UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

Headwater Research LLC, *Plaintiff*, vs. Cellco Partnership, d/b/a Verizon Wireless, Verizon Corporate Services Group Inc., *Defendants*.	CASE NO. 6:23-CV-00352-JRG-RSP **PLAINTIFF HEADWATER RESEARCH LLC'S AMENDED DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS** **JURY DEMANDED**

PLAINTIFF HEADWATER RESEARCH LLC'S AMENDED DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

Pursuant to P.R. 3-1 and P.R. 3-2, patent owner Headwater Research LLC ("Headwater") hereby provides its disclosure of asserted claims and infringement contentions and its accompanying document production. This disclosure is based on the information available to Headwater as of the date of this disclosure, before Headwater has received any discovery on the design or operation of the defendants' products. Headwater reserves the right to amend this disclosure to the full extent permitted under the court's rules and orders.

P.R. 3-1: DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

P.R. 3-1(A): ASSERTED CLAIMS

Headwater asserts that defendants Verizon Communications Inc., Cellco Partnership, d/b/a Verizon Wireless, Verizon Corporate Services Group Inc., (collectively "Verizon") infringe one or more of the following claims, directly, by inducement, by contributory infringement:

[redacted]

U.S. Patent No.	*Asserted Claims*
8,589,541	1-174
8,924,543	1-13, 15-16, 21-23, 28, 30-33, 35-47, 57-66, 68-72, 80, 85-93, 96, 98-99, 112-113, 120-121
9,198,042	1-9, 12-14, 16-18
9,215,613	1-24

Collectively, these four patents are referred to herein as the Asserted Patents, and these claims as the Asserted Claims.

P.R. 3-1(B): ACCUSED INSTRUMENTALITIES OF WHICH HEADWATER IS AWARE

In this section, Headwater provides lists of accused products that Headwater is aware of infringing based upon information presently available to it and its investigation to date. Headwater's infringement claims are not limited to these listed products and specifically extend to all products and apparatuses of Verizon similar to the listed products that include the claimed elements. Unless otherwise stated, Headwater's infringement assertions apply to all variations, versions, editions, and applications of each of the listed products.

U.S. PATENT NO. 8,589,541

Headwater accuses the following smartphones, basic phones, tablets, laptops, and hotspot devices sold (including those sold in bundles with data plans) or used by Verizon for use with Verizon's wireless network services of infringing each of the Asserted Claims of the '541 patent:

Servers, hardware, software, and services leased, owned, supported, and/or operated by Verizon comprising Verizon's wireless network services functionality, including but not limited to "OTADM," "PROPOTA" "VZOTADM," "FOTA," "SDM," and/or "DM." *See, e.g.,* VZN-HW0174593, VZN-HW0177231, VZN-HW0173610, VZN-HW0169149.

Date: January 12, 2024

/s/ Marc Fenster

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendants on January 12, 2024, via electronic mail.

/s/ *Marc Fenster*
Marc Fenster