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

Valtrus Innovations Ltd.	§	
	§	
	§	
Plaintiff	§	
	§	
v.	§	**CIVIL ACTION NO. 2:24-cv-21-JRG**
	§	
	§	
SAP America, Inc. and SAP, SE.	§	**JURY TRIAL DEMANDED**
	§	
Defendants.		

PLAINTIFF VALTRUS INNOVATIONS LTD.'S INFRINGEMENT CONTENTIONS

Pursuant to Patent Rules 3-1 and 3-2, Plaintiff Valtrus Innovations Ltd. ("Plaintiff" or "Valtrus") hereby discloses its asserted claims and infringement contentions and accompanying document production. Valtrus's investigation of infringement by Defendants SAP America, Inc. and SAP, SE (together, "Defendants" or "SAP") is on-going, and thus Valtrus expressly reserves the right to supplement its infringement contentions when additional information becomes available, including but not limited to Defendants' production of source code and other technical documents, interrogatory responses, and disclosures under the local patent rules.

I. P.R. 3-1(a)-(c)—ASSERTED PATENTS AND ACCUSED INSTRUMENTALITIES

Valtrus presently asserts infringement by SAP, under at least 35 U.S.C. §§ 271(a)-(c), of claims of U.S. Patent Nos. 6,823,409 (the "'409 Patent"); 6,889,244 (the "'244 Patent"); 7,152,182 (the "'182 Patent"); 7,313,575 (the "'575 Patent"); 6,691,139 (the "'139 Patent"); 7,936,738 (the

VALTRUS EXHIBIT 2011
SAP v. VALTRUS IPR2025-00414
PAGE 1 of 5

"'738 Patent"), and 6,871,264 (the "'264 Patent") (collectively, "the Asserted Patents") by various instrumentalities, as identified in the appended claim chart exhibits.

Exhibit	Patent	Asserted Claims
A-1	'409	1-17
A-2	'409	1-17
A-3	'409	1-17
B	'244	1-10
C	'182	1-7, 9-18
D	'575	1-14, 16-28, 30-36
E	'139	1-4, 5, 7-11, 12, 14-18
F	'738	1-6, 10, 33
G-1	'264	1-5, 8-11
G-2	'264	1-5, 8-11
G-3	'264	1-5, 8-11

Charts identifying where each element of each asserted claim of each asserted patent is found within the accused instrumentalities are attached hereto as Exhibits A through G.

II. P.R. 3-1(d)—LITERAL INFRINGEMENT AND DOCTRINE OF EQUIVALENTS

Valtrus presently contends that every limitation of each asserted claim is literally present in the accused instrumentalities. Additionally, in certain instances, as set forth in Exhibits A-G, Valtrus contends that the limitations are alternatively met under the doctrine of equivalents. *See* Exhibits A through G for further explanation. Valtrus reserves all rights under P.R. 3-6.

III. P.R. 3-1(e)—PRIORITY DATES

Valtrus contends that every asserted claim is entitled to a priority date no later than the dates identified in the chart below based on the earliest-filed U.S. applications to which the patents claim priority.

Patent	Priority Date
'409	September 28, 2001
'244	October 31, 2000
'182	June 6, 2003

VALTRUS EXHIBIT 2011
SAP v. VALTRUS IPR2025-00414
PAGE 2 of 5

Patent	Priority Date
’575	June 14, 2004
’139	January 31, 2001
’738	March 2, 2006 (§371(c)(1), (2), (4) date); July 6, 2004 (PCT date)[1]
’264	March 6, 2002

IV. P.R. 3-1(f)—VALTRUS PRODUCTS THAT PRACTICE THE ASSERTED PATENTS

Valtrus does not intend to rely on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention of any Asserted Patent.

V. P.R. 3-2—DOCUMENT PRODUCTION ACCOMPANYING DISCLOSURE.

After a reasonable investigation, Valtrus is not aware of any documents responsive to P.R. 3-2(a) within its possession, custody, or control. Pursuant to P.R. 3-2(b), Valtrus is producing the following responsive documents: VAL-SAP00000001 - VAL-SAP00000008, VAL-SAP00000010 (e.g., at VAL-SAP00000305), VAL-SAP00001690 (e.g., at VAL-SAP00001971). Pursuant to P.R. 3-2(c), Valtrus is producing the following responsive documents: VAL-SAP00000010 - VAL-SAP00002602.

[1] Valtrus further contends that every asserted claim of the ’738 patent is entitled to a priority date of July 25, 2003, based on the EP counterpart.

VALTRUS EXHIBIT 2011
SAP v. VALTRUS IPR2025-00414
PAGE 3 of 5

Respectfully submitted,

/s/ *Matthew G. Berkowitz*
Matthew G. Berkowitz – LEAD ATTORNEY
Patrick Colsher
Savannah H. Carnes
Aaron Morris
Navid C. Bayar
Reichman Jorgensen Lehman & Feldberg LLP
100 Marine Parkway, Suite 300
Redwood Shores, CA 94065
Tel: (650) 623-1401
mberkowitz@reichmanjorgensen.com
pcolsher@reichmanjorgensen.com
scarnes@reichmanjorgensen.com
amorris@reichmanjorgensen.com
nbayar@reichmanjorgensen.com

Philip J. Eklem
peklem@reichmanjorgensen.com
Reichman Jorgensen Lehman & Feldberg LLP
1909 K Street NW, Suite 800
Washington DC, 20006
Tel: (202) 894-7310

Khue V. Hoang
Reichman Jorgensen Lehman & Feldberg LLP
400 Madison Avenue, Suite 14D
New York, NY 10017
Tel: (212) 381-1965
khoang@reichmanjorgensen.com

Of Counsel:

Andrea L. Fair
Texas Bar No. 24078488
Claire Abernathy Henry
Texas State Bar No. 24053063

WARD, SMITH & HILL, PLLC
1507 Bill Owens Pkwy.
Longview, TX 75604
Tel: (903) 757-6400
andrea@wsfirm.com
claire@wsfirm.com

VALTRUS EXHIBIT 2011
SAP v. VALTRUS IPR2025-00414
PAGE 4 of 5

Attorneys for Plaintiff

VALTRUS EXHIBIT 2011
SAP v. VALTRUS IPR2025-00414
PAGE 5 of 5