

EXHIBIT 17

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
[2.pre] A digital content reproducing apparatus, comprising:	Each of the Accused Motorola '394 Products ¹ is digital content reproducing apparatus. <i>See e.g.</i> , Technical Specifications of each of the Accused Motorola '394 Products available at Motorola's website showing that each of the devices is a portable smartphone that includes an application processor including, for example, a CPU/DSP/ISP/GPU for reproducing digital content (e.g., recorded, received, or downloaded videos)).	
	Infringing Device	Technical Specifications
	Moto edge+	https://www.motorola.com/us/smartphones-motorola-edge-plus/p
	Moto G Power 2022	https://www.motorola.com/us/smartphones-moto-g-power-gen-3/p
	Moto E (2020)	https://www.motorola.com/us/smartphones-moto-e/p?skuId=414
	Razr (2d gen.)	https://www.motorola.com/us/smartphones-razr-gen-2/p?skuId=464
	Motorola edge (2021)	https://www.motorola.com/us/smartphones-motorola-edge-gen-2/p?skuId=631

¹ The Accused Motorola '394 Products include the Moto E (2020), Razr 2nd generation, Motorola Edge (2021), Motorola Edge (2020), Motorola Edge 5G UW, Motorola Edge+, Moto G Stylus (2021), Motorola One 5G Ace, Motorola One 5G UW, Motorola One 5G UW Ace, Moto G Stylus (2020), Moto G100, Moto G Pure, Moto G Power (2021), Moto G Stylus 5G, Moto G Fast, Moto G Play, Moto G Power (2020), and Moto G Power (2022). Maxell reserves the right to accuse additional products as discovery proceeds in this investigation.

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Motorola edge (2020)	https://www.motorola.com/us/smartphones-motorola-edge/p?skuId=352
	Motorola edge 5G UW	https://www.notebookcheck.net/Motorola-Edge-5G-UW.584139.0.html
	Moto G Stylus (2021)	https://www.motorola.com/us/smartphones-moto-g-stylus-gen-2/p?skuId=538
	Moto G Stylus (2020)	https://www.motorola.com/us/smartphones-moto-g-stylus/p?skuId=295
	Motorola One 5G Ace	https://www.motorola.com/us/smartphones-motorola-one-5g-ace/p?skuId=537
	Motorola One 5G UW	https://www.verizon.com/smartphones/motorola-one-5g-uw/
	Motorola One 5G UW Ace	https://www.verizon.com/smartphones/motorola-one-5g-uw-ace/
	Moto G100	https://www.motorola.com/us/smartphones-moto-g100/p?skuId=627
	Moto G Pure	https://www.motorola.com/us/smartphones-moto-g-pure/p?skuId=648
	Moto G Power (2021)	https://www.motorola.com/us/smartphones-moto-g-power-gen-2/p?skuId=535

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	Moto G Stylus 5G	https://www.motorola.com/us/smartphones-moto-g-stylus-5g/p?skuId=619
	Moto G Fast	https://www.motorola.com/us/smartphones-moto-g-fast/p?skuId=415
	Moto G Play	https://www.motorola.com/us/smartphones-moto-g-play/p?skuId=536
	Moto G Power (2020)	https://www.motorola.com/us/smartphones-moto-g-power/p?skuId=617
	These technical specifications confirm that each of the Accused Motorola '394 Products includes a processor capable of reproducing digital content, such as videos and images, as shown by the following exemplary cites to the above-referenced technical specifications. processor & RAM The Qualcomm® Snapdragon™ 865 Mobile Platform is the world's fastest¹, with an AI engine that can process 15 trillion operations per second. Add to that 12GB of DDR5 memory and 256GB of UFS 3.0 storage⁶ for faster bandwidth and lower battery drain. It's all the power you can handle. 6.7" display Enjoy content on the most immersive smartphone display ever. Stretching 6.7" and wrapping nearly 90° around both sides, the Endless Edge display maximizes the viewing area. See a billion shades of color with HDR10+ and scroll smoothly with the 90Hz screen refresh rate.	

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	 the most immersive display In a class of its own, the Endless Edge display wraps nearly 90° around both sides and stretches 6.7". See a billion shades of color with HDR10+ and scroll smoothly with the 90Hz refresh rate. Moto edge+ Tech Specs (https://www.motorola.com/us/smartphones-motorola-edge-plus/p). performance <table><tr><td>Operating System Android™ 11 with easy access to the Google apps you use most</td><td>Internal Storage 64GB</td><td>Sensors Notification LED type, Fingerprint reader, Proximity sensor, Accelerometer, Ambient Light sensor, Gyroscope, e-compass, Barometer, hotspot</td></tr><tr><td>Processor MediaTek Helio G37</td><td>Expandable Storage 512GB^S</td><td>Memory (RAM) 4GB</td></tr><tr><td>Security Fingerprint reader, Face unlock</td><td></td><td></td></tr></table>	Operating System Android™ 11 with easy access to the Google apps you use most	Internal Storage 64GB	Sensors Notification LED type, Fingerprint reader, Proximity sensor, Accelerometer, Ambient Light sensor, Gyroscope, e-compass, Barometer, hotspot	Processor MediaTek Helio G37	Expandable Storage 512GB ^S	Memory (RAM) 4GB	Security Fingerprint reader, Face unlock		
Operating System Android™ 11 with easy access to the Google apps you use most	Internal Storage 64GB	Sensors Notification LED type, Fingerprint reader, Proximity sensor, Accelerometer, Ambient Light sensor, Gyroscope, e-compass, Barometer, hotspot								
Processor MediaTek Helio G37	Expandable Storage 512GB ^S	Memory (RAM) 4GB								
Security Fingerprint reader, Face unlock										

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	display Display Size 6.5" Max Vision Resolution HD+ (1600x720) 269ppi Screen to Body Ratio Active Area-Touch Panel (AA-TP): 86.45% Display Technology IPS TFT LCD 90Hz refresh rate Aspect Ratio 20:9 Leave the charger at home and head out with a battery that can go up to 3 days¹. Listen to your favorite tunes, enjoy a movie marathon, or scroll through your social feeds while on the go without needing to stop for a recharge.  Moto G Power 2022 Tech Specs (https://www.motorola.com/us/smartphones-moto-g-power-

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	gen-3/p) (annotations added). Further, AIDA64 reports for the accused products confirm that they include one or more chipsets (such as the Qualcomm Snapdragon 865 (SM8250) system-on-a-chip used in the Motorola edge+, and the MediaTek Helio P35 (MT6765) CPU used in the Moto G Power 2022) to reproduce digital content: <<< CPU >>> SoC Model: Qualcomm Snapdragon 865 (SM8250) Core Architecture: 4x Qualcomm Kryo 585 Silver @ 1804 MHz 3x ARM Cortex-A77 @ 2419 MHz ARM Cortex-A77 @ 2841 MHz Manufacturing Process: 7 nm Instruction Set: 64-bit ARMv8-A CPU Revision: r1p0 CPU Cores: 8 Motorola edge+ AIDA64 Rep. at 2.

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	<<< CPU >>> SoC Model: Qualcomm Snapdragon 765/765G Core Architecture: 6x Qualcomm Kryo 475 Silver @ 1804 MHz Qualcomm Kryo 475 Gold @ 2208 MHz Qualcomm Kryo 475 Gold @ 2304 MHz Manufacturing Process: 7 nm Instruction Set: 64-bit ARMv8-A CPU Revision: r15p14 CPU Cores: 8 Motorola edge AIDA64 Rep. at 2. <<< CPU >>> SoC Model: Qualcomm Snapdragon 632 Core Architecture: 4x Qualcomm Kryo 250 LP @ 1804 MHz 4x Qualcomm Kryo 250 HP @ 1804 MHz Manufacturing Process: 14 nm Instruction Set: 64-bit ARMv8-A (32-bit Mode) CPU Revision: r10p2 CPU Cores: 8 Motorola E AIDA64 Rep. at 2.

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	<<< CPU >>> SoC Model: Qualcomm Snapdragon 460/662 Core Architecture: 4x Qualcomm Kryo 240/250/260/280 LP @ 1804 MHz 4x Qualcomm Kryo 240/250/260/280 HP @ 2016 MHz Manufacturing Process: 11 nm Instruction Set: 64-bit ARMv8-A CPU Revision: r10p2 CPU Cores: 8 Motorola G Power (2021) AIDA64 Rep. at 2. SoC Model: MediaTek Helio P35 (MT6765) Core Architecture: 8x ARM Cortex-A53 @ 1800 MHz Manufacturing Process: 12 nm Instruction Set: 64-bit ARMv8-A CPU Revision: r0p4 CPU Cores: 8 Motorola G Power 2022 AIDA64 Rep. at 4. On information and belief, and as shown by the above-referenced technical specifications, the remaining Accused Motorola '394 Products include similar chipsets/CPU's that infringe in the same manner. In addition, as shown in the following screenshots taken using exemplary Motorola devices, the Accused Motorola '394 Products each reproduce digital content, for example, in the form of recorded videos:

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 Motorola Edge (2020)	 Motorola edge+

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 Motorola E (2020)	 Motorola One 5G

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 Moto G Power (2021)	 Moto G Power 2022 On information and belief, and as shown by the above-referenced technical specifications, the remaining Accused Motorola '394 Products include similar capabilities and infringe in the same manner.
[2.a] an input unit which inputs digital content;	Each of the Accused Motorola '394 Products includes an input unit which inputs digital content. <i>See, e.g.,</i> Technical Specifications of Accused Motorola '394 Products (showing that each of the Accused Motorola '394 Products are capable of processing digital content).	

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	For example, each of the Accused Motorola '394 Products includes one or more network interfaces (<i>e.g.</i>, Wi-Fi, cellular), each of which operates as an input unit for inputting digital content from a network (<i>e.g.</i>, a Wi-Fi network, a cellular network, or from the internet via the Wi-Fi or cellular networks). In another example, each of the Accused Motorola '394 Products includes built-in/internal storage and/or memory operating as an input unit to input and store digital content such as videos and games for later retrieval, decoding and display. As an additional example, each of the Accused Motorola '394 Products includes an image signal processor (ISP) and/or decoder for processing, decoding, reproducing, and displaying digital content such as still images and moving videos. <i>See, e.g.</i>, Technical Specifications of Accused Motorola '394 Products. On information and belief, the ISP in each of the accused devices is part of or otherwise associated with the chipset in each accused device. Additionally, each of the Accused Motorola '394 Products includes a display processor/controller for processing and displaying digital content such as still images and moving videos. <i>See, e.g.</i>, Technical Specifications of Accused Motorola '394 Products. On information and belief, the display processor/controller in each of the accused devices is part of or otherwise associated with the chipset/CPU in each accused device. The display processor/controller may be part of the ISP or separate therefrom. Discovery from Motorola is expected to confirm the precise arrangement and location of the input unit in one or more of these data pipelines. As one example of Motorola's infringement, the ISPs and/or display processors in each of the accused devices includes an "input unit" in the form of an entry point into the ISP/display processor that receives/inputs digital content into the ISP/display processor for processing. In another example of Motorola's infringement the "input unit" may be another point in the ISP/display data processing pipeline. As a further example of Motorola's infringement, the Accused Motorola '394 Products each include WiFi or cellular interfaces that input digital content received from, for example, another device (<i>e.g.</i>, via MMS, Bluetooth file sharing, email) and/or a content server (<i>e.g.</i>, Netflix).

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	For example, the Motorola edge+ and Motorola G Power 2022 each have one or more network interfaces. Specifically, these devices have mobile communication network interfaces in the form of cellular and Wi-Fi interfaces: Network <table><tr><td>Wi-Fi</td><td>Wi-Fi 802.11 a/b/g/n/ac/ax 2.4 GHz + 5 GHz Wi-Fi 6 WiFi hotspot</td></tr><tr><td>SAR</td><td>Head: 0.88 W/kg, Body-worn: 1.43 W/kg</td></tr><tr><td>Network</td><td>5G: mmWave band n260/n261 5G: sub-6GHz band n2/5/41/66/71/77/78 4G:LTE band 1/2/3/4/5/7/8/12/13/17/20/25/26/28/29/30/34/38/39/40/41/42/46/48/66/71</td></tr><tr><td>World Device</td><td>Works in over 200 countries depending on your plan.</td></tr></table> Motorola edge+ Tech. Specs (Verizon.com). connectivity Bluetooth Technology Bluetooth® 5.0 Location Services GPS, A-GPS, LTEPP, SUPL, GLONASS NFC No SIM Card 1 Nano SIM + 1 microSD Wi-Fi Wi-Fi 802.11 a/b/g/n/ac 2.4GHz 5G Wi-Fi Moto G Power 2022 Tech. Specs. The user guides for the Accused Motorola '394 Products confirm the presence of both cellular and Wi-Fi capabilities, as shown in the following examples:	Wi-Fi	Wi-Fi 802.11 a/b/g/n/ac/ax 2.4 GHz + 5 GHz Wi-Fi 6 WiFi hotspot	SAR	Head: 0.88 W/kg, Body-worn: 1.43 W/kg	Network	5G: mmWave band n260/n261 5G: sub-6GHz band n2/5/41/66/71/77/78 4G:LTE band 1/2/3/4/5/7/8/12/13/17/20/25/26/28/29/30/34/38/39/40/41/42/46/48/66/71	World Device	Works in over 200 countries depending on your plan.
Wi-Fi	Wi-Fi 802.11 a/b/g/n/ac/ax 2.4 GHz + 5 GHz Wi-Fi 6 WiFi hotspot								
SAR	Head: 0.88 W/kg, Body-worn: 1.43 W/kg								
Network	5G: mmWave band n260/n261 5G: sub-6GHz band n2/5/41/66/71/77/78 4G:LTE band 1/2/3/4/5/7/8/12/13/17/20/25/26/28/29/30/34/38/39/40/41/42/46/48/66/71								
World Device	Works in over 200 countries depending on your plan.								

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	NETWORK  Connected to cellular/mobile network (full signal). Speed of your network connection is also shown. For example,  or . Possible speeds, from slowest to fastest, are 3G, H, H+, 4G, 5G. Available speeds depend on your carrier and your location.  Poor connection to cellular/mobile network.  Connected to different cellular/mobile network (roaming).  Data Saver is on, preventing apps from using background data.  Wi-Fi network within range.  Connected to Wi-Fi network. Motorola edge+ User Guide at 18.

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement								
	<table><tr><th>Icon</th><th>Setting</th></tr><tr><td></td><td>Wi-Fi</td></tr><tr><td></td><td>Bluetooth</td></tr><tr><td></td><td>Mobile data</td></tr></table> <i>Id.</i> at 26-27.	Icon	Setting		Wi-Fi		Bluetooth		Mobile data
Icon	Setting								
	Wi-Fi								
	Bluetooth								
	Mobile data								

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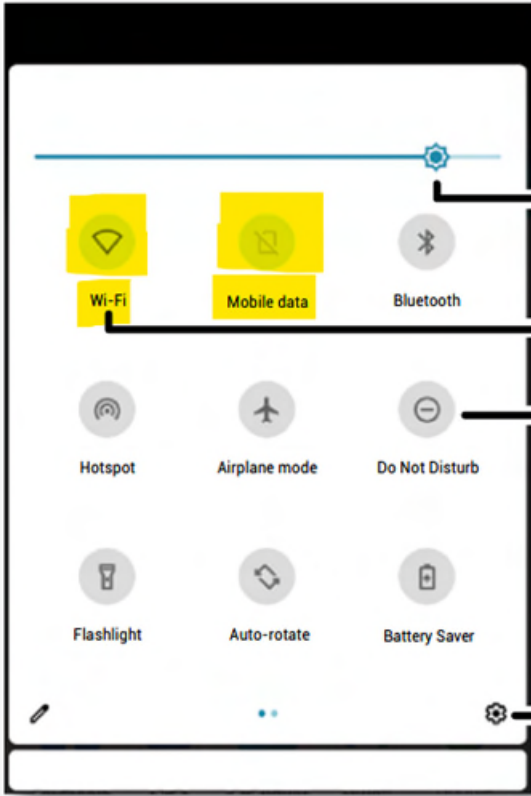
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	 The screenshot shows a smartphone's quick settings menu. At the top is a horizontal slider for screen brightness, with a gear icon on the right. Below this are three icons: Wi-Fi, Mobile data, and Bluetooth. The Wi-Fi and Mobile data icons are highlighted with yellow boxes. Below these are three more icons: Hotspot, Airplane mode, and Do Not Disturb. Below those are three more icons: Flashlight, Auto-rotate, and Battery Saver. At the bottom right is a gear icon for 'See all phone settings.' Four lines with arrows point from text annotations to specific elements: 'Set screen brightness.' points to the brightness slider; 'Turn Wi-Fi on/off.' points to the Wi-Fi icon; 'Tap an icon to turn it on/off. Touch and hold to see more options.' points to the Airplane mode icon; and 'See all phone settings.' points to the gear icon at the bottom right. Moto G Power 2022 User Guide at 16 (highlighting added). The AIDA64 reports for these exemplary devices additional show the presence of cellular and Wi-Fi network interfaces:

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	<<< Network >>> << Telephony >> Phone Type: CDMA Network Operator Name: Verizon Wireless Network Operator Code: 311480 Network Operator Country: United States SIM Provider Name: Verizon SIM Provider Code: 311480 SIM Provider Country: United States SIM State: Ready Network Type: Unknown Data Connection State: Disconnected Data Activity: Dormant Device Is Roaming: No ICC Card: Present << Wi-Fi >> State: Enabled SSID: <unknown ssid> BSSID: 02:00:00:00:00:00 Hidden SSID: Yes Motorola edge+ AIDA64 Rep. at 4.

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	<< Telephony >> Phone Type: GSM Network Operator Country: United States SIM State: Absent ICC Card: Not Present << Wi-Fi >> State: Enabled SSID: <unknown ssid> BSSID: 02:00:00:00:00:00 Hidden SSID: Yes Motorola edge AIA64 Rep. at 4.

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	<< Telephony >> Phone Type: GSM Network Operator Country: United States SIM State: Absent ICC Card: Not Present << Wi-Fi >> State: Enabled SSID: <unknown ssid> BSSID: 02:00:00:00:00:00 Hidden SSID: Yes Moto E AIDA64 Rep. at 4.

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	<< Telephony >> Phone Type: GSM Network Operator Country: United States SIM State: Absent ICC Card: Not Present << Wi-Fi >> State: Enabled SSID: <unknown ssid> BSSID: 02:00:00:00:00:00 Hidden SSID: Yes Motorola G Power (2021) AIDA64 Rep. at 4.

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	<<< Network >>> << Telephony >> Phone Type: GSM Network Operator Country: United States SIM State: Absent ICC Card: Not Present << Wi-Fi >> State: Enabled SSID: <unknown ssid> BSSID: 02:00:00:00:00:00 Hidden SSID: Yes Moto G Power 2022 AIDA64 Rep. at 6. On information and belief, and as shown by the above-referenced technical specifications, the remaining Accused Motorola '394 Products include similar interfaces that infringe in the same manner. The following exemplary screenshots, taken using accused devices, show the ability of the Accused Motorola '394 Products to stream digital content through an input unit:

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	 A screenshot of a Motorola Edge (2020) smartphone screen. The screen displays a video of a Mario figurine. The status bar at the top shows the time as 9:35 and 50% battery. The video player interface includes a progress bar at the bottom with a play/pause button, and icons for Share, Edit, and Delete. Motorola Edge (2020)	 A screenshot of a Motorola edge+ smartphone screen. The screen displays a video of a Mario figurine. The status bar at the top shows the time as 5:10 and 66% battery. The video player interface includes a progress bar at the bottom with a play/pause button, and icons for Share, Edit, and Delete. Motorola edge+

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	 Motorola E (2020)	 Motorola One 5G

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 Moto G Power (2021)	 Moto G Power 2022 On information and belief, the remaining Accused Motorola '394 Products include similar interfaces that infringe in the same manner. Should Motorola argue that its products do not literally have the claimed “input unit,” Maxell contends that this limitation is also satisfied under the doctrine of equivalents. In other words, each of the Accused Motorola '394 Products includes software, hardware, or a combination of the two that is insubstantially different from the claimed “input unit which inputs digital content.” For example, each of these accused devices includes

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	software, hardware, or a combination of the two that performs substantially the same function (<i>e.g.</i> , inputting digital content) in substantially the same way (<i>e.g.</i> , using software, hardware, or a combination of the two to allow for receipt of digital content) to achieve substantially the same result (<i>e.g.</i> , allowing digital content to enter into a data pipeline for further processing or eventual display).										
[2.b] a reproducer which reproduces the inputted digital content; and	Each of the Accused Motorola '394 Products includes a reproducer which reproduces the inputted digital content. <i>See, e.g.</i>, Technical Specifications of Accused Motorola '394 Products (showing that the accused devices include a chipset including, for example, a CPU/DSP/ISP/decoder/GPU for reproducing digital content). For example, the Qualcomm and MediaTek baseband processors used in the Accused Motorola '394 Products each have an ISP, a decoder, a DSP, and/or a GPU for reproducing inputted digital content. The following table, taken based on information from the above-referenced technical specifications, shows the model of processor/chipset used in each accused device, each of which includes an ISP, a decoder, a DSP, and/or a GPU: <table data-bbox="693 873 1682 1414"> <tr> <th data-bbox="693 873 991 984">Infringing Device</th><th data-bbox="991 873 1682 984">Exemplary Chipset/CPU (Containing ISP/DSP/GPU)</th></tr> <tr> <td data-bbox="693 984 991 1092">Moto edge+</td><td data-bbox="991 984 1682 1092">Qualcomm Snapdragon 865 octa-core processor / Adreno 650 GPU</td></tr> <tr> <td data-bbox="693 1092 991 1162">Moto G Power 2022</td><td data-bbox="991 1092 1682 1162">MediaTek Helio G37</td></tr> <tr> <td data-bbox="693 1162 991 1308">Moto E (2020)</td><td data-bbox="991 1162 1682 1308">Qualcomm Snapdragon 632 octa-core processor w/ 1.8 GHz octa-core Kryo 250 CPU, 725 MHz Adreno 506 GPU</td></tr> <tr> <td data-bbox="693 1308 991 1414">Razr (2d gen.)</td><td data-bbox="991 1308 1682 1414">Qualcomm Snapdragon 765G processor w/ Adreno 620 GPU</td></tr> </table>	Infringing Device	Exemplary Chipset/CPU (Containing ISP/DSP/GPU)	Moto edge+	Qualcomm Snapdragon 865 octa-core processor / Adreno 650 GPU	Moto G Power 2022	MediaTek Helio G37	Moto E (2020)	Qualcomm Snapdragon 632 octa-core processor w/ 1.8 GHz octa-core Kryo 250 CPU, 725 MHz Adreno 506 GPU	Razr (2d gen.)	Qualcomm Snapdragon 765G processor w/ Adreno 620 GPU
Infringing Device	Exemplary Chipset/CPU (Containing ISP/DSP/GPU)										
Moto edge+	Qualcomm Snapdragon 865 octa-core processor / Adreno 650 GPU										
Moto G Power 2022	MediaTek Helio G37										
Moto E (2020)	Qualcomm Snapdragon 632 octa-core processor w/ 1.8 GHz octa-core Kryo 250 CPU, 725 MHz Adreno 506 GPU										
Razr (2d gen.)	Qualcomm Snapdragon 765G processor w/ Adreno 620 GPU										

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	Motorola edge (2021)	Qualcomm Snapdragon 778G mobile platform w/ Adreno 642L GPU	
	Motorola edge (2020)	Qualcomm Snapdragon 765	
	Motorola edge 5G UW	Qualcomm Snapdragon 778G mobile platform w/ Adreno 642L GPU	
	Moto G Stylus (2021)	Qualcomm Snapdragon 678	
	Moto G Stylus (2020)	Qualcomm Snapdragon 665 mobile processor	
	Motorola One 5G Ace	Qualcomm Snapdragon 750 5G	
	Motorola One 5G UW	Qualcomm Snapdragon 765 5G	
	Motorola One 5G UW Ace	Qualcomm Snapdragon 750G 5G	
	Moto G100	Qualcomm Snapdragon 870 5G w/ Mobile Platform Adreno 650 GPU	
	Moto G Pure	MediaTek Helio G25	
	Moto G Power (2021)	Qualcomm Snapdragon 662 Mobile Processor	

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	Moto G Stylus 5G	Qualcomm Snapdragon 480 5G	
	Moto G Fast	Qualcomm Snapdragon 665 Mobile Processor	
	Moto G Play	Qualcomm Snapdragon 460 w/ 1.8 GHz octa-core Kryo 260 CPU, 600 MHz Adreno 610 GPU	
	Moto G Power (2020)	Qualcomm Snapdragon 665 Mobile Processor	
	In addition, each of the Accused Motorola '394 Products includes a video player (<i>e.g.</i> , as part of the preinstalled Camera app or the like) for reproducing and editing digital content. This is shown from the following screenshots taken on exemplary Motorola devices:		

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 Motorola Edge (2020)	 Motorola edge+

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 Motorola E (2020)	 Motorola One 5G

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 Moto G Power (2021)	 Moto G Power 2022 The remaining Accused Motorola '394 Products include similar capabilities and thus infringe in the same manner. Should Motorola argue that its products do not literally have the claimed “reproducer,” Maxell contends that this limitation is also satisfied under the doctrine of equivalents. In other words, each of the Accused Motorola '394 Products includes software, hardware, or a combination of the two that is insubstantially different from the claimed “reproducer which reproduces the inputted digital content.” For example, each of these accused

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	devices includes software, hardware, or a combination of the two that performs substantially the same function (<i>e.g.</i>, reproducing inputted digital content) in substantially the same way (<i>e.g.</i>, using software, hardware, or a combination of the two to allow for reproduction/playback of digital content) to achieve substantially the same result (<i>e.g.</i>, allowing digital content to be reproduced for further processing or eventual display).
[2.c] an output unit which outputs the reproduced digital content;	Each of the Accused Motorola '394 Products include an output unit which outputs the reproduced digital content. <i>See, e.g.</i>, Technical Specifications of Accused Motorola '394 Products (showing that the accused devices include a display for outputting reproduced digital content). For example, the Qualcomm and MediaTek baseband processors used in the Accused Motorola '394 Products each have an ISP, a decoder, a DSP, and/or a GPU for outputting reproduced digital content to be displayed on a display screen, as evidenced by the above-referenced technical specifications. Each of the Accused Motorola '394 Products outputs reproduced digital content (<i>e.g.</i>, moving videos) through an ISP and/or decoder and/or GPU operating as an output unit that outputs this digital content to be displayed. For example, each accused device includes an ISP or a display processor for processing and displaying/outputting digital content. Additionally, each of the Accused Motorola '394 Products includes a display processor for processing and displaying/outputting digital content. As one example of Motorola's infringement, the ISPs and/or display pipelines in each of the accused devices includes an "output unit" in the form of an exit point out of the ISP/display processor that transmits or otherwise outputs digital content out of the ISP/display pipeline for further processing and/or display. In another example of Motorola's infringement the "output unit" may be another point within the data processing pipeline that outputs digital content to another point in the pipeline. In still another example of Motorola's infringement, the claimed "output unit" may be an input point into the devices' display units/assemblies or display sub-processor. Discovery from

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	Motorola is expected to confirm the precise arrangement and location of the output unit in the accused devices. The following screenshots, taken from exemplary accused Motorola devices, show the capabilities of the Accused Motorola '394 Products to output digital content on a display: A screenshot of a Motorola Edge (2020) smartphone screen. The screen displays a video of a Mario figurine. The status bar at the top shows a signal strength icon, a 5G icon, a battery icon at 66%, and the time 9:35. The video player interface includes a play button, a progress bar with a slider, and a timestamp of 0:04. At the bottom, there are icons for Share, Edit, and Delete. Motorola Edge (2020) A screenshot of a Motorola edge+ smartphone screen. The screen displays a video of a Mario figurine. The status bar at the top shows a signal strength icon, a 5G icon, a battery icon at 66%, and the time 5:10. The video player interface includes a play button, a progress bar with a slider, and a timestamp of 0:04. At the bottom, there are icons for Share, Edit, and Delete. Motorola edge+

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	 A screenshot of a Motorola E (2020) smartphone screen. The screen displays a video of a Mario figurine standing on a white surface. The status bar at the top shows the time 11:30 and various icons. The video player interface at the bottom shows a progress bar from 0:03 to 0:10 and standard playback controls. Motorola E (2020)	 A screenshot of a Motorola One 5G smartphone screen. The screen displays a video of a Mario figurine standing on a white surface. The status bar at the top shows the time 10:37 and various icons. The video player interface at the bottom shows a progress bar from 0:03 to 0:11 and standard playback controls. Motorola One 5G

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 Moto G Power (2021)	 Moto G Power 2022 On information and belief, and as shown by the above-referenced technical specifications, the remaining Accused Motorola '394 Products include similar display capabilities that infringe in the same manner. Should Motorola argue that its products do not literally have the claimed “output unit,” Maxell contends that this limitation is also satisfied under the doctrine of equivalents. In other words, each of the Accused Motorola '394 Products includes software, hardware, or a combination of the two that is insubstantially different from the claimed “output unit

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	which outputs the reproduced digital content.” For example, each of these accused devices includes software, hardware, or a combination of the two that performs substantially the same function (<i>e.g.</i>, outputting reproduced digital content) in substantially the same way (<i>e.g.</i>, using software, hardware, or a combination of the two to allow for transmission of digital content) to achieve substantially the same result (<i>e.g.</i>, allowing digital content to exit a data processing pipeline for eventual display).								
[2.d] a display which displays the outputted digital content together with an alternative display of either of a linear content operation panel allowing user-instruction regarding linear reproduction functions of the reproduced digital content or an interactive content operation panel allowing user-instruction of interactive functions to an outside of the digital content reproducing apparatus,	Each of the Accused Motorola ’394 Products include a display which displays the outputted digital content together with an alternative display of either of a linear content operation panel allowing user-instruction regarding linear reproduction functions of the reproduced digital content or an interactive content operation panel allowing user-instruction of interactive functions to an outside of the digital content reproducing apparatus. <i>See, e.g.</i>, Technical Specifications of Accused Motorola ’394 Products (showing that the accused devices include a display for displaying digital content). For example, the Qualcomm and MediaTek chipset used in the Accused Motorola ’394 Products each includes a display with a GPU or some other display processor for processing and displaying reproduced digital content outputted by the ISP and/or decoder, as evidenced by the above-referenced technical specifications. In particular, based on information available on Motorola’s online support pages, including the technical specifications for its products, each of the Accused Motorola ’394 Products includes one of the following displays (such as an LCD, LED, or OLED) for displaying digital content: <table data-bbox="827 1094 1698 1380"> <tr> <th data-bbox="827 1094 1222 1166">Infringing Device</th><th data-bbox="1222 1094 1698 1166">Included Display Screen</th></tr> <tr> <td data-bbox="827 1166 1222 1237">Moto edge+</td><td data-bbox="1222 1166 1698 1237">6.7” FHD+ display</td></tr> <tr> <td data-bbox="827 1237 1222 1308">Moto G Power 2022</td><td data-bbox="1222 1237 1698 1308">6.5” Max Vision HD+ display</td></tr> <tr> <td data-bbox="827 1308 1222 1380">Moto E (2020)</td><td data-bbox="1222 1308 1698 1380">6.2” HD+ display</td></tr> </table>	Infringing Device	Included Display Screen	Moto edge+	6.7” FHD+ display	Moto G Power 2022	6.5” Max Vision HD+ display	Moto E (2020)	6.2” HD+ display
Infringing Device	Included Display Screen								
Moto edge+	6.7” FHD+ display								
Moto G Power 2022	6.5” Max Vision HD+ display								
Moto E (2020)	6.2” HD+ display								

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		Razr (2d gen.)	6.2” HD+ main (foldable) display / 2.7” external display
		Motorola edge (2021)	6.8” FHD+ display
		Motorola edge (2020)	6.7” FHD+ display
		Motorola edge 5G UW	6.8” FHD+ Max Vision display
		Moto G Stylus (2021)	6.8” FHD+ display
		Moto G Stylus (2020)	6.4” Max Vision display
		Motorola One 5G Ace	6.7” FHD+ display
		Motorola One 5G UW	6.7” Full HD+ CinemaVision display
		Motorola One 5G UW Ace	6.7” FHD+ Max Vision display
		Moto G100	6.7” FHD+ display
		Moto G Pure	6.5” Max Vision display
		Moto G Power (2021)	6.6” HD+ display
		Moto G Stylus 5G	6.8” FHD+ Max Vision display
		Moto G Fast	6.4” HD+ display
		Moto G Play	6.5” HD+ display

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		Moto G Power (2020)	6.4" FHD+ Max Vision display
	Each of the Accused Motorola '394 Products outputs reproduced digital content (<i>e.g.</i>, moving videos) through an ISP and/or decoder and/or GPU operating as an output unit that outputs this digital content. For example, each accused device includes an ISP or a display processor for processing and displaying/outputting digital content. As shown for claim element [2.c] herein, each of the Accused Motorola '394 Products includes a display and a GPU for processing reproduced digital content outputted by the ISP and/or decoder and displaying them on the display. As also shown for that claim element, each of the Accused Motorola '394 Products is capable of displaying the outputted digital content (<i>e.g.</i>, digital content that has been outputted from one or more data pipelines to a display screen). Further, the display in each of the Accused Motorola '394 Products displays outputted digital content together with an alternative display of either (1) a linear content operation panel or (2) an interactive content operation panel. For example, the following screenshot shows the display of the outputted digital content together with the display of a linear content operation panel allowing user-instruction regarding linear reproduction functions of the reproduced digital content. For example, as shown in the following exemplary screenshots from the accused devices, the linear content operation panel allows forward and/or rewind reproduction functions:		

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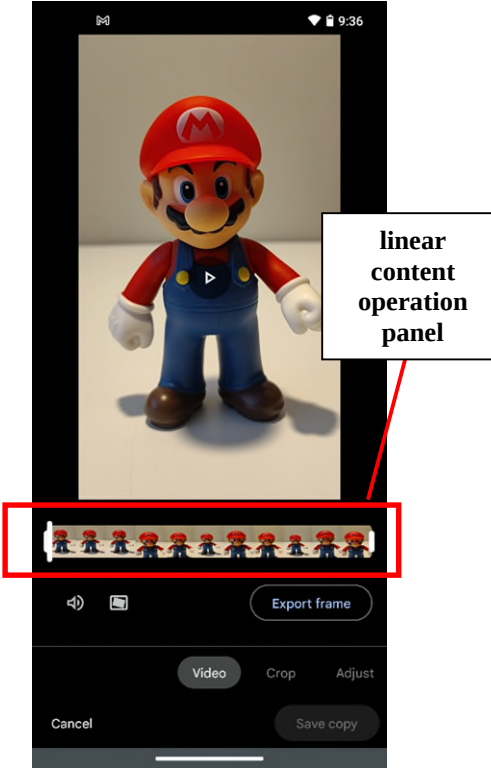
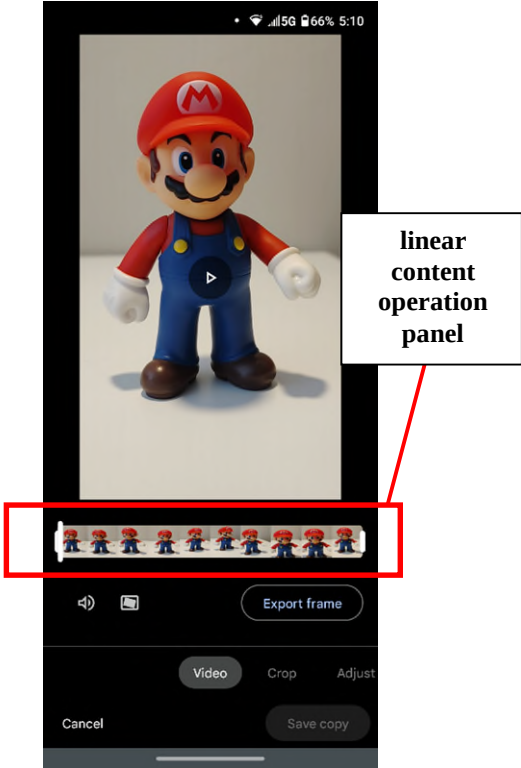
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 linear content operation panel Motorola Edge (2020) (annotations added)	 linear content operation panel Motorola edge+ (annotations added)

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 The screenshot shows a smartphone camera interface with a Mario figure in the center. At the bottom, there is a horizontal strip of small image thumbnails, which is highlighted by a red rectangular box. A white callout box with the text "linear content operation panel" has a red line pointing to this strip. Below the thumbnails, the words "Stabilize" and "Rotate" are visible. Motorola E (2020) (annotations added)	 The screenshot shows a smartphone camera interface with a Mario figure in the center. At the bottom, there is a horizontal strip of small image thumbnails, which is highlighted by a red rectangular box. A white callout box with the text "linear content operation panel" has a red line pointing to this strip. Above the thumbnails, the text "Export frame" is visible. Motorola One 5G (annotations added)

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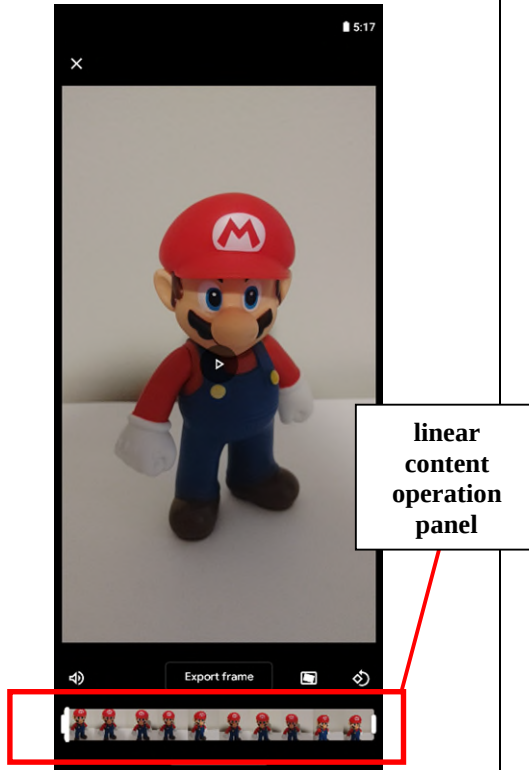
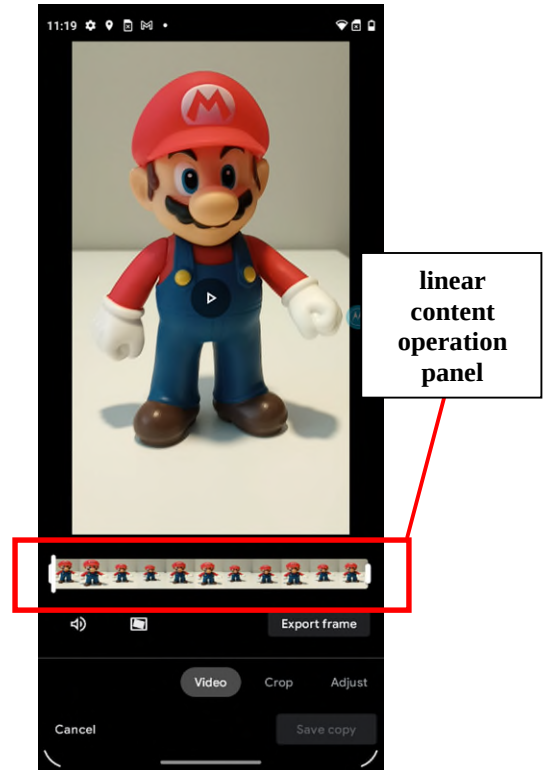
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	 linear content operation panel Moto G Power (2021)  linear content operation panel Moto G Power 2022 (annotations added) In the foregoing examples, an interactive content operation panel is <u>not</u> being displayed on the display screen—only a linear content operation panel is displayed with the digital content. Further, the following screenshot shows the alternative display of the outputted digital content together with the display of an interactive content operation panel allowing user-instruction of interactive functions to an outside of the digital content reproducing

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	apparatus (for example, “sharing” content via Bluetooth/Wi-Fi/cellular with a device outside of the digital content reproducing apparatus):  interactive content operation panel Motorola Edge (2020) (annotations added)  interactive content operation panel Motorola edge+ (annotations added)

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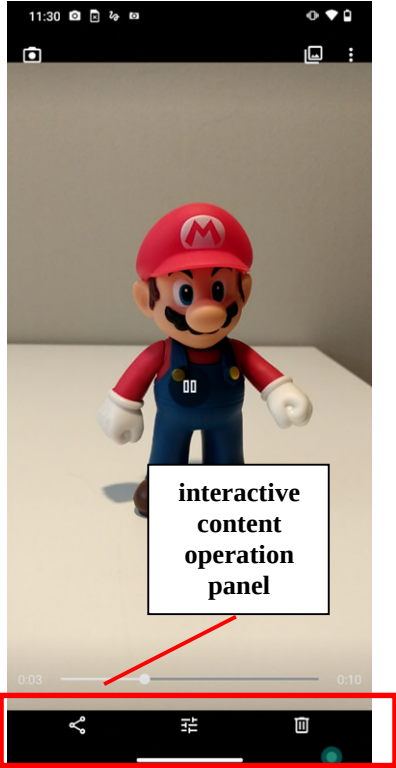
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 Motorola E (2020) (annotations added)	 Motorola One 5G (annotations added)

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

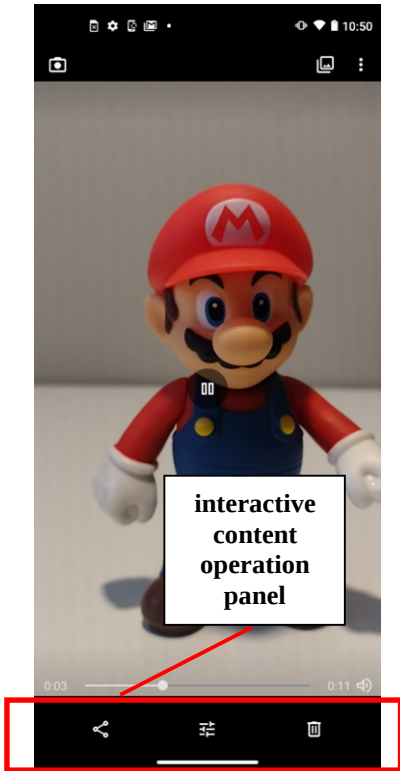
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	 Moto G Power (2021)	 Moto G Power 2022 (annotations added)
	Each of the remaining Accused Motorola '394 Products operate in a similar manner and thus infringe in the same way. As additional evidence of the products' ability to display an interactive content operation panel that allows a user to instruct that the content be displayed outside of the device itself (<i>e.g.</i>, by sharing the digital content outside of the accused device through WiFi, cellular connection, or Bluetooth), the user manuals of each of the Accused Motorola	

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	'394 Products establishes that each includes a “share” button for sharing digital content: ~ » View, share, or delete: Tap a thumbnail to open it, then tap  to share,  to delete, or Menu  for more options. Motorola edge User Guide at 22. Transfer files » Photos or videos: Open the photo or video, then tap  > Bluetooth. <i>Id.</i> at 30. Share photos and videos You can wirelessly share one, multiple, or all items from any Photos view, sending them as email or message attachments, uploading to the cloud, or using device-to-device connections like Bluetooth. In addition to sharing wirelessly, you can transfer photos to your computer with a USB connection. Motorola User Guide at 97. After pairing with a device, you'll need to set sharing options and then you can use Bluetooth to: • Make or receive calls with a headset • Make or receive calls and play music over your car's audio system • Transfer music • Share photos • Share contacts • Share your phone's internet connection with your computer <i>Id.</i> at 136.

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	Share files and links with nearby Android phones Share content easily and securely. You can share things like photos or videos, contacts, documents, and links. Send them to another Android phone near you without using an internet connection. Share content with someone 1. Open the content to share. 2. Touch  or touch  > Share, then select Nearby Share. Your phone will look for nearby devices. 3. Hold your phone and the other phone close to each other. 4. When you see the other phone in your list of nearby devices, touch its name to send the item. The other person can accept or reject the transfer. <i>Id.</i> at 147-48.

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U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	About wireless sharing What you can share You can share your photos and videos, contacts, screenshots, and downloaded files. When sharing photos and videos When deciding how to share your photos or videos, consider these factors: • Resolution (high versus low) of the photo or video; high resolution uses more data • Number of photos to share (one photo or a few or an entire vacation album) • Whether you want to share on the internet or from device-to-device • Length of availability for sharing <i>Id.</i> at 151.

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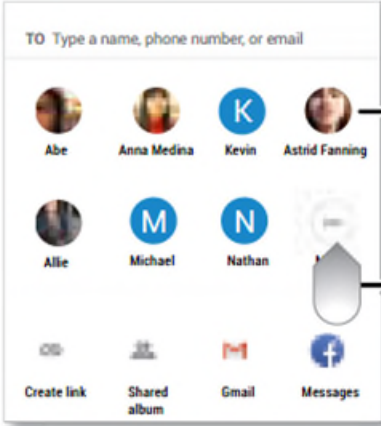
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	Direct Share In some apps, you can share something directly to a contact, app, or conversation. Select the share option within an app, then select a contact, choose an app, or type a name or number to find a contact.  The screenshot shows a sharing menu with a search bar at the top labeled 'TO Type a name, phone number, or email'. Below the search bar are eight contact thumbnails: Abe, Anna Medina, Kevin, Astrid Fanning, Alle, Michael, Nathan, and a fourth contact. To the right of the thumbnails, a line points to the first row with the text 'Tap a contact to share information.' Below the contact thumbnails are four app icons: 'Create link', 'Shared album', 'Gmail', and 'Messages'. To the right of these icons, a line points to a vertical arrow indicating a swipe gesture with the text 'Swipe up for more share options.' <i>Id.</i> at 10. » View, share, or delete: Tap a thumbnail to open it, then tap  to share,  to delete, or Menu  for more options. Moto E (2020) User Guide at 21. Share files » Photos or videos: Open the photo or video, then tap  > Bluetooth. Moto G Power (2021) User Guide at 29.

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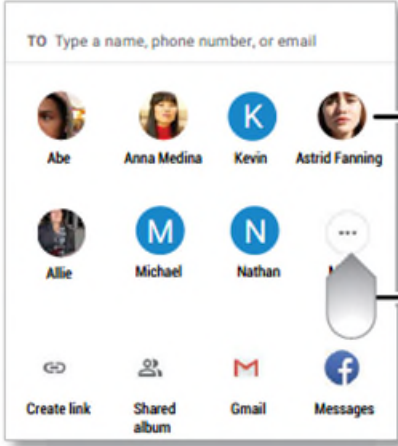
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	Direct Share In some apps, you can share something directly to a contact, app, or conversation.  The screenshot shows a sharing interface with a search bar at the top labeled 'TO Type a name, phone number, or email'. Below the search bar is a grid of contact avatars: Abe, Anna Medina, Kevin, Astrid Fanning, Allie, Michael, and Nathan. To the right of the grid, a line points to the contact selection area with the text 'Tap a contact to share information.' Below the contact grid is a 'More' button (three dots) with a line pointing to it and the text 'Swipe up for more share options.' At the bottom of the interface are four share options: 'Create link', 'Shared album', 'Gmail', and 'Messages'. Select the share option (usually by tapping ) within an app, then select a contact, choose an app, or type a name or number to find a contact. To use NFC, Bluetooth, or Nearby Share to share files, see Connect, share, pay & sync. <i>Id.</i> at 11.

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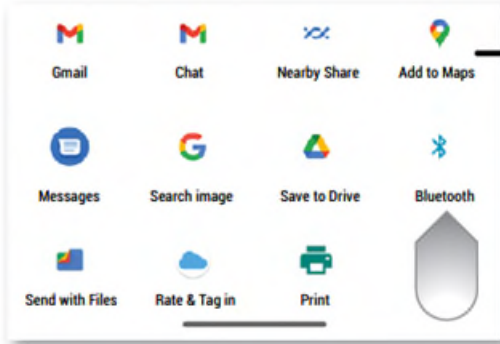
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	Direct Share In some apps, you can share something directly to a contact, app, or conversation.  Tap an app to share information. Swipe up for more share options. Select the share option (usually by tapping ) within an app, then choose an app or contact to share information. To share files using Bluetooth or Nearby Share, see Connect, share & sync. Motorola G Power (2022) at 17. » View, share, or delete: Tap a thumbnail to open it, then tap  to share,  to delete, or Menu  for more options. <i>Id.</i> at 34.

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	Share files » Photos or videos: Open the photo or video, then tap  > Bluetooth. » Contacts: Swipe up  >  Contacts. Touch and hold a contact, then tap  > Bluetooth. <i>Id.</i> at 46.
[2.e] wherein the linear content operation panel and the interactive content operation panel are distinct panels from each other, which are not generated by a disabling of buttons; and	In each of the Accused Motorola '394 Products, the linear content operation panel and the interactive content operation panel are distinct panels from each other, which are not generated by a disabling of buttons. For example, as shown in the following screenshots, the linear content operation panel and the interactive content operation panel are distinct panels from each other. As also shown from these screenshots are not generated merely by the disabling of buttons.

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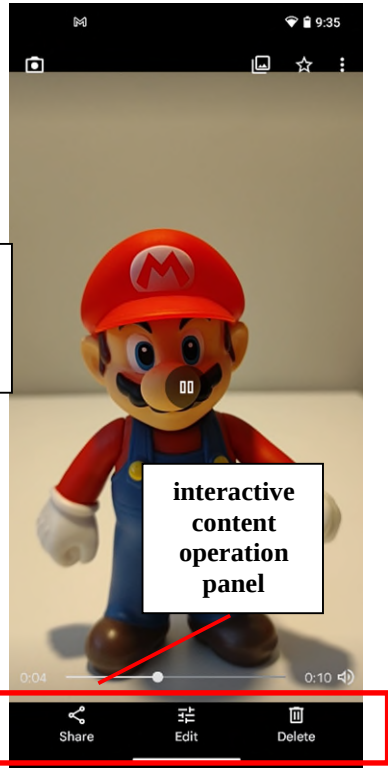
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement		
	Motorola Edge (2020)	 A screenshot of a Motorola Edge (2020) smartphone displaying a video player interface. The video shows a Mario figure. At the bottom of the video frame, there is a horizontal timeline with a series of small Mario icons, which is highlighted by a red rectangular box. A white callout box with the text "linear content operation panel" points to this timeline. Below the video frame, there are controls including a play button, a volume icon, and buttons for "Export frame", "Video", "Crop", "Adjust", "Cancel", and "Save copy".	 A screenshot of a Motorola Edge (2020) smartphone displaying a video player interface. The video shows a Mario figure. At the bottom of the screen, there is a horizontal bar with three icons: "Share", "Edit", and "Delete", which is highlighted by a red rectangular box. A white callout box with the text "interactive content operation panel" points to this bar. Above the bar, there is a progress bar with a play button and a volume icon.

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	Motorola edge+	 linear content operation panel	 interactive content operation panel

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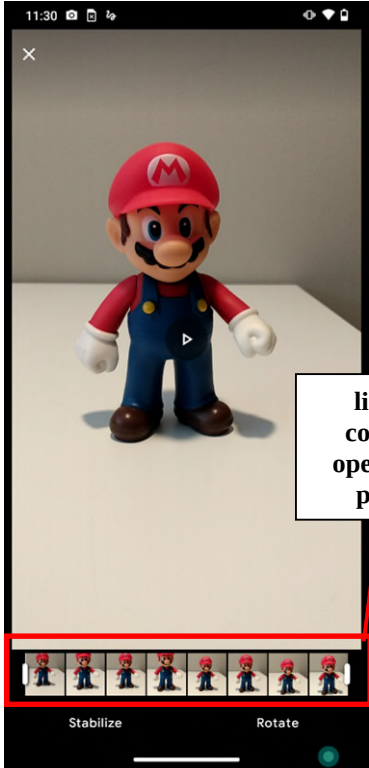
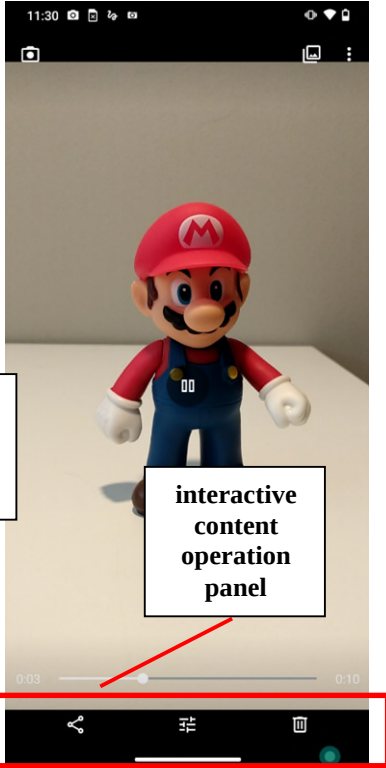
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Motorola E (2020)	 linear content operation panel  interactive content operation panel

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	Motorola One 5G	 linear content operation panel	 interactive content operation panel

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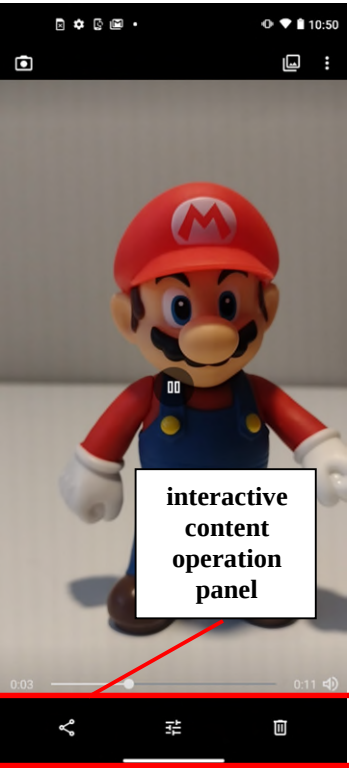
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Moto G Power (2021)	 linear content operation panel  interactive content operation panel

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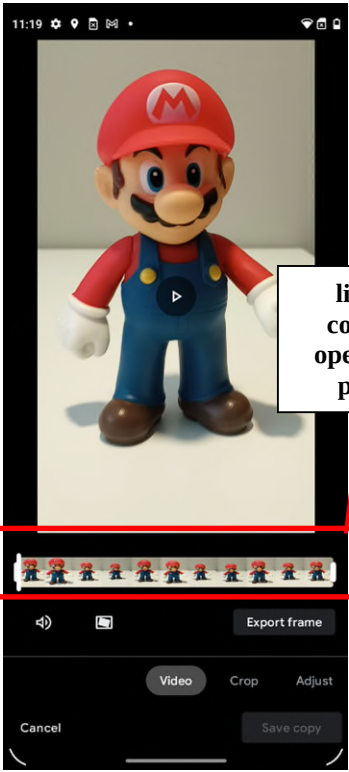
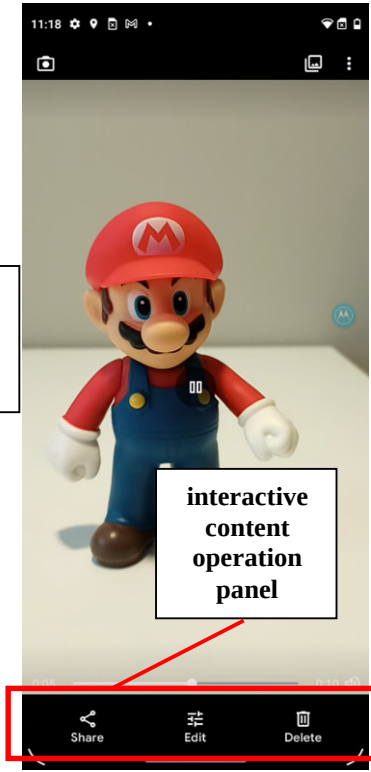
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Moto G Power 2022   Each of the remaining Accused Motorola '394 Products operate in a similar manner and thus infringe in the same way.	
[2.f] a controller which controls the alternative display of either of the linear content operation panel or the interactive content operation panel,	Each of the Accused Motorola '394 Products include a controller which controls the alternative display of either of the linear content operation panel or the interactive content operation panel. <i>See, e.g.,</i> Technical Specifications of Accused Motorola '394 Products (showing that the accused devices include a processor/CPU). For example, each of the Accused Motorola '394 Products includes a MediaTek or Qualcomm processor/chipset that includes at least one processor or CPU operating as a	

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement																
	controller. These chipsets (or a portion thereof) control and render the display of digital content along with the alternative displays of the linear content operation panel and the interactive content operation panel. In one example of Motorola’s infringement, each of the Accused Motorola ’394 Products includes the following chipsets that operate as or contain the claimed “controller”: <table data-bbox="768 461 1757 1320"> <tr> <th data-bbox="768 461 1066 570">Infringing Device</th><th data-bbox="1066 461 1757 570">Exemplary Chipset/CPU (Containing/Acting as “Controller”)</th></tr> <tr> <td data-bbox="768 570 1066 678">Moto edge+</td><td data-bbox="1066 570 1757 678">Qualcomm Snapdragon 865 octa-core processor / Adreno 650 GPU</td></tr> <tr> <td data-bbox="768 678 1066 748">Moto G Power 2022</td><td data-bbox="1066 678 1757 748">MediaTek Helio G37</td></tr> <tr> <td data-bbox="768 748 1066 894">Moto E (2020)</td><td data-bbox="1066 748 1757 894">Qualcomm Snapdragon 632 octa-core processor w/ 1.8 GHz octa-core Kryo 250 CPU, 725 MHz Adreno 506 GPU</td></tr> <tr> <td data-bbox="768 894 1066 1003">Razr (2d gen.)</td><td data-bbox="1066 894 1757 1003">Qualcomm Snapdragon 765G processor w/ Adreno 620 GPU</td></tr> <tr> <td data-bbox="768 1003 1066 1112">Motorola edge (2021)</td><td data-bbox="1066 1003 1757 1112">Qualcomm Snapdragon 778G mobile platform w/ Adreno 642L GPU</td></tr> <tr> <td data-bbox="768 1112 1066 1221">Motorola edge (2020)</td><td data-bbox="1066 1112 1757 1221">Qualcomm Snapdragon 765</td></tr> <tr> <td data-bbox="768 1221 1066 1320">Motorola edge 5G UW</td><td data-bbox="1066 1221 1757 1320">Qualcomm Snapdragon 778G mobile platform w/ Adreno 642L GPU</td></tr> </table>	Infringing Device	Exemplary Chipset/CPU (Containing/Acting as “Controller”)	Moto edge+	Qualcomm Snapdragon 865 octa-core processor / Adreno 650 GPU	Moto G Power 2022	MediaTek Helio G37	Moto E (2020)	Qualcomm Snapdragon 632 octa-core processor w/ 1.8 GHz octa-core Kryo 250 CPU, 725 MHz Adreno 506 GPU	Razr (2d gen.)	Qualcomm Snapdragon 765G processor w/ Adreno 620 GPU	Motorola edge (2021)	Qualcomm Snapdragon 778G mobile platform w/ Adreno 642L GPU	Motorola edge (2020)	Qualcomm Snapdragon 765	Motorola edge 5G UW	Qualcomm Snapdragon 778G mobile platform w/ Adreno 642L GPU
Infringing Device	Exemplary Chipset/CPU (Containing/Acting as “Controller”)																
Moto edge+	Qualcomm Snapdragon 865 octa-core processor / Adreno 650 GPU																
Moto G Power 2022	MediaTek Helio G37																
Moto E (2020)	Qualcomm Snapdragon 632 octa-core processor w/ 1.8 GHz octa-core Kryo 250 CPU, 725 MHz Adreno 506 GPU																
Razr (2d gen.)	Qualcomm Snapdragon 765G processor w/ Adreno 620 GPU																
Motorola edge (2021)	Qualcomm Snapdragon 778G mobile platform w/ Adreno 642L GPU																
Motorola edge (2020)	Qualcomm Snapdragon 765																
Motorola edge 5G UW	Qualcomm Snapdragon 778G mobile platform w/ Adreno 642L GPU																

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement		
		Moto G Stylus (2021)	Qualcomm Snapdragon 678
		Moto G Stylus (2020)	Qualcomm Snapdragon 665 mobile processor
		Motorola One 5G Ace	Qualcomm Snapdragon 750 5G
		Motorola One 5G UW	Qualcomm Snapdragon 765 5G
		Motorola One 5G UW Ace	Qualcomm Snapdragon 750G 5G
		Moto G100	Qualcomm Snapdragon 870 5G w/ Mobile Platform Adreno 650 GPU
		Moto G Pure	MediaTek Helio G25
		Moto G Power (2021)	Qualcomm Snapdragon 662 Mobile Processor
		Moto G Stylus 5G	Qualcomm Snapdragon 480 5G
		Moto G Fast	Qualcomm Snapdragon 665 Mobile Processor
		Moto G Play	Qualcomm Snapdragon 460 w/ 1.8 GHz octa-core Kryo 260 CPU, 600 MHz Adreno 610 GPU

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Moto G Power (2020)	Qualcomm Snapdragon 665 Mobile Processor
	On information and belief, each of these processors runs and controls an operating system and the user interface, including the panels referred to and shown earlier in this chart. Discovery is expected to confirm this functionality. Further, AIDA64 reports for the accused devices confirm that they include one or more Qualcomm or MediaTek chipsets, for example, to execute program processing that causes the display of the operation panels referred to earlier in this chart: <<< CPU >>> SoC Model: Qualcomm Snapdragon 765/765G Core Architecture: 6x Qualcomm Kryo 475 Silver @ 1804 MHz Qualcomm Kryo 475 Gold @ 2208 MHz Qualcomm Kryo 475 Gold @ 2304 MHz Manufacturing Process: 7 nm Instruction Set: 64-bit ARMv8-A CPU Revision: r15p14 CPU Cores: 8 Motorola edge AIDA64 Rep. at 2.	

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	<<< CPU >>> SoC Model: Qualcomm Snapdragon 865 (SM8250) Core Architecture: 4x Qualcomm Kryo 585 Silver @ 1804 MHz 3x ARM Cortex-A77 @ 2419 MHz ARM Cortex-A77 @ 2841 MHz Manufacturing Process: 7 nm Instruction Set: 64-bit ARMv8-A CPU Revision: r1p0 CPU Cores: 8 Motorola edge+ AIDA64 Rep. at 2. <<< CPU >>> SoC Model: Qualcomm Snapdragon 632 Core Architecture: 4x Qualcomm Kryo 250 LP @ 1804 MHz 4x Qualcomm Kryo 250 HP @ 1804 MHz Manufacturing Process: 14 nm Instruction Set: 64-bit ARMv8-A (32-bit Mode) CPU Revision: r10p2 CPU Cores: 8 Motorola E AIDA64 Rep. at 2.

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	<<< CPU >>> SoC Model: Qualcomm Snapdragon 460/662 Core Architecture: 4x Qualcomm Kryo 240/250/260/280 LP @ 1804 MHz 4x Qualcomm Kryo 240/250/260/280 HP @ 2016 MHz Manufacturing Process: 11 nm Instruction Set: 64-bit ARMv8-A CPU Revision: r10p2 CPU Cores: 8 Motorola G Power (2021) AIDA64 Rep. at 2. SoC Model: MediaTek Helio P35 (MT6765) Core Architecture: 8x ARM Cortex-A53 @ 1800 MHz Manufacturing Process: 12 nm Instruction Set: 64-bit ARMv8-A CPU Revision: r0p4 CPU Cores: 8 Motorola G Power 2022 AIDA64 Rep. at 4.
[2.g] wherein only one of the linear content operation panel or the interactive content operation panel is displayed exclusively at any given time, together with the outputted digital content[;]	In each of the Accused Motorola '394 Products, only one of the linear content operation panel or the interactive content operation panel is displayed exclusively at any given time, together with the outputted digital content. In one example of Motorola's infringement, the MediaTek or Qualcomm chipset executing the operating system in the Accused Motorola '394 Products control the alternative display of either of the linear content operation panel or the interactive content operation panel, wherein only one of the linear content operation panel or the

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

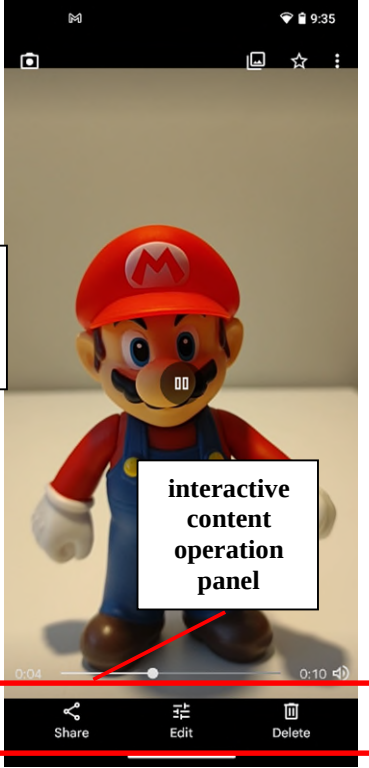
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
	interactive content operation panel is displayed exclusively at any given time, together with the outputted digital content as shown in the following three examples: Motorola Edge (2020)  linear content operation panel  interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement		
	Motorola edge+	 linear content operation panel	 interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

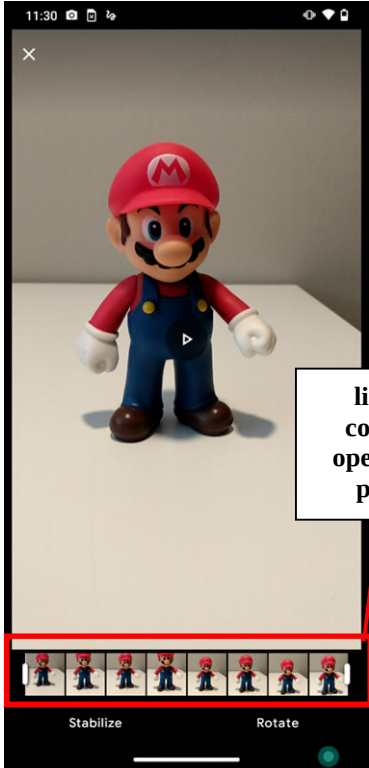
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Motorola E (2020)	 linear content operation panel  interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Motorola One 5G	 linear content operation panel  interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Moto G Power (2021)	 linear content operation panel  interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

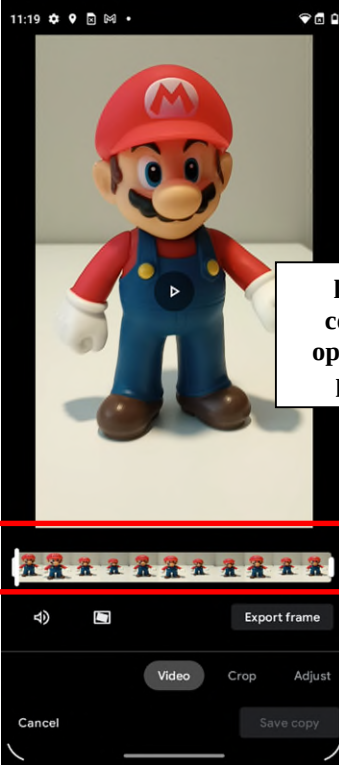
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Moto G Power 2022  linear content operation panel	 interactive content operation panel
In each of the foregoing screenshots in the left-hand column (displaying the linear content operation panel), only the linear content operation panel is displayed exclusively and “Share” is not displayed on this screen. Likewise, in the right-hand column, only “Share” control (part of the interactive content operation panel) is displayed exclusively, whereas the linear content operation control panel is not displayed. In other words, the panels are distinct and displayed independently form one another. In each instance, however, the digital content is still displayed. Each of the remaining Accused Motorola ’394 Products operate similarly and thus infringe in the same way.		

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

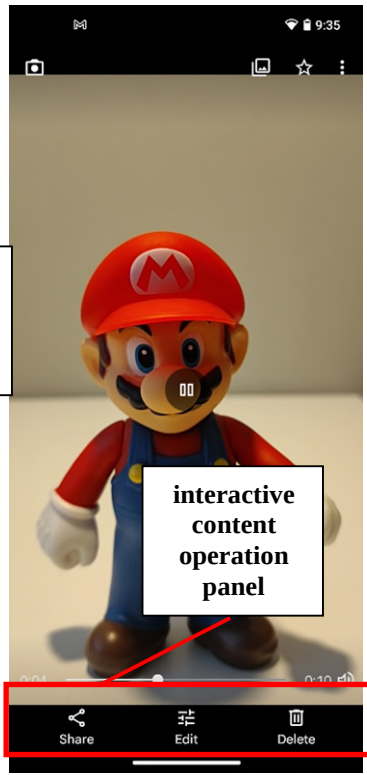
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
[2.h] wherein the outputted digital content together with either the linear content operation panel or the interactive content operation panel, are displayed concurrently in one screen.	Each of the Accused Motorola '394 Products such that the outputted digital content together with either the linear content operation panel or the interactive content operation panel, are displayed concurrently in one screen. For example, as shown in the following three examples the digital content is displayed concurrently in one screen with either the linear content operation panel or the interactive content operation panel: Motorola Edge (2020)  

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

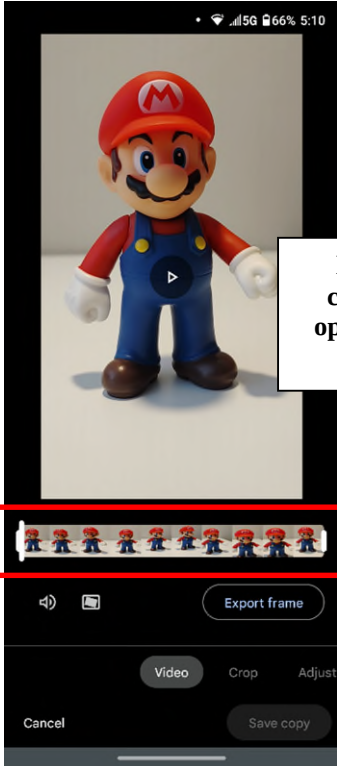
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement		
	Motorola edge+	 linear content operation panel	 interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Motorola E (2020)	 linear content operation panel  interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement			
	Motorola One 5G	 linear content operation panel	 interactive content operation panel	

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

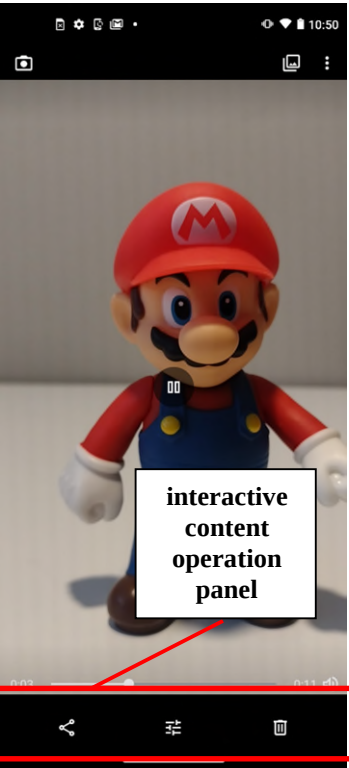
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Moto G Power (2021)	 linear content operation panel  interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

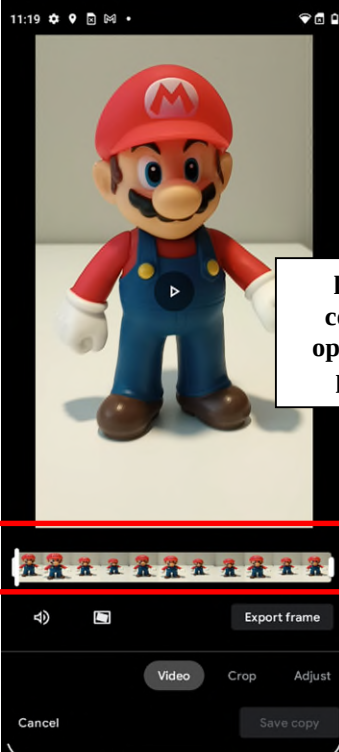
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Moto G Power 2022 	
In each of the preceding screenshots on the left-hand column, the linear content operation panel is displayed concurrently with the digital content, and “Share” (part of the interactive content operation panel) is not displayed. Likewise, in each of the screenshots in the right-hand column, the “Share” button (part of the interactive content operation panel) is displayed concurrently with the digital content, and the linear content operation panel is not displayed. Each of the remaining Accused Motorola ’394 Products operate similarly and thus infringe in the same way.		

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
4. A digital content reproducing apparatus, comprising:	See claim elements [2.pre]
[4.a] an input unit which inputs digital content;	See claim element [2.a]
[4.b] a reproducer which reproduces the inputted digital content;	See claim element [2.b]
[4.c] an output unit which outputs the reproduced digital content;	See claim element [2.c]
[4.d] a display which displays the outputted digital content together with an alternative display of either of a linear content operation panel allowing user-instruction regarding linear reproduction functions of the reproduced digital content or an interactive content operation panel allowing user-instruction of interactive functions to an outside of the digital content reproducing apparatus,	See claim element [2.d]
[4.e] wherein buttons of the linear content operation panel are mutually different from buttons of the interactive content operation panel; and	In each of the Accused Motorola '394 Products, buttons of the linear content operation panel are mutually different from buttons of the interactive content operation panel. For example, as shown in the following example buttons of the linear content operation panel are mutually different from buttons of the interactive content operation panel:

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

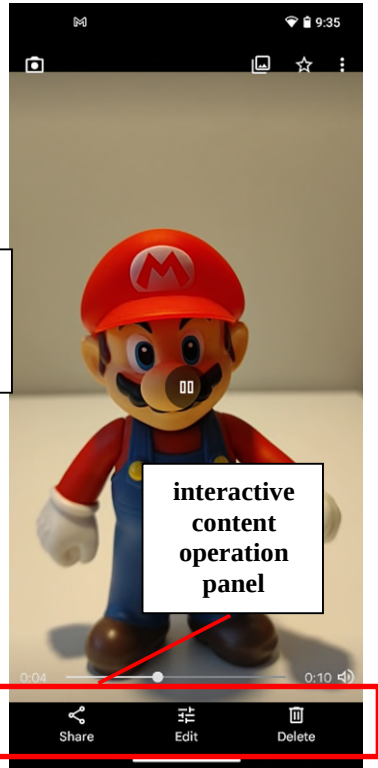
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement		
	Motorola Edge (2020)	 A screenshot of a Motorola Edge (2020) smartphone screen displaying a video of Mario. At the bottom of the screen, a red box highlights a horizontal timeline with multiple small Mario icons, representing a linear content operation panel. A callout box labeled "linear content operation panel" points to this timeline. Below the timeline are buttons for "Export frame", "Video", "Crop", "Adjust", "Cancel", and "Save copy".	 A screenshot of a Motorola Edge (2020) smartphone screen displaying a video of Mario. At the bottom of the screen, a red box highlights a horizontal timeline with a playhead and buttons for "Share", "Edit", and "Delete", representing an interactive content operation panel. A callout box labeled "interactive content operation panel" points to this timeline. Above the timeline is a progress bar showing "0:04" and "0:10".

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

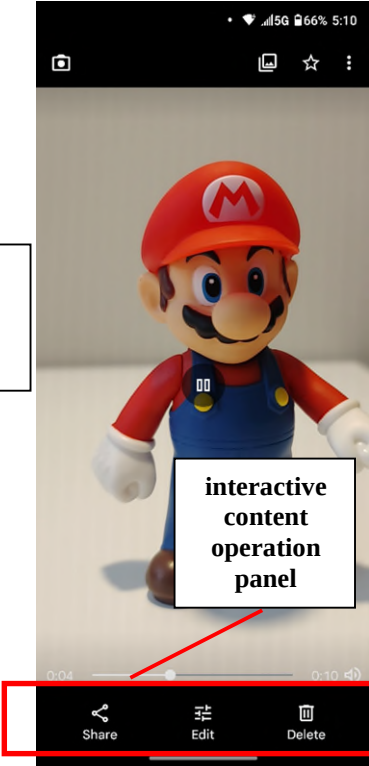
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement		
	Motorola edge+	 linear content operation panel	 interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

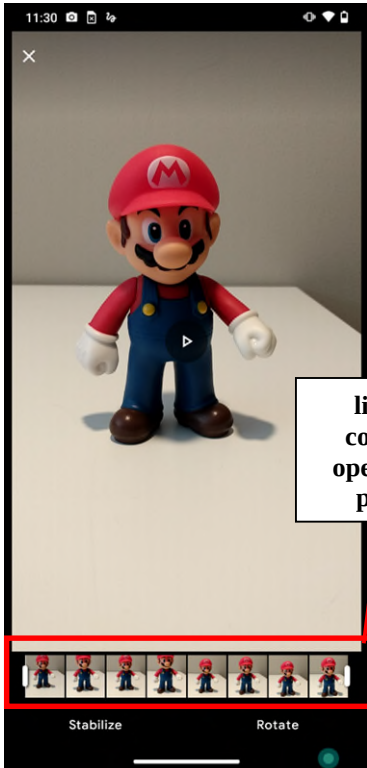
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Motorola E (2020)	 A screenshot of the Motorola E (2020) camera app interface. It shows a Mario figure in the center. At the bottom, there is a horizontal strip of seven small thumbnail images of the Mario figure, each in a different pose. Below this strip are two buttons labeled 'Stabilize' and 'Rotate'. A red box highlights the thumbnail strip, and a callout box labeled 'linear content operation panel' points to it.  A screenshot of the Motorola E (2020) camera app interface, similar to the one on the left. It shows a Mario figure in the center. At the bottom, there is a horizontal strip of three icons: a share icon, a grid icon, and a trash icon. A red box highlights this strip, and a callout box labeled 'interactive content operation panel' points to it.

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

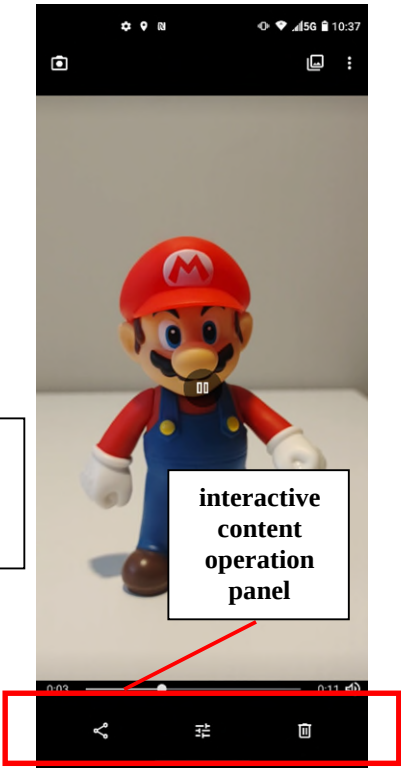
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement		
	Motorola One 5G	 A screenshot of the Motorola One 5G AR application interface. It displays a 3D Mario character in the center. At the bottom, there is a horizontal strip of small thumbnail images of the character in various poses, which is highlighted by a red rectangular box. A callout box with the text "linear content operation panel" points to this strip.	 A screenshot of the Motorola One 5G AR application interface, similar to the previous one but with a different bottom panel. The bottom panel, highlighted by a red rectangular box, contains three icons: a share icon, a zoom icon, and a screenshot icon. A callout box with the text "interactive content operation panel" points to this panel.

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

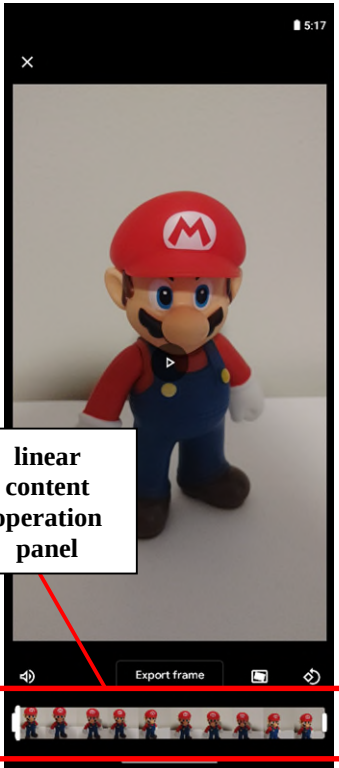
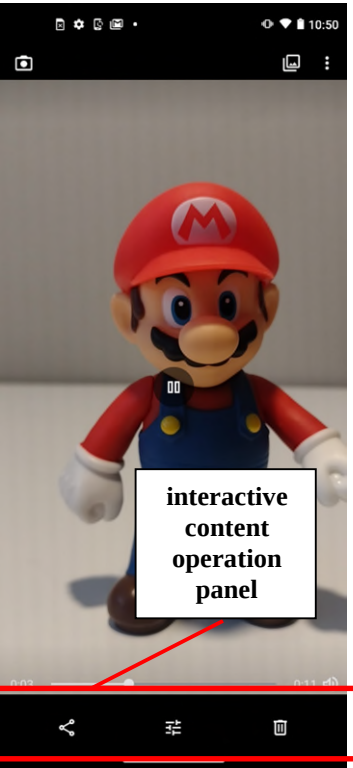
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Moto G Power (2021)	 linear content operation panel  interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

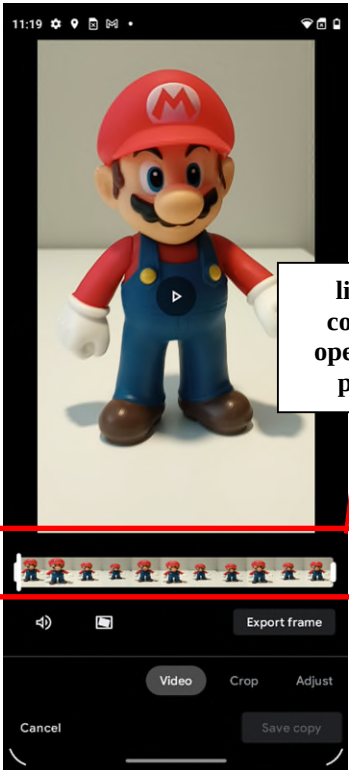
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Moto G Power 2022   As shown in each of the preceding screenshots, the linear content operation panel includes control buttons that are not the same as the user interface control button for the interactive content operation panel (including, <i>e.g.</i>, the “Share” button). In other words, the buttons in each panel are distinct from those in the other panel.	
[4.f] a controller which controls the alternative display of either of the linear content operation panel or the interactive content operation panel,	See claim element [2.e]	

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
wherein only one of the linear content operation panel or the interactive content operation panel is displayed exclusively at any given time, together with the outputted digital content;	
[4.g] wherein the outputted digital content together with either the linear content operation panel or the interactive content operation panel, are displayed concurrently in one screen.	See claim element [2.f]
5. The digital content reproducing apparatus according to claim 4, wherein all the buttons are mutually different from each other.	See claim element [4.e] showing that all the buttons in the three examples are different from each other.
[7.pre] A digital content reproducing apparatus, comprising:	See claim element [2.pre]
[7.a] an input unit which inputs digital content;	See claim element [2.a]
[7.b] a reproducer which reproduces the inputted digital content;	See claim element [2.b]
[7.c] an output unit which outputs the reproduced digital content;	See claim element [2.c]
[7.d] a display which displays the	See claim element [2.d]

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
outputted digital content together with an alternative display of either of a linear content operation panel allowing user-instruction regarding linear reproduction functions of the reproduced digital content or an interactive content operation panel allowing user-instruction of interactive functions to an outside of the digital content reproducing apparatus,	
[7.e] wherein buttons of the linear content operation panel producing mutually differing functions from functions of buttons of the interactive content operation panel; and	In each of the Accused Motorola '394 Products, buttons of the linear content operation panel produce mutually differing functions from functions of the interactive content operation panel. For example, as shown in the following screenshots, buttons of the linear content operation panel provide mutually differing functions from buttons of the interactive content operation panel. In this example, the buttons of the linear content operation panel allow for rewinding and fast-forwarding of the digital content, whereas the interactive content operation panel includes a button that allows for the sharing of the digital content external to the device.

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

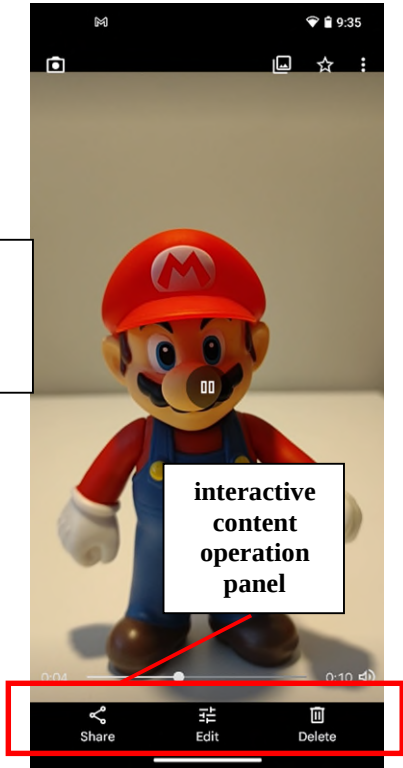
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Motorola Edge (2020)	 A screenshot of a Motorola Edge (2020) smartphone displaying a 3D Mario character. At the bottom of the screen, a horizontal strip of small Mario icons is highlighted with a red box. A callout box labeled "linear content operation panel" points to this strip. Below the strip are buttons for "Export frame", "Video", "Crop", "Adjust", "Cancel", and "Save copy".  A screenshot of a Motorola Edge (2020) smartphone displaying a 3D Mario character. At the bottom of the screen, a horizontal strip of icons for "Share", "Edit", and "Delete" is highlighted with a red box. A callout box labeled "interactive content operation panel" points to this strip. Above the strip is a video player interface with a play button and a progress bar.

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement			
	Motorola edge+	 linear content operation panel	 interactive content operation panel	

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

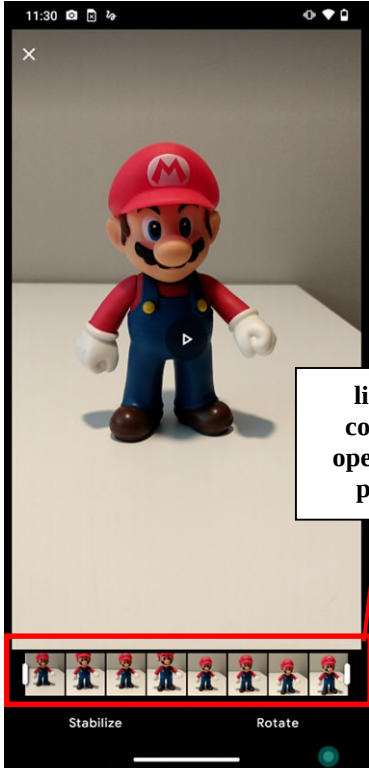
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Motorola E (2020)	 

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement		
	Motorola One 5G	 linear content operation panel	 interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

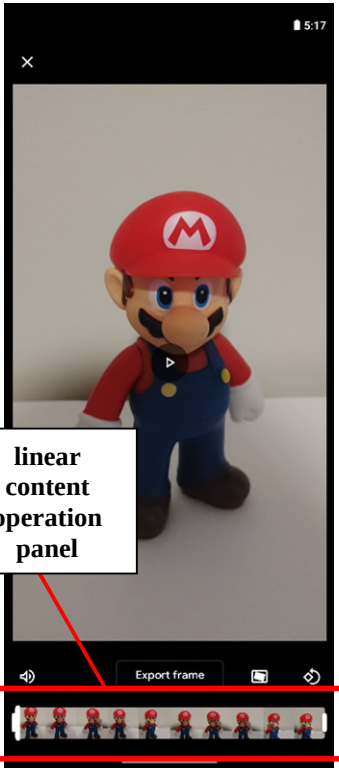
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Moto G Power (2021)	 linear content operation panel  interactive content operation panel

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

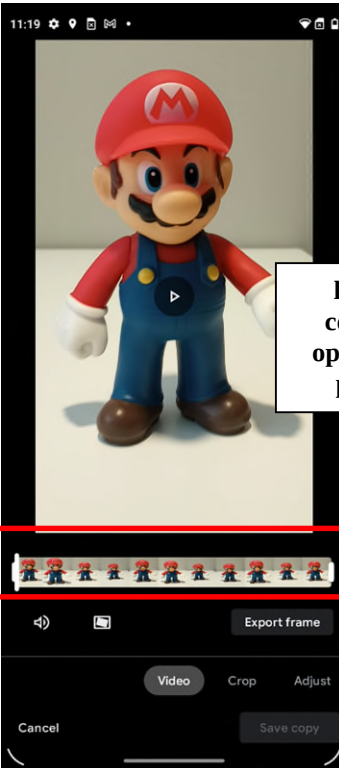
U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement	
	Moto G Power 2022  	
[7.f] a controller which controls the alternative display of either of the linear content operation panel or the interactive content operation panel, wherein only one of the linear content operation panel or the	See claim element [2.e]	

EXHIBIT 17: PRELIMINARY INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 8,170,394

U.S. Patent No. 8,170,394	Exemplary Evidence of Infringement
interactive content operation panel is displayed exclusively at any given time, together with the outputted digital content;	
[7.g] wherein the outputted digital content together with either the linear content operation panel or the interactive content operation panel, are displayed concurrently in one screen.	See claim element [2.f]
8. The digital content reproducing apparatus according to claim 7, wherein all the buttons of the linear content operation panel and the interactive content operation panel, provide mutually differing functions from each other	See claim element [7.e], showing that all of the buttons identified in the three examples provide mutually differing functions from each other.