

**SMITH INTERFACE TECHNOLOGIES, LLC'S
PATENT L.R. 3.1 PRELIMINARY INFRINGEMENT CONTENTIONS**

**EXHIBIT C1 - U.S. Patent No. 10,936,114 (Apple Watch)
Claims 1, 27, 30, and 32**

Smith Interface Technologies, LLC ("Smith Interface") accuses Apple of infringing claims 1, 27, 30, and 32 of U.S. Patent No. 10,936,114 (hereinafter "the '114 Patent"). Smith Interface provides the following claim chart. *See* Exhibit C1.

This claim chart identifies specifically where each element of each Asserted Claim is found within each Accused Instrumentality and provides Apple's notice of identified instrumentalities (including "the Accused System") that incorporate or reflect the recited claim elements. This claim chart is not intended to be an expert report on infringement or provide detailed analysis of the claim terms or infringement. This claim chart includes information related to an assertion of infringement with respect to the '114 Patent Accused Products identified, including diagrams, web page screenshots, and other documentary evidence by way of example and not by way of limitation.

The Asserted Claims include elements that are implemented, at least in part, by instrumentalities described in confidential information not accessible to Plaintiff. In some instances, the precise processes and algorithms used are, at least in part, not publicly available. An analysis of Apple's (or other third parties') technical documentation and/or software source code may be necessary to more fully identify all infringing features and functionality. Accordingly, Smith Interface reserves the right to supplement these contentions once such information is made available to Smith Interface. Furthermore, Smith Interface reserves the right to revise these contentions, as appropriate, upon issuance of the Court's Claim Construction Order.

The claim chart refers to the Accused System and the aforementioned products are included in (or can operate in conjunction with) the Accused System, as noted in the claim chart. To the extent the below claim chart relies on evidence for the Accused System, Smith Interface asserts that, on information and belief, any similarly-functioning system also infringe the charted claim. Smith Interface reserves the right to amend these infringement contentions with other products made, used, sold, imported, or offered for sale by Apple. Smith Interface also reserves the right to amend these infringement contentions by citing other claims of the '114 Patent, not listed in the claim chart, that are infringed by the Accused System. Smith Interface further reserves the right to amend these infringement contentions by adding, subtracting, or otherwise modifying content in the "Accused System" section.

To the extent there are any differences between the accused instrumentalities and the following claim elements, any such differences are insubstantial and are alleged to infringe under the doctrine of equivalents.

Claim	Claim Elements	Exemplary Accused System (Apple Watch Series 8, WatchOS 9)
1 ¹	(a) An apparatus, comprising: at least one non-transitory memory storing instructions and a plurality of applications; a touch screen; and one or more processors in communication with the at least one non-transitory memory and the touch screen, wherein the one or more processors execute the instructions to:	Apple Watch series 8 devices comprise <i>at least one non-transitory memory storing instructions and a plurality of applications; a touch screen (e.g., Always-On Retina display, etc.); and one or more processors (e.g., S8 SiP with 64-bit dual-core processor, etc.) in communication with the at least one non-transitory memory and the touch screen.</i> See the evidence above and below, for example: 

¹ Each element of the independent claims incorporates all elements of the independent claim. For example, any evidence provided in claim 1 element (a) incorporates all claim elements 1(b)-(f).

		 Always-On Retina display Up to 1000 nits brightness S8 SiP with 64-bit dual-core processor https://www.apple.com/watch/compare/
	(b) display, via the touch screen, an object and at least a portion of an interface;	Apple Watch series 8 devices are designed to <i>display, via the touch screen</i> (e.g., Always-On Retina display, etc.), <i>an object</i> (e.g., one or more controls of Apple Watch face, etc.) <i>and at least a portion of an interface</i> (e.g., Apple Watch face, etc.); See the evidence above and below, for example:

		
	(c) detect a gesture on the touch screen on the object;	Apple Watch series 8 devices are designed <i>to detect a gesture on the touch screen</i> (e.g., Always-On Retina display, etc.) <i>on the object</i> (e.g., one or more controls of Apple Watch face, etc.); See the evidence above and below, for example:

		
	(d) when a magnitude of a duration of the gesture being detected on the touch screen on the object is less than a first magnitude threshold, perform an operation;	Apple Watch series 8 devices are designed to, <i>when a magnitude of a duration of the gesture being detected on the touch screen</i> (e.g., Always-On Retina display, etc.) <i>on the object</i> (e.g., one or more controls of Apple Watch face, etc.) <i>is less than a first magnitude threshold, perform an operation;</i> See the evidence above and below, for example:

		
	(e) when the magnitude of the duration of the gesture being detected on the touch screen on the object is greater than the first magnitude threshold, perform a scaling in connection with at least the object, where the scaling includes a reduction in a size such that the size is inversely related to the magnitude of the duration of the gesture being detected on	Apple Watch series 8 devices are designed to, <i>when the magnitude of the duration of the gesture being detected on the touch screen (e.g., Always-On Retina display, etc.) on the object (e.g., one or more controls of Apple Watch face, etc.) is greater than the first magnitude threshold, perform a scaling in connection with at least the object, where the scaling includes a reduction in a size such that the size is inversely related to the magnitude of the duration of the gesture being detected on the touch screen on the object;</i> See the evidence above and below, for example:

the touch screen on the object; and	
(f) when the magnitude of the duration of the gesture being detected on the touch screen on the object is greater than a second magnitude threshold, perform another operation.	Apple Watch series 8 devices are designed to, <i>when the magnitude of the duration of the gesture being detected on the touch screen (e.g., Always-On Retina display, etc.) on the object (e.g., one or more controls of Apple Watch face, etc.) is greater than a second magnitude threshold, perform another operation.</i> See the evidence above and below, for example:

		
27	(a) An apparatus, comprising: at least one non-transitory memory storing instructions and a plurality of applications; a touch screen; and one or more processors in communication with the at least one non-transitory memory and the touch screen, wherein the one or more processors execute	Apple Watch series 8 devices comprise <i>at least one non-transitory memory storing instructions and a plurality of applications; a touch screen</i> (e.g., Always-On Retina display, etc.); <i>and one or more processors</i> (e.g., S8 SiP with 64-bit dual-core processor, etc.) <i>in communication with the at least one non-transitory memory and the touch screen, wherein the one or more processors execute the instructions to cause the apparatus to:</i>

	the instructions to cause the apparatus to:	  Always-On Retina display Up to 1000 nits brightness S8 SiP with 64-bit dual-core processor https://www.apple.com/watch/compare/
	(b) display an object on at least a portion of an interface;	Apple Watch series 8 devices are designed to <i>display an object</i> (e.g., one or more controls of Apple Watch face, etc.) <i>on at least a portion of an interface</i> (e.g., Apple Watch face, etc.). See the evidence above and below, for example:

		
	(c) detect a gesture via the touch screen on the object;	Apple Watch series 8 devices are designed to <i>detect a gesture via the touch screen</i> (e.g., Always-On Retina display, etc.) <i>on the object</i> (e.g., one or more controls of Apple Watch face, etc.). See the evidence above and below, for example:

		
	(d) perform a first function in a first touch state;	Apple Watch series 8 devices are designed to <i>perform a first function in a first touch state</i> . See the evidence above and below, for example:

		
	(e) perform a second function in a second touch state; and	Apple Watch series 8 devices are designed to <i>perform a second function in a second touch state</i>. See the evidence above and below, for example:

		
	(f) during detection of at least a portion of the gesture and based on a change in a duration of the gesture being detected via the touch screen on the object, perform a scale operation in connection with the at least portion of the interface, where the scale operation includes a reduction in a size that is inversely related to the duration of the gesture being detected via the touch screen on the object.	Apple Watch series 8 devices are designed to, <i>during detection of at least a portion of the gesture and based on a change in a duration of the gesture being detected via the touch screen (e.g., Always-On Retina display, etc.) on the object (e.g., one or more controls of Apple Watch face, etc.), perform a scale operation in connection with the at least portion of the interface (e.g., Apple Watch face, etc.), where the scale operation includes a reduction in a size that is inversely related to the duration of the gesture being detected via the touch screen on the object.</i> See the evidence above and below, for example:

		
30	(a) An apparatus, comprising: at least one non-transitory memory storing instructions and a plurality of applications; a touch screen; a vibrator; and one or more processors in communication with the at least one non-transitory memory, the touch screen,	Apple Watch series 8 devices comprise <i>at least one non-transitory memory storing instructions and a plurality of applications; a touch screen</i> (e.g., Always-On Retina display, etc.); <i>a vibrator</i>; and <i>one or more processors</i> (e.g., S8 SiP with 64-bit dual-core processor, etc.) <i>in communication with the at least one non-transitory memory, the touch screen, and the vibrator.</i> See the evidence above and below, for example:

	and the vibrator, wherein the one or more processors execute the instructions to cause the apparatus to:	  Always-On Retina display Up to 1000 nits brightness S8 SiP with 64-bit dual-core processor https://www.apple.com/watch/compare/
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Manage Apple Watch Haptic Alerts

1. Open the Settings app.
2. Scroll down and tap Sounds & Haptics.
3. Turn Haptic Alerts on or off.



<https://support.apple.com/en-us/HT204793>

(b) display a first object and at least one other object;	Apple Watch series 8 devices are designed to <i>display a first object</i> (e.g., one or more controls of Apple Watch face, etc.) <i>and at least one other object</i>. See the evidence above and below, for example: 
(c) detect a gesture on the touch screen on the first object;	Apple Watch series 8 devices are designed to <i>detect a gesture on the touch screen</i> (e.g., Always-On Retina display, etc.) <i>on the first object</i> (e.g., one or more controls of Apple Watch face, etc.). See the evidence above and below, for example:

		
	(d) during detection of at least a portion of the gesture before a completion thereof is detected, perform a scale operation, based on a change in a duration of the gesture being detected on the touch screen on the first object, on at least the at least one other object, where the scale operation includes a reduction in a size that is inversely related to the duration of the gesture being detected	Apple Watch series 8 devices are designed such that, <i>during detection of at least a portion of the gesture before a completion thereof is detected, perform a scale operation, based on a change in a duration of the gesture being detected on the touch screen (e.g., Always-On Retina display, etc.) on the first object (e.g., one or more controls of Apple Watch face, etc.), on at least the at least one other object, where the scale operation includes a reduction in a size that is inversely related to the duration of the gesture being detected on the touch screen on the first object.</i> See the evidence above and below, for example:

	on the touch screen on the first object; and	
	(e) after at least a portion of the scale operation, vibrate the apparatus and perform an action.	Apple Watch series 8 devices are designed to, <i>after at least a portion of the scale operation, vibrate the apparatus and perform an action.</i> See the evidence above and below, for example:

Manage Apple Watch Haptic Alerts

1. Open the Settings app.
2. Scroll down and tap Sounds & Haptics.
3. Turn Haptic Alerts on or off.



<https://support.apple.com/en-us/HT204793>

		 The image displays four Apple Watch Series 8 faces arranged in a 2x2 grid. The top-left, top-right, and bottom-left faces show a 'Chronograph' watch face with complications for UV Index (UVI), Temperature (71°F), Time of Day (7:40 PM), and Time Zone (+10 HOURS). The bottom-right face shows an 'Infograph' watch face with a smaller version of the same complications. Each watch face has a black background with white hands and markers, and a silver-colored case.
32	(a) An apparatus, comprising:	Apple Watch series 8 devices comprise at least one non-transitory memory storing instructions and a plurality of applications; a touch screen (e.g., Always-On Retina display, etc.); and one or more

at least one non-transitory memory storing instructions and a plurality of applications; a touch screen; and one or more processors in communication with the at least one non-transitory memory and the touch screen, wherein the one or more processors execute the instructions to:	processors (e.g., S8 SiP with 64-bit dual-core processor, etc.) in communication with the at least one non-transitory memory and the touch screen. See the evidence above and below, for example:   Always-On Retina display Up to 1000 nits brightness S8 SiP with 64-bit dual-core processor https://www.apple.com/watch/compare/
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	(b) display, via the touch screen, a first object and at least one other object;	Apple Watch series 8 devices are designed to <i>display, via the touch screen</i> (e.g., Always-On Retina display, etc.), <i>a first object</i> (e.g., one or more controls of Apple Watch face, etc.) <i>and at least one other object</i>. See the evidence above and below, for example: 
	(c) detect at least one component of a gesture on the touch screen on the first object;	Apple Watch series 8 devices are designed to <i>detect at least one component of a gesture on the touch screen on the first object</i> (e.g., one or more controls of Apple Watch face, etc.). See the evidence above and below, for example:

		
	(d) when a first component of the gesture is detected where a magnitude of a duration of the gesture being detected on the touch screen on the first object is less than a first magnitude threshold, perform a function upon a cessation of the gesture being detected;	Apple Watch series 8 devices are designed such that <i>when a first component of the gesture is detected where a magnitude of a duration of the gesture being detected on the touch screen (e.g., Always-On Retina display, etc.) on the first object (e.g., one or more controls of Apple Watch face, etc.) is less than a first magnitude threshold, perform a function upon a cessation of the gesture being detected.</i> See the evidence above and below, for example:

		 (e) when a second component of the gesture is detected where the magnitude of the duration of the gesture being detected on the touch screen on the first object is greater than the first magnitude threshold, perform a scale operation for the at least one other object, where the scale operation includes a reduction in a size so as to be inversely related to the magnitude of the duration of the gesture being detected on the touch screen on the first object. See the evidence above and below, for example:
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magnitude of the duration of the gesture being detected on the touch screen on the first object; and	
(f) when a third component of the gesture is detected where the magnitude of the duration of the gesture being detected on the touch screen on the first object is greater than a second magnitude threshold, perform another function.	Apple Watch series 8 devices are designed such that <i>when a third component of the gesture is detected where the magnitude of the duration of the gesture being detected on the touch screen (e.g., Always-On Retina display, etc.) on the first object (e.g., one or more controls of Apple Watch face, etc.) is greater than a second magnitude threshold, perform another function.</i> See the evidence above and below, for example:

