

From: [Bittner, Michael](#)
To: [Aaron Morris](#); [SAP-Valtrus_Winston](#)
Cc: [RJ_Valtrus-SAP](#); [Andrea Fair](#); [Claire Henry](#)
Subject: RE: Valtrus Innovations Ltd v. SAP - No. 2:24-cv-00021-JRG | Claim Narrowing
Date: Thursday, May 1, 2025 11:28:06 AM
Attachments: [image001.png](#)

CAUTION: EXTERNAL SENDER

Clarification below. We are maintaining it.

	Maintained References	Dropped References
182 Patent	ASE Margerie Ruuth ServiceGuard Froemke Ofek	Polyzois Crockett Nahum Wahl
244 Patent	Bowman Fuchs Garg Sybase HA (pending motion) Suarez	Langseth Miyamoto Muller Miller
575 Patent	Chau IBM UDB Oracle 9i Actaworks	Upton Li
738 Patent	Akita Iyer Java Messaging Kaler Vontela	Cambell Brouk Bozinovski

From: Aaron Morris <amorris@reichmanjorgensen.com>
Sent: Wednesday, April 30, 2025 7:19 PM
To: Bittner, Michael <MBittner@winston.com>; SAP-Valtrus_Winston <SAP-Valtrus_Winston@winston.com>
Cc: RJ_Valtrus-SAP <RJ_Valtrus-SAP@reichmanjorgensen.com>; Andrea Fair <andrea@millerfairhenry.com>; Claire Henry <claire@millerfairhenry.com>
Subject: RE: Valtrus Innovations Ltd v. SAP - No. 2:24-cv-00021-JRG | Claim Narrowing

Hi Michael,

It looks like the Suarez reference is in both columns for the 244 patent. Can you clarify whether

this has been dropped?

Best,

Aaron L. Morris | (650) 623-5076 | REICHMAN JORGENSEN LEHMAN & FELDBERG LLP

From: Bittner, Michael <MBittner@winston.com>

Sent: Wednesday, April 30, 2025 2:28 PM

To: Aaron Morris <amorris@reichmanjorgensen.com>; SAP-Valtrus_Winston <SAP-Valtrus_Winston@winston.com>

Cc: RJ_Valtrus-SAP <RJ_Valtrus-SAP@reichmanjorgensen.com>; Andrea Fair <andrea@millerfairhenry.com>; Claire Henry <claire@millerfairhenry.com>

Subject: RE: Valtrus Innovations Ltd v. SAP - No. 2:24-cv-00021-JRG | Claim Narrowing

CAUTION: EXTERNAL SENDER

Counsel,

Pursuant to the Court's operative Scheduling Order, SAP identifies the following narrowed set of references:

	Maintained References	Dropped References
182 Patent	ASE Margerie Ruuth ServiceGuard Froemke Ofek	Polyzois Crockett Nahum Wahl
244 Patent	Bowman Fuchs Garg Sybase HA (pending motion) Suarez	Langseth Miyamoto Muller Suarez Miller
575 Patent	Chau IBM UDB Oracle 9i Actaworks	Upton Li
738 Patent	Akita Iyer Java Messaging	Cambell Brouk Bozinovski

	Kaler Vontela	
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From: Aaron Morris <amorris@reichmanjorgensen.com>
Sent: Thursday, April 10, 2025 4:39 PM
To: SAP-Valtrus_Winston <SAP-Valtrus_Winston@winston.com>; Bittner, Michael <MBittner@winston.com>
Cc: RJ_Valtrus-SAP <RJ_Valtrus-SAP@reichmanjorgensen.com>; Andrea Fair <andrea@millerfairhenry.com>; Claire Henry <claire@millerfairhenry.com>
Subject: RE: Valtrus Innovations Ltd v. SAP - No. 2:24-cv-00021-JRG | Claim Narrowing

Counsel,

In accordance with the claim narrowing schedule in the Amended Docket Control Order (Dkt. 65), Valtrus identifies the following claims:

Patent	Dropped Claims	Currently Asserted Claims
6,823,409	All claims	
6,889,244	2, 4, 9	1, 3, 5, 6, 8, 10
7,152,182	7, 9, 12, 13	1, 6, 10, 16, 17, 18
7,313,575	None	1, 4, 31, 32, and 36
6,691,139	All claims	
7,936,738	6	1, 2, 3, 5, 10, 33
6,871,264	All claims	

Best,

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From: Aaron Morris
Sent: Friday, January 24, 2025 2:40 PM
To: SAP-Valtrus_Winston@winston.com; Bittner, Michael <MBittner@winston.com>
Cc: RJ_Valtrus-SAP <RJ_Valtrus-SAP@reichmanjorgensen.com>; Andrea Fair <andrea@millerfairhenry.com>; Claire Henry <claire@millerfairhenry.com>
Subject: Valtrus Innovations Ltd v. SAP - No. 2:24-cv-00021-JRG | Claim Narrowing

Counsel,

In accordance with the claim narrowing schedule in the Amended Docket Control order (Dkt. 65), Valtrus identifies the following claims:

Patent	Dropped Claims	Currently Asserted Claims
6,823,409	2, 10, 12, 13, 15-17	1, 4-5, 7-9
6,889,244	None	1-6, 8-10
7,152,182	2, 4, 5, and 11	1, 6, 7, 9-10, 12-13, 16-18
7,313,575	2, 5-7, 10-11, 12, 13-14, 17-25, 28, 33, 35	1, 4, 31, 32, and 36
6,691,139	12, 14-18	1, 3, 5, 7-11
7,936,738	None	1-3, 5-6, 10, 33
6,871,264	3, 8, 10	1, 4, 5, 9, 11

Best,

Aaron L. Morris | (650) 623-5076 | REICHMAN JORGENSEN LEHMAN & FELDBERG LLP

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