction and scope. Defendants' Invalidity Contentions do not represent Defendants' agreement or view as to the meaning of any claim term contained in WRT's Infringement Contentions. Furthermore, Defendants do not necessarily agree with or adopt any claim construction used by WRT in its Infringement Contentions, and nothing in these Invalidity Contentions is intended to endorse any particular claim construction. Defendants note that WRT's apparent claim construction would render the Asserted Claims broader in scope than the written description of any purported invention in the patent-in-suit. Nothing herein should be construed as an admission that Defendants agree with WRT's apparent claim constructions or that WRT has proposed any discernable constructions for claims and/or claim terms in its Infringement Contentions. Defendants expressly reserve the right to challenge the sufficiency of WRT's Infringement Contentions and any claims or claim terms WRT purports to have explicitly or implicitly construed therein. Defendants further expressly reserve the right to propose alternative constructions to those that have been or may be advocated by WRT or that may be applied or implied in these Invalidity Contentions or the accompanying claim charts.

Pursuant to the provisions of P.R. 3-3, the accompanying invalidity claim charts list specific examples of prior art that included and/or disclosed, either expressly or inherently, each limitation of certain claims and/or examples of prior art references and systems in view of which

a person of ordinary skill in the art would have considered each limitation and the claimed combination of such limitations obvious. In an effort to focus the issues, Defendants endeavored to identify specific relevant portions and/or features of the identified prior art that disclose the elements of the asserted claims. Although Defendants have identified at least one citation per element for each reference, the identified prior art may contain additional descriptions of or alternative support for the claim limitations and each and every disclosure of the same element in the reference is not necessarily identified. In addition, where Defendants cite to a particular figure in a reference, the citation should be understood to encompass the caption and description of the figure and any text relating to the figure. Similarly, where Defendants cite to particular text referring to a figure, the citation should be understood to include the figure and caption as well.

It also should be recognized that persons of ordinary skill in the art generally read a prior art reference as a whole and in the context of other publications and literature. Thus, Defendants may rely on uncited portions or features of the identified prior art, other documents, and expert testimony to provide context or to aid in understanding the identified prior art. To understand and interpret a specific statement or disclosure within a prior art reference, such persons would rely on other information within the reference, along with other publications and their general scientific or engineering knowledge. Defendants consequently reserve the right to rely upon other unidentified portions of the prior art references and on other publications and expert testimony to provide context, and as aids to understanding and interpreting the portions that are identified. Defendants also reserve the right to rely on other portions of the prior art references, other publications, and the testimony of experts to establish that a person of ordinary skill in the art would have been motivated to modify or combine certain of the cited references so as to

render the claims obvious. Furthermore, the production of documents that have been identified in these Invalidity Contentions shall not be deemed an admission that such documents are admissible or that Defendants have waived any objections regarding the admissibility of such documents.

WRT also has not identified which elements of the asserted claims or combinations thereof it alleges were not known to one of ordinary skill in the art at the time of the alleged invention. For any claim limitation that WRT alleges is not disclosed in a particular prior art reference disclosed herein, Defendants reserve the right to assert that such limitation is either inherent in the reference or obvious to one of ordinary skill in the art at the time, in light of the same, or that the limitation is disclosed in one or more other prior art references and in combination would have rendered the asserted claims obvious. The obviousness combinations of references provided below under 35 U.S.C. § 103 are merely exemplary and are not intended to be exhaustive. Additional obviousness combinations of the references identified below are possible, and Defendants reserve the right to use any such combination(s) in this litigation.

I. INVALIDATING PRIOR ART (35 U.S.C. §§ 102 and 103)

Defendants contend that the following prior art references either anticipate and/or render obvious each asserted claim of the '287 patent. For the reasons set forth above, Defendants reserve the right to modify and/or amend this list of prior art.

A. Patents and Applications

Defendants identify the following invalidating prior art patents and applications:

Patent or Application Number	Country of Origin	Filing Date	Issue Date	Exhibit No. of Claim Chart
4,780,599	U.S.	6/28/85	10/25/88	Multiple charts

Patent or Application Number	Country of Origin	Filing Date	Issue Date	Exhibit No. of Claim Chart
5,392,447	U.S.	1/10/92	2/21/95	Multiple charts
5,465,353	U.S.	4/1/94	11/7/95	Ex. 1 ¹
5,640,193	U.S.	8/15/94	6/17/97	Ex. 2
5,754,308	U.S.	6/27/95	5/19/98	Ex. 3
5,867,597	U.S.	9/5/95	2/2/99	Ex. 4
5,970,484	U.S.	1/28/94	10/19/99	Ex. 5
5,971,277	U.S.	8/12/98	10/26/99	Multiple charts
6,081,629	U.S.	9/17/97	6/27/00	Multiple charts
6,104,834	U.S.	8/1/96	8/15/00	Ex. 6
6,229,139	U.S.	7/23/98	5/8/01	Multiple charts
6,253,201	U.S.	6/23/98	6/26/01	Ex. 7
6,397,213	U.S.	5/12/99	5/28/02	Ex. 8
6,515,988	U.S.	7/17/98	2/4/03	Ex. 9
6,522,889	U.S.	12/23/99	2/18/03	Ex. 10
6,707,581	U.S.	6/27/00	3/16/04	Multiple charts
6,671,684	U.S.	9/1/00	12/30/03	Ex. 11
6,766,363	U.S.	8/31/00	6/20/04	Ex. 12
6,865,284	U.S.	12/20/99	3/8/05	Ex. 13
6,880,124	U.S.	6/4/99	4/12/05	Ex. 14
6,964,374	U.S.	10/2/98	11/15/05	Ex. 15

¹ While the Exhibit numbers listed in these table identify the primary claim chart addressing each reference, the references may also be cited in other claim charts.

Patent or Application Number	Country of Origin	Filing Date	Issue Date	Exhibit No. of Claim Chart
7,065,559	U.S.	6/16/00	6/20/06	Ex. 16
7,444,353	U.S.	5/9/00	10/28/08	Ex. 17
2002/0102966A1	U.S. application	11/6/00 (provisional filing date)	8/1/02 (published)	Ex. 18
0 893 759 A2	E.P.	7/21/97	1/27/99 (published)	Ex. 19
WO 99/17230	W.O.	6/23/98	4/8/99 (published)	Ex. 27

B. Publications

Defendants identify the following invalidating publications:

Title	Author	Publication	Date	Exhibit No. of Claim Chart
“Why e-read? Finding Opportunities in the Merger of Paper and Computers”	Schilit	Future of Print Media Journal	April 1999	Ex. 20
“As We May Read: The Reading Appliance Revolution”	Schilit	Computer	January 1999	Ex. 21
Article: “Document Image Matching Techniques”	Hull, et al.	Symposium on Document Image Understanding Technology, Annapolis, MD	April 1997	Ex. 22

C. Products and Implementations

Defendants identify the following invalidating products and implementations:

Product or Implementation	Approximate Implementation Date	Exhibit No. of Claim Chart
Amazon.com	Functionality in 1999	Ex. 23
Gutenberg.net	Functionality on March 2, 2000	Ex. 24
Nokia 9000	1996	Ex. 25
Nokia 9210	November 2000	Ex. 25
PALM VII	April 1999	Ex. 25
Wired.com	Functionality in 1999	Ex. 25
NYTimes.com	Functionality in 1999	Ex. 25
BarnesandNoble.com	Functionality in 1999	Ex. 25
Hull prior invention	Work occurred between 1993 and 1996	Ex. 26

* * *

The prior art identified herein and/or produced by Defendants herewith is also relevant for its disclosure of the state of the art and reasons and motivations for making improvements, additions, and combinations.

For the purpose of complying with P.R. 3-3(c), attached hereto are charts comparing the above prior art patents, publications, and implementations to the elements of the asserted claims of the '287 patent. (*See Exhibits 1 to 27.*) In view of Defendants' current understanding of the claims and/or the claim constructions WRT suggests in alleging infringement, Defendants contend that each of the references listed above anticipate the asserted claims as indicated in the attached charts under 35 U.S.C. § 102. To the extent that any claim element is not anticipated

pursuant to 35 U.S.C. § 102, Defendants assert nevertheless that the claimed combination would have been obvious to one of ordinary skill in view of the knowledge that was possessed by one of ordinary skill in the art. Additionally, to the extent that any claim element is not anticipated, Defendants also assert that the claimed combination would have been obvious to one of ordinary skill in the art in view of the combination of prior art references. One of ordinary skill in the art would have been motivated to combine the teachings of the references, as set forth in the attached charts or through additional combination of the references cited above.

In general, motivation to modify or combine the prior art references as set forth herein are present in the references themselves, the common knowledge of one of ordinary skill in the art, the prior art as a whole, or the nature of the problems allegedly addressed by the '287 patent. The references identified by Defendants address the same technical issues and suggest similar solutions to those issued discussed in the '287 patent and generally known at the time of the purported invention. If, and to the extent, WRT challenges the correspondence of any of these references with respect to particular elements of the asserted claims of the '287 patent, Defendants reserve the right to supplement these Invalidity Contentions to identify motivation to modify or combine particular references with additional particularity.

In particular, those of ordinary skill in the art at the time of the alleged invention of the '287 patent would have been motivated to modify or combine the prior art references set forth herein because, *inter alia*, (a) the references in general deal with the same or related subject matter, including the identification of documents, the transmission of electronic version of documents, and the use of handheld devices to capture or convey information regarding documents; (b) one of ordinary skill in the art would have been motivated by the problem that the inventor was attempting to solve, or with other problems that would have been faced in

reaching a solution, including how to transmit the contents of a copy of a paper document to a third party without scanning the entire document, and would have looked to references that concerned similar issues or taught how to overcome the problems faced; (c) the combinations were obvious to try and would have operated in their known and expected way; (d) the combinations were within the skill and understanding of a person of ordinary skill in the art; (e) the combinations would have been motivated by the developments in technology, including the increased availability and processing power of handheld devices, the increased availability of functionality, such as cameras and scanners on handheld devices, increases in communication bandwidths, and the proliferation of electronically available information; (f) the combinations reflect various design choices that would have been known to one of ordinary skill in the art and within that person's technical capability to implement; and (g) the combinations would enhance commercial opportunities and make the product more desirable, for example, by extending the document scanning, recognition, and retrieval capabilities to handheld devices, thus accessing a larger commercial market.

In general, a claimed invention is unpatentable if the differences between it and the prior art "are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art." 35 U.S.C. § 103(a); *Graham v. John Deere Co.*, 383 U.S. 1, 13-14 (1966). The ultimate determination of whether an invention is or is not obvious is a legal conclusion based on underlying factual inquiries including: "(1) the scope and content of the prior art; (2) the level of ordinary skill in the art; (3) the differences between the claimed invention and the prior art; and (4) objective evidence of nonobviousness." *Miles Labs., Inc. v. Shandon, Inc.*, 997 F.2d 870, 877 (Fed. Cir. 1993). See also *Graham*, 383 U.S. at 17-18.

The U.S. Supreme Court decision in *KSR International Co. v. Teleflex Inc.*, 127 S. Ct. 1727, 1739 (2007) (“KSR”) reaffirmed *Graham*, but at the same time held that a claimed invention can be obvious even if there is no teaching, suggestion, or motivation for combining the prior art to produce that invention. In summary, *KSR* holds that patents which are based on new combinations of elements or components already known in a technical field may be found to be obvious. *See, generally, KSR*, 127 S. Ct. at 1727. Specifically, the Court in *KSR* rejected a rigid application of the “teaching, suggestion, or motivation [to combine]” test. *Id.* at 1741. “In determining whether the subject matter of a patent claim is obvious, neither the particular motivation or the avowed purpose of the patentee controls. What matters is the objective reach of the claim.” *Id.* at 1741-42. “Under the correct analysis, any need or problem known in the field of endeavor at the time of invention and addressed by the patent can provide a reason for combining the elements in the manner claimed.” *Id.* at 1742.

In addition, in *KSR*, the Supreme Court emphasized the principle that “[t]he combination of familiar elements according to known methods is likely to be obvious when it does no more than yield predictable results.” *KSR*, 127 S. Ct. at 1739. A key inquiry is whether the “improvement is more than the predictable use of prior art elements according to their established functions.” *Id.* at 1740. In view of the Supreme Court’s *KSR* decision, the PTO issued a set of new Examination Guidelines. *See Examination Guidelines for Determining Obviousness Under 35 U.S.C. § 103 in view of the Supreme Court Decision in KSR International Co. v. Teleflex, Inc.*, 72 Fed. Reg. 57526 (October 10, 2007). Those Guidelines summarized the *KSR* decision, and identified various rationales for finding a claim obvious, including those based on other precedents. Those rationales include:

- (A) Combining prior art elements according to known methods to yield predictable results;

- (B) Simple substitution of one known element for another to obtain predictable results;
- (C) Use of known technique to improve similar devices (methods, or products) in the same way;
- (D) Applying a known technique to a known device (method, or product) ready for improvement to yield predictable results;
- (E) “Obvious to try” – choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success;
- (F) Known work in one field of endeavor may prompt variations of it for use in either the same field or a different one based on design incentives or other market forces if the variations would have been predictable to one of ordinary skill in the art;
- (G) Some teaching, suggestion, or motivation in the prior art that would have led one of ordinary skill to modify the prior art reference or to combine prior art reference teachings to arrive at the claimed invention.

Id. at 57529. Defendants contend that one or more of these rationales apply in considering the obviousness of the Asserted Claims of the ‘287 patent.

The various motivations described above provide a basis for combining or modifying references, as detailed below, to render each of the asserted claims obvious. In addition, the Court can consider the inferences and creative steps a person of ordinary skill in the art would employ in making such combinations. *See KSR*, 127 S. Ct. at 1741 (“a court can take account of the inferences and creative steps that a person of ordinary skill in the art would employ”).

II. INVALIDITY CONTENTIONS BASED ON 35 U.S.C. § 112

Defendants contend that various asserted claims of the ‘287 patent are invalid for failure to satisfy the enablement, indefiniteness, and/or written description requirements of 35 U.S.C. § 112. A more detailed basis for Defendants’ written description, enablement, and indefiniteness defenses will be set forth in Defendants’ expert report(s) on invalidity, to be served in accordance with the Court’s Scheduling Order. Defendants’ contentions are based in whole or in part on their present understanding of the asserted claims and WRT’s apparent construction of

those claims in its Infringement Contentions. Accordingly, Defendants' invalidity contentions based upon 35 U.S.C. § 112 may reflect alternative positions as to claim construction and scope. Further, by asserting grounds for invalidity based on WRT's apparent claim construction or any other particular claim construction, Defendants are not adopting WRT's claim construction, nor admitting to the accuracy of any particular claim construction.

A. Indefiniteness

Defendants contend that all of the asserted claims of the '287 patent are invalid for failing to comply with the definiteness requirement of 35 U.S.C. § 112, paragraph 2. Defendants' grounds for this contention include, without limitation, the following claim limitations (or claim limitations similar thereto):

- “reference data”
- “scanning data”
- “extracted”

Defendants further assert that claim 11 is indefinite and inoperative because it recites receiving the scanning information at the handheld device before the scanning data is extracted from the captured information.

B. Enablement and Written Description

Defendants contend that the claims of the '287 patent are invalid for failing to comply with the requirements of 35 U.S.C. § 112, paragraph 1. Specifically, the claims are not enabled and lack adequate written description for the full scope of the claims due to at least the following claim limitations (or claim limitation similar thereto):

- “sharing with a recipient” – The patent does not disclose sending the document back to the user that submitted the scanned information, though WRT asserts in its Infringement Contentions that such action is covered by the claims. The patent also

does not disclose sending links to a document, though WRT asserts in its Infringement Contentions that such action is covered by the claims.

- “each reference document having reference data stored in a memory” – The patent does not disclose and did not teach one of ordinary skill in the art how to generate the reference data.
- “extracting at least a portion of the received document data as scanning data” – The patent does not disclose and did not teach one of ordinary skill in the art how to perform the claimed extraction.
- “comparing the scanning data with the reference data” – The patent does not disclose and did not teach one of ordinary skill in the art how to perform the comparison between the scanning data and the reference data.
- “selecting, when the scanning data matches at least a portion of the reference data of one of the reference documents, the one reference document as the identified document” – The patent does not disclose and did not teach one of ordinary skill in the art how to select when the scanning data matches at least a portion of the reference data.
- “information captured from a source document by the handheld device” – The patent does not disclose capturing the data as broadly as WRT asserts in its Infringement Contentions, such as taking a photograph with the handheld device.
- “capturing the information from the document using the handheld device” – The patent does not disclose capturing the data as broadly as WRT asserts in its Infringement Contentions, such as taking a photograph with the handheld device.
- “receiving, by the data processing apparatus, the captured information as scanning data; information from the handheld device” – The patent does not disclose extracting the scanning data on the handheld device, and therefore it did not disclose receiving the scanning data by the data processing apparatus.
- “a memory in which a plurality of instructions are stored” – The patent does not disclose any instructions or algorithm would be stored in memory and it did not enable one of ordinary skill in the art to make the instructions that would carry out the claimed invention.
- “execution of the instructions causing a plurality of steps to be performed including ...” – The patent does not disclose any instructions or algorithm would be stored in memory and it did not enable one of ordinary skill in the art to make the instructions that would carry out the claimed invention.
- “the execution of the instructions by the processor causes further steps to be performed” – The patent does not disclose any instructions or algorithm would be

stored in memory and it did not enable one of ordinary skill in the art to make the instructions that would carry out the claimed invention.

- “processor readable program code such that when executed by a processor in a data processing apparatus, performs a method for . . .” – The patent does not disclose any program code that would be stored in memory and it did not enable one of ordinary skill in the art to make the program code that would carry out the claimed invention.
- “each reference item having associated reference data stored in a memory” – The patent did not disclose how to create the reference data and did not enable one of ordinary skill in the art to create the reference data.
- “information captured from an item by the handheld device” – The patent does not disclose capturing the data as broadly as WRT asserts in its Infringement Contentions, such as taking a photograph with the handheld device. The patent also does not disclose or enable one of ordinary in the art to capture from, process the data from, and identify any item other than a document, and therefore does not disclose or enable the full scope of the claims.

II. DEFENDANTS’ P.R. 3-4 DISCLOSURES

A. P.R. 3-4(a)

Concurrent with the service of these Invalidity Contentions and to the extent that Defendants can determine the “aspects or elements of an Accused Instrumentality” that WRT has identified in its Infringement Contentions, each Defendant individually will produce to WRT or make available for inspection material sufficient to show the operation of any such aspects or elements, including documentation relating to the products identified in WRT’s Infringement Contentions, to the extent such materials exist. Defendants are willing to make such documents and/or source code available for inspection, but Defendants will need to confer with WRT regarding the pending patent prosecution bar and protective order disputes.

B. P.R. 3-4(b)

Concurrent with the service of these Invalidity Contentions, Defendants collectively will produce to Plaintiff all of the items of prior art identified in sections I(A) and I(B) above to the extent that such art does not already appear in the file history of the ‘287 patent.

Dated: September 23, 2011

By: /s/ Daniel T. Shvodian
James F. Valentine (admitted *pro hac vice*)
California State Bar No. 149269
Daniel T. Shvodian (admitted *pro hac vice*)
California State Bar No. 184576
PERKINS COIE LLP
3150 Porter Drive
Palo Alto, CA 94304-1212
Telephone: 650.838.4300
Facsimile: 650.838.4350
E-mail: JValentine@perkinscoie.com
E-mail: DShvodian@perkinscoie.com

Michael C. Smith
Texas State Bar No. 18650410
SIEBMAN, BURG, PHILLIPS & SMITH, LLP
P.O. Box 1556
Marshall, TX 75671-1556
Telephone: 903.938.8900
Facsimile: 972.767.4620
E-mail: michaelsmith@siebman.com

Attorneys for Defendants and Counterclaimants
A9.COM, INC., AMAZON.COM, INC., and
GOOGLE INC.

By: /s/ Michael C. Smith
Michael C. Smith
Texas State Bar No. 18650410
SIEBMAN, BURG, PHILLIPS & SMITH, LLP
P.O. Box 1556
Marshall, TX 75671-1556
Telephone: 903.938.8900
Facsimile: 972.767.4620
E-mail: michaelsmith@siebman.com

Robert F. Perry (admitted *pro hac vice*)
Allison H. Altersohn (admitted *pro hac vice*)
KING & SPALDING LLP
1185 Avenue of the Americas
New York, NY 10036
Telephone: 212.556.2100
Facsimile: 212.556.2222
E-mail: rperry@kslaw.com
E-mail: aaltersohn@kslaw.com

Attorneys for Defendant
NOKIA INC.

By: /s/ Michael E. Jones

Michael E. Jones
Texas State Bar No. 18650410
Allen Franklin Gardner
POTTER MINTON P.C.
110 N. College, Suite 500
P.O. Box 359
Tyler, TX 75710-0359
Telephone: 903.597.8311
Facsimile: 903.593.0846
E-mail: mikejones@potterminton.com
E-mail: allengardner@potterminton.com

Mark D. Rowland (admitted *pro hac vice*)
ROPES & GRAY LLP
1900 University Avenue, 6th Floor
East Palo Alto, CA 94303-2284
Telephone: 650.617.4016
Facsimile: 650.566.4144
Email: mark.rowland@ropesgray.com

Attorneys for Defendant and Counterclaimant
RICOH INNOVATIONS, INC.

CERTIFICATE OF SERVICE

A true and correct copy of the above and foregoing document, Defendants' Preliminary Invalidity Contentions Pursuant to Patent Rules 3-3 and 3-4, was served on the following counsel via e-mail on this 23rd day of September, 2011.

/s/ Daniel T. Shvodian

Daniel T. Shvodian

William E. Davis, III
Texas State Bar No. 24047416
THE DAVIS FIRM, P.C.
111 W. Tyler Street
Longview, TX 75601
Telephone: 903.230.9090
Facsimile: 903.230.9661
E-mail: bdavis@bdavisfirm.com

Attorneys for Plaintiff
WIRELESS RECOGNITION
TECHNOLOGIES LLC

Cameron H. Tousi (admitted *pro hac vice*)
David M. Farnum (admitted *pro hac vice*)
Ralph P. Albrecht (admitted *pro hac vice*)
ALBRECHT TOUSI & FARNUM, PLLC
1701 Pennsylvania Avenue, NW, Suite 300
Washington, DC 20006
Telephone: 202.349.1490
Facsimile: 202.318.8788
E-mail: chtousi@atfirm.com
E-mail: dmfarnum@atfirm.com
E-mail: rpalbrecht@atfirm.com

Attorneys for Plaintiff
WIRELESS RECOGNITION
TECHNOLOGIES LLC

Michael C. Smith
Texas State Bar No. 18650410
SIEBMAN, BURG, PHILLIPS & SMITH, LLP
P.O. Box 1556
Marshall, TX 75671-1556
Telephone: 903.938.8900
Facsimile: 972.767.4620
E-mail: michaelsmith@siebman.com

Attorneys for Defendant
NOKIA INC.

Robert F. Perry (admitted *pro hac vice*)
Allison H. Altersohn (admitted *pro hac vice*)
KING & SPALDING LLP
1185 Avenue of the Americas
New York, NY 10036
Telephone: 212.556.2100
Facsimile: 212.556.2222
E-mail: rperry@kslaw.com
E-mail: aaltersohn@kslaw.com

Attorneys for Defendant
NOKIA INC.

Michael E. Jones
Texas State Bar No. 18650410
Allen Franklin Gardner
POTTER MINTON P.C.
110 N. College, Suite 500
P.O. Box 359
Tyler, TX 75710-0359
Telephone: 903.597.8311
Facsimile: 903.593.0846
E-mail: mikejones@potterminton.com
E-mail: allengardner@potterminton.com

Attorneys for Defendant and Counterclaimant
RICOH INNOVATIONS, INC.

Mark D. Rowland (admitted *pro hac vice*)
ROPES & GRAY LLP
1900 University Avenue, 6th Floor
East Palo Alto, CA 94303-2284
Telephone: 650.617.4016
Facsimile: 650.566.4144
Email: mark.rowland@ropesgray.com

Attorneys for Defendant and Counterclaimant
RICOH INNOVATIONS, INC.