

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

DROPBOX, INC.,

*Plaintiff/Counterclaim
Defendant,*

v.

MOTION OFFENSE, LLC,

*Defendant / Counterclaim
Plaintiff.*

MOTION OFFENSE, LLC,

Plaintiff,

v.

DROPBOX, INC.,

Defendant.

Civil Action No. 6:20-cv-00251-ADA

JURY TRIAL DEMANDED

Civil Action No. 6:21-cv-00758-ADA

JURY TRIAL DEMANDED

JURY VERDICT FORM


May 19, 2023
1:40 PM

When answering the following questions and filling out this Verdict Form, please follow the directions provided throughout the Form. Your answer to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Jury Instructions. Please refer to the Jury Instructions if you are unsure about the meaning or usage of any legal term that appears in the questions below.

As used here, “Motion Offense” means Motion Offense LLC and “Dropbox” means “Dropbox Inc.” As used here, “’158 Patent” refers to U.S. Patent No. 10,013,158, “’052 Patent” refers to U.S. Patent No. 10,021,052, “’548 Patent” refers to U.S. Patent No. 10,587,548 and “’215 Patent” refers to U.S. Patent No. 11,044,215.

We, the jury, unanimously agree to the answers to the following questions, and return them under the instructions of this Court as our verdict in this case.

I. QUESTIONS OF INFRINGEMENT

Please answer Question 1 separately for each asserted patent claim.

Q1. For each asserted patent claim, has Motion Offense proven by a preponderance of the evidence that Dropbox has infringed? Please answer in each cell with “Yes” (for Motion Offense) or “No” (for Dropbox).	
'158 patent – Claim 3	<i>NO</i>
'158 patent – Claim 6	<i>NO</i>
'158 patent – Claim 14	<i>NO</i>
'052 patent – Claim 12	<i>NO</i>
'052 patent – Claim 20	<i>NO</i>
'052 patent – Claim 27	<i>NO</i>
'548 patent – Claim 46	<i>NO</i>
'215 patent – Claim 18	<i>NO</i>

II. QUESTIONS OF PRIORITY DATE

ANSWER QUESTION 2 FOR EACH ASSERTED CLAIM OF THE '158 PATENT AND EACH ASSERTED CLAIM OF THE '052 PATENT.

<p>Q2. For each asserted patent claim, has Motion Offense proven by a preponderance of the evidence that the claim is entitled to a priority date of September 25, 2012?</p> <p>Please answer in each cell with "Yes" (for Motion Offense) or "No" (for Dropbox).</p>	
'158 patent – Claim 3	NO
'158 patent – Claim 6	NO
'158 patent – Claim 14	NO
'052 patent – Claim 12	NO
'052 patent – Claim 20	NO
'052 patent – Claim 27	NO

ANSWER QUESTION 2 FOR CLAIM 46 OF THE '548 PATENT AND/OR CLAIM 18 OF THE '215 PATENT ONLY IF YOU ANSWERED "YES" FOR THAT CLAIM IN QUESTION 1.

<p>Q2. For each asserted patent claim, has Motion Offense proven by a preponderance of the evidence that the claim is entitled to a priority date of September 25, 2012??</p> <p>Please answer in each cell with "Yes" (for Motion Offense) or "No" (for Dropbox).</p>	
'548 patent – Claim 46	NO
'215 patent – Claim 18	NO

III. QUESTIONS OF INVALIDITY

ANSWER QUESTION 3 FOR EACH ASSERTED CLAIM OF THE '158 PATENT AND EACH ASSERTED CLAIM OF THE '052 PATENT.

<p>Q3. For each asserted patent claim, has Dropbox proven by clear and convincing evidence that the claim is invalid as anticipated or obvious in light of the prior art?</p> <p>Please answer in each cell with "Yes" (for Dropbox) or "No" (for Motion Offense).</p>	
'158 patent – Claim 3	<i>Yes</i>
'158 patent – Claim 6	<i>Yes</i>
'158 patent – Claim 14	<i>Yes</i>
'052 patent – Claim 12	<i>Yes</i>
'052 patent – Claim 20	<i>Yes</i>
'052 patent – Claim 27	<i>Yes</i>

ANSWER QUESTION 3 FOR CLAIM 46 OF THE '548 PATENT AND/OR CLAIM 18 OF THE '215 PATENT ONLY IF YOU ANSWERED "YES" FOR THAT CLAIM IN QUESTION 1.

<p>Q3. For each asserted patent claim, has Dropbox proven by clear and convincing evidence that the claim is invalid as anticipated or obvious in light of the prior art?</p> <p>Please answer in each cell with "Yes" (for Dropbox) or "No" (for Motion Offense).</p>	
'548 patent – Claim 46	<i>YES</i>
'215 patent – Claim 18	<i>YES</i>

IV. QUESTION OF DAMAGES (ONLY IF APPLICABLE)

IF YOU ANSWERED “NO” FOR ALL CLAIMS IN QUESTION 1 (NOT INFRINGED), DO NOT ANSWER QUESTION 4. PROCEED DIRECTLY TO THE FINAL SIGNATURE PAGE.

IF YOU ANSWERED “YES” (INFRINGED) FOR AT LEAST ONE CLAIM IN QUESTION 1 AND YOU FOUND ANY INFRINGED CLAIM NOT INVALID (“NO” IN QUESTION 3), THEN PROCEED TO QUESTION 4.

Q4. What is the amount of reasonable royalty damages through June 30, 2022, that Motion Offense has proved by a preponderance of the evidence as a result of the infringement you found in Question No. 1?

Amount of Reasonable Royalty Damages: \$ _____

PROCEED TO THE FINAL SIGNATURE PAGE.

FINAL PAGE OF JURY VERDICT FORM

You have now reached the end of the Verdict Form and should review it to ensure it accurately reflects your unanimous determinations. After you have satisfied that your unanimous answers are correctly reflected above, your Jury Foreperson should then sign and date this Verdict Form in the spaces below. Once that is done, notify the Court Security Officer that you have reached a verdict.

SIGNED this 19 day of May 2023

JURY FOREPERSON