

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

Infogation Corporation,

Plaintiff,

v.

Honda Motor Co. Ltd.,

Defendant.

Case No. 2:23-cv-00513-JRG

Jury Trial Demanded

PRELIMINARY INFRINGEMENT CONTENTIONS

In accordance with the Order Governing Proceedings issued in this case, Infogation Corporation (“Plaintiff”) respectfully serves these Preliminary Infringement Contentions against Honda Motor Co. Ltd. (“Honda” or “Defendant”).

Appended hereto are charts setting forth where in the Accused Instrumentalities (as defined in the operative Complaint) each element of each Asserted Claim is found.

The Asserted Patents are as follows: U.S. Patent No. 10,062,107 (the “’107 Patent”); U.S. Patent No. 10,776,863 (the “’863 Patent”); and U.S. Patent No. 11,449,930 (the “’930 Patent”) (hereinafter collectively referred to as “the Asserted Patents”).

The Asserted Claims are as follows:

- U.S. Patent 6,292,743 Claims 1;
- U.S. Patent 8,406,994 Claims 1;
- U.S. Patent 8,898,003 Claims 1.
- U.S. Patent 10,107,628 Claims 1.

The priority date of the ’743 Patent is January 6, 1999. The priority date of the ’994 Patent and the ’003 Patent is November 7, 2008. The priority date of the ’628 Patent is August 7, 2011.

PRELIMINARY INFRINGEMENT CONTENTIONS

The '743 Patent expired January 6, 2019. The expiration date of the '994 Patent is May 11, 2031. The '003 Patent does not expire before February 2, 2030. The '628 Patent does not expire before July 26, 2033.

To the extent Defendant challenges either the priority date or the expiration date of any Asserted Patent or of individual Asserted Claim, Plaintiff contends that any such challenge must be raised with specificity contemporaneous with Defendant's Invalidity Contentions. Given the central importance of the priority date (the "date of invention") to the issues of claim construction and validity, Plaintiff will move to preclude any such argument or challenge not timely raised.

In addition to the appended Claim Charts, Plaintiff is producing all document in its possession, custody, and control (if any) evidencing conception and reduction to practice of the Asserted Claims, as well as copies of the file histories for each of the Asserted Patents.

Dated: May 15, 2024

Respectfully Submitted

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ATTORNEYS FOR PLAINTIFF

InfoGation's Preliminary Infringement Claim Chart
InfoGation Corporation v. Honda Motor Co. Ltd.,
Cause No.: 2:23-cv-00513-JRG
U.S. Patent No. 6,292,743
Asserted Claim: 1.

Plaintiff provides this Infringement Chart based upon its best reasonable evaluation of publicly available information as of the date of service hereof. Most, if not all, of the infringing functionality is proprietary to Defendant; thus, Plaintiff reserves its right to supplement these Contentions as necessary following full technical production on the part of Defendant and following full review of the relevant historical source code for the Accused Instrumentalities by Plaintiff's experts to be designated in due course of this litigation.

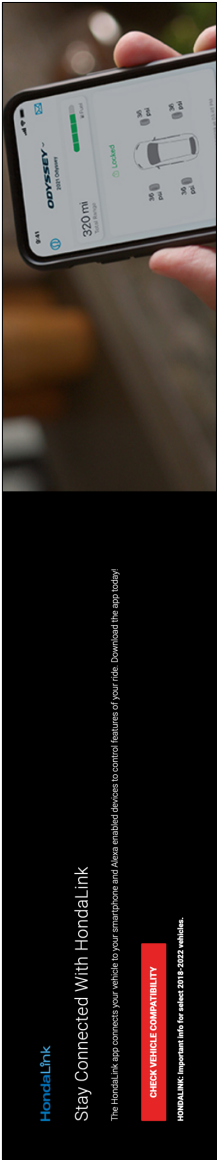
As of the date of preparation of this Infringement Chart, which is being undertaken without the benefit of discovery, Plaintiff believes and alleges that each element is literally present in the Accused Instrumentalities. To the extent discovery reveals infringement occurs in manners or using systems different than those believed to be made, used, and sold by Defendant, Plaintiff intends to argue that such differences are nevertheless infringing under the Doctrine of Equivalents.

This Infringement Chart is applicable to methods practiced and/or implemented by or in connection with all iterations of the Accused Instrumentalities made, used, sold, and/or offered for sale, from and after the date falling prior to the date of filing of the Original Complaint in this litigation, and extending through the expiration of the '743 Patent. Plaintiff contends, and hereupon alleges, that all such iterations, versions, and progressively more robust implementations of the Accused Instrumentalities during the period of infringement nevertheless infringe the Asserted Claims in substantially the same or identical manner as is set forth herein.

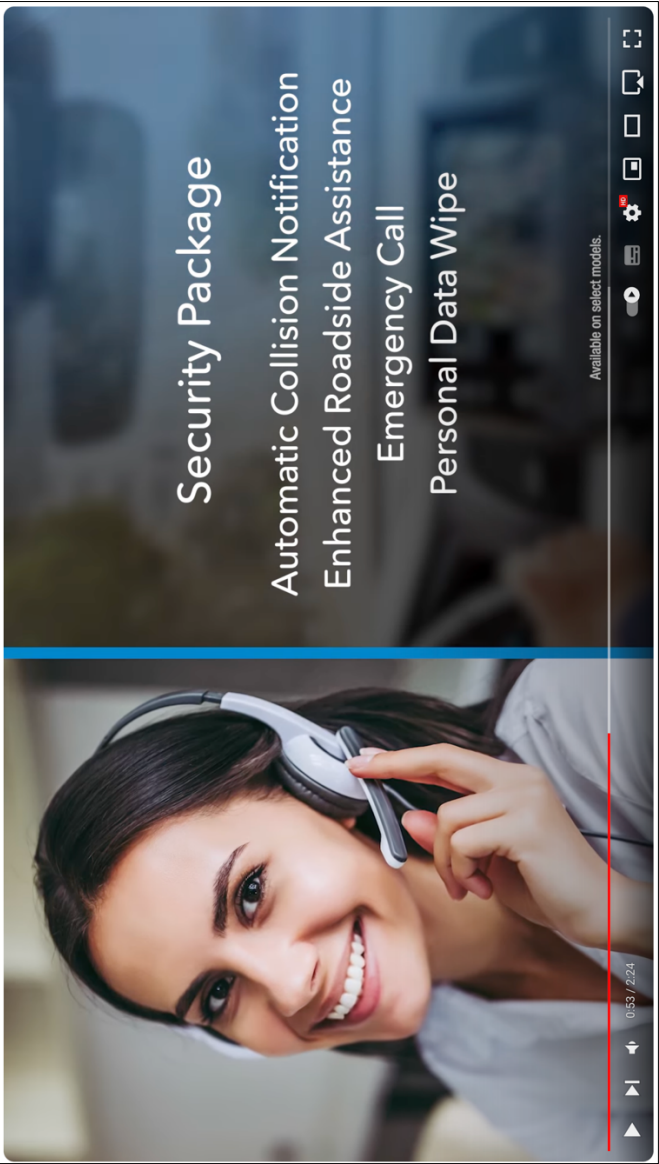
In preparing these Charts, and for the sake of completeness, Plaintiff has included the preambles for each Asserted Claim. In so doing, Plaintiff does not contend that such preambles are in any way limiting on any Asserted Claim.

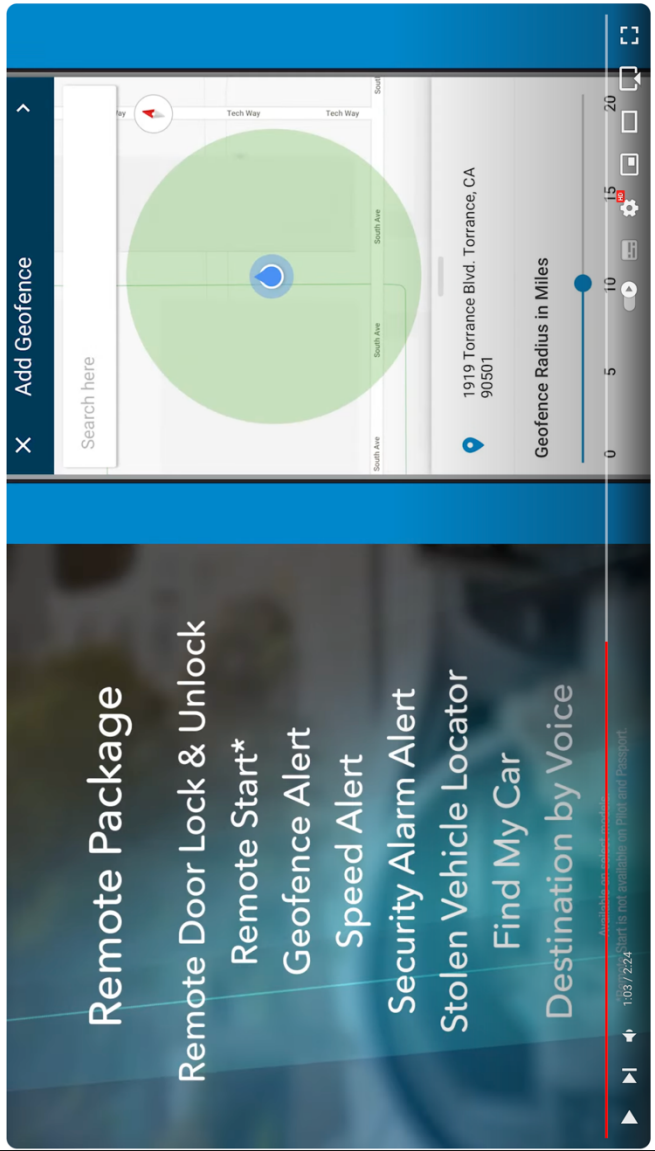
For each element of these Charts, it is herein alleged to infringe literally, or in the alternative, under the doctrine of equivalents.

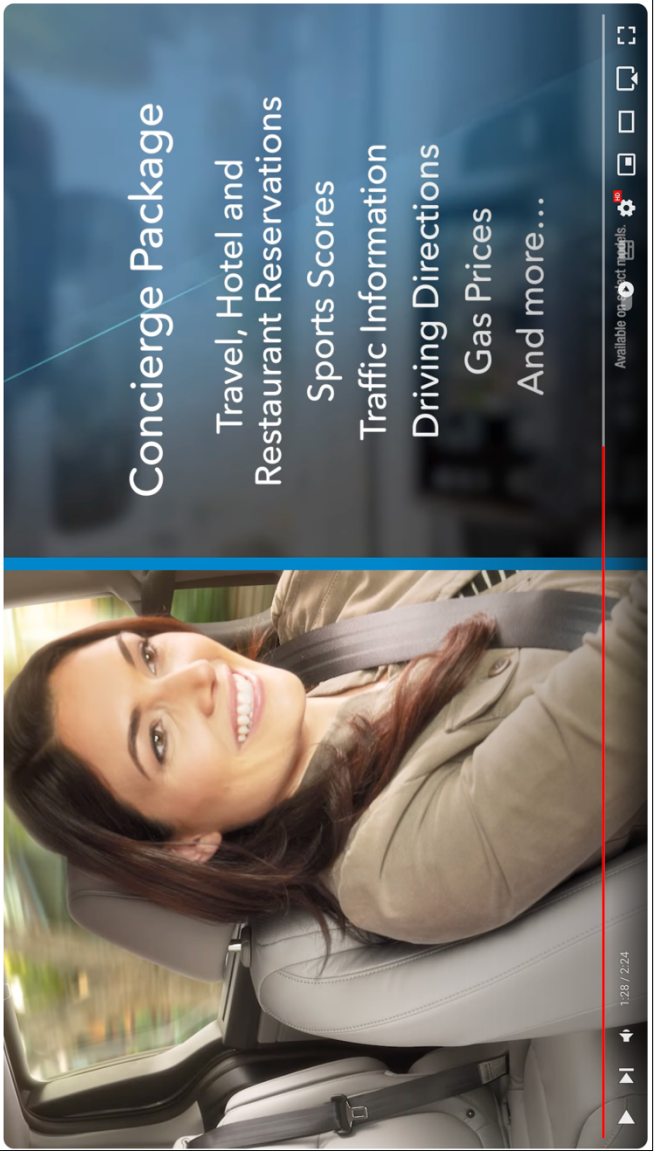
U.S. Patent No. 6,292,743		Toyota Audio Multimedia System (“the Accused Instrumentalities”)	
Asserted Claim Element		Preliminary Infringement Contention	
Claim 1		To the extent the preamble is limiting, the Accused Instrumentalities practices and provides a method for providing an optimal route using real-time information for a navigation system comprising a client and a server, said server coupled to a computer network (e.g., the Acura’s GPS Navigation system included in Honda Acura’s lineup of personal vehicles, in all trims and configurations such as but not limited to Acura MDX, RDX, TLX, etc. is a client that is in constant communication with the Toyota server through a computer network and provides an optimal route based on real-time information). More specifically, Honda Acura navigation system (the client) which is vehicle’s onboard navigation system through which the driver interacts with the system which is connected to the remote component that stores and processes data related to navigation, such as maps, traffic information, and routing algorithms (Honda server connected through cloud). The server communicates with the client (the vehicle) over a network connection, providing real-time information and guidance to the navigation system.	
[1.P]: A method for providing an optimal route using real-time information for a navigation system comprising a client and a server, said server coupled to a computer network, said method comprising the steps of:			

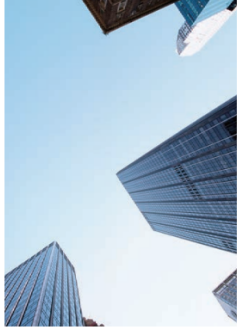
U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	 Visit Website Honda Link Select models offer a wealth of helpful subscription services HondaLink Subscription Services come with complimentary trials of Security for one year and a Remote/Concierge trial for three months. Enrollment is required to access the Remote/Concierge trial and to access certain features of Security. At the end of each trial period, purchase of a subscription is required to continue the respective services. <i>See, https://www.youtube.com/watch?v=ErQqRGFiZIM (runtime at 0:20)</i>  HondaLink Stay Connected With HondaLink The HondaLink app connects your vehicle to your smartphone and Alexa enabled devices to control features of your ride. Download the app today! CHECK VEHICLE COMPATIBILITY HONDA LINK: Important info for select 2018-2022 vehicles. <i>See, https://mygarage.honda.com/s/hondalink-marketing</i>

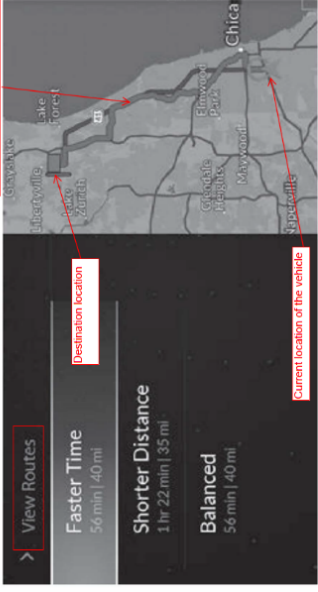
Toyota Audio Multimedia System ("the Accused Instrumentalities")

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	 The image is a screenshot of a YouTube video player. On the left, there is a video of a smiling woman wearing a headset, with her hand near her ear. On the right, there is a dark overlay with white text listing features: 'Security Package', 'Automatic Collision Notification', 'Enhanced Roadside Assistance', 'Emergency Call', and 'Personal Data Wipe'. Below the text, it says 'Available on select models.' The video player interface includes a progress bar at the bottom with a timestamp of 0:53 / 2:24, and standard YouTube controls like play, pause, and volume. <i>See, https://www.youtube.com/watch?v=li3igSI3HpQ</i>

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	 The screenshot displays the Toyota Audio Multimedia System interface. The top half features a list of features: Remote Package, Remote Door Lock & Unlock, Remote Start*, Geofence Alert, Speed Alert, Security Alarm Alert, Stolen Vehicle Locator, Find My Car, and Destination by Voice. The bottom half shows a map with a green circular geofence centered on a location marked with a blue dot. The map includes street names like Tech Way, South Ave, and South Blvd. A search bar at the top left of the map area contains the text "Search here". A "Geofence Radius in Miles" slider is visible on the right side of the map, with a value of 10 miles selected. The address "1919 Torrance Blvd. Torrance, CA 90501" is displayed below the map. <i>See, https://www.youtube.com/watch?v=li3igS13HpQ</i>

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	 <i>See, https://www.youtube.com/watch?v=li3igS13HpQ</i>

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities) Overview—Functions at a Glance Navigation You can select any place/landmark as a destination by using True Touchpad Interface. The navigation system gives you turn-by-turn driving directions to your destination.  Store home address ➡ P 19 Register your home address. Store locations ➡ P 22 Store locations to use as the destination. Enter destination ➡ P 42 Select your destination using several methods. Select route ➡ P 56 Set route preferences and select one of the available routes.  Track route ➡ P 57 Follow your route in real-time with voice guidance. Add waypoints ➡ P 63 Add “pit stops” along your route.  See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF
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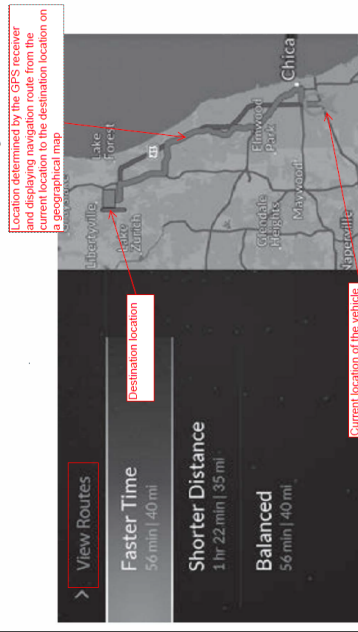
U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	<u>Viewing and Selecting the Routes</u> View and select different routes to your destination.  1. Select <u>View Routes on the destination information screen.</u> ➡ Viewing the Destination Information P. 55 2. Select an option. ➡ The estimated travel time and travel distance are displayed for each route. See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF (Annotated) [Page 56] Basic Acura Navigation Operation The <u>Acura navigation system</u> uses <u>GPS</u> and a map database to plot <u>your current location</u> and guide you to <u>your desired destination</u>. You can see your map displayed on the screen in the center of your dash, and you can use buttons to enter destination information. You also the option of controlling your system via voice commands. While you are driving, certain manual functions may be disabled, so default to audible commands! See, https://www.parkaveacura.com/how-do-i-use-acura-navigation/ (<i>emphasis added</i>)

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System ("the Accused Instrumentalities") Current Location  ENTER/MENU button (on map) ► Map/Route ► Current Location Display and save <u>your current location for future use as a destination</u>. The <u>address, latitude, longitude, and elevation of your current location are displayed</u>. ■ To save your current location in the address book: 1. Press  to select Address Book. ► Move  to scroll the map as necessary. Displaying current location of the vehicle determined by GPS receiver and displaying on map screen. See, http://techinfo.honda.com/rjanis/pubs/OM/AH/BTZ51818OG/enu/BTZ51818NV.PDF [Annotated] [Page 112]
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U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) Driving to Your Destination <u>Viewing the Route</u> This section describes how to follow the route guidance to your destination. <u>Map Screen</u> GUIDANCE Next turn indicator After calculating the route to your destination, the route is displayed on the map screen. As you drive, the system tracks your position on the map in real time and provides guidance as you approach each guidance point on the route. ➡ During Route Guidance P. 7 See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF (emphasis added) [Page 57]
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Viewing and Selecting the Routes

View and select different routes to your destination.



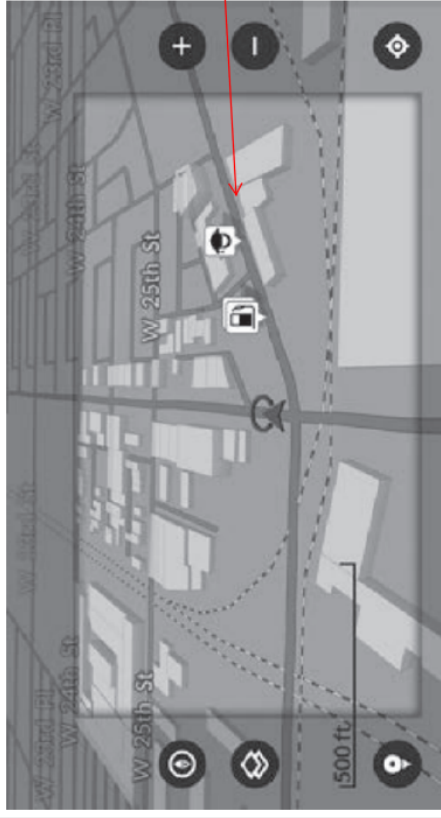
1. Select View Routes on the destination information screen.

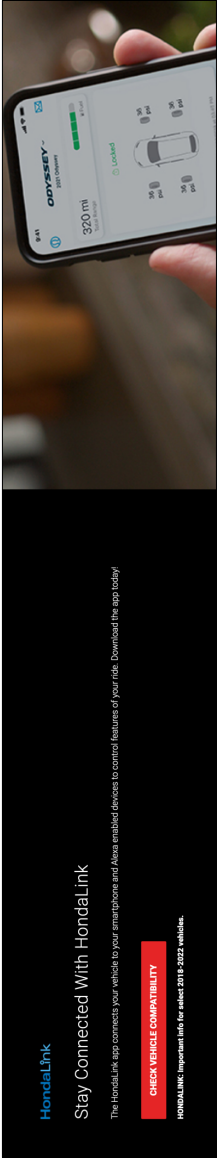
➔ Viewing the Destination Information P. 55

2. Select an option.

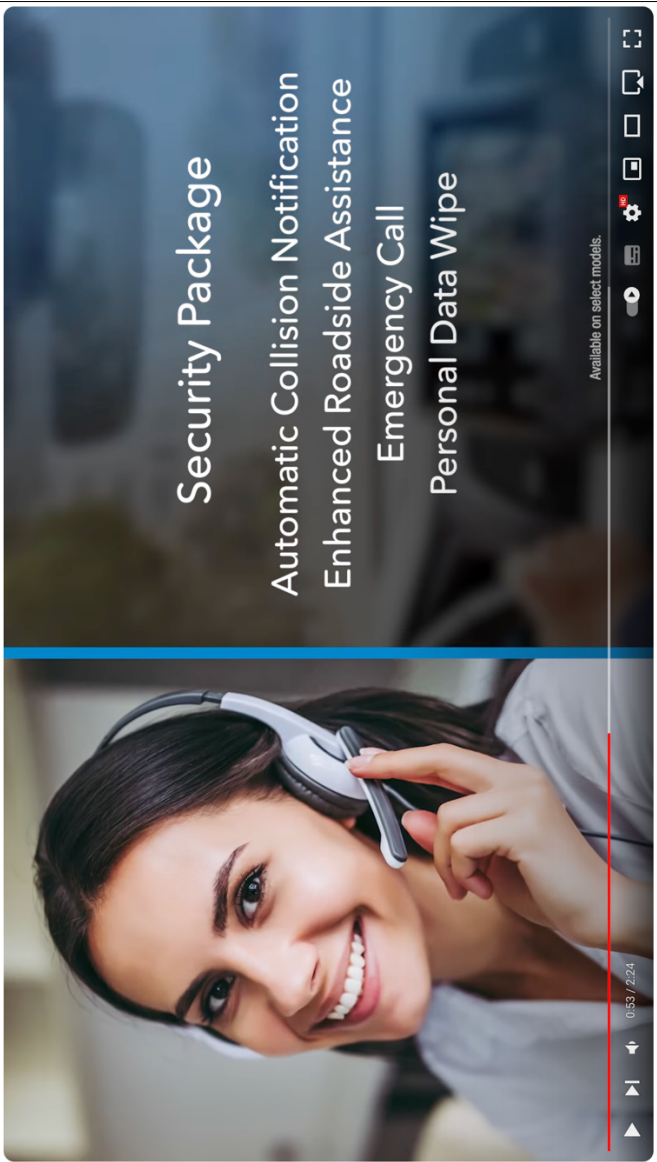
► The estimated travel time and travel distance are displayed for each route.

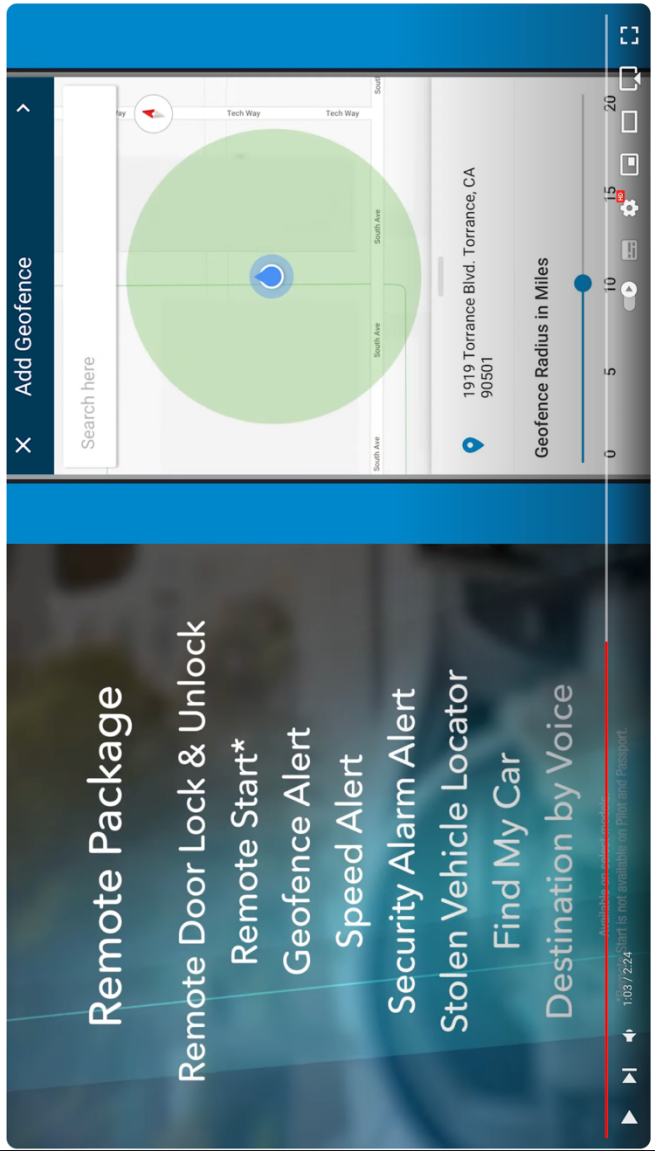
See, <http://techinfo.honda.com/rjanis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF>
(Annotated) [Page 56]

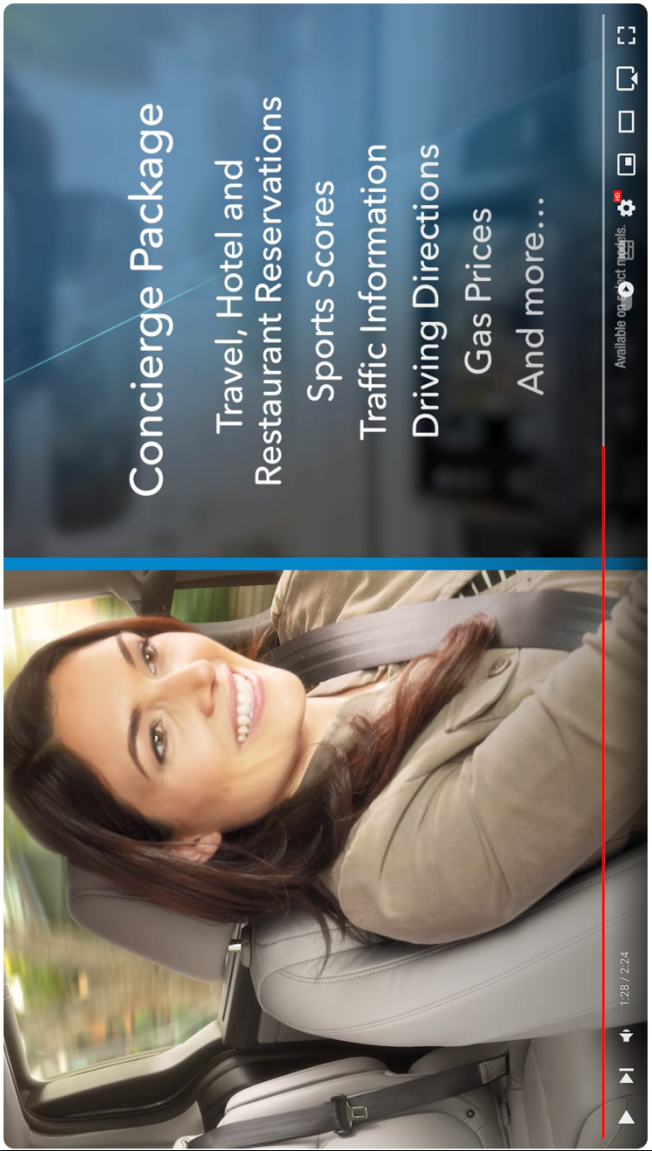
U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	Selecting a Location  (Home) ► Navigation ► EXPLORE  1. Select . A Point of interest can be selected by the user on a 3D map.
[1.A]: establishing a wireless connection between the client and the server;	See, http://techinfo.honda.com/rjanis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF (Annotated) [Page 51] The Accused Instrumentalities establishes a wireless connection between the client and server. More specifically, Acura’s Navigation system establishes a wireless connection between the vehicle’s onboard navigation system and the server in the cloud through cellular connectivity. Furthermore, using Honda Link App, the wireless connection is established through user’s phone for the onboard navigation system (the client) and the server.

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities)
	 Visit Website Honda Link Select models offer a wealth of helpful subscription services HondaLink Subscription Services come with complimentary trials of Security for one year and a Remote/Concierge trial for three months. Enrollment is required to access the Remote/Concierge trial and to access certain features of Security. At the end of each trial period, purchase of a subscription is required to continue the respective services. <i>See, https://www.youtube.com/watch?v=ErQqRGFiZIM (runtime at 0:20)</i>  HondaLink Stay Connected With HondaLink The HondaLink app connects your vehicle to your smartphone and Alexa enabled devices to control features of your ride. Download the app today! CHECK VEHICLE COMPATIBILITY HONDA LINK: Important info for select 2018-2022 vehicles. <i>See, https://mygarage.honda.com/s/hondalink-marketing</i>

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)  Remote START FREE TRIAL WHY SUBSCRIBE TO REMOTE? The Remote package unlocks more convenient connectivity features for your Honda. Effortless check-in on your vehicle's location, get alerts, and access exclusive person requests from your app to make sure you're safe. KEY FEATURES Remote Start Get comfy by cooling down or warming up your car ahead of time.* Security Alarm Alert Get notifications when your vehicle alarm is triggered. Remote Lock & Unlock Remotely lock or unlock the car doors with the app. Find My Car Never forget where you parked by displaying your vehicle location on the app. Geofence Alert Receive a notification anytime your car enters or leaves a region set by you. Destination by Voice Talk to an iOS system to search for places and get directions sent to your navigation system. Stolen Vehicle Locator The locator system uses sophisticated technology to help the authorities find your stolen car. Amazon Alexa Skill Send commands to your vehicle with Alexa. Learn More Driver Feedback Get a score based on how you drive. The better your driving habits, the better your score. Learn More See, https://mygarage.honda.com/s/hondalink-marketing
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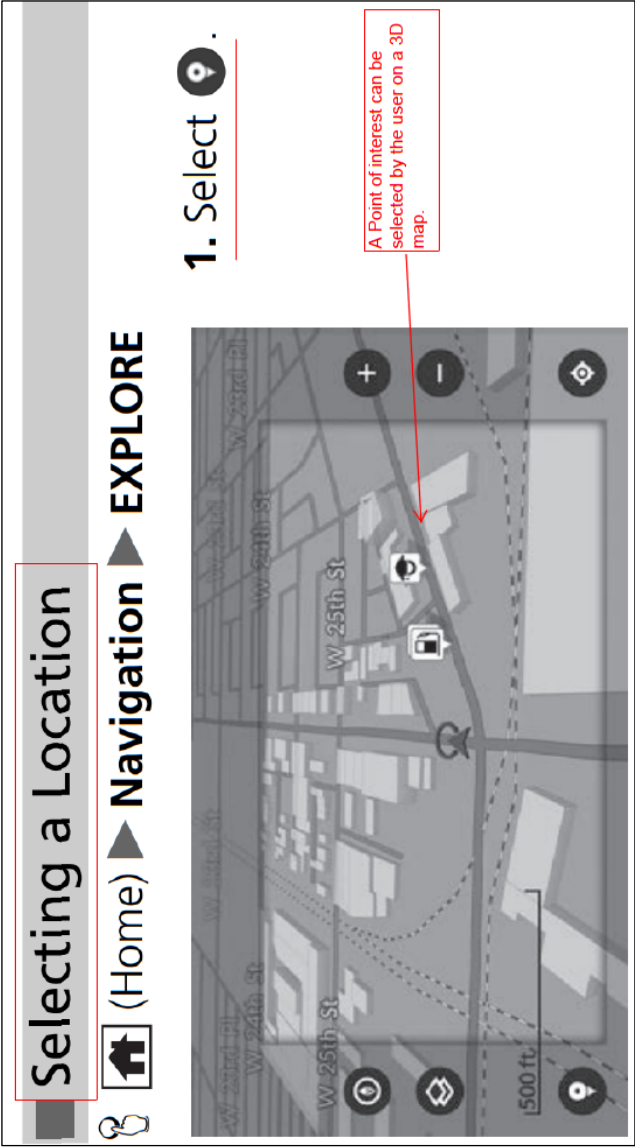
U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	 The image is a screenshot of a YouTube video player. On the left, there is a video frame showing a woman with dark hair wearing a white headset and smiling. On the right, there is a dark overlay with white text listing features: 'Security Package', 'Automatic Collision Notification', 'Enhanced Roadside Assistance', 'Emergency Call', and 'Personal Data Wipe'. Below the text, it says 'Available on select models.' At the bottom of the video frame, there is a red progress bar and a timestamp '0:53 / 2:24'. At the bottom of the entire player, there is a standard YouTube control bar with play, pause, and other icons. <i>See, https://www.youtube.com/watch?v=li3igSI3HpQ</i>

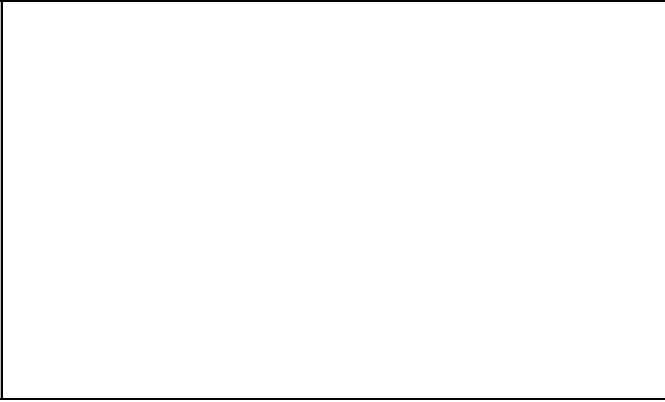
U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
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U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	 <i>See, https://www.youtube.com/watch?v=li3igS13HpQ</i>

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	Calculating the Route This section describes how to calculate your route. <u>After you set the destination, the system calculates the route taking the calculation method and route preferences you set in the navigation menu.</u> If you set the route with traffic events to be minimized, the system examines traffic conditions and optimizes the route for the shortest time. ➤ Calculation Mode P. 33 ➤ Route Preferences P. 34 <u>When the system completes the route calculation, it displays the route line on the map screen and starts the route guidance.</u> ➤ Driving to Your Destination P. 57 <i>See, http://techinfo.honda.com/rjanis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF (Annotated) [Page 54]</i>
[1.B]: transmitting start and end route designations from the client to the server;	The Accused Instrumentalities transmits start and end route designations from the client to the server. More specifically, the vehicle’s navigation system (the client) collects the user’s input (either through voice or by typing) or selected locations for the starting point and destination, and then transmits this information to the cloud (the server) via a wireless connection. The server receives these route designations and uses them to perform calculations and generate an optimal route based on real-time information. By transmitting the start and end route designations, the client enables the server to provide accurate and customized navigation instructions and guidance for the selected route.

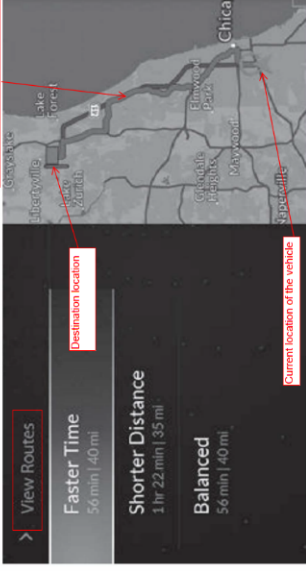
U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) Entering a Destination This section describes how to enter a destination for route guidance. There are three methods you can search for a destination. Select an option. The following options are available: • EXPLORE: Sets a destination by selecting a location or POI icon on the map. ➡ Map Input P. 51 • Find: Sets a destination by searching for a keyword, or selecting a category, previous destination, downloaded place or favorite location. ➡ Find P. 43 • Nearby: Sets a destination by selecting a category near your current position. ➡ Nearby P. 50 See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF [page 42]
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U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	 See, http://techinfo.honda.com/rjanis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF (Annotated) [Page 51]

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	 See, https://www.youtube.com/watch?v=li3igS13HpQ  See, https://mygarage.honda.com/s/hondalink-marketing

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities) Remote START FREE TRIAL WHY SUBSCRIBE TO REMOTE? The Remote package unlocks more convenient connectivity features for your Honda. Effortless check-in on your vehicle's location, get alerts, and access exclusive person features from your app to make sure you're safe. KEY FEATURES Remote Start Get comfy by cooling down or warming up your car ahead of time.* Security Alarm Alert Get notifications when your vehicle alarm is triggered. Remote Lock & Unlock Remotely lock or unlock the car doors with the app. Find My Car Never forget where you parked by displaying your vehicle location on the app. Geofence Alert Receive a notification anytime your car enters or leaves a region set by you. Destination by Voice Talk to an iOS system to search for places and get directions sent to your navigation system. Stolen Vehicle Locator The locator system uses sophisticated technology to help the authorities find your stolen car. Amazon Alexa Skill Send commands to your vehicle with Alexa. Learn More Driver Feedback Get a score based on how you drive. The better your driving habits, the better your score. Learn More See, https://mygarage.honda.com/s/hondalink-marketing
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U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) Calculating the Route This section describes how to calculate your route. <u>After you set the destination, the system calculates the route taking the calculation method and route preferences you set in the navigation menu.</u> If you set the route with traffic events to be minimized, the system examines traffic conditions and optimizes the route for the shortest time. ➤ Calculation Mode P. 33 ➤ Route Preferences P. 34 <u>When the system completes the route calculation, it displays the route line on the map screen and starts the route guidance.</u> ➤ Driving to Your Destination P. 57 See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF (Annotated) [Page 54]
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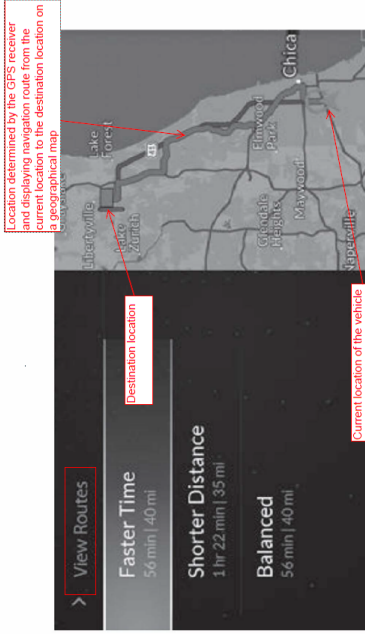
U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	Viewing and Selecting the Routes View and select different routes to your destination. Location determined by the GPS receiver and displaying navigation route from the current location to the destination location.  The screenshot shows a navigation app interface. At the top, there's a 'View Routes' button. Below it, three route options are listed: 'Faster Time' (56 min 40 mi), 'Shorter Distance' (1 hr 22 min 35 mi), and 'Balanced' (56 min 40 mi). To the right of these options is a map showing a route from a current location (marked with a red dot) to a destination (marked with a red dot). The map includes labels for various locations like Chicago, Elmhurst, and Naperville. 1. Select <u>View Routes</u> on the destination information screen. ➡ Viewing the Destination Information P. 55 2. Select an option. ▶ The estimated travel time and travel distance are displayed for each route.
[1.D]: calculating the optimal route by the server, based on the real-time information and said start information and said start and end route designations;	The Accused Instrumentalities calculates the optimal route by the server, based on the real-time information and said start and end route designations. More specifically, after receiving the start and end route designations from the client, servers utilize the real-time information it has collected to calculate the optimal route. By taking into account this real-time information, the server determines the most efficient and fastest route to reach the destination. Furthermore, upon information and belief, by continuously updating and recalculating the route based on the real-time information received from the server, Acura navigation ensures that the driver is guided along the most efficient path, minimizing delays and providing a smoother navigation experience.

See, <http://techinfo.honda.com/rjanis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF> (Annotated) [Page 56]

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) 1. Select . See, http://techinfo.honda.com/rjanis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF (Annotated) [Page 51]
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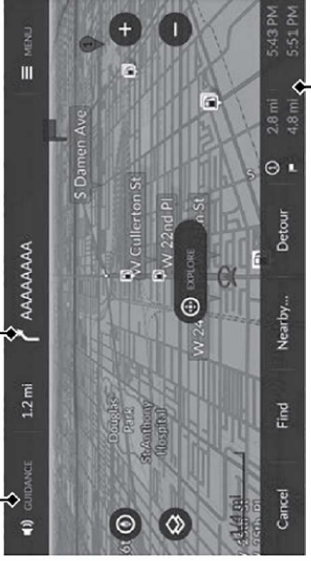
U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	 2. Click on your desired location. ▶ <u>The selected location name is displayed on the top of the map screen.</u> 3. Select Done. ▶ <u>The destination information screen is displayed.</u> ➡ Viewing the Destination Information P. 55 4. Select Start Route to set the route to your destination. ▶ <u>The system starts calculating the route.</u> ➡ Calculating the Route P. 54 See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF (Annotated) [Page 51]

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) <u>Calculating the Route</u> This section describes how to calculate your route. <u>After you set the destination, the system calculates the route taking the calculation method and route preferences you set in the navigation menu.</u> If you set the route with traffic events to be minimized, the system examines traffic conditions and optimizes the route for the shortest time. ➡ Calculation Mode P. 33 ➡ Route Preferences P. 34 <u>When the system completes the route calculation, it displays the route line on the map screen and starts the route guidance.</u> ➡ Driving to Your Destination P. 57 See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF (Annotated) [Page 54]
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U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) Viewing and Selecting the Routes View and select different routes to your destination.  The screenshot shows a navigation interface with a dark background. On the left, there is a list of route options: "View Routes" (with a right arrow), "Faster Time" (56 min 40 mi), "Shorter Distance" (1 hr 22 min 35 mi), and "Balanced" (56 min 40 mi). To the right of this list is a map showing a route from Libertyville to Chicago. Red arrows point from the "View Routes" button to the map and from the "Destination location" label to the map. A red box highlights the "Current location of the vehicle" on the map. Location determined by the GPS receiver and displaying navigation route from the current location to the destination location on a geographical map. Destination location Current location of the vehicle 1. <u>Select View Routes on the destination information screen.</u> ➡ Viewing the Destination Information P. 55 2. Select an option. ▲ The estimated travel time and travel distance are displayed for each route. See, http://techinfo.honda.com/rjanis/pubs/OM/AH/BTYA42222NM/enu/BTYA42222NM.PDF (Annotated) [Page 56]
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U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) <u>During Route Guidance</u> During route guidance, route information is displayed on the map screen. You can see information of upcoming turns on the turn list screen. See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA4222NM/enu/BTYA4222NM.PDF (annotated) [Page 7]
[1.E]: formatting the optimal route into a non-proprietary, natural language description;	The Accused Instrumentalities formats optimal route into a non-proprietary, natural language description. More specifically, the route is transformed into human-readable instructions that can be

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) easily understood by the driver. The description includes distance units, turn-by-turn directions, landmarks, street names, and any other relevant information needed to navigate the route successfully. During Route Guidance <u>During route guidance, route information is displayed on the map screen.</u> <u>You can see information of upcoming turns on the turn list screen.</u> Map Screen Next turn indicator Select to display the turn list screen. GUIDANCE Select to replay the voice guidance for the next maneuver. Lane guidance Distance to next maneuver Next street name Driving maneuver after next turn Destination Zoom in/out Select to zoom in or out of an area. Calculated route Data field The distance to the destination and estimated arrival time/remaining time are displayed. Select to view detailed destination information. In Ambient Mode: BBBBBBBBBB Current street name See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA42222NM/enu/BTYA42222NM.PDF (annotated) [Page 7]
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U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) Driving to Your Destination <u>Viewing the Route</u> This section describes how to follow the route guidance to your destination. <u>Map Screen</u> GUIDANCE Next turn indicator AAAAAAA 1.2 mi  After calculating the route to your destination, the route is displayed on the map screen. As you drive, the system tracks your position on the map in real time and provides guidance as you approach each guidance point on the route. ➡ During Route Guidance P. 7 See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF (emphasis added) [Page 57]
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Entering a Destination



This section describes how to enter a destination for route guidance. There are three methods you can search for a destination.

Select an option.



The following options are available:

- **EXPLORE:** Sets a destination by selecting a location or POI icon on the map.
 **Map Input** P. 51
- **Find:** Sets a destination by searching for a keyword, or selecting a category, previous destination, downloaded place or favorite location.
 **Find** P. 43
- **Nearby:** Sets a destination by selecting a category near your current position.
 **Nearby** P. 50

See, <http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF> [page 42]

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
[1.F]: downloading said non-proprietary, natural language description to the client;	The Accused Instrumentalities downloads the non-proprietary, natural language description to the client. More specifically, after formatting the optimal route into a non-proprietary, natural language description, the server downloads the instructions to the onboard navigation system (the client). Once downloaded, the client can interpret and display the non-proprietary, natural language description to the driver, presenting the route instructions in a clear and understandable manner.

During Route Guidance

During route guidance, route information is displayed on the map screen. You can see information of upcoming turns on the turn list screen.

Map Screen

Next turn indicator
Select to display the turn

GUIDANCE — Select to replay the voice guidance for the next maneuver.

Lane guidance –

Distance to next maneuver —

Next turn indicator —
Select to display the turn list screen.

Next street name

Driving maneuver after next turn

Destination

Zoom in/out
Select to zoom in or out of an area.

Calculated route

In Ambient Mode:

Current street name

Data field

The distance to the destination and estimated arrival time/remaining time are displayed.
Select to view detailed destination information.

See, <http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA222NM/enu/BTYA222NM.PDF> (annotated)

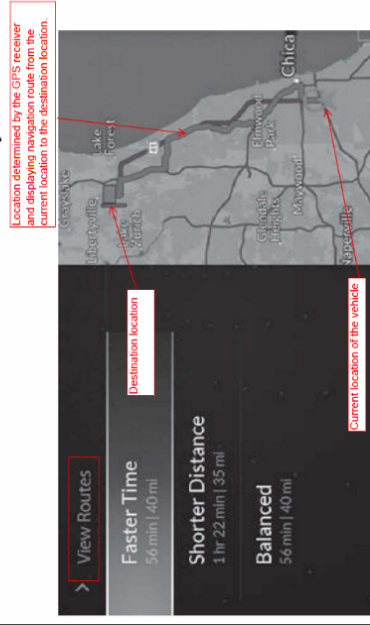
[Page 7]

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) Entering a Destination  (Home) ► Navigation This section describes how to enter a destination for route guidance. There are three methods you can search for a destination. Select an option.  The following options are available: • EXPLORE: Sets a destination by selecting a location or POI icon on the map.  Map Input P. 51 • Find: Sets a destination by searching for a keyword, or selecting a category, previous destination, downloaded place or favorite location.  Find P. 43 • Nearby: Sets a destination by selecting a category near your current position.  Nearby P. 50 See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF [page 42]
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U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities) Enhanced features provide a better driving experience Beyond basic routing, your navigation system offers a variety of features that enhance your driving experience. Updating your map optimizes features such as:***  3D LANDMARKS Seeing 3D Landmarks on your map creates a clear visual connection to the real world. This is especially helpful for urban navigation  LANE GUIDANCE Lane Guidance ensures that you are always in the right place when approaching exits, road mergers, an complex interchanges See, https://acuranavi.navigation.com/cms/page.WhyUpdate/en_US/AcuraNA/USD (emphasis added) <u>Embedded Navigation: Ready When You Are</u> Whether you start your vehicle by turning a key or pressing a button, your embedded navigation system is ready to go. No need to attach cables or mounts. You don't have to worry about data usage. And with a large screen and voice activation, you can keep your eyes on the road and hands on the wheel. Add fresh data to the mix and you've got the ideal navigation experience. Update your navigation system map today and drive with confidence. * Data points above represent the average across all map updates. Exact data is available on each product page. ** If your navigation systems does not already have a speed limit feature, updating your map will not add this feature. *** Available features vary by navigation system. Enhancements to these features also vary by map update. See, https://acuranavi.navigation.com/cms/page.WhyUpdate/en_US/AcuraNA/USD (emphasis added)
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Viewing and Selecting the Routes

View and select different routes to your destination.

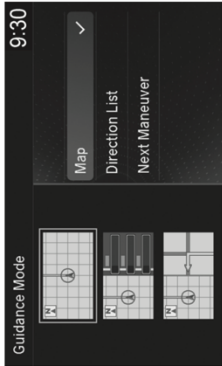
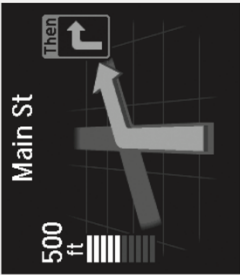


- 1. Select View Routes on the destination information screen.**

➔ Viewing the Destination Information P. 55

- 2.** Select an option. ► The estimated travel time and travel distance are displayed for each route.

See, <http://techinfo.honda.com/rjanis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF>
(Annotated) [Page 56]

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) When the display mode is set to the map with guidance screen.  9:30 Rotate  to select an option. Press . Turn-by-Turn Directions The next guidance point appears on the multi-information display.  Turn-by-Turn Directions P. 9  500 ft Main St Then You can turn this feature on or off using the multi-information display. See the Owner's Manual for instructions. The following options are available: • Map (factory default): Displays only the map screen. When you approach a guidance point, the next guidance point appears.  Map screen  Next Maneuver screen Near the next guidance point Next guidance point
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See, <http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTZ51818OG/enu/BTZ51818NV.PDF> (Page 46)

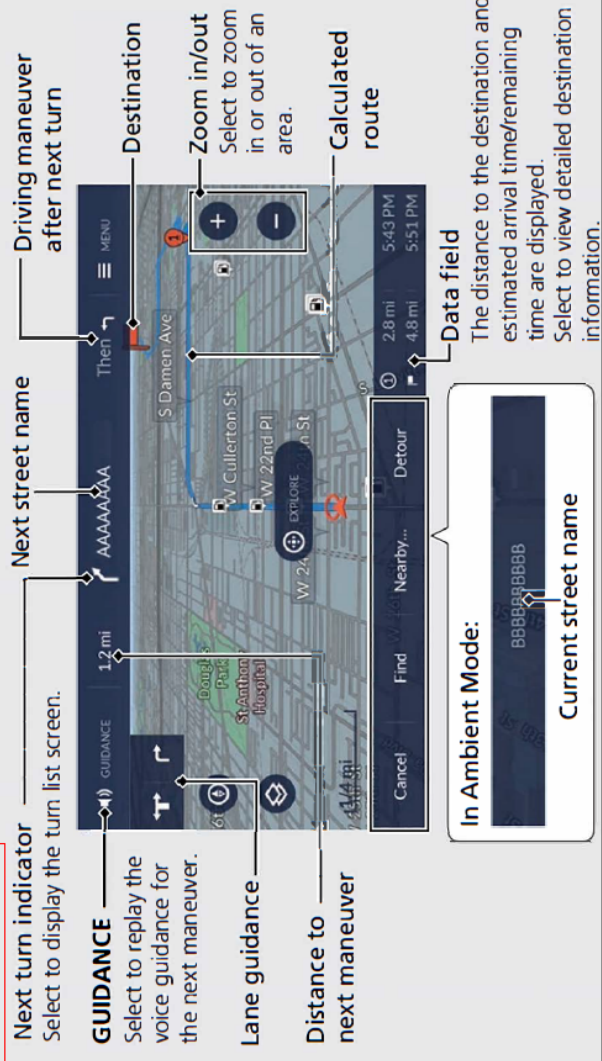
U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities)
	Direction List screen Next Maneuver screen Near the next guidance point Guidance direction list Next guidance point • Next Maneuver: Displays the map and next guidance point simultaneously on the map screen. Next Maneuver screen Next Maneuver screen Near the next guidance point Next guidance point See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTZ51818OG/enu/BTZ51818NV.PDF [Annotated] [Page 47]
[1.G]: reconstructing the optimal route by the client	The Accused Instrumentalities reconstructs the optimal route by the client using a local mapping database. More specifically, once the non-proprietary, natural language description of the optimal route

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
using a local mapping database; and	is downloaded to the vehicle’s onboard navigation system, it utilizes its local mapping database. This database contains detailed map information, including roads, intersections, points of interest, and other relevant data. Using the downloaded route description as a reference, the navigation system leverages the local mapping database to reconstruct the optimal route. It analyzes the start and end route designations, along with the real-time information received from the server, to calculate the precise route.

During Route Guidance

During route guidance, route information is displayed on the map screen. You can see information of upcoming turns on the turn list screen.

Map Screen



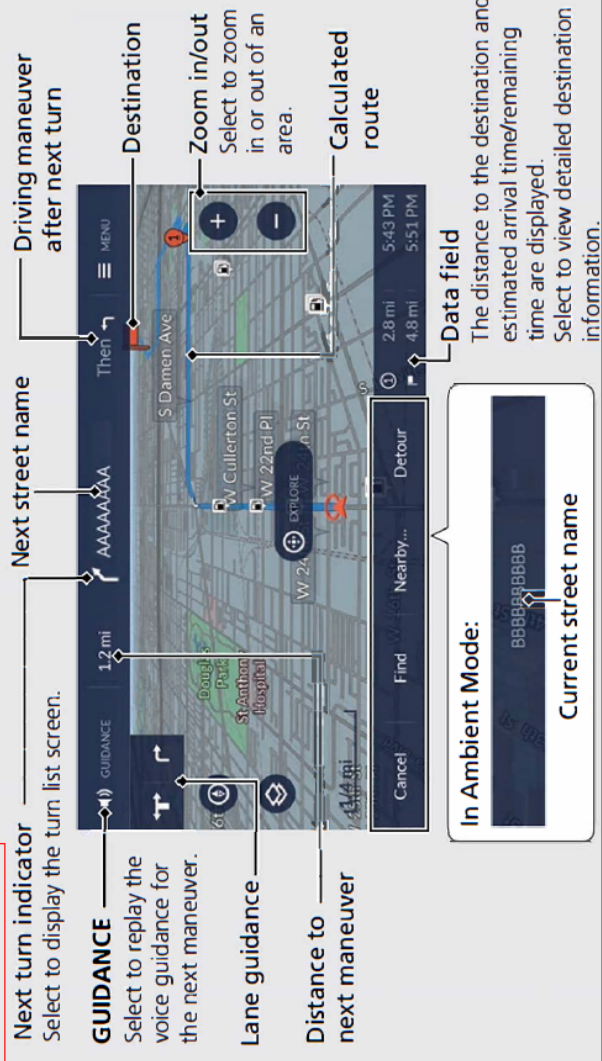
See, <http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF> (annotated) [Page 7]

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”) Driving to Your Destination <u>Viewing the Route</u> This section describes how to follow the route guidance to your destination. <u>Map Screen</u> GUIDANCE Next turn indicator After calculating the route to your destination, the route is displayed on the map screen. As you drive, the system tracks your position on the map in real time and provides guidance as you approach each guidance point on the route. ➡ During Route Guidance P. 7 See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF (emphasis added) [Page 57]
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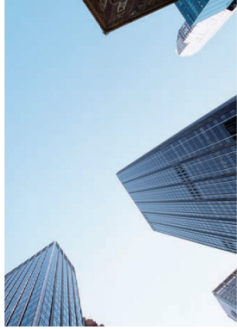
During Route Guidance

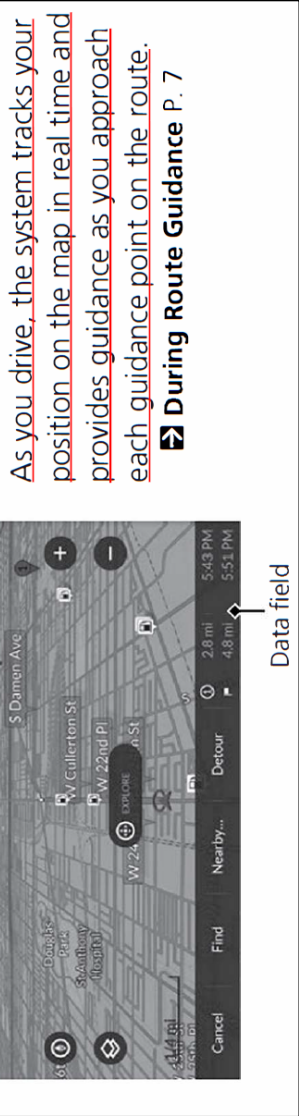
During route guidance, route information is displayed on the map screen. You can see information of upcoming turns on the turn list screen.

Map Screen



See, <http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF> (annotated)
[Page 7]

U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities) Overview—Functions at a Glance Navigation  You can select any place/landmark as a destination by using True Touchpad Interface. The navigation system gives you turn-by-turn driving directions to your destination. Store home address ➡ P 19 Register your home address. Store locations ➡ P 22 Store locations to use as the destination. Enter destination ➡ P 42 Select your destination using several methods. Select route ➡ P 56 Set route preferences and select one of the available routes.  Track route ➡ P 57 Follow your route in real-time with voice guidance. Add waypoints ➡ P 63 Add “pit stops” along your route.  See, http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF Basic Acura Navigation Operation The Acura navigation system uses GPS and a map database to plot your current location and guide you to your desired destination. You can see your map displayed on the screen in the center of your dash, and you can use buttons to enter destination information. You also the option of controlling your system via voice commands. While you are driving, certain manual functions may be disabled, so default to audible commands! See, https://www.parkaveacura.com/how-do-i-use-acura-navigation/ (<i>emphasis added</i>)
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U.S. Patent No. 6,292,743	Toyota Audio Multimedia System (“the Accused Instrumentalities”)
	Driving to Your Destination <u>Viewing the Route</u> This section describes how to follow the route guidance to your destination. <u>Map Screen</u> GUIDANCE Next turn indicator AAAAAAA 1.2 mi  After calculating the route to your destination, the route is displayed on the map screen. As you drive, the system tracks your position on the map in real time and provides guidance as you approach each guidance point on the route. ➡ During Route Guidance P. 7

See, <http://techinfo.honda.com/rjanisis/pubs/OM/AH/BTYA2222NM/enu/BTYA2222NM.PDF> (emphasis added) [Page 57]