

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WEBROOT INC. and OPEN TEXT, INC.,

Plaintiffs,

v.

SOPHOS LTD.,

Defendant.

C.A. No. 6:22-cv-00240-ADA-DTG

**JURY TRIAL DEMANDED**

**DEFENDANT SOPHOS LTD.'S FINAL INVALIDITY CONTENTIONS**

**7. U.S. Patent No. 11,409,869<sup>5</sup>**

- U.S. Patent Pub. No. 2006/0026675 to Cai et al. (“Cai et al.”)
- U.S. Patent Pub. No. 2015/0213376 to Ideses et al. (“Ideses et al.”)
- U.S. Patent Pub. No. 2017/0098074 to Okano et al. (“Okano et al. ’074”)
- U.S. Patent No. 8,799,190 to Stokes et al. (“Stokes et al.”)
- U.S. Patent No. 9,245,120 to Friedrichs et al. (“Friedrichs et al.”)
- U.S. Patent No. 9,398,034 to Ronen et al. (“Ronen et al.”)
- U.S. Patent No. 8,955,133 to Kumar et al. (“Kumar et al.”)
- U.S. Patent No. 9,672,355 to Titonis et al. (“Titonis et al.”)
- U.S. Patent No. 10,268,820 to Okano et al. (“Okano et al. ’820”)
- U.S. Patent No. 10,395,032 to Keller et al. (“Keller et al.”)
- U.S. Patent Pub. No. 2006/0037080 to Maloof (“Maloof”)
- U.S. Patent Pub. No. 2007/0240220 to Tuvell et al. (“Tuvell et al.”)
- U.S. Patent Pub. No. 2009/0254992 to Schultz et al. (“Schultz et al.”)
- U.S. Patent Pub. No. 2011/0047618 to Evans et al. (“Evans et al.”)
- U.S. Patent Pub. No. 2013/0198841 to Poulson (“Poulson”)
- U.S. Patent Pub. No. 2014/0090061 to Avasarala et al. (“Avasarala et al.”)
- U.S. Patent Pub. No. 2015/0096024 to Haq et al. (“Haq et al.”)
- U.S. Patent Pub. No. 2016/0277423 to Apostolescu et al. (Apostolescu et al.”)
- U.S. Patent No. 8,161,548 to Wan (“Wan”)
- U.S. Patent No. 8,578,497 to Antonakakis et al. (“Antonakakis et al.”)
- U.S. Patent No. 8,719,939 to Krasser et al. (“Krasser et al.”)

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<sup>5</sup> Sophos hereby incorporates by reference all references for the ’844 patent listed in the Preliminary Invalidation Contentions’ ’844 Patent “State of the Art” section.

- U.S. Patent No. 9,286,182 to Fries et al. (“Fries et al.”)
- U.S. Patent No. 9,330,257 to Valencia et al. (“Valencia et al.”)
- U.S. Patent No. 9,516,039 to Yen et al. (“Yen”)
- U.S. Patent No. 9,832,211 to Hsiao et al. (“Hsiao et al.”)
- U.S. Patent No. 9,853,997 to Canzanese et al. (“Canzanese et al.”)
- U.S. Patent No. 8,838,992 to Zhu et al. (“Zhu et al.”)
- U.S. Patent No. 8,505,094 to Xuewen et al. (“Xuewen et al.”)
- E.P. Patent No. 2,182,458 to Moskovitch et al. (“Moskovitch et al.”)
- U.S. Patent No. 10,666,676 to Hsu et al. (“Hsu et al.”)
- U.S. Patent No. 8,935,788 to Diao et al. (“Diao et al.”)
- U.S. Patent No. 7,756,535 to Diao et al. (“Diao et al. II”)
- U.S. Patent No. 8,560,466 to Diao et al. (“Diao et al. III”)
- U.S. Patent No. 7,689,531 to Diao et al. (“Diao et al. IV”)
- U.S. Patent No. 7,949,771 to Chen et al. (“Chen et al.”)
- U.S. Patent No. 8,495,144 to Cheng et al. (“Cheng et al”)
- U.S. Patent No. 8,850,570 to Ramzan (“Ramzan”)
- U.S. Patent No. 8,023,974 to Diao et al. (“Diao et al. V”)
- U.S. Patent Pub. No. 2010/0191734 to Rajaram et al. (“Rajaram et al.”)
- U.S. Patent Pub. No. 2014/0090064 to Pistoia et al. (“Pistoia et al.”)
- U.S. Patent No. 8,533,831 to Satish (“Satish”)
- U.S. Patent No. 8,885,938 to Hong et al. (“Hong et al.”)
- U.S. Patent No. 9,129,110 to Mason et al. (“Mason et al.”)
- U.S. Patent No. 9,497,204 to Symons et al. (“Symons et al.”)
- U.S. Patent Pub. No. 2010/0162395 to Kennedy et al. (“Kennedy et al.”)

## V. ACCOMPANYING DOCUMENT PRODUCTION

Pursuant to the Parties' Proposed Scheduling Order, Defendant has produced or will promptly produce all prior art referenced in its Final Invalidity Contentions. *See* documents with the prefix "SOPHOS-" produced herewith. Defendant will promptly produce any documents uncovered during discovery, including through third-party subpoenas.

Dated: November 1, 2023

Respectfully submitted,

/s/ Brian Rosenthal

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**Certificate of Service**

I hereby certify that on November 1, 2023, the foregoing document has been served by electronic mail on all counsel of record.

/s/ *Lauren Womack*

Lauren Womack