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**Attorneys for Plaintiff InfoGation Corp.**

**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF CALIFORNIA**

INFOGATION CORP.,

Plaintiff,

v.

HUAWEI TECHNOLOGIES CO., LTD and HUAWEI DEVICE USA, INC.,

Defendants.

Case No.: 3:16-cv-01903-JAH-DHB

**INFOGATION CORP.'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS**

**DEMAND FOR JURY TRIAL**

Pursuant to the Court's Scheduling Order entered November 22, 2016 (Dkt. No. 31), InfoGation Corp. ("InfoGation") hereby discloses its asserted claims and infringement contentions against Huawei Technologies Co., Ltd. and Huawei Device USA, Inc. as follows:

(a) InfoGation alleges that Huawei infringes claim 15 of U.S. Patent No. 6,292,743.

(b) InfoGation currently identifies the Huawei Activa, Huawei Ascend, Huawei Enjoy, Huawei Fusion, Huawei G610s, Huawei G7 Plus, Huawei G8, Huawei Honor, Huawei Impulse, Huawei M886 Mercury, Huawei Mate 8; Huawei Mate S; Huawei Nexus 6P; Huawei P8; Huawei P8lite, Huawei P8max, Huawei P9, Huawei P9 lite, Huawei P9 Plus, Huawei Premia, Huawei SnapTo, Huawei Summit, Huawei T8300, Huawei U8100, Huawei U8110, Huawei U8150 IDEOS, Huawei U8180 IDEOS Xl, Huawei U8300, Huawei U8350 Boulder, Huawei U8500 IDEOS X2, Huawei U8510 IDEOS X3, Huawei U8520 Duplex, Huawei U8650 Sonic, Huawei U8687 Cronos, Huawei U8800 IDEOS X5, Huawei U8800 Pro, Huawei U8850 Vision, Huawei U8860 Honor, Huawei U9000 IDEOS X6, Huawei Y360, Huawei Y3II, Huawei Y560, Huawei Y5II, Huawei Y6, Huawei Y6 Pro, Huawei Y625, and Huawei Y635 smartphone product linesas the Accused Instrumentalities.

(c) A claim chart pursuant to section 1(c) of the Scheduling Order is attached as Appendix A to this Disclosure.

(d) InfoGation is not asserting indirect infringement at this time.

(e) Each element of claim 15 is claimed to be literally present.

(f) The priority date to which claim 15 is entitled is January 6, 1999.

(g) Section 1(g) of the Scheduling Order does not apply here.

(h) InfoGation is not asserting willful infringement at this time.

DATED: December 2, 2016

KIRBY & KIRBY LLP,

By: /s/ Sean T.C. Phelan
Michael L. Kirby
Heather W. Schallhorn

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*Attorneys for Plaintiff INFOGATION CORP.*

## PROOF OF SERVICE

**JUDGE**: Hon. Marilyn L. Huff
U.S. District Court Judge

***InfoGation Corp. vs. Huawei Technologies, et al***.
United States District Court, Southern District of California
**Case No.** 3:16-cv-01903-H-JLB

On December 2, 2016, the undersigned served the following documents, titled:

1. InfoGation's Disclosure of Asserted Claims and Infringement Contentions and accompanying document production.

Said documents were served via electronic mail, in accordance with Civil Local Rule 5.2 of the United States District Court for the Southern District of California, on all parties to said action, through counsel of record, as identified in the attached Service List.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of counsel of record in this action, who is authorized to practice in this Court, and at whose direction the service was made.

Executed on December 2, 2016 at San Diego, California.

*/s/ Sean T.C. Phelan*
Sean T.C. Phelan

**SERVICE LIST**

**InfoGation Corp. vs. Huawei Technologires, et al.**
**United States District Court, Southern District of California**
**Case No. 3:16-cv-01903-H-JLB**

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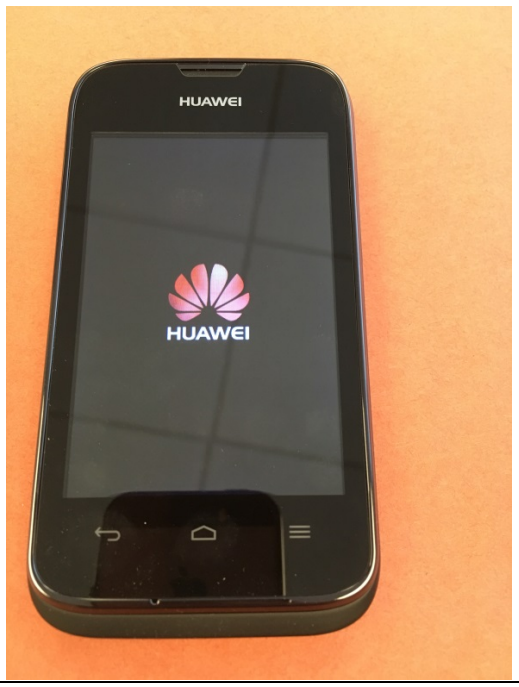
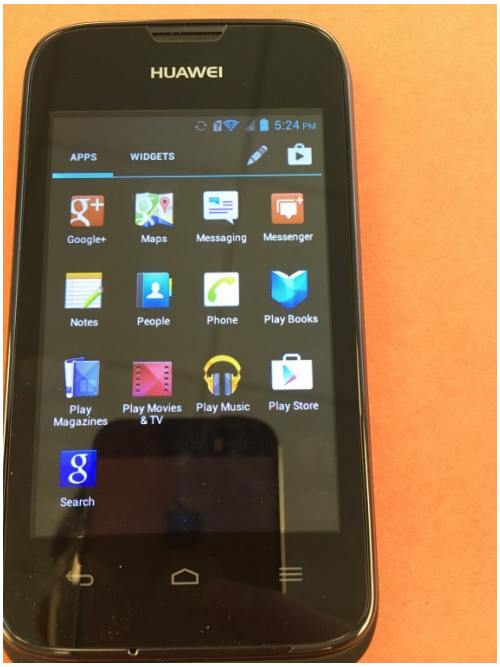
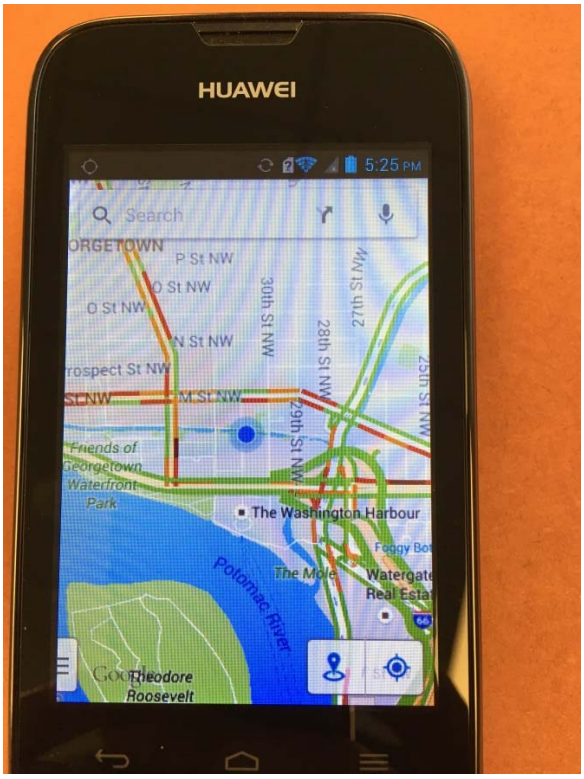
**APPENDIX A – INFRINGEMENT CLAIM CHART**
**INFOGATION CORP. V. HUAWEI TECHNOLOGIES CO., LTD.**
**CASE NO. 16-CV-01903-H-JLB**

Note: The accused device referenced in the following claim chart is the Huawei U8687 (sometimes referred to as U8687 Vision or U8687 Cronos). The analysis presented herein also applies to the other Huawei accused devices, which upon information and belief contain the same or similar components that behave in the same or similar manner as those present in the accused Huawei U8687 device.

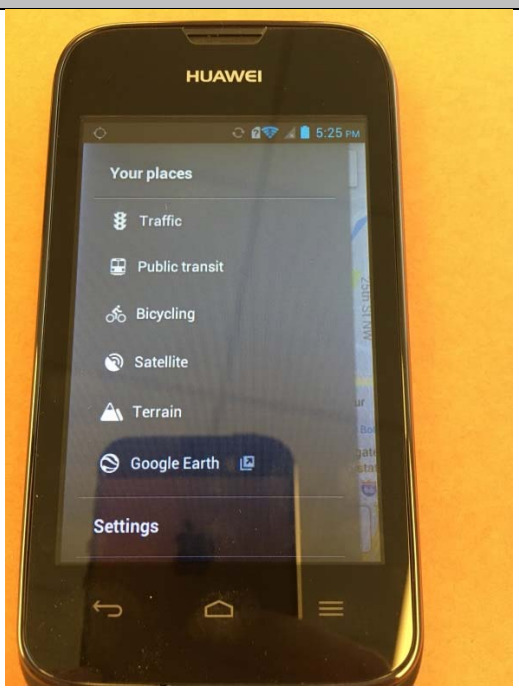
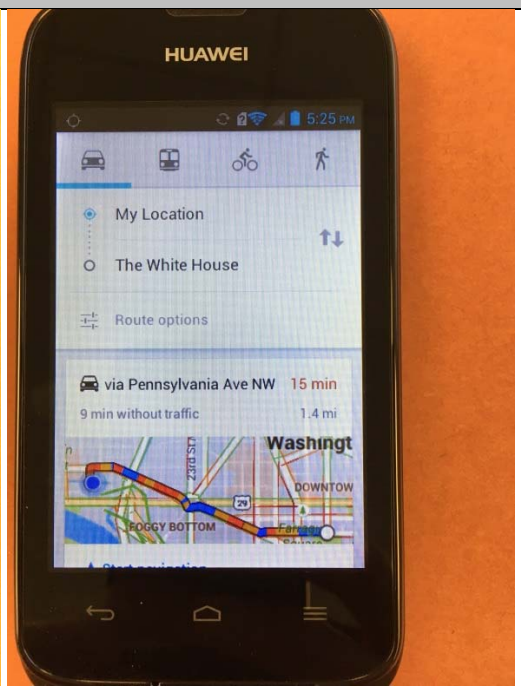
| U.S. Patent No. 6,292,743 | Accused Device (Huawei U8687) |
|---|---|
| 15. A mobile navigation system comprising: | Preamble |
| a navigation computer; | The Huawei U8687 is a navigation computer. It contains a 1 GHz processor and 512 MB of RAM.<br><br>HUAWEI Vision U8687 4GB Unlocked GSM Android v4.0 Smartphone - Black<br>by Huawei<br>46 customer reviews \| 28 answered questions<br>Currently unavailable.<br>We don't know when or if this item will be back in stock.<br>• 2G: GSM 850 / 900 / 1800 / 1900, 3G Network: HSDPA 850 / 1900 / 1700 (AWS)<br>• 3.5" TFT Display Capacitive Multi-Touchsscreen<br>• Android v4.0 (Ice Cream Sandwich), 1 GHz Cortex-A5 Processor, Chipset: Qualcomm MSM7225A Snapdragon<br>• 3.2 Megapixel Camera (2048 x 1536 pixels)<br>• Internal Memory: 512 MB RAM, 4GB ROM (2.71GB user available) + microSD Slot Expandable up to 32GB<br><br>Source: https://www.amazon.com/HUAWEI-Vision-U8687-Unlocked-Android/dp/B00OYFAX8Q<br><br>  <br>  |

**APPENDIX A – INFRINGEMENT CLAIM CHART**
**INFOGATION CORP. V. HUAWEI TECHNOLOGIES CO., LTD.**
**CASE NO. 16-CV-01903-H-JLB**

| U.S. Patent No. 6,292,743 | Accused Device (Huawei U8687) |
|---|---|
| |  |
| a wireless transceiver coupled to said navigation computer for connecting with a navigation server, | The Huawei U8687 has a wireless transceiver coupled to it. Specifically, the Huawei U8687 contains a wireless transceiver for communication on GSM/HSDPA cellular networks. The Huawei U8687 also can communicate wirelessly via the 802.11 b/g/n wireless protocols.<br><br>HUAWEI Vision U8687 4GB Unlocked GSM Android v4.0 Smartphone - Black<br>by Huawei<br>46 customer reviews \| 28 answered questions<br>Currently unavailable.<br>We don't know when or if this item will be back in stock.<br>• 2G: GSM 850 / 900 / 1800 / 1900, 3G Network: HSDPA 850 / 1900 / 1700 (AWS)<br>• 3.5" TFT Display Capacitive Multi-Touchsscreen<br>• Android v4.0 (Ice Cream Sandwich), 1 GHz Cortex-A5 Processor, Chipset: Qualcomm MSM7225A Snapdragon<br>• 3.2 Megapixel Camera (2048 x 1536 pixels)<br>• Internal Memory: 512 MB RAM, 4GB ROM (2.71GB user available) + microSD Slot Expandable up to 32GB<br><br>Source: https://www.amazon.com/HUAWEI-Vision-U8687-Unlocked-Android/dp/B00OYFAX8Q<br><br>The Huawei U8687 can connect to a Google Maps navigation server through a GSM/HSDPA cellular network. |

| U.S. Patent No. 6,292,743 | Accused Device (Huawei U8687) |
|---|---|
| | Directions Service<br><br>Overview<br><br>You can calculate directions (using a variety of methods of transportation) by using the `DirectionsService` object. This object communicates with the Google Maps API Directions Service which receives direction requests and returns computed results. You may either handle these directions results yourself or use the `DirectionsRenderer` object to render these results.<br><br>When specifying the origin or destination in a directions request, you can specify a query string (for example, "Chicago, IL" or "Darwin, NSW, Australia"), a `LatLng` value, or a `google.maps.Place` object.<br><br>The Directions service can return multi-part directions using a series of waypoints. Directions are displayed as a polyline drawing the route on a map, or additionally as a series of textual description within a `<div>` element (for example, "Turn right onto the Williamsburg Bridge ramp").<br><br>Source: https://developers.google.com/maps/documentation/javascript/directions<br><br>  |
| said navigation server for calculating | The Huawei U8687 can send a directions request to a Google Maps navigation server. If the Google Maps application on the Huawei U8687 has the "traffic" setting turned on, the Google Maps navigation server will calculate optimal routes based on real-time traffic information. |

| U.S. Patent No. 6,292,743 | Accused Device (Huawei U8687) |
|---|---|
| optimal routes based on real-time information, | Driving Options<br><br>You can specify routing options for driving directions through the `DrivingOptions` (https://developers.google.com/maps/documentation/javascript/3.exp/reference#DrivingOptions) object. You must supply a Google Maps APIs Premium Plan client ID (https://developers.google.com/maps/documentation/javascript/get-api-key#client-id) when loading the API if you want to include a `drivingOptions` field in the `DirectionsRequest`.<br><br>The `DrivingOptions` object contains the following fields:<br><br>`{`<br>`  departureTime: Date,`<br>`  trafficModel: TrafficModel`<br>`}`<br><br>These fields are explained below:<br><br>• `departureTime` (*required for the* `drivingOptions` *object literal to be valid*) specifies the desired time of departure as a `Date` object. The value must be set to the current time or some time in the future. It cannot be in the past. (The API converts all dates to UTC to ensure consistent handling across time zones.) For Google Maps APIs Premium Plan customers, if you include the `departureTime` in the request, the API returns the best route given the expected traffic conditions at the time, and includes the predicted time in traffic (`duration_in_traffic`) in the response. If you don't specify a departure time (that is, if the request does not include `drivingOptions`), the returned route is a generally good route without taking traffic conditions into account.<br><br>• `trafficModel` (*optional*) specifies the assumptions to use when calculating time in traffic. This setting affects the value returned in the `duration_in_traffic` field in the response, which contains the predicted time in traffic based on historical averages. Defaults to `bestguess`. The following values are permitted:<br>  ◦ `bestguess` (default) indicates that the returned `duration_in_traffic` should be the best estimate of travel time given what is known about both historical traffic conditions and live traffic. Live traffic becomes more important the closer the `departureTime` is to now..<br>  ◦ `pessimistic` indicates that the returned `duration_in_traffic` should be longer than the actual travel time on most days, though occasional days with particularly bad traffic conditions may exceed this value.<br>  ◦ `optimistic` indicates that the returned `duration_in_traffic` should be shorter than the actual travel time on most days, though occasional days with particularly good traffic conditions may be faster than this value.<br><br>Source: https://developers.google.com/maps/documentation/javascript/directions |

| U.S. Patent No. 6,292,743 | Accused Device (Huawei U8687) |
|---|---|
| |   |
| said optimal routes being formatted using a non-proprietary, natural language description; | The optimal routes are formatted using a non-proprietary, natural language description.<br><br>The route from a directions request is called a DirectionsRoute. A DirectionsRoute contains one or more legs (DirectionsLegs), and each leg consists of a series of steps (DirectionSteps).<br><br>A **DirectionsRoute** contains a single result from the specified origin and destination. This route may consist of one or more legs (of type **DirectionsLeg**) depending on whether any waypoints were specified. As well, the route also contains copyright and warning information which must be displayed to the user in addition to the routing information.<br><br>The **DirectionsRoute** is an object literal with the following fields:<br><br>• **legs[]** contains an array of **DirectionsLeg** objects, each of which contains information about a leg of the route, from two locations within the given route. A separate leg will be present for each waypoint or destination specified. (A route with no waypoints will contain exactly one **DirectionsLeg**.) Each leg consists of a series of **DirectionStep**s.<br><br>Source: https://developers.google.com/maps/documentation/javascript/directions<br><br>Each step of the route contains a text field labeled “instructions,” which contains a specific, single text instruction, such as “Turn left at W. 4th St.” or “Merge onto I-80 West.” |

| U.S. Patent No. 6,292,743 | Accused Device (Huawei U8687) |
|---|---|
| | Directions Steps<br><br>A **DirectionsStep** is the most atomic unit of a direction's route, containing a single step describing a specific, single instruction on the journey. E.g. "Turn left at W. 4th St." The step not only describes the instruction but also contains distance and duration information relating to how this step relates to the following step. For example, a step denoted as "Merge onto I-80 West" may contain a duration of "37 miles" and "40 minutes," indicating that the next step is 37 miles/40 minutes from this step.<br><br>The **DirectionsStep** is an object literal with the following fields:<br><br>• **instructions** contains instructions for this step within a text string.<br><br>Source: https://developers.google.com/maps/documentation/javascript/directions<br><br>These text instructions can be formatted in either JavaScript Object Notation (JSON) or eXtensible Markup Language (XML), both of which are non-proprietary languages.<br><br>Directions Requests<br><br>A Google Maps Directions API request takes the following form:<br><br>`https://maps.googleapis.com/maps/api/directions/outputFormat?parameters`<br><br>where **outputFormat** may be either of the following values:<br><br>• **json** (recommended) indicates output in JavaScript Object Notation (JSON)<br>• **xml** indicates output as XML<br><br>Source: https://developers.google.com/maps/documentation/directions/intro |
| a mapping database coupled to said navigation computer for reconstructing said optimal route from said non-proprietary, natural language description; and | The Huawei U8687 contains 512 MB of RAM for storage of a mapping database.<br><br>HUAWEI Vision U8687 4GB Unlocked GSM Android v4.0 Smartphone - Black<br>by Huawei<br>46 customer reviews \| 28 answered questions<br><br>Currently unavailable.<br>We don't know when or if this item will be back in stock.<br><br>• 2G: GSM 850 / 900 / 1800 / 1900, 3G Network: HSDPA 850 / 1900 / 1700 (AWS)<br>• 3.5" TFT Display Capacitive Multi-Touchsscreen<br>• Android v4.0 (Ice Cream Sandwich), 1 GHz Cortex-A5 Processor, Chipset: Qualcomm MSM7225A Snapdragon<br>• 3.2 Megapixel Camera (2048 x 1536 pixels)<br>• Internal Memory: 512 MB RAM, 4GB ROM (2.71GB user available) + microSD Slot Expandable up to 32GB<br><br>Source: https://www.amazon.com/HUAWEI-Vision-U8687-Unlocked-Android/dp/B00OYFAX8Q<br><br>Routes from a directions request can be displayed with a polyline overlaid on top of the map as well as the textual display of the series of steps comprising the route. |

| U.S. Patent No. 6,292,743 | Accused Device (Huawei U8687) |
|---|---|

### Displaying the **DirectionsResult**

The `DirectionsResult` contains the result of the directions query, which you may either handle yourself, or pass to a `DirectionsRenderer` object, which can automatically handle displaying the result on a map.

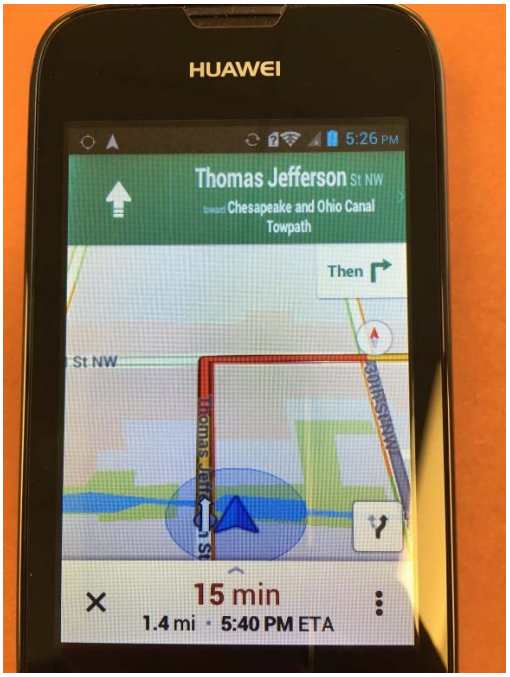
To display a `DirectionsResult` using a `DirectionsRenderer`, you simply need to do the following:

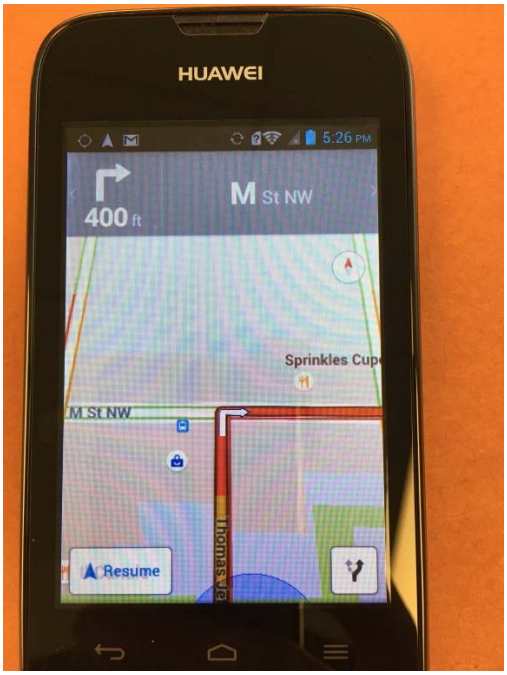
1. Create a `DirectionsRenderer` object.
2. Call `setMap()` on the renderer to bind it to the passed map.
3. Call `setDirections()` on the renderer, passing it the `DirectionsResult` as noted above. Because the renderer is an `MVCObject`, it will automatically detect any changes to its properties and update the map when its associated directions have changed.

A `DirectionsRenderer` not only handles display of the polyline and any associated markers, but also can handle the textual display of directions as a series of steps. To do so, simply call `setPanel()` on your `DirectionsRenderer`, passing it the `<div>` in which to display this information. Doing so also ensures that you display the appropriate copyright information, and any warnings which may be associated with the result.

Textual directions will be provided using the browser's preferred language setting, or the language specified when loading the API JavaScript using the `language` parameter. (For more information, see Localization.

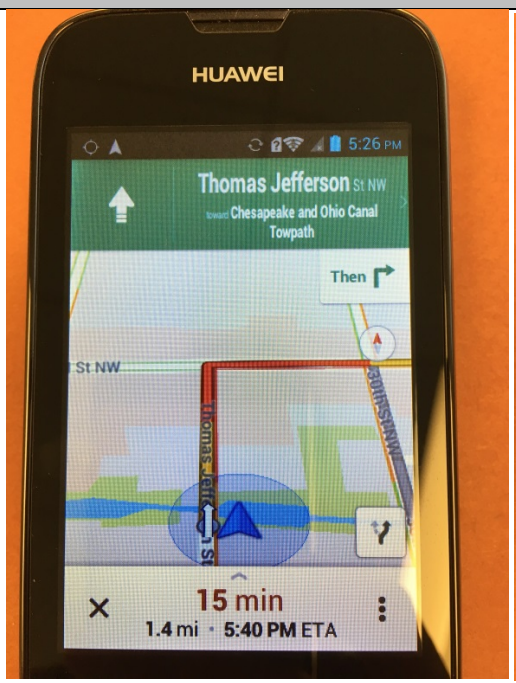
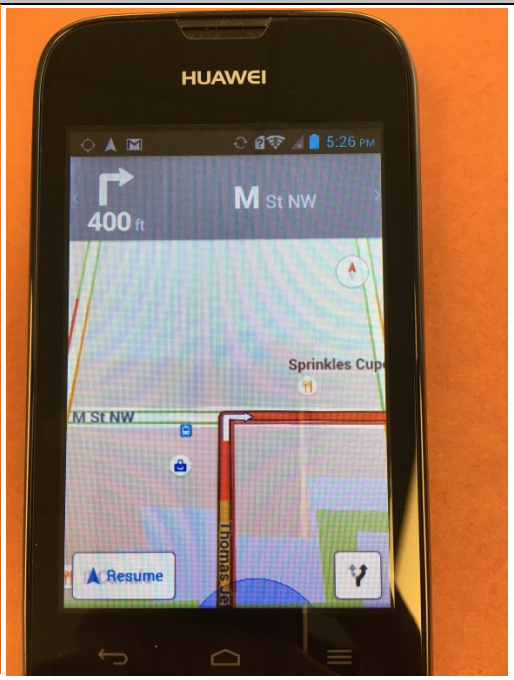
Source: https://developers.google.com/maps/documentation/javascript/directions



| U.S. Patent No. 6,292,743 | Accused Device (Huawei U8687) |
|---|---|
| a display screen coupled to said navigation computer for displaying said optimal route using said mapping database. | The Huawei U8687 contains a 3.5" touch screen.<br><br>HUAWEI Vision U8687 4GB Unlocked GSM Android v4.0 Smartphone - Black<br>by Huawei<br>46 customer reviews \| 28 answered questions<br><br>Currently unavailable.<br>We don't know when or if this item will be back in stock.<br><br>• 2G: GSM 850 / 900 / 1800 / 1900, 3G Network: HSDPA 850 / 1900 / 1700 (AWS)<br>• 3.5" TFT Display Capacitive Multi-Touchsscreen<br>• Android v4.0 (Ice Cream Sandwich), 1 GHz Cortex-A5 Processor, Chipset: Qualcomm MSM7225A Snapdragon<br>• 3.2 Megapixel Camera (2048 x 1536 pixels)<br>• Internal Memory: 512 MB RAM, 4GB ROM (2.71GB user available) + microSD Slot Expandable up to 32GB<br><br>Source: https://www.amazon.com/HUAWEI-Vision-U8687-Unlocked-Android/dp/B00OYFAX8Q<br><br>Routes from a directions request can be displayed on the touch screen, with a display of a polyline overlaid on top of the map as well as the textual display of the series of steps comprising the route.<br><br>Displaying the **DirectionsResult**<br><br>The `DirectionsResult` contains the result of the directions query, which you may either handle yourself, or pass to a `DirectionsRenderer` object, which can automatically handle displaying the result on a map.<br><br>To display a `DirectionsResult` using a `DirectionsRenderer`, you simply need to do the following:<br><br>1. Create a `DirectionsRenderer` object.<br>2. Call `setMap()` on the renderer to bind it to the passed map.<br>3. Call `setDirections()` on the renderer, passing it the `DirectionsResult` as noted above. Because the renderer is an `MVCObject`, it will automatically detect any changes to its properties and update the map when its associated directions have changed.<br><br>A `DirectionsRenderer` not only handles display of the polyline and any associated markers, but also can handle the textual display of directions as a series of steps. To do so, simply call `setPanel()` on your `DirectionsRenderer`, passing it the `<div>` in which to display this information. Doing so also ensures that you display the appropriate copyright information, and any warnings which may be associated with the result.<br><br>Textual directions will be provided using the browser's preferred language setting, or the language specified when loading the API JavaScript using the `language` parameter. (For more information, see Localization.<br><br>Source: https://developers.google.com/maps/documentation/javascript/directions |

**APPENDIX A – INFRINGEMENT CLAIM CHART**
**INFOGATION CORP. V. HUAWEI TECHNOLOGIES CO., LTD.**
**CASE NO. 16-CV-01903-H-JLB**

| U.S. Patent No. 6,292,743 | Accused Device (Huawei U8687) |
|---|---|
| |   |