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

MOTION OFFENSE, LLC, *Plaintiff.* v. DROPBOX, INC., *Defendant.*	**Civil Action No. 6:23-cv-303-ADA**

PLAINTIFF'S DISCLOSURE OF PRELIMINARY
INFRINGEMENT CONTENTIONS

I. INTRODUCTION

Pursuant to the Court's Order Governing Proceedings, Plaintiff Motion Offense, LLC ("Motion Offense" or "Plaintiff"), serves these preliminary Infringement Contentions with respect to claims 1-12 and 14-24 of U.S. Patent No. 11,611,520 (the "'520 patent") (referred to herein as the "Asserted Patent" and "Asserted Claims"). A chart setting forth Motion Offense's preliminary contentions is attached hereto.

II. PRIORITY

Based on its current investigation, Motion Offense provides the following priority date for the Asserted Patent:

U.S. Patent No. 11,611,520: September 22, 2012

Plaintiff has provided with these contentions documents related to the above asserted priority date.

III. RESERVATION

With respect to all issues subject to these preliminary contentions, Motion Offense's

investigation is ongoing, discovery has not yet commenced, and Defendant has yet to produce any documents in this case. Accordingly, Motion Offense's disclosures are based on publicly available and/or publicly discernable materials regarding the accused instrumentalities that describe or discuss aspects of the operation of the instrumentalities. Motion Offense reserves the right to supplement or alter its disclosures herein based on additional information obtained through further investigation, discovery, claim construction, expert analysis, or any position taken by Defendant.

Dated: September 20, 2023

Respectfully submitted,

/s/ Timothy Delvin
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via electronic filing and/or electronic mail on September 20, 2023.

/s Timothy Devlin
Timothy Devlin