

EXHIBIT G-15
Defendant's Invalidity Contentions

Chart for U.S. Patent No. 8,468,244
U.S. Patent Publication No. 2003/018,2435 to Redlich ("Redlich")

As shown in the chart below, the Asserted Claim of the '244 Patent are invalid under (1) 35 U.S.C. § 102 because U.S. Patent Publication No. 2003/018,2435 to Redlich ("Redlich") meets each element of the claim, and/or (2) 35 U.S.C. § 103 because Redlich renders the claim obvious either alone, or in combination with the knowledge of a person having ordinary skill in the art, and in further combination with the references specifically identified below and in the following claim chart and/or one or more references identified in Defendant's Preliminary Invalidity Contentions. The following quotations and diagrams come from Redlich. Redlich constitutes prior art because it was published by no later than September 25, 2003, which is prior to the alleged priority date of the '244 Patent (January 5, 2007).

Motivations to combine the disclosures in Redlich with disclosures in other publications known in the art, as explained in this chart, include at least the similarity in subject matter between the references to the extent they concern methods relating to the storage of security sensitive content in a file storage system. Insofar as the references cite other patents or publications, or suggest additional changes, one of ordinary skill in the art would look beyond a single reference to other references in the field.

These invalidity contentions are based on Defendant's present understanding of the asserted claims, and DigitalDoors' apparent construction of the claims in its February 28, 2023 Disclosure of Asserted Claims and Infringement Contentions Pursuant to P.R. 3-1, which is deficient at least insofar as it fails to cite any documents or identify accused structures, acts, or materials in the Accused Products with particularity. Defendant does not agree with DigitalDoors' application of the claims, or that the claims satisfy the requirements of 35 U.S.C. § 112. Defendant's contentions herein are not, and should in no way be seen as, admissions or adoptions as to any particular claim scope or construction, or as any admission that any particular element is met by any accused product in any particular way. Defendant objects to any attempt to imply claim construction from this chart. Defendant's prior art invalidity contentions are made in a variety of alternatives and do not represent Defendant's agreement or view as to the meaning, definiteness, written description support for, or enablement of any claim contained therein.