UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

GEOSCOPE TECHNOLOGIES PTE. LTD., Plaintiff, v. GOOGLE LLC, Defendant.	Case No. 1:22-cv-01331-MSN-JFA

PRELIMINARY IDENTIFICATION OF ASSERTED CLAIMS

Pursuant to the Joint Discovery Plan (ECF No. 50) submitted for entry by the Court, Plaintiff Geoscope Technologies Pte Ltd. ("Geoscope") provides the following Preliminary Identification of Asserted Claims of U.S. Patent Nos. 7,561,104 ("the '104 Patent"), 8,400,358 ("the '358 Patent"), 8,786,494 ("the '494 Patent"), 8,406,753 ("the '753 Patent), 9,097,784 ("the '784 Patent"), and 8,320,264 ("the '264 Patent") (collectively, "the Asserted Patents"). This disclosure is made based upon information known and available to Geoscope at the present date. Defendant Google LLC ("Google") has not yet provided any discovery in this case and discovery from Google may provide Geoscope with new facts warranting the assertion of additional claims of the Asserted Patents. Geoscope reserves the right to amend this disclosure and/or identify additional asserted claims in its Preliminary and Final Infringement Disclosures to the full extent consistent with the Court's Rules and Orders, the Joint Discovery Plan, and any other applicable rule or authority.

U.S. Patent No. 7,561,104

Geoscope presently asserts that Google infringes claims 1, 2, 3, and 11 of the '104 Patent. Based on its claim of priority to U.S. Provisional Patent Application No. 60/899,379 ("the '379

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Provisional"), each asserted claim of the '104 Patent is entitled to a priority date of February 5, 2007.

U.S. Patent No. 8,400,358

Geoscope presently asserts that Google infringes claims 1, 4, 5, 10, 11, 15, 18, 19, 24, 25, 41, 42, 43, 46, 49, and 52 of the '358 Patent. Based on its claim of priority to the '379 Provisional, each asserted claim of the '358 Patent is entitled to a priority date of February 5, 2007.

U.S. Patent No. 8,786,494

Geoscope presently asserts that Google infringes claims 1, 4, 9, 10, 25, 26, 29, 32, and 35 of the '494 Patent. Based on its claim of priority to the '379 Provisional, each asserted claim of the '494 Patent is entitled to a priority date of February 5, 2007.

U.S. Patent No. 8,406,753

Geoscope presently asserts that Google infringes claims 1, 7, 9, 32, 38, and 40 of the '753 Patent. Based on its claim of priority to the '379 Provisional, each asserted claim of the '753 Patent is entitled to a priority date of February 5, 2007.

U.S. Patent No. 9,097,784

Geoscope presently asserts that Google infringes claims 1, 2, 10, 11, 12, 13, 21, and 22 of the '784 Patent. Based on its claim of priority to the '379 Provisional, each asserted claim of the '784 Patent is entitled to a priority date of February 5, 2007.

U.S. Patent No. 8,320,264

Geoscope presently asserts that Google infringes claims 1, 3, 6, 11, 23, 25, 26, and 27 of the '264 Patent. Based on its claim of priority to U.S. Provisional Patent Application No. 60/681,475, each asserted claim of the '264 Patent is entitled to a priority date of May 17, 2005.

Dated: March 27, 2023

/s/ Saunak K. Desai

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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of March 2023, I caused a true and correct copy of the foregoing **PRELIMINARY IDENTIFICATION OF ASSERTED CLAIMS** to be served on all counsel of record via e-mail service.

/s/ Saunak K. Desai

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