

**Softex LLC v. Defendants, 1:22-cv-01308, 1:22-cv-01309, 1:22-cv-01311 (W.D. Tex.)
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Claim Chart Against U.S. Patent No. 8,506,649 (“’649 patent”)

Charted Reference: U.S. Patent Publication No. 2003/0051090 to Bonnett (“Bonnett”)

Bonnett, claiming priority to September 10, 2001 (provisional filing date) and published on March 13, 2003, qualifies as prior art to the ’649 patent under at least 35 U.S.C. §§ 102(a), (b), and/or (e) depending upon the priority date of the ’649 patent.

As set forth in the chart below, all asserted claims of the ’649 patent are anticipated and/or obvious over Bonnett.¹

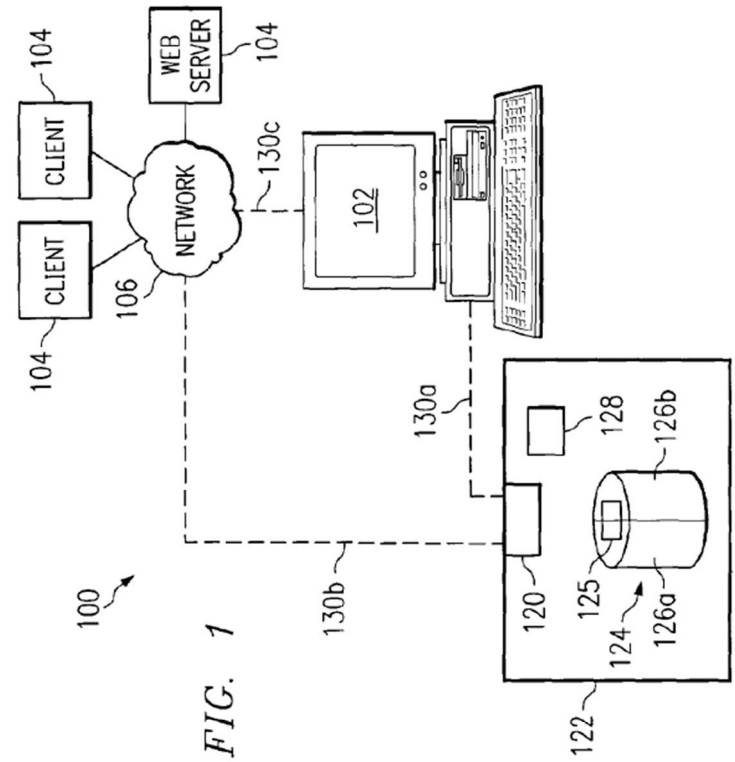
Except where specifically noted otherwise, this chart applies the apparent constructions of claim terms as used by Softex LLC (“Softex”) in its infringement contentions; such use, however, does not imply that Defendants adopt or agree with Softex’s constructions in any way.

To the extent the charted reference is held not to explicitly or inherently disclose any particular element below, such limitations were obvious for the reasons stated below and in Defendants’ Initial Invalidity Contentions, which are incorporated herein by reference.

Defendants are investigating this prior art and have not yet completed discovery from third parties who may have information concerning it. Defendants reserve the right to modify, amend, and/or supplement these contentions as information becomes available, and as discovery proceeds.

Evidence of Invalidity	
Claim Element	Claim 1
1.[pre] A mobile electronic device, comprising:	<i>To the extent that the preamble is limiting, it is disclosed or suggested by Bonnett. For example:</i> “FIG. 1 is a block diagram illustrating one example of a computing system 100 including an appliance 122. In the illustrated embodiment, system 100 includes at least one appliance 122 capable of performing a desired communicating and/or computing

¹ The excerpts cited herein are exemplary. For any claim limitation, Defendants may rely on excerpts cited for any other limitation and/or additional excerpts not set forth fully herein to the extent necessary to provide a more comprehensive explanation for a reference’s disclosure of a limitation. Where an excerpt refers to or discusses a figure or figure items, that figure and any additional descriptions of that figure should be understood to be incorporated by reference as if set forth fully therein.

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	functionality. Appliance 122 may comprise any device or combination of devices including one or more software and/or firmware modules operable to affect the function of the device. In some non-limiting examples, appliance 122 could comprise a computing and/or communicating device, such as, for example, a personal digital assistant (PDA), a cell phone, a digitized audio recorder/player, or any other digital or analog device. In other non-limiting examples of appliance 122 include any device that implements a program operable to carry out a desired functionality, such as, a home appliance (e.g., refrigerator or dishwasher), a power tool, or any other digital or analog device.” [0018] <i>FIG. 1</i> 

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1[a] a processor;	<i>To the extent that the preamble is not fully disclosed or suggested by Bonnett, the preamble would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i> <i>This limitation is disclosed or suggested by Bonnett. For example:</i> “FIG. 1 is a block diagram illustrating one example of a computing system 100 including an appliance 122. In the illustrated embodiment, system 100 includes at least one appliance 122 capable of performing a desired communicating and/or computing functionality. Appliance 122 may comprise any device or combination of devices including one or more software and/or firmware modules operable to affect the function of the device. In some non-limiting examples, appliance 122 could comprise a computing and/or communicating device, such as, for example, a personal digital assistant (PDA), a cell phone, a digitized audio recorder/player, or any other digital or analog device. In other non-limiting examples of appliance 122 include any device that implements a program operable to carry out a desired functionality, such as, a home appliance (e.g., refrigerator or dishwasher), a power tool, or any other digital or analog device.” [0018] “In this embodiment, appliance 122 executes one or more programs 125a-125n capable of at least partially contributing to one or more functions of appliance 122. That is, programs 125 are not required to be capable of performing a desired function of appliance 122 alone, but may contribute to the performance of the function as part of a larger routine. Programs 125 stored on memory device 124 may include, for example, software, firmware, code, portions of code, data compilations, and/or a combination of these or any other type of information. In various embodiments, program 125 stored on memory device 124 may include firmware having a software image for an embedded device.” [0019]

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1[b] one or more non-transitory machine-readable storage media responsive to the processor; and	<i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i> <i>This limitation is disclosed or suggested by Bonnett. For example:</i> “FIG. 1 is a block diagram illustrating one example of a computing system 100 including an appliance 122. In the illustrated embodiment, system 100 includes at least one appliance 122 capable of performing a desired communicating and/or computing functionality. Appliance 122 may comprise any device or combination of devices including one or more software and/or firmware modules operable to affect the function of the device. In some non-limiting examples, appliance 122 could comprise a computing and/or communicating device, such as, for example, a personal digital assistant (PDA), a cell phone, a digitized audio recorder/player, or any other digital or analog device. In other non-limiting examples of appliance 122 include any device that implements a program operable to carry out a desired functionality, such as, a home appliance (e.g., refrigerator or dishwasher), a power tool, or any other digital or analog device.” [0018] “In this embodiment, appliance 122 executes one or more programs 125a-125n capable of at least partially contributing to one or more functions of appliance 122. That is, programs 125 are not required to be capable of performing a desired function of appliance 122 alone, but may contribute to the performance of the function as part of a larger routine. Programs 125 stored on memory device 124 may include, for example, software, firmware, code, portions of code, data compilations, and/or a combination of these or any other type of information. In various embodiments, program 125 stored on memory device 124 may include firmware having a software image for an embedded device.” [0019] <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the</i>

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1[c] a security application in at least one of the non-transitory machine-readable storage media, wherein the security application is operable to perform operations comprising:	<i>general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidation Contentions.</i> <i>This limitation is disclosed or suggested by Bonnett. For example:</i> “In one embodiment, an appliance comprises a memory comprising at least a hidden portion of memory operable to store at least a portion of a program capable of contributing to one or more functions of the appliance. The appliance also comprises a controller operable to process at least a portion of the program stored on the hidden portion of memory. The appliance further comprises an external interface operable to provide access to at least an open portion of the memory. In one particular embodiment, the hidden portion of memory is inaccessible through the external interface.” [0007] “Depending on the specific features implemented, particular embodiments of the present invention may exhibit some, none, or all of the following technical advantages. Various embodiments substantially restrict access to portions of a program stored in a memory accessible to an appliance. Restricting access to programs and/or portions of a program can help prevent a user from deleting or corrupting those portions of the program, which can lead to an improved reliability of the appliance. In addition, restricting access to portions of the program can assist program designers in the protection of licensed code, firmware, and/or software. Some embodiments allow for a secure program upgrade of the restricted access portions of the program stored in a memory accessible to the appliance.”[0011] “In this embodiment, appliance 122 executes one or more programs 125a-125n capable of at least partially contributing to one or more functions of appliance 122. That is, programs 125 are not required to be capable of performing a desired function of appliance 122 alone, but may contribute to the performance of the function as part of a larger routine. Programs 125 stored on memory device 124 may include, for example, software, firmware, code, portions of code, data compilations, and/or a combination of these or any other type of information. In various embodiments,

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	program 125 stored on memory device 124 may include firmware having a software image for an embedded device.” [0019] <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
1[c][i] enabling an owner of the mobile electronic device to register the mobile electronic device with a security service residing at least partially on one or more servers;	<i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
1[c][ii] causing the mobile electronic device to automatically send identifying information from the mobile electronic device to the security service;	<i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
1[c][iii] after the owner has registered the mobile electronic device with the security service, causing the mobile electronic device to periodically communicate with the security service, when the mobile electronic device is in a state other than a state in which the mobile electronic device is powered off;	<i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
1[c][iv] after the owner has registered the mobile electronic device with the security service, accepting a notification at the mobile electronic device from the security service,	<i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>

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wherein the notification comprises a message indicating that the owner of the mobile electronic device has reported a loss or requested disabling of the mobile electronic device;	
1[c][v] in response to receiving the notification, automatically disabling at least one user function of the mobile electronic device while still allowing the mobile electronic device to communicate with the security service; and	<i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
1[c][vi] automatically causing at least some user data to be copied from the mobile electronic device to at least one of the servers;	<i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
1[d] wherein the one or more non-transitory machine-readable storage media comprises non-volatile memory;	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> “In this embodiment, appliance 122 includes a memory 124 operable to store one or more programs 125. Memory 124 may include any hardware, software, firmware, or combination thereof operable to store and facilitate retrieval of information. Memory 124 may store information using any of a variety of data structures, arrangements, and/or compilations. Memory 124 may, for example, include a dynamic random access memory (DRAM), a static random access memory (SRAM), a NAND flash memory, or any other suitable volatile or nonvolatile storage and retrieval device or combination of devices. Although this example depicts memory 124 as a single medium, memory 124 may comprise any additional number of storage media without departing from the scope of the present disclosure. All or part of memory 124 could reside locally within appliance 122 or could reside in a location remote from and accessible to appliance 122.” [0031]

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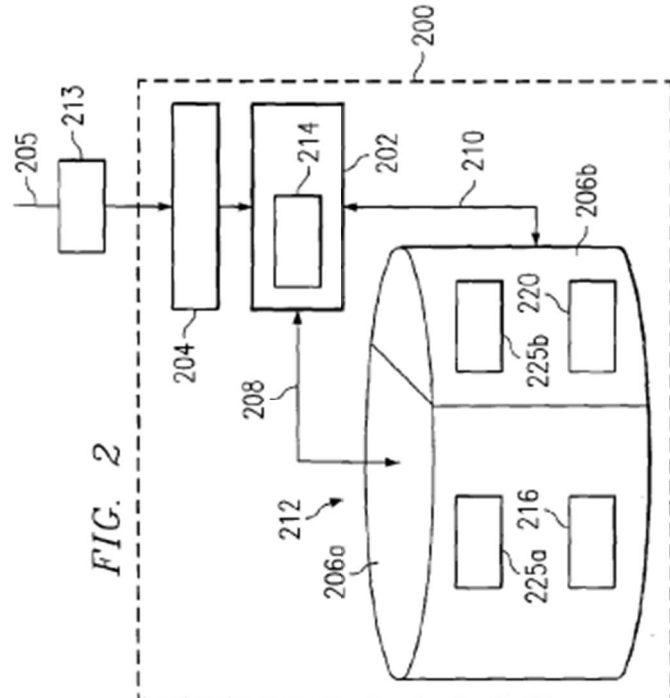
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	“In this particular example, appliance 300 includes a memory 312 operable to store one or more programs 325 capable of at least partially contributing to one or more functions of appliance 300. In this particular embodiment, memory 312 comprises NAND flash memory. In various embodiments, the structure and function of memory 312 can be substantially similar to memory 212 of FIG. 2. In this embodiment, memory 312 comprises a single storage medium. Although this example illustrates memory 312 as a single storage medium, any additional number of storage media can be used without departing from scope of the present disclosure.” [0047] <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
1[e] wherein the non-volatile memory comprises a changeable area that can be modified by a user and a system area that cannot be modified by the user;	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> “In one embodiment, an appliance comprises a memory comprising at least a hidden portion of memory operable to store at least a portion of a program capable of contributing to one or more functions of the appliance. The appliance also comprises a controller operable to process at least a portion of the program stored on the hidden portion of memory. The appliance further comprises an external interface operable to provide access to at least an open portion of the memory. In one particular embodiment, the hidden portion of memory is inaccessible through the external interface.” [0007] “In one particular embodiment, memory 124 includes at least an open partition of memory 126a and at least a hidden partition of memory 126b. Although this example uses two partitions of memory 126a and 126b, any number of partitions can be used without departing from the scope of the present disclosure. In an alternative embodiment, open partition 126a and hidden partition 126b can comprise physically separate memory devices. As used throughout this document, the term "hidden partition" or "hidden portion" of memory refers to a part of memory 124 that is

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	substantially free from access by a user through an external interface. A memory device 124 comprising at least hidden partition 126b is advantageous in substantially preventing a user from deleting or corrupting portions of the program stored on hidden partition 126b of memory 124, which can lead to an improved reliability of appliance 122. In addition, hidden partition 126b can enable program designers to substantially protect licensed code and/or software stored on memory device 124.” [0032] “In this embodiment, memory 212 includes’ at least an open partition of memory 206a and at least a hidden partition of memory 206b. Open partition 206a operates to store those portions 225a of program 225 that are accessible to the user through external interface 204. In various embodiments, open partition 206a may store, for example, media files, data files, and/or any other information desired by program designers to be made accessible to the user. Similarly, hidden partition 206b operates to store at least a portion 225b of program 225 that a program designer desires to be made inaccessible to a user of appliance 200. Hidden partition 206b can store, for example, executable files, the operating portion of the program, operating system applications, Mass Storage Class drivers, decryption sequence libraries, firmware, software, data files, data libraries, rights management information, and/or any other desired information.” [0036] “In the illustrated embodiment, hidden partition 206b comprises at least a portion of memory 212. In various embodiments, the structure and function of hidden partition 206b can be substantially similar to hidden partition of memory 126b of FIG. 1. In this particular embodiment, hidden partition 206b is substantially free from access by a user through external interface 204. Restricting access to portions 225b of program 225 is advantageous in substantially preventing a user from deleting and/or corrupting those portions of the program. The restricted access can lead to an improved reliability of appliance 200. In addition, hidden partition 206b can enable program designers to substantially protect licensed code, firmware, and/or software.” [0037] “In this particular embodiment, hidden partition 206b comprises an atypical protocol and/or format that is generally incapable of being registered by a host through external

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	interface 204. Implementing an atypical protocol and/or format allows hidden partition 206b to be substantially free from access by a user through external interface 204. In other embodiments, hidden partition 206b can comprise an encrypted file stored on memory 212. The encrypted file can be substantially free from access without the appropriate decryption sequence. In an alternative embodiment, hidden partition 206b can comprise a separate independent memory device that is not coupled to and/or capable of being isolated, at least temporarily, from external interface 204.” [0038] “In this embodiment, memory 312 includes at least an open partition of memory 306a and at least a hidden partition of memory 306b. Although this example illustrates two partitions of memory 312, any additional number of partitions can be used without departing from the scope of the present disclosure. The structure and function of open partition 306a can be substantially similar to open partition 206a of FIG. 2. The structure and function of hidden partition 306b can be substantially similar to hidden partition 206b of FIG. 2.” [0048]

Claim Element	Evidence of Invalidity
	<i>FIG. 2</i>  The diagram, labeled FIG. 2, illustrates a system 200 enclosed in a dashed rectangular box. An input element 205 is connected to a block 213. The output of 213 flows into block 204. From block 204, the flow continues to block 214. Block 214 is connected to a database 210. The database 210 is depicted as a cylinder divided into two halves. The left half contains two rectangular blocks labeled 212 and 216. The right half contains two rectangular blocks labeled 220 and 225b. Below the cylinder, there are two more rectangular blocks labeled 206a and 206b. Arrows indicate the flow of data: from 205 to 213, 213 to 204, 204 to 214, 214 to 210, and from 210 to 206a and 206b. Additionally, there is a feedback loop arrow from 206a back to 214. A label 208 points to the top of the database cylinder. A label 202 points to block 214. A label 210 points to the right half of the database cylinder. A label 206a points to the bottom-left block, and a label 206b points to the bottom-right block.

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1[f] wherein the security application utilizes code residing at least partially in the system area; and	FIG. 3 <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
1[f] wherein the security application utilizes code residing at least partially in the system area; and	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> “In one embodiment, an appliance comprises a memory comprising at least a hidden portion of memory operable to store at least a portion of a program capable of contributing to one or more functions of the appliance. The appliance also comprises a controller operable to process at least a portion of the program stored on the hidden portion of memory. The appliance further comprises an external interface operable to provide access to at least an open portion of the memory. In one particular

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	embodiment, the hidden portion of memory is inaccessible through the external interface.” [0007] “Depending on the specific features implemented, particular embodiments of the present invention may exhibit some, none, or all of the following technical advantages. Various embodiments substantially restrict access to portions of a program stored in a memory accessible to an appliance. Restricting access to programs and/or portions of a program can help prevent a user from deleting or corrupting those portions of the program, which can lead to an improved reliability of the appliance. In addition, restricting access to portions of the program can assist program designers in the protection of licensed code, firmware, and/or software. Some embodiments allow for a secure program upgrade of the restricted access portions of the program stored in a memory accessible to the appliance.”[0011] “In this embodiment, appliance 122 executes one or more programs 125a-125n capable of at least partially contributing to one or more functions of appliance 122. That is, programs 125 are not required to be capable of performing a desired function of appliance 122 alone, but may contribute to the performance of the function as part of a larger routine. Programs 125 stored on memory device 124 may include, for example, software, firmware, code, portions of code, data compilations, and/or a combination of these or any other type of information. In various embodiments, program 125 stored on memory device 124 may include firmware having a software image for an embedded device.” [0019] “In one particular embodiment, memory 124 includes at least an open partition of memory 126a and at least a hidden partition of memory 126b. Although this example uses two partitions of memory 126a and 126b, any number of partitions can be used without departing from the scope of the present disclosure. In an alternative embodiment, open partition 126a and hidden partition 126b can comprise physically separate memory devices. As used throughout this document, the term "hidden partition" or "hidden portion" of memory refers to a part of memory 124 that is substantially free from access by a user through an external interface. A memory device

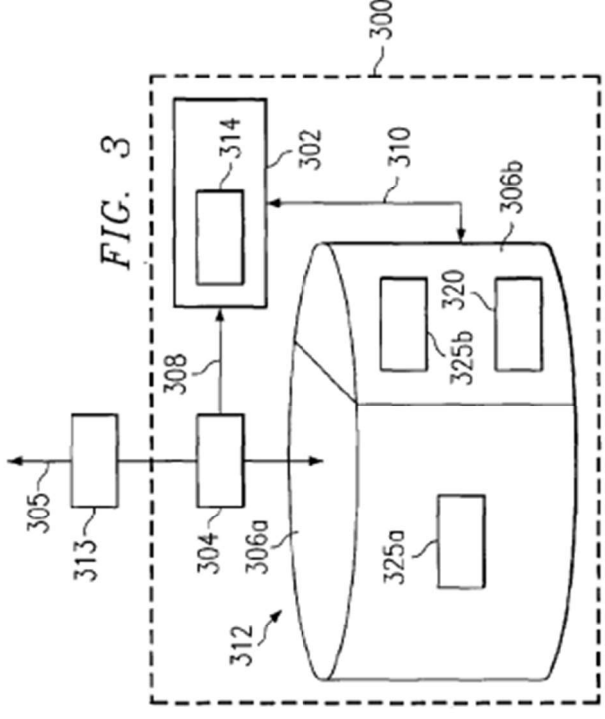
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	124 comprising at least hidden partition 126b is advantageous in substantially preventing a user from deleting or corrupting portions of the program stored on hidden partition 126b of memory 124, which can lead to an improved reliability of appliance 122. In addition, hidden partition 126b can enable program designers to substantially protect licensed code and/or software stored on memory device 124.” [0032] “In this embodiment, memory 212 includes' at least an open partition of memory 206a and at least a hidden partition of memory 206b. Open partition 206a operates to store those portions 225a of program 225 that are accessible to the user through external interface 204. In various embodiments, open partition 206a may store, for example, media files, data files, and/or any other information desired by program designers to be made accessible to the user. Similarly, hidden partition 206b operates to store at least a portion 225b of program 225 that a program designer desires to be made inaccessible to a user of appliance 200. Hidden partition 206b can store, for example, executable files, the operating portion of the program, operating system applications, Mass Storage Class drivers, decryption sequence libraries, firmware, software, data files, data libraries, rights management information, and/or any other desired information.” [0036] “In the illustrated embodiment, hidden partition 206b comprises at least a portion of memory 212. In various embodiments, the structure and function of hidden partition 206b can be substantially similar to hidden partition of memory 126b of FIG. 1. In this particular embodiment, hidden partition 206b is substantially free from access by a user through external interface 204. Restricting access to portions 225b of program 225 is advantageous in substantially preventing a user from deleting and/or corrupting those portions of the program. The restricted access can lead to an improved reliability of appliance 200. In addition, hidden partition 206b can enable program designers to substantially protect licensed code, firmware, and/or software.” [0037] “In this particular embodiment, hidden partition 206b comprises an atypical protocol and/or format that is generally incapable of being registered by a host through external interface 204. Implementing an atypical protocol and/or format allows hidden partition

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	206b to be substantially free from access by a user through external interface 204. In other embodiments, hidden partition 206b can comprise an encrypted file stored on memory 212. The encrypted file can be substantially free from access without the appropriate decryption sequence. In an alternative embodiment, hidden partition 206b can comprise a separate independent memory device that is not coupled to and/or capable of being isolated, at least temporarily, from external interface 204.” [0038] “In this embodiment, memory 312 includes at least an open partition of memory 306a and at least a hidden partition of memory 306b. Although this example illustrates two partitions of memory 312, any additional number of partitions can be used without departing from the scope of the present disclosure. The structure and function of open partition 306a can be substantially similar to open partition 206a of FIG. 2. The structure and function of hidden partition 306b can be substantially similar to hidden partition 206b of FIG. 2.” [0048]

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	<i>FIG. 2</i> The diagram, labeled FIG. 2, illustrates a system 200 enclosed in a dashed rectangular box. An input line 205 enters a rectangular block 213. An arrow points from block 213 to another rectangular block 204. From block 204, an arrow points to a third rectangular block 202. Block 202 contains a smaller rectangular component 214. An arrow points from block 202 to a fourth rectangular block 210. From block 210, an arrow points to a large cylindrical database structure. The database is divided into two vertical sections: 206a on the left and 206b on the right. Section 206a contains two rectangular blocks labeled 212 and 216. Section 206b contains two rectangular blocks labeled 220 and 225b. An arrow labeled 208 points from the top of section 206a to the component 214 within block 202. The entire system is labeled 200 at the top right.

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	 <i>FIG. 3</i> <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidation Contentions.</i>
1[g] wherein the security application receives the notification from at least one of the servers via the system area.	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> “In one embodiment, an appliance comprises a memory comprising at least a hidden portion of memory operable to store at least a portion of a program capable of contributing to one or more functions of the appliance. The appliance also comprises a controller operable to process at least a portion of the program stored on the hidden portion of memory. The appliance further comprises an external interface operable to

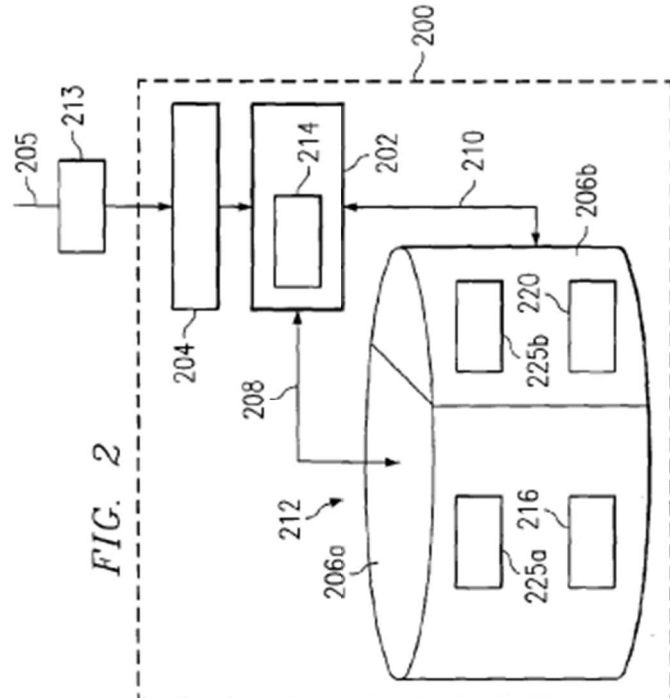
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	provide access to at least an open portion of the memory. In one particular embodiment, the hidden portion of memory is inaccessible through the external interface.” [0007] “Depending on the specific features implemented, particular embodiments of the present invention may exhibit some, none, or all of the following technical advantages. Various embodiments substantially restrict access to portions of a program stored in a memory accessible to an appliance. Restricting access to programs and/or portions of a program can help prevent a user from deleting or corrupting those portions of the program, which can lead to an improved reliability of the appliance. In addition, restricting access to portions of the program can assist program designers in the protection of licensed code, firmware, and/or software. Some embodiments allow for a secure program upgrade of the restricted access portions of the program stored in a memory accessible to the appliance.”[0011] “In this embodiment, appliance 122 executes one or more programs 125a-125n capable of at least partially contributing to one or more functions of appliance 122. That is, programs 125 are not required to be capable of performing a desired function of appliance 122 alone, but may contribute to the performance of the function as part of a larger routine. Programs 125 stored on memory device 124 may include, for example, software, firmware, code, portions of code, data compilations, and/or a combination of these or any other type of information. In various embodiments, program 125 stored on memory device 124 may include firmware having a software image for an embedded device.” [0019] “In one particular embodiment, memory 124 includes at least an open partition of memory 126a and at least a hidden partition of memory 126b. Although this example uses two partitions of memory 126a and 126b, any number of partitions can be used without departing from the scope of the present disclosure. In an alternative embodiment, open partition 126a and hidden partition 126b can comprise physically separate memory devices. As used throughout this document, the term "hidden partition" or "hidden portion" of memory refers to a part of memory 124 that is

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	substantially free from access by a user through an external interface. A memory device 124 comprising at least hidden partition 126b is advantageous in substantially preventing a user from deleting or corrupting portions of the program stored on hidden partition 126b of memory 124, which can lead to an improved reliability of appliance 122. In addition, hidden partition 126b can enable program designers to substantially protect licensed code and/or software stored on memory device 124.” [0032] “In this embodiment, memory 212 includes’ at least an open partition of memory 206a and at least a hidden partition of memory 206b. Open partition 206a operates to store those portions 225a of program 225 that are accessible to the user through external interface 204. In various embodiments, open partition 206a may store, for example, media files, data files, and/or any other information desired by program designers to be made accessible to the user. Similarly, hidden partition 206b operates to store at least a portion 225b of program 225 that a program designer desires to be made inaccessible to a user of appliance 200. Hidden partition 206b can store, for example, executable files, the operating portion of the program, operating system applications, Mass Storage Class drivers, decryption sequence libraries, firmware, software, data files, data libraries, rights management information, and/or any other desired information.” [0036] “In the illustrated embodiment, hidden partition 206b comprises at least a portion of memory 212. In various embodiments, the structure and function of hidden partition 206b can be substantially similar to hidden partition of memory 126b of FIG. 1. In this particular embodiment, hidden partition 206b is substantially free from access by a user through external interface 204. Restricting access to portions 225b of program 225 is advantageous in substantially preventing a user from deleting and/or corrupting those portions of the program. The restricted access can lead to an improved reliability of appliance 200. In addition, hidden partition 206b can enable program designers to substantially protect licensed code, firmware, and/or software.” [0037] “In this particular embodiment, hidden partition 206b comprises an atypical protocol and/or format that is generally incapable of being registered by a host through external

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	interface 204. Implementing an atypical protocol and/or format allows hidden partition 206b to be substantially free from access by a user through external interface 204. In other embodiments, hidden partition 206b can comprise an encrypted file stored on memory 212. The encrypted file can be substantially free from access without the appropriate decryption sequence. In an alternative embodiment, hidden partition 206b can comprise a separate independent memory device that is not coupled to and/or capable of being isolated, at least temporarily, from external interface 204.” [0038] “In this embodiment, memory 312 includes at least an open partition of memory 306a and at least a hidden partition of memory 306b. Although this example illustrates two partitions of memory 312, any additional number of partitions can be used without departing from the scope of the present disclosure. The structure and function of open partition 306a can be substantially similar to open partition 206a of FIG. 2. The structure and function of hidden partition 306b can be substantially similar to hidden partition 206b of FIG. 2.” [0048]

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	<i>FIG. 2</i>  The diagram, labeled FIG. 2, illustrates a system 200 enclosed in a dashed box. An input 205 feeds into a block 213, which then connects to block 204. Block 204 is connected to block 214. Block 214 is connected to a database 210. The database 210 is depicted as a cylinder with two vertical sections. The left section contains data elements 212 and 216, while the right section contains 220, 225a, and 225b. Below the database are two output blocks, 206a and 206b. Arrows indicate the flow of data: from 205 to 213, 213 to 204, 204 to 214, 214 to 210, and from 210 to 206a and 206b. Additionally, there is a feedback loop from 206a back to 214 via arrow 208, and from 206b back to 210 via arrow 202.

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	<i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
	Claim 2 <i>Because this claim recites a negative limitation, Bonnett need not affirmatively state that the notification includes no third-party certification. Rather, Bonnett discloses this limitation because its disclosures are complete and provide no indication that the disclosed “notification” (see cl. 1[c][iv] above) includes—or that there would be reason to include—a third-party certification.</i>

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	<i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
Claim 7	Claim 9
7. A mobile device according to claim 1, wherein the operations the security application is operable to perform further comprise: after the at least some user data has been copied from the mobile electronic device to at least one of the servers, causing at least some of the user data to be deleted from the mobile electronic device. 9.[pre] A method for providing security for a mobile electronic device, the method comprising:	<i>To the extent that the preamble is limiting, it is disclosed or suggested by Bonnett. For example:</i> “FIG. 4 is a flow chart illustrating an exemplary method for securely upgrading at least a portion of a program stored on a hidden partition of memory in an appliance. In one particular embodiment, the portion of a program stored on the hidden partition depicted in FIG. 2 can be securely upgraded. In this example, method 400 begins at step 410 where appliance 200 receives an encrypted update file 213. In various embodiments, encrypted update file 213 can be received, for example, from a communications link 205 at an external interface 204.” [0052] <i>To the extent that the preamble is not fully disclosed or suggested by Bonnett, the preamble would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>

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9[a] receiving, at a mobile electronic device, a request from an owner of the mobile electronic device to register the mobile electronic device with a security service residing at least partially on one or more servers;	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> See claim 1[c][i]. <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
9[b] in response to the request from that owner, registering the mobile electronic device with the security service;	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> See claim 1[c][i]. <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
9[c] automatically sending identifying information for the mobile electronic device from the mobile electronic device to the security service;	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> See claim 1[c][ii]. <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
9[d] after the owner has registered the mobile electronic device with the security service, periodically communicating with the security service, when the mobile electronic	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> See claim 1[c][iii].

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device is in a state other than a state in which the mobile electronic device is powered off;	<i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
9[e] after the owner has registered the mobile electronic device with the security service, wherein the notification comprises a message indicating that the owner of the mobile electronic device has reported a loss or requested disabling of the mobile electronic device;	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> <i>See claim 1[c][iv].</i> <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
9[f] in response to accepting the notification, automatically disabling at least one user function of the mobile electronic device while still allowing the mobile electronic device to communicate with the security service; and	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> <i>See claim 1[c][v].</i> <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
9[g] automatically causing at least some user data to be copied from the mobile electronic device to at least one of the servers;	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> <i>See claim 1[c][vi].</i> <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>

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9[h] wherein the mobile electronic device comprises non-volatile memory;	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> See claim 1[d]. <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
9[i] wherein the non-volatile memory comprises a changeable area that can be modified by a user and system area that cannot be modified by the user;	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> See claim 1[e]. <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
9[j] wherein the security application utilizes code residing at least partially in the system area; and	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> See claim 1[f]. <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
9[k] wherein the operation of accepting the notification from the security service comprises receiving the notification from at least one of the servers via the system area.	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> See claim 1[g].

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	<i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
	Claim 10
10. A mobile electronic device according to claim 9, wherein the notification includes no third-party certification.	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> <i>See claim 2.</i> <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>
	Claim 15
15. A mobile device according to claim 9, wherein the operations the security application is operable to perform further comprise: after the at least some user data has been copied from the mobile electronic device to at least one of the servers, causing at least some of the user data to be deleted from the mobile electronic device.	<i>This limitation is disclosed or suggested by Bonnett. For example:</i> <i>See claim 7.</i> <i>To the extent that this limitation is not fully disclosed or suggested by Bonnett, this limitation would have been obvious to a person of ordinary skill in the art in combination with the general knowledge in the field, common sense, and/or with any of the references identified in the Initial Invalidity Contentions.</i>