# U.S. Patent No. 9,941,830 ("'830 Patent")

**Accused Instrumentalities**

Apple products with Taptic Engine technology,, including without limitation iPhone products (iPhone 6s, 6s Plus, 7, 7 Plus, 8, 8 Plus, X, XR, XS, XS Max, 11, 11 Pro, 11 Pro Max, SE (second generation), 12, 12 mini, 12 Pro, 12 Pro Max, 13, 13 mini, 13 Pro, 13 Pro Max, SE (third generation), 14, 14 Plus, 14 Pro, 14 Pro Max, 15, 15 Plus, 15 Pro, 15 Pro Max), MacBook products (MacBook Pro from 2015, MacBook from 2018, MacBook Air from 2018) and Apple Watch products (1st generation, Series 1, Series 2, Series 3, Series 4, Series 5, SE, Series 6, Series 7, SE (second generation), Series 8, Ultra, Series 9, Ultra 2), and all variants and iterations thereof (collectively, "Accused Products"), infringe at least Claims 1, 2, 3, 4, 5, 6, 7, 8, 14, 15, 16, 17, 19, and 20 of the '830 Patent.

Each Accused Product infringes the claims in substantially the same way, and the evidence shown in this chart is similarly applicable to each Accused Product. Each claim limitation is literally infringed by each Accused Product. However, to the extent any claim limitation is not met literally, it is nonetheless met under the doctrine of equivalents because the differences between the claim limitation and each Accused Product would be insubstantial, and each Accused Product performs substantially the same function, in substantially the same way, to achieve the same result as the claimed invention. Notably, Defendant has not yet articulated which, if any, particular claim limitations it believes are not met by the Accused Products.

**Claim 1**

| Claim 1 | Accused Products |
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| [1pre]. A vibration module comprising: | To the extent the preamble is limiting, each Accused Product includes or constitutes a vibration module.<br><br>For example, each of the Apple iPhone 14 and the Apple Watch Ultra contain a linear actuator ("Taptic Engine"), haptic controller(s), and associated circuitry, as described in connection with the claim limitations below.<br><br>*See, e.g.*: |