

Exhibit A

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Plaintiff H2 Intellect LLC (“H2 Intellect”) provides this infringement claim chart subject to all reservations, objections, statements, and disclaimers set forth herein and in its Infringement Contentions, as well as any amendment, supplement, or modification thereof, which are incorporated herein by reference in their entirety. This Disclosure of Asserted Claims and Infringement Contentions for U.S. Patent No. 8,433,296 (the “’296 patent”) is based only on publicly available information. Therefore, these infringement contentions, while based on diligent investigation by H2 Intellect and its counsel, reflect only the current state of H2 Intellect’s knowledge, understanding, and belief on this subject.

H2 Intellect continues to investigate the facts relating to this action. H2 Intellect reserves the right to rely on any information produced later in discovery to assert infringement, and to adjust its infringement contentions accordingly. Specifically, Plaintiff reserves the right to amend these infringement contentions based on the technical documents produced by The Home Depot, Inc., Home Depot U.S.A., Inc., and Home Depot Product Authority, LLC (collectively, Home Depot”) that pertain to the Home Depot mobile application and infrastructure (including the Store Mode and Curbside Pickup features), mobile devices used by Defendants’ employees (including the hdPhone operating system and device), and any other Home Depot product that practices the Asserted Claims (directly or indirectly, literally or under the doctrine of equivalents), including Home Depot’s advertising and content delivery applications (collectively, the “Accused Products”). The Accused Products as used herein also include practicing the Asserted Claims by performing the claimed steps of method claims (directly or indirectly, literally or under the doctrine of equivalents) and/or indirectly (by contributing to or inducing infringement or through joint infringement with its users, which Home Depot controls or directs).

H2 Intellect has prepared this infringement claim chart identifying, with reasonable specificity given the lack of any discovery, where in the Accused Products each element of the asserted claims is found. H2 Intellect contends that each element of the asserted claims is practiced literally by such Accused Products, either directly or indirectly through induced infringement and/or contributory infringement and/or joint infringement (including specifically alleging joint infringement with the users of the Accused Products, which Home Depot directs or controls). To the extent Home Depot disputes literal infringement, H2 Intellect contends that any such disputed element is practiced by the Accused Products under the doctrine of equivalents.

This claim chart is not intended to and does not construe the claims of the ’296 patent and does not limit the positions Plaintiff may take in the Court’s claim construction procedures. H2 Intellect specifically reserves the right to further investigate the ’296 patent, to test and evaluate the products and methods that may infringe the ’296 patent, and to modify and supplement this claim chart. This claim chart is provided to illustrate exemplary information practically available prior to discovery.

These contentions are not limited to the exemplar systems, methods, and implementations depicted and described herein. This chart addresses products that are representative of all the “Accused Products” as defined in Plaintiff H2 Intellect’s Infringement Contentions Pursuant to Local Patent Rules 3–1 and 3–2 (“Plaintiff’s Infringement Contentions”).

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The chart below demonstrates using example products. Upon information and belief, Home Depot develops and commercializes multiple applications that utilize the accused functionality shown in the chart below. If Home Depot utilizes other products that perform geofencing or other related functionality, then depending on the details of the implementation, those products and services may be infringing and Home Depot is on notice for those products. Plaintiff will update its contentions with more information after that information, which details do not appear to be public, is learned through discovery.

1. The Home Depot Mobile Application¹

<https://www.homedepot.com/c/mobile-app>
<https://www.youtube.com/watch?v=bLbiUqIu8WE>
<https://www.youtube.com/watch?v=7XbygJeebqo>
<https://www.youtube.com/watch?v=-5sGrZkkzjE>
<https://digiday.com/marketing/how-home-depot-uses-mobile-to-drive-sales/>
<https://www.pointr.tech/>
<https://www.pointr.tech/sectors/retail>
<https://www.pointr.tech/blog/building-blocks-to-implement-store-mode>
<https://radar.com/blog/retail-showdown-curbside-pickup>
<https://www.zdnet.com/article/how-home-depot-navigated-a-demand-boom-during-covid-19/>
<https://econsultancy.com/how-retailers-are-using-geofencing-to-improve-in-store-cx/>
<https://www.reflectivedata.com/how-geofencing-works-for-brick-and-mortar-businesses/>
<https://www.digitalcommerce360.com/2018/03/14/home-depot-keeps-marketing-costs-check/>
<https://raincross.com/unlocking-the-power-of-data-for-geofencing-campaigns/>

2. Employee-Operated Mobile Devices

<https://corporate.homedepot.com/news/company/home-depot-upgrades-store-network-and-mobile-devices-enhance-interconnected-experience>
<https://hbsdealer.com/home-depot-upgrades-mobile-device>
<https://chainstoreage.com/home-depot-rolls-out-machine-learning-based-employee-app>
<https://chainstoreage.com/exclusive-qa-home-depot-senior-vp-technology>
https://www.prosalesmagazine.com/news/the-home-depot-introduces-new-in-store-network-and-mobile-devices_o
<https://www.ciodive.com/news/home-depot-sidekick-app/640521/>
<https://www.heyinnovations.com/resources/iot-retail>

¹ For each of the Accused Products, we list exemplary publicly available sources that support Plaintiff’s contentions. The contentions and evidence are not intended to be limited to these exemplary sources.

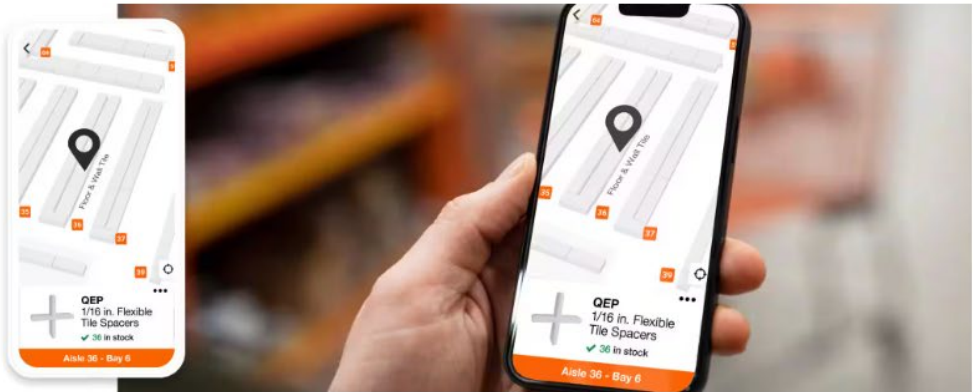
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<https://ir.homedepot.com/news-releases/2023/01-12-2023-130328698>

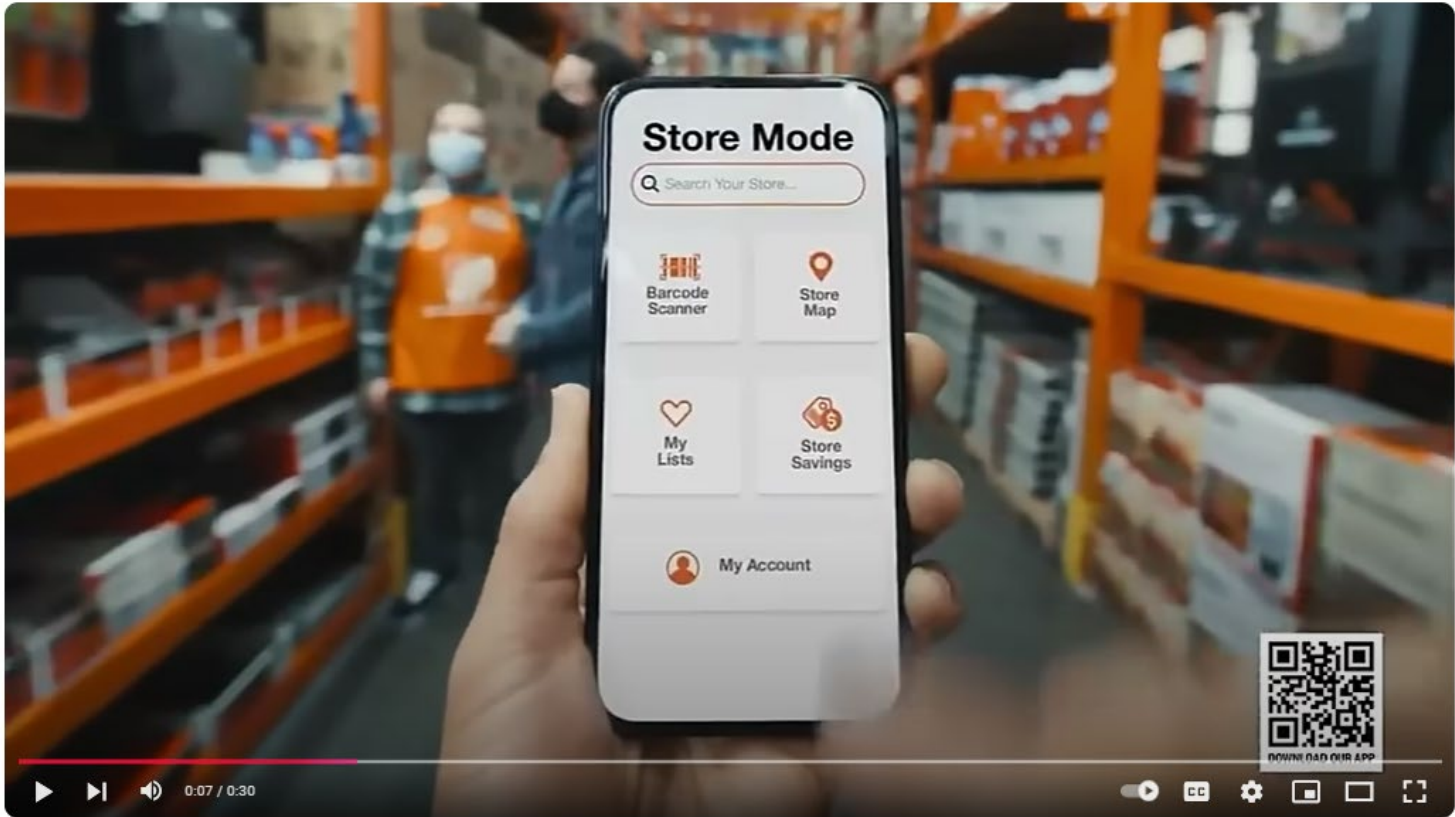
<https://www.zebra.com/us/en/products/spec-sheets/mobile-computers/handheld/tc5x-series.html>

Claim Element	The Accused Products
[1 pre] A method comprising:	Home Depot has directly infringed (literally and/or under the doctrine of equivalents) and/or indirectly infringed (by contributing to or inducing infringement or through joint infringement with its users, which Home Depot controls or directs) this claim by making, using, selling, importing, and/or offering for sale the Accused Products which implement an infringing system. To the extent the preamble is limiting, the Accused Products perform the claimed method by performing all of the claimed steps and/or enable users to perform the claimed methods by performing all of the claimed steps. Store Mode Take your project from doing to done when you visit any store. View in-stock items, Product Lists, reviews & more. 

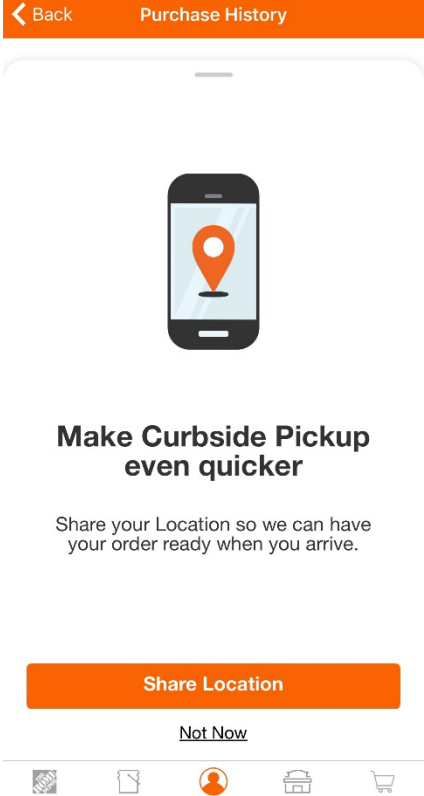
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Claim Element	The Accused Products
	Product Locator No need to wander. The app helps you navigate to the aisle and bay to find the item you need.  Shop, Plan and Manage Projects with The Home Depot Mobile App With The Home Depot Mobile App, doing doesn't stop. Start a project by building a shopping list you can't lose with the Product List feature. Unsure what you need to replace? Simply use your device to search for products by photo. Just snap a picture and the Image Search feature will tell you what is. Need it fast? Tap delivery, curbside, or In-Store Pickup. When you are shopping in-store, launch Store Mode to get what you need fast. https://www.homedepot.com/c/mobile-app

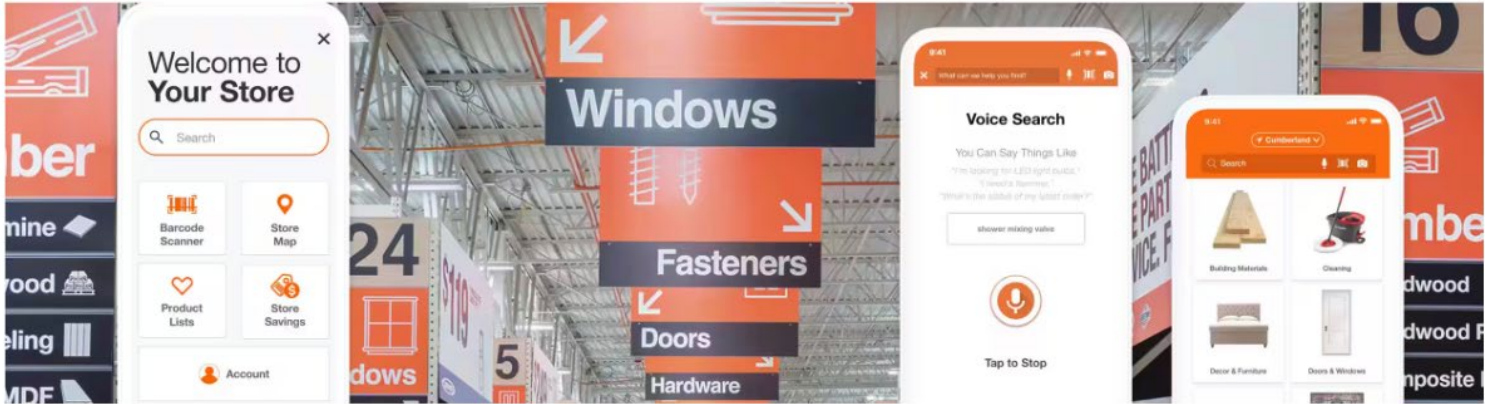
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Claim Element	The Accused Products
	 The Home Depot Commercial 2022 - (USA) https://www.youtube.com/watch?v=bLbiUqIu8WE

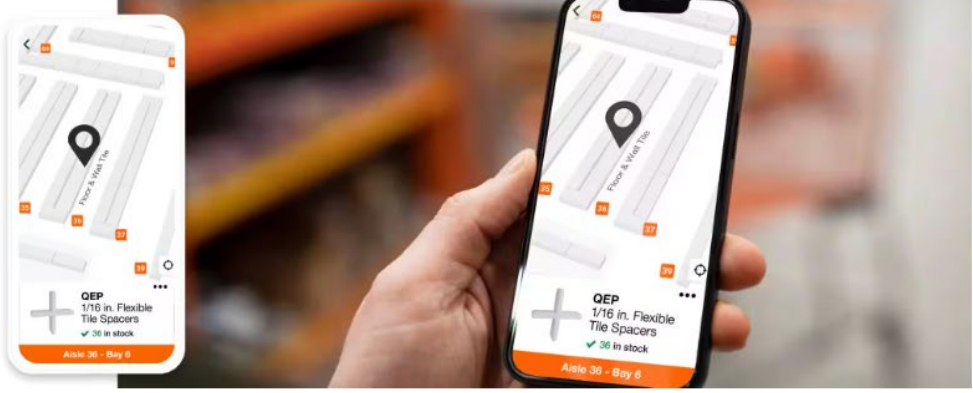
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Claim Element	The Accused Products
	 Home Depot Mobile Application
[1a] registering a plurality of application programs for use with a content delivery platform, wherein the plurality of registered application programs are each associated with at least one application program type;	The Accused Products perform and/or facilitate the step of registering a plurality of application programs for use with a content delivery platform, wherein the plurality of registered application programs are each associated with at least one application program type. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element:

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Claim Element	The Accused Products
	Download The Home Depot Mobile App    https://www.homedepot.com/c/mobile-app

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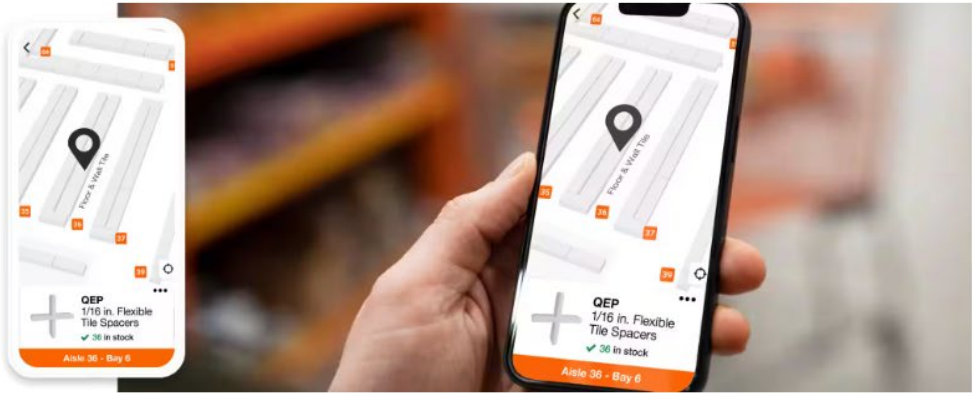
Claim Element	The Accused Products
	Store Mode Take your project from doing to done when you visit any store. View in-stock items, Product Lists, reviews & more.  Product Locator No need to wander. The app helps you navigate to the aisle and bay to find the item you need.  Shop, Plan and Manage Projects with The Home Depot Mobile App With The Home Depot Mobile App, doing doesn't stop. Start a project by building a shopping list you can't lose with the Product List feature. Unsure what you need to replace? Simply use your device to search for products by photo. Just snap a picture and the Image Search feature will tell you what is. Need it fast? Tap delivery, curbside, or In-Store Pickup. When you are shopping in-store, launch Store Mode to get what you need fast. https://www.homedepot.com/c/mobile-app

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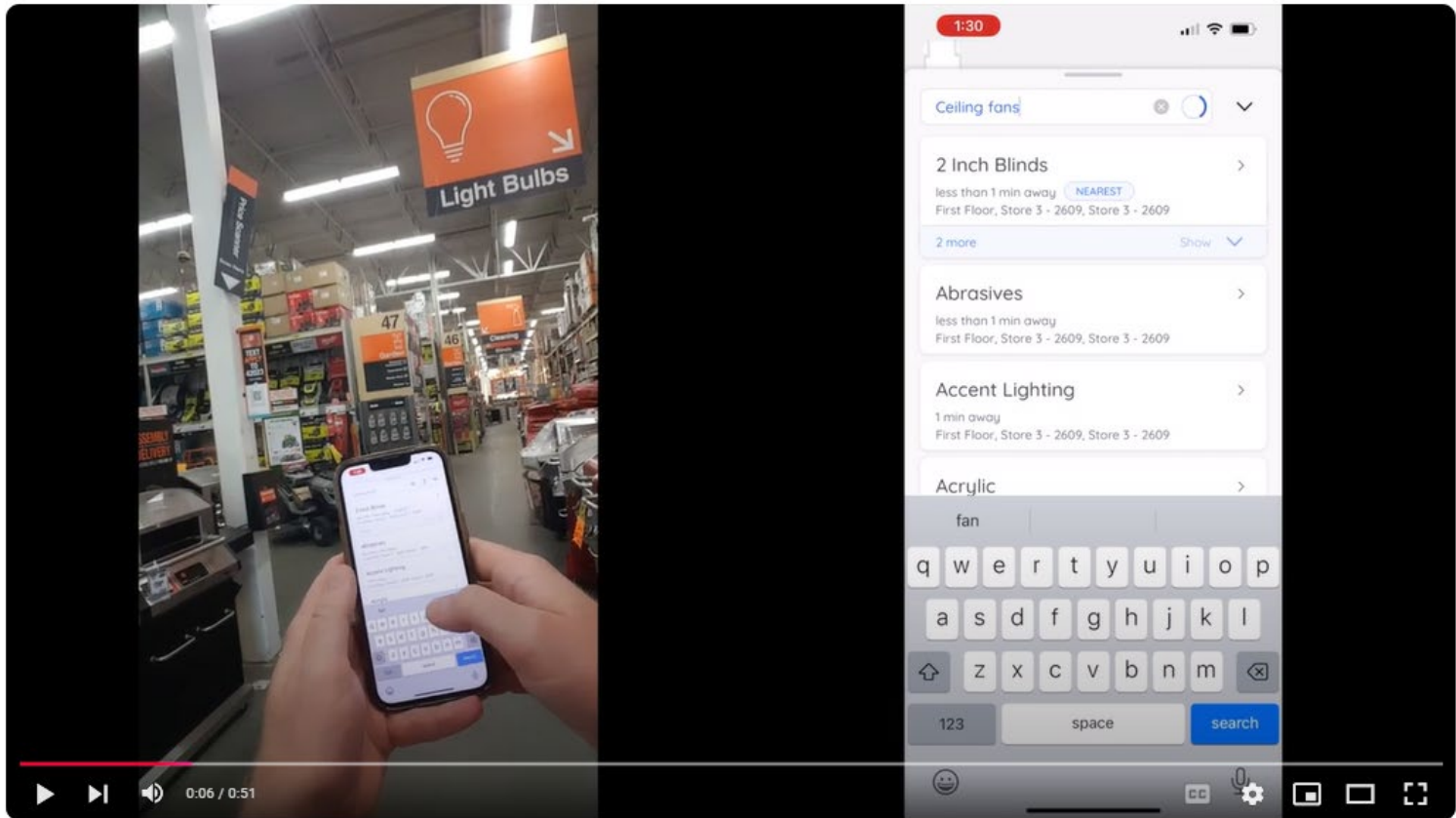
Home Depot has rolled out 125,000
hdPhones across its stores



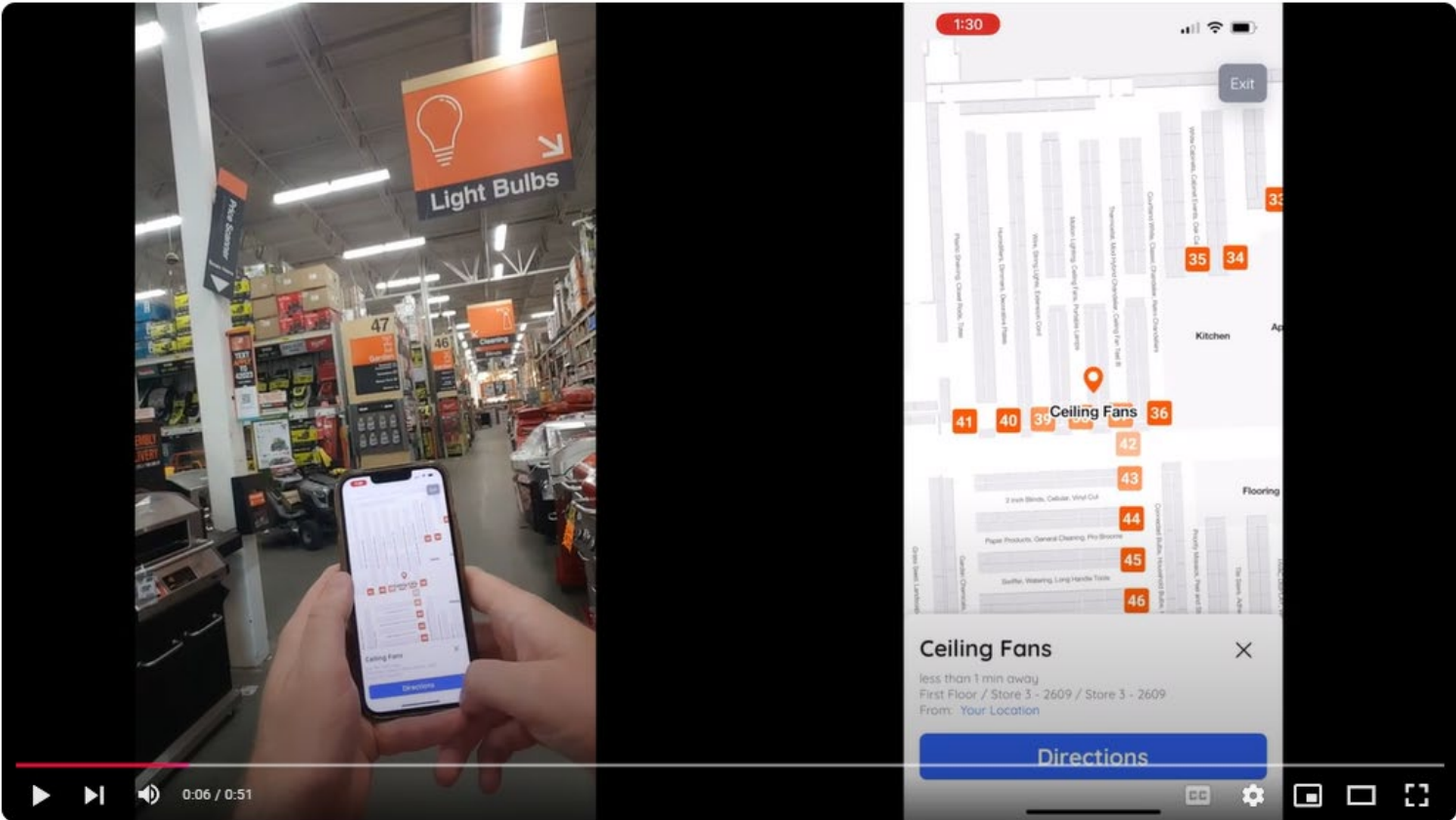
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Claim Element	The Accused Products
	https://www.heyinnovations.com/resources/iot-retail
[1b] establishing a plurality of perimeters defining a plurality of geographic areas;	The Accused Products perform and/or facilitate establishing a plurality of perimeters defining a plurality of geographic areas. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element: Product Locator No need to wander. The app helps you navigate to the aisle and bay to find the item you need.  Shop, Plan and Manage Projects with The Home Depot Mobile App With The Home Depot Mobile App, doing doesn't stop. Start a project by building a shopping list you can't lose with the Product List feature. Unsure what you need to replace? Simply use your device to search for products by photo. Just snap a picture and the Image Search feature will tell you what is. Need it fast? Tap delivery, curbside, or In-Store Pickup. When you are shopping in-store, launch Store Mode to get what you need fast. https://www.homedepot.com/c/mobile-app

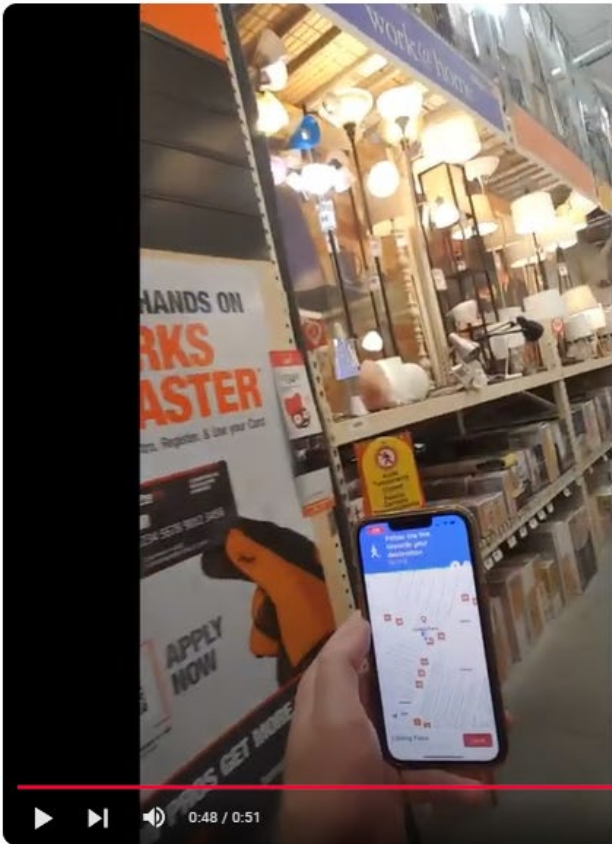
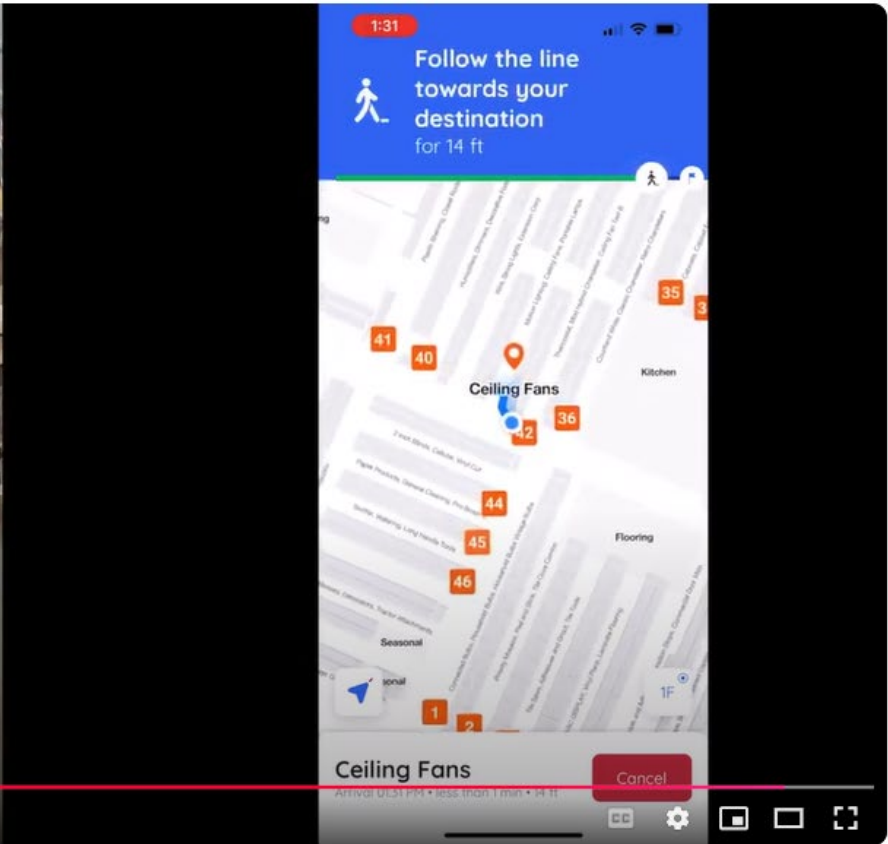
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Claim Element	The Accused Products
	 The image is a screenshot of a video showing a person's hands holding a smartphone in a Home Depot store. The phone screen displays a search for "Ceiling fans". The search results show several categories: "2 Inch Blinds" (less than 1 min away, NEAREST, First Floor, Store 3 - 2609, Store 3 - 2609), "Abrasives" (less than 1 min away, First Floor, Store 3 - 2609, Store 3 - 2609), "Accent Lighting" (1 min away, First Floor, Store 3 - 2609, Store 3 - 2609), and "Acrylic" (1 min away, First Floor, Store 3 - 2609, Store 3 - 2609). A close-up of the phone screen shows the search results and a keyboard. The video player interface at the bottom shows a progress bar at 0:06 / 0:51.

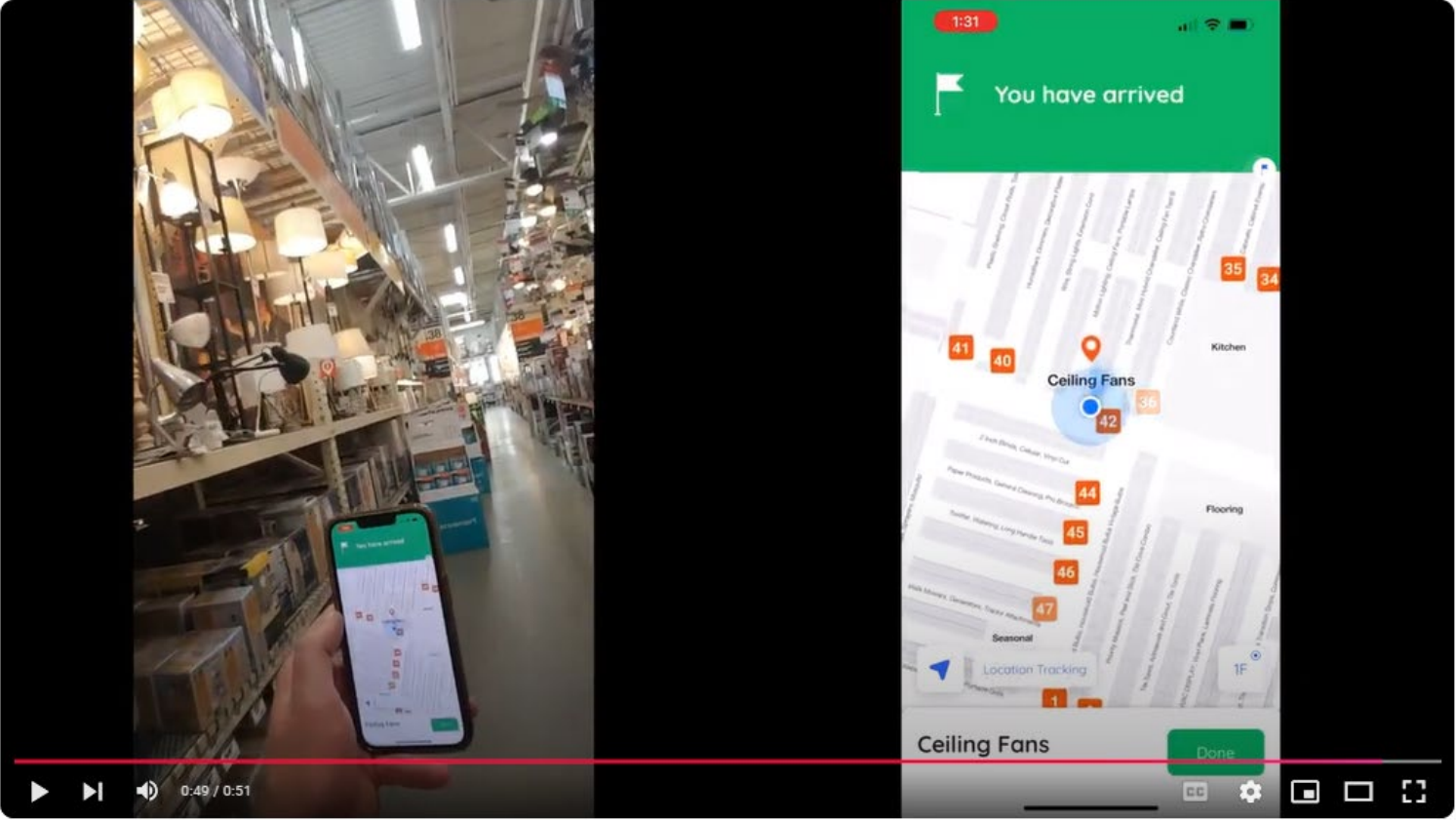
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Claim Element	The Accused Products
	 https://www.youtube.com/watch?v=-5sGrZkkzjE

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Claim Element	The Accused Products
	 

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Claim Element	The Accused Products
	 https://www.youtube.com/watch?v=-5sGrZkkzjE

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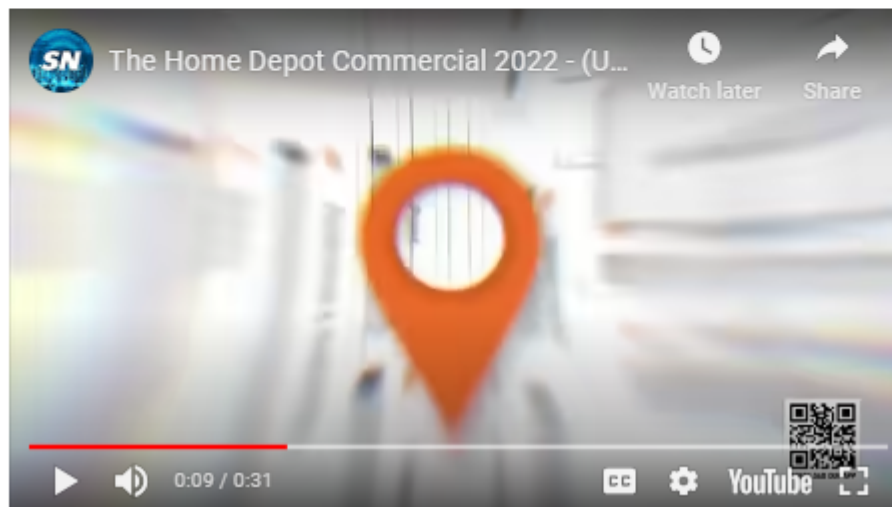
Claim Element	The Accused Products
	Home Depot’s revamped mobile app highlights engaging features like barcode search, voice search and visual search. When a user walks into a Home Depot store, the app will automatically switch to in-store mode. Then, the shopper can use the app to navigate to the aisle in which a product is located. Home Depot also works with Adobe on mobile analytics, geofencing and mobile content optimization to drive offline sales and in-store pickups. https://digiday.com/marketing/how-home-depot-uses-mobile-to-drive-sales/

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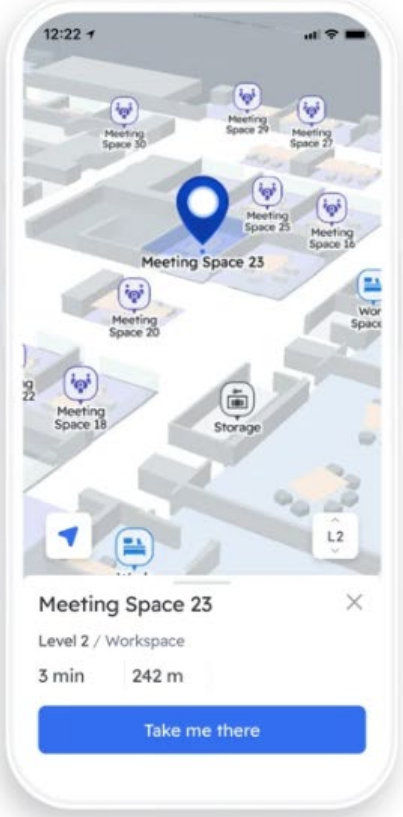
1. Digitizing maps

An accurate [in-store map](#) is the first step to Store Mode. It unlocks a host of other features, including wayfinding, product location, aisle location, and proximity-based push notifications. [Indoor mapping](#) in retail poses two significant challenges. Firstly, manually creating digital maps for hundreds (or even thousands) of diverse stores is incredibly time-consuming which can delay your app launch considerably. Secondly, keeping maps updated in a retail environment that changes their layout frequently according to the retail calendar and changing seasons, promotions, and displays is a never-ending task. Fortunately, tools like [MapScale®](#) can retrieve existing maps of all stores in any format and convert them in a fraction of the time it would take using a manual conversion. Maps can be upgraded and changed in seconds with simple cloud-based mapping tools. Once this step has been completed, the groundwork is laid for rich and engaging location-aware features.

Watch how Home Depot has enabled digital maps & Store Mode in their app:



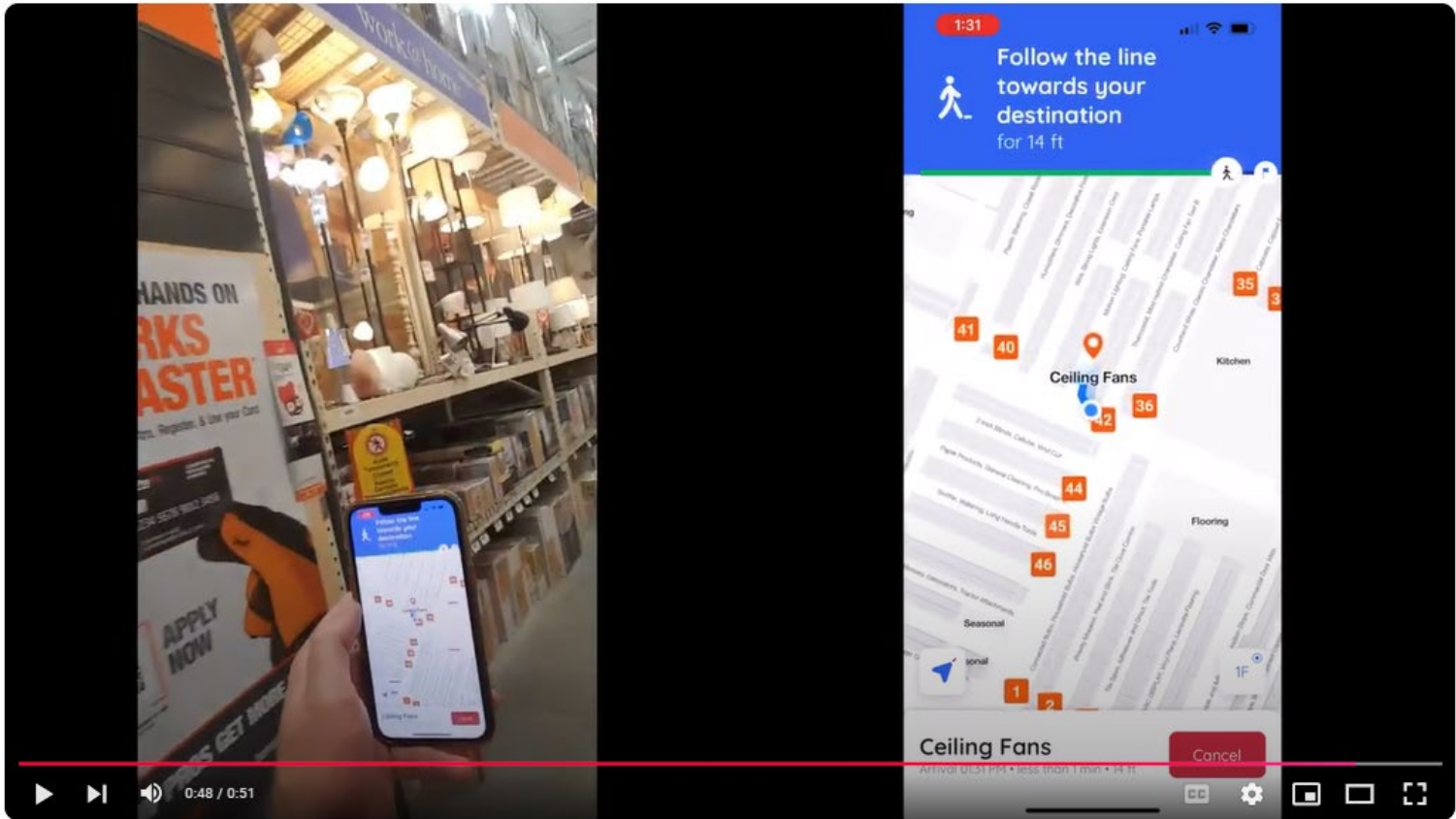
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Claim Element	The Accused Products
	https://www.pointr.tech/blog/building-blocks-to-implement-store-mode  Scalable, practical, and device-agnostic • Multi-language support • Pointr Maps™ are available across all platforms: iOS, Android, web and kiosk • Give mobile maps to everyone in an app-free package with Pointr Express™ • Full offline functionality for mobile devices • Use AI to automatically create accurate maps at scale with our MapScale® tool • Future-proof: All map data is stored in GeoJSON, and you can export to PNG, SVG or CSV format. We also support Apple's IMDF file type https://www.pointr.tech/solutions/location-based-services/indoor-mapping
[1c] reserving delivery of content from a plurality of sponsors to the plurality of registered application programs on the basis of both a geographic area and	The Accused Products perform and/or facilitate reserving delivery of content from a plurality of sponsors to the plurality of registered application programs on the basis of both a geographic area and an application program type associated with each of the plurality of registered application programs. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element:

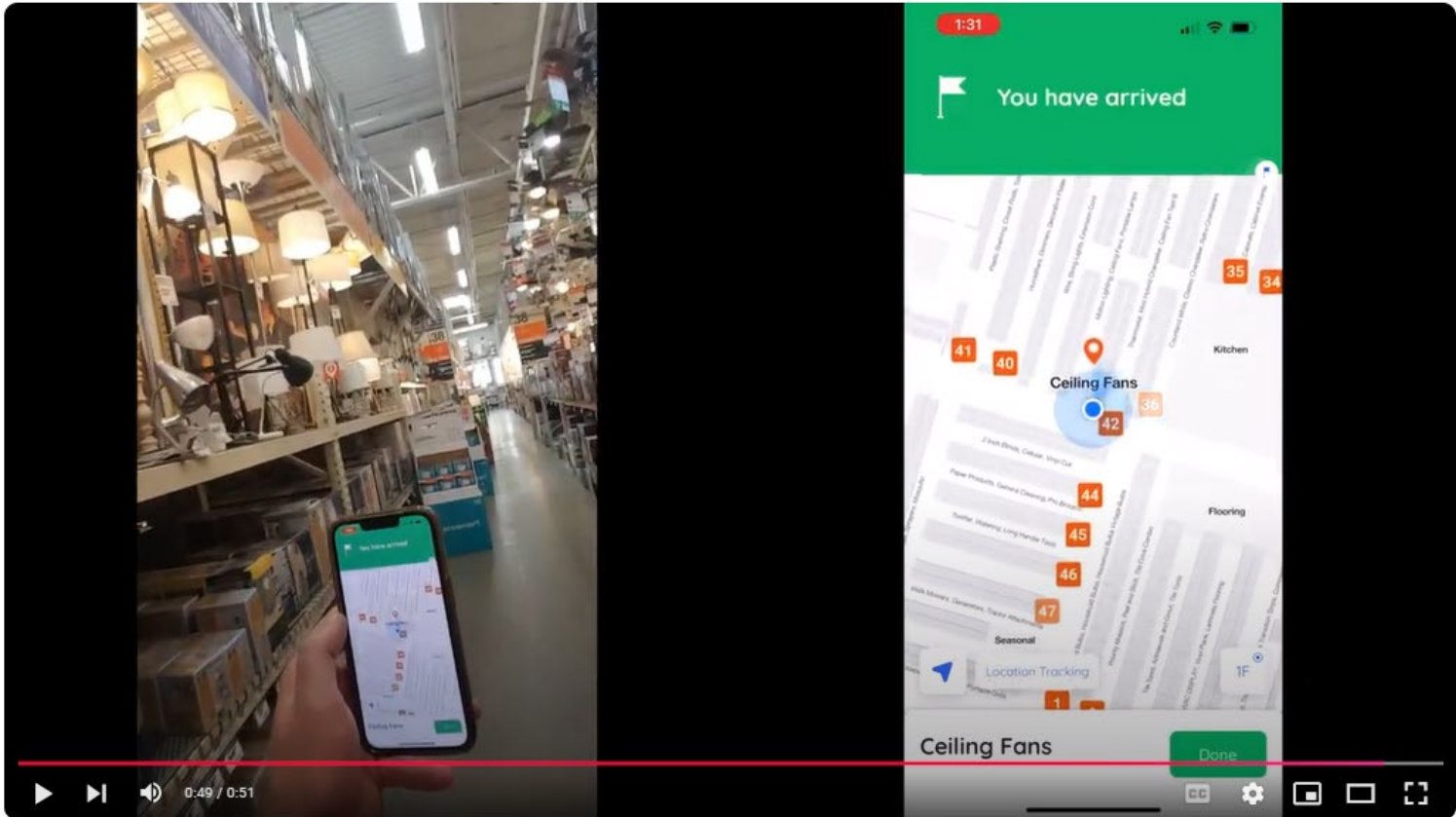
U.S. Patent No. 8,433,296 (the “’296 Patent”)
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Claim Element	The Accused Products
an application program type associated with each of the plurality of registered application programs;	In Home Depot’s next iteration, customers had to text or call when they arrived at the store. Eventually, they transitioned to a process fully embedded in their app using geofencing so that most of the communication and data exchange happened automatically. Home Depot was able to do this quickly by leveraging solutions like DataStax built on Apache Cassandra. https://radar.com/blog/retail-showdown-curbside-pickup And then with the rapid testing in two weeks, majority of our US stores implemented curbside pickup. And the first one, customers are manually checked in by a Greeter, and there was manual release of the order by the Runners. In the next iteration, customers could text us or call when they were in the parking lot. And associates had an app guiding through the order release using the first one mobile devices. Then we embedded the application of that into our app and brought geo-fencing in, automatically we can communicate to a customer in the parking lot, what car they are in, and our associate knows and can deliver the order. https://www.zdnet.com/article/how-home-depot-navigated-a-demand-boom-during-covid-19/

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Claim Element	The Accused Products
	 https://www.youtube.com/watch?v=-5sGrZkkzjE

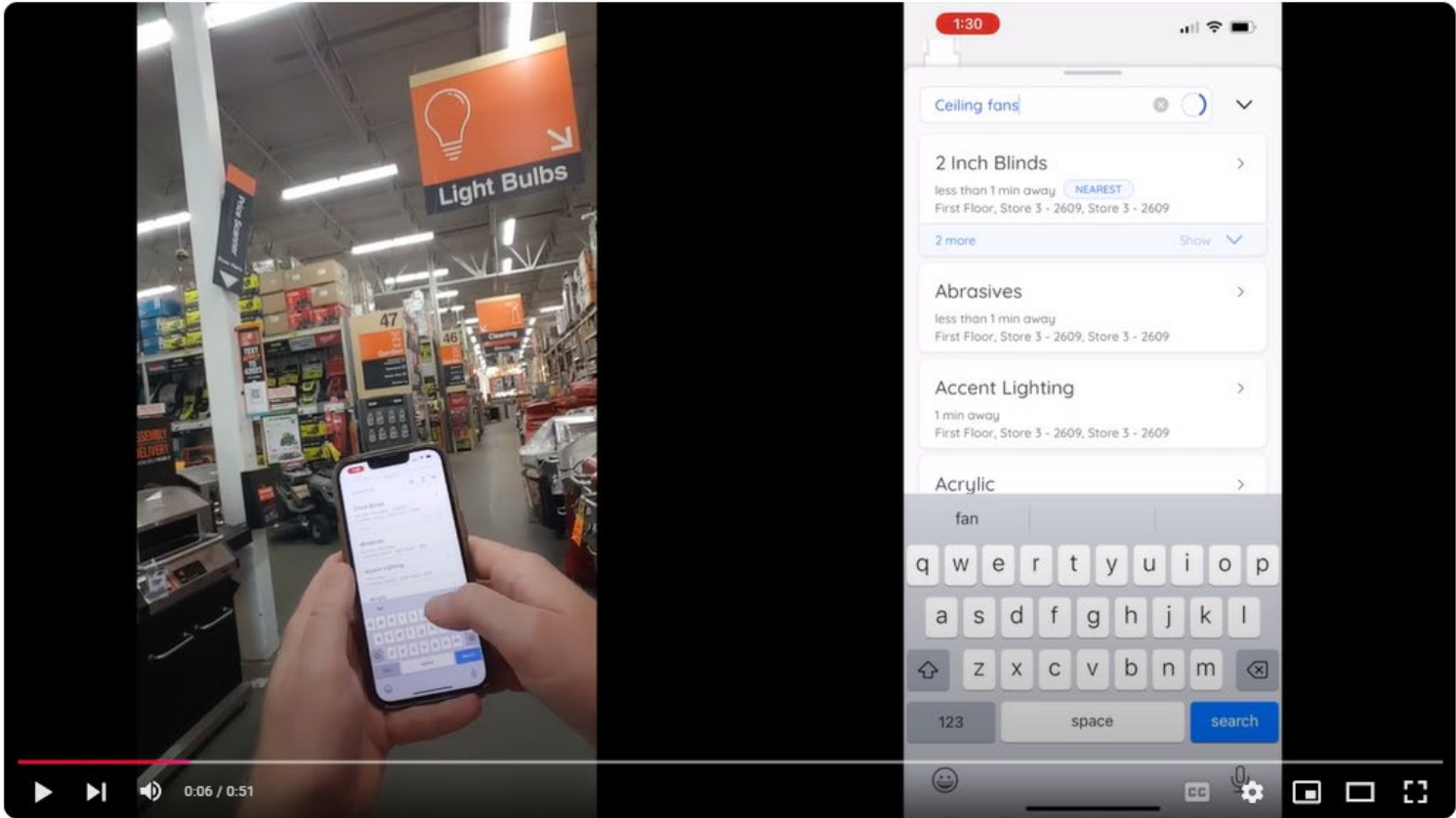
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Claim Element	The Accused Products
	Geofencing can be another valuable element of brand apps, further enhancing the experience of browsing and shopping in a physical location. Home Depot is one effective example, first rolled out in 2014. Its app automatically switches to an ‘in-store’ mode when a consumer enters, allowing them to gain additional features like the ‘product locator’ tool. By using location-based technology, the app automatically detects which store the user is in, giving them a map to specific products based on their exact position. https://econsultancy.com/how-retailers-are-using-geofencing-to-improve-in-store-cx/ Home Depot has an app that senses when people walk into one of its physical stores, then gives them extra content to simplify the shopping experience. For example, they can rely on their phones to scan barcodes on merchandise or use the Product Locator, which has a mapping function to help people know exactly where to go in a specific store to find the stuff they need. About 45 percent of Home Depot purchases people make online get picked up in local stores. The content that arrives through the app once individuals get within the required distance from the store could spur them to do more inside than merely go to retrieve the items they bought. https://www.reflectivedata.com/how-geofencing-works-for-brick-and-mortar-businesses/

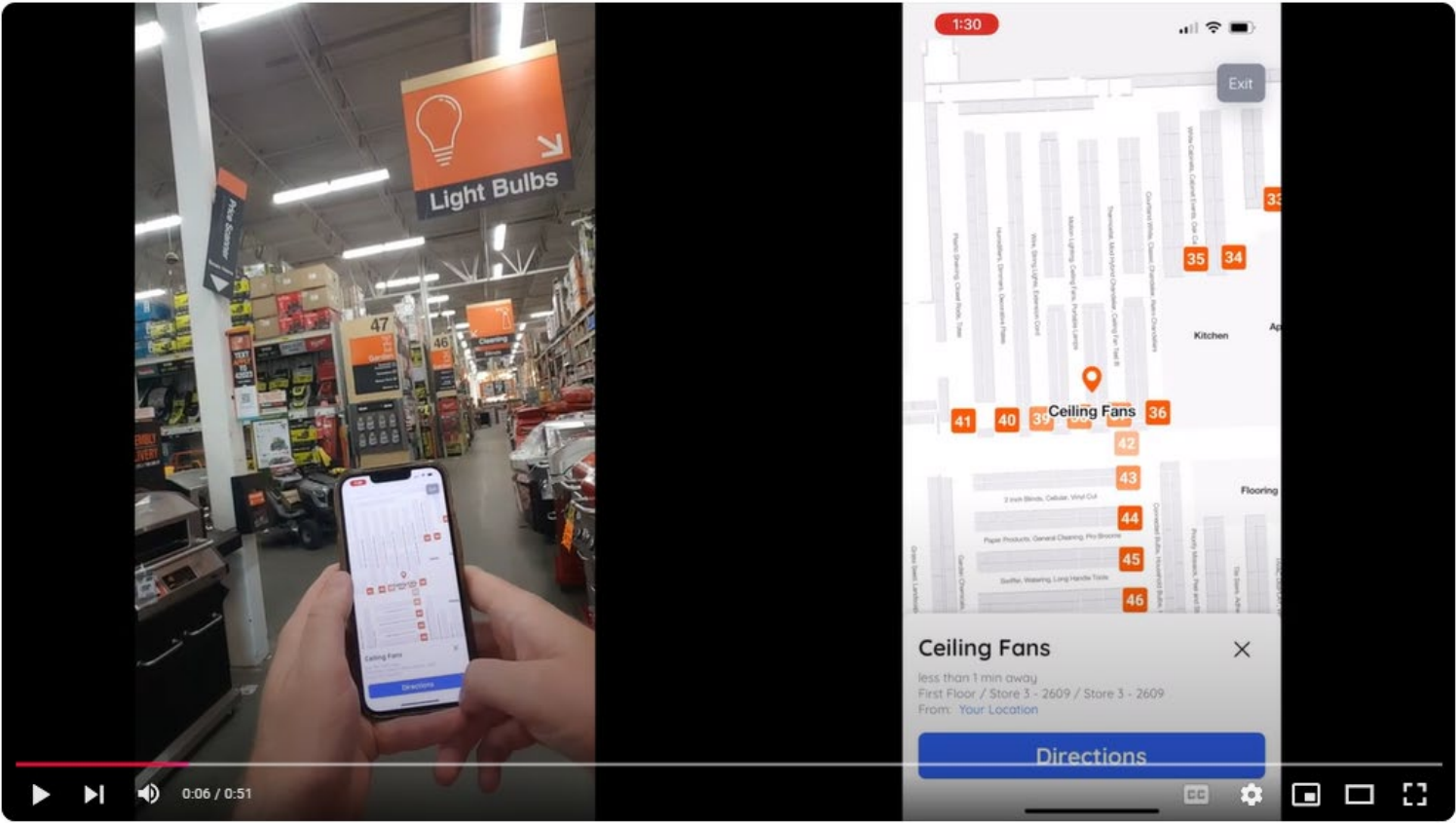
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Claim Element	The Accused Products
[1d] receiving, from a sponsor, a request to obtain an interest in a selected one of the plurality of geographic areas;	The Accused Products perform and/or facilitate receiving, from a sponsor, a request to obtain an interest in a selected one of the plurality of geographic areas. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element: In Home Depot’s next iteration, customers had to text or call when they arrived at the store. Eventually, they transitioned to a process fully embedded in their app using geofencing so that most of the communication and data exchange happened automatically. Home Depot was able to do this quickly by leveraging solutions like DataStax built on Apache Cassandra. https://radar.com/blog/retail-showdown-curbside-pickup And then with the rapid testing in two weeks, majority of our US stores implemented curbside pickup. And the first one, customers are manually checked in by a Greeter, and there was manual release of the order by the Runners. In the next iteration, customers could text us or call when they were in the parking lot. And associates had an app guiding through the order release using the first one mobile devices. Then we embedded the application of that into our app and brought geo-fencing in, automatically we can communicate to a customer in the parking lot, what car they are in, and our associate knows and can deliver the order. https://www.zdnet.com/article/how-home-depot-navigated-a-demand-boom-during-covid-19/

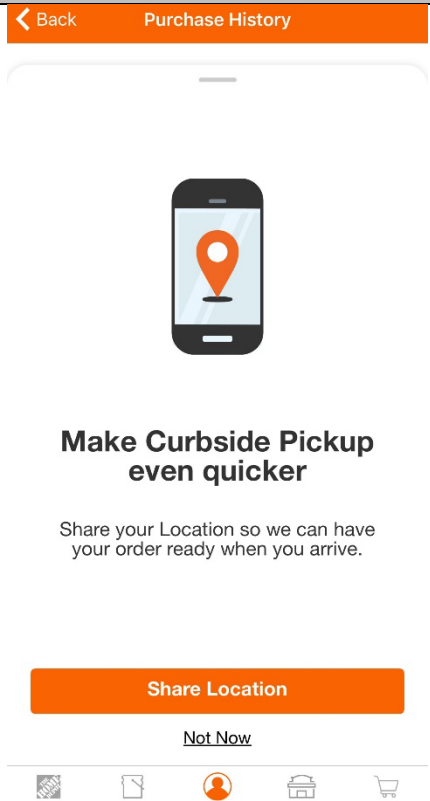
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Claim Element	The Accused Products
	 The image is a screenshot from a video showing a person's hands holding a smartphone in a Home Depot aisle. The phone screen displays a map with numbered locations (33-46) and a 'Ceiling Fans' search result. The background shows store shelves and a 'Light Bulbs' sign. The video player interface at the bottom indicates a duration of 0:06 / 0:51. https://www.youtube.com/watch?v=-5sGrZkkzjE

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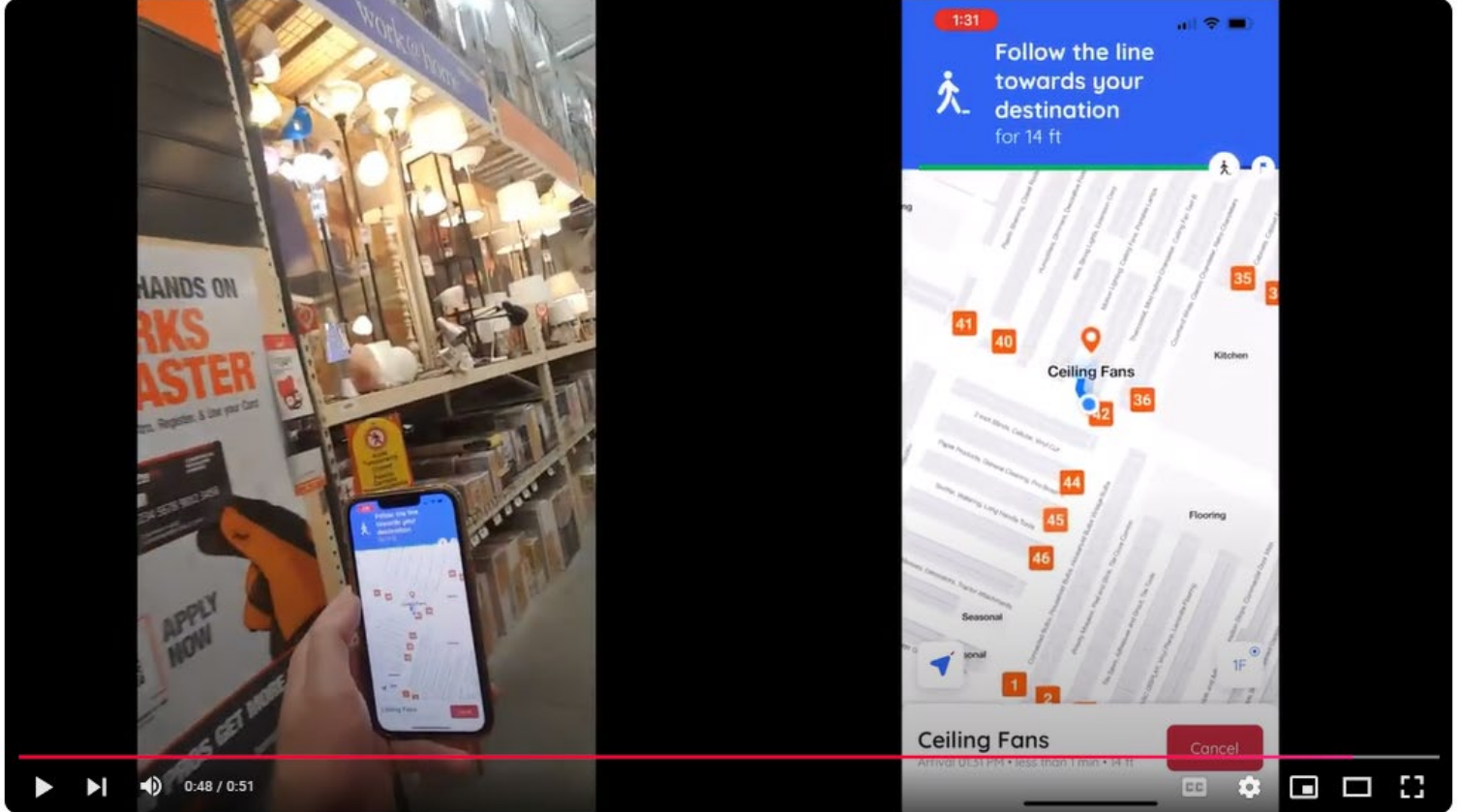
Claim Element	The Accused Products
	 The screenshot shows the Home Depot mobile app interface. At the top, there is an orange navigation bar with a back arrow and the text 'Purchase History'. Below this, a large orange location pin icon is centered on a smartphone screen. Underneath the icon, the text reads: 'Make Curbside Pickup even quicker'. Below that, a smaller line of text says: 'Share your Location so we can have your order ready when you arrive.' At the bottom of the screen, there is an orange button labeled 'Share Location' and a link labeled 'Not Now'. At the very bottom, there is a navigation bar with five icons: a Home Depot logo, a document, a person, a storefront, and a shopping cart. Home Depot Mobile Application
[1e] providing the sponsor a response to the request;	The Accused Products perform and/or facilitate providing the sponsor a response to the request. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element:

Claim Element	The Accused Products
	Home Depot Mobile Application In Home Depot's next iteration, customers had to text or call when they arrived at the store. Eventually, they transitioned to a process fully embedded in their app using geofencing so that most of the communication and data exchange happened automatically. Home Depot was able to do this quickly by leveraging solutions like DataStax built on Apache Cassandra.

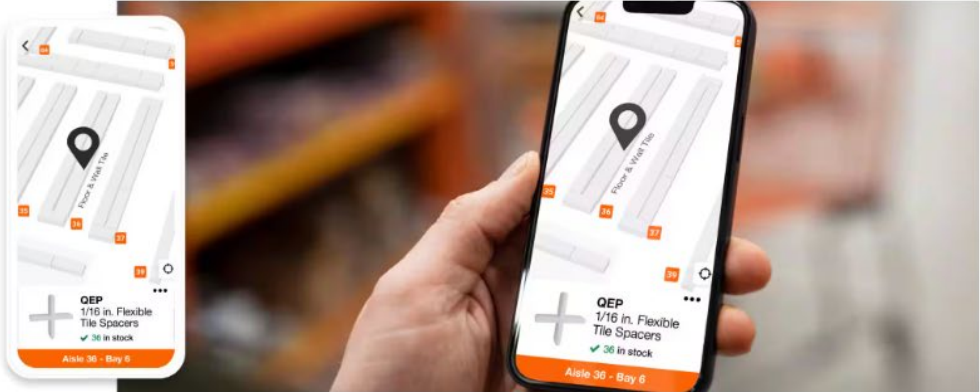
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	https://radar.com/blog/retail-showdown-curbside-pickup And then with the rapid testing in two weeks, majority of our US stores implemented curbside pickup. And the first one, customers are manually checked in by a Greeter, and there was manual release of the order by the Runners. In the next iteration, customers could text us or call when they were in the parking lot. And associates had an app guiding through the order release using the first one mobile devices. Then we embedded the application of that into our app and brought geo-fencing in, automatically we can communicate to a customer in the parking lot, what car they are in, and our associate knows and can deliver the order. https://www.zdnet.com/article/how-home-depot-navigated-a-demand-boom-during-covid-19/

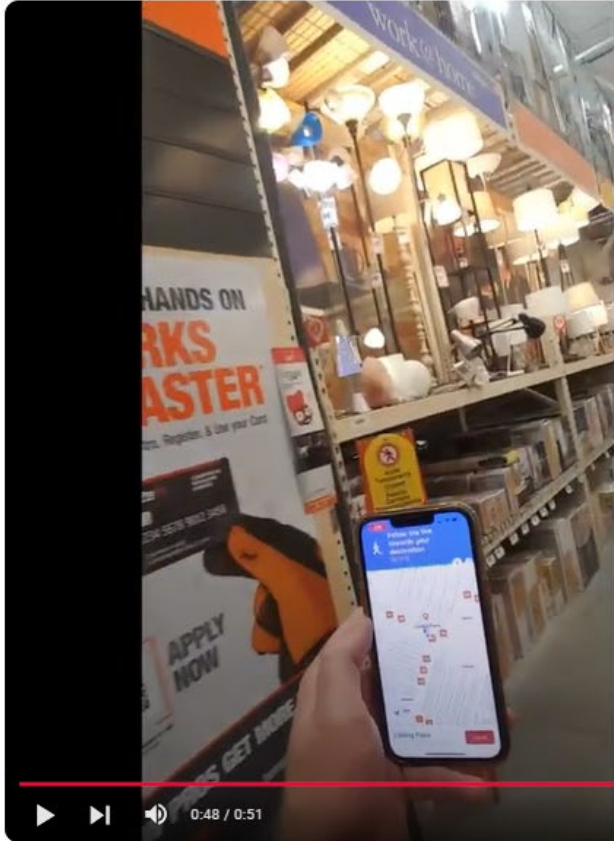
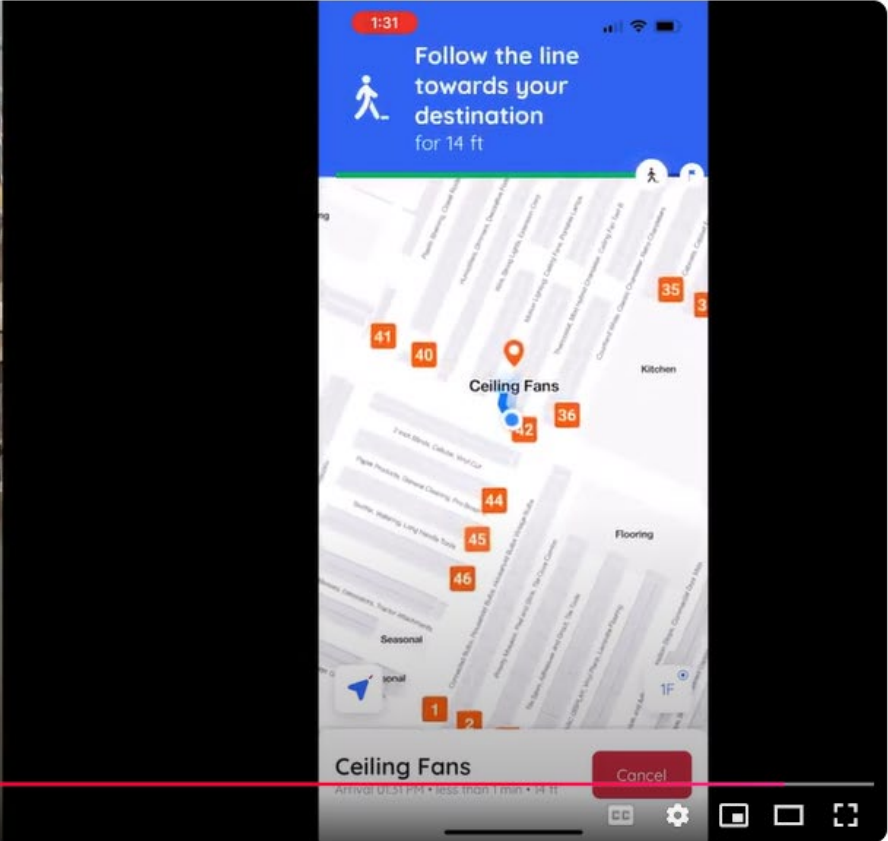
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Claim Element	The Accused Products
	 https://www.youtube.com/watch?v=-5sGrZkkzjE
[1f] storing a record of the interest in the selected one of the plurality of geographic areas;	The Accused Products perform and/or facilitate storing a record of the interest in the selected one of the plurality of geographic areas. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element:

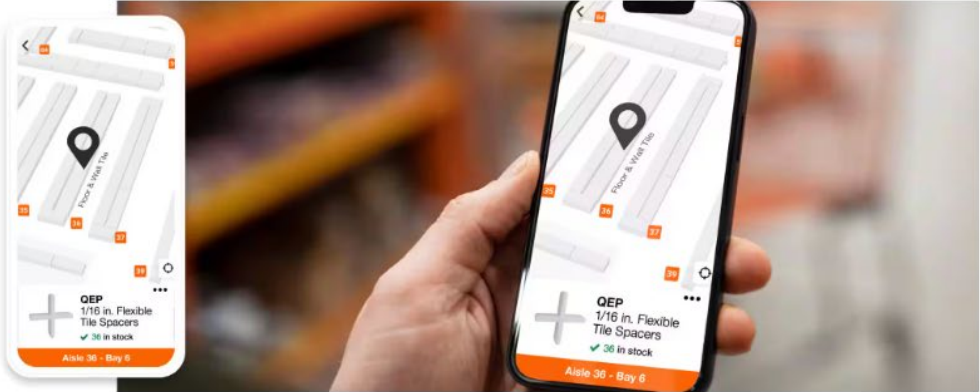
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	Product Locator No need to wander. The app helps you navigate to the aisle and bay to find the item you need.  https://www.homedepot.com/c/mobile-app

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Claim Element	The Accused Products
	  https://www.youtube.com/watch?v=-5sGrZkkzjE In Home Depot’s next iteration, customers had to text or call when they arrived at the store. Eventually, they transitioned to a process fully embedded in their app using geofencing so that most of the communication and data exchange happened automatically. Home Depot was able to do this quickly by leveraging solutions like DataStax built on Apache Cassandra.

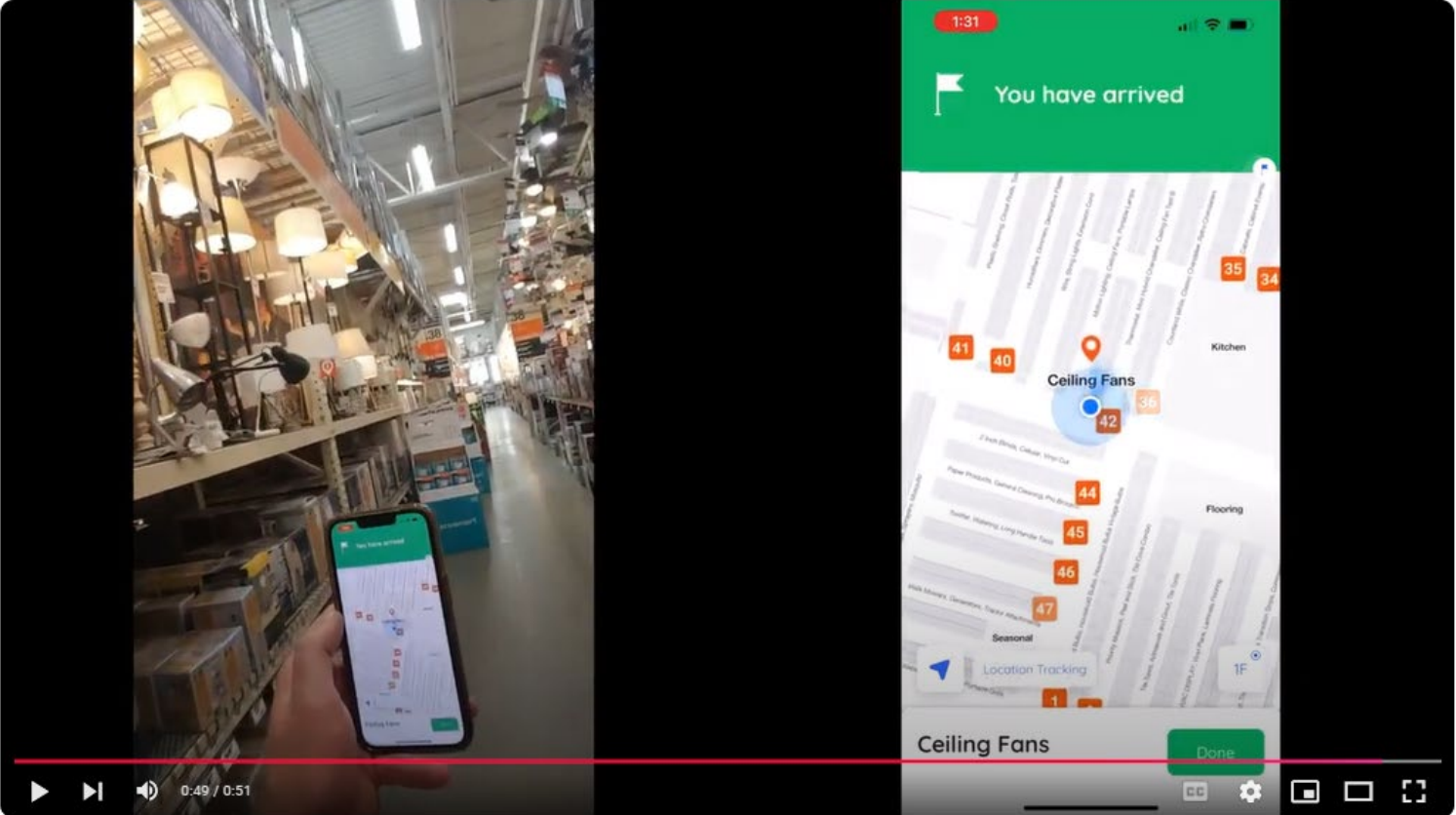
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Claim Chart**

Claim Element	The Accused Products
[1g] receiving, from the sponsor, content to be delivered to registered application programs having target locations contained within the selected one of the plurality of geographic areas;	https://radar.com/blog/retail-showdown-curbside-pickup The Accused Products perform and/or facilitate receiving, from the sponsor, content to be delivered to registered application programs having target locations contained within the selected one of the plurality of geographic areas. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element: Product Locator No need to wander. The app helps you navigate to the aisle and bay to find the item you need.  https://www.homedepot.com/c/mobile-app 2. The Home Depot The Home Depot used geofencing to engage customers in-store. Users received notifications with discounts and product recommendations when they entered a Home Depot location. The campaign was a great success, driving more in-store purchases. https://raincross.com/unlocking-the-power-of-data-for-geofencing-campaigns/

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	Geofencing can be another valuable element of brand apps, further enhancing the experience of browsing and shopping in a physical location. Home Depot is one effective example, first rolled out in 2014. Its app automatically switches to an ‘in-store’ mode when a consumer enters, allowing them to gain additional features like the ‘product locator’ tool. By using location-based technology, the app automatically detects which store the user is in, giving them a map to specific products based on their exact position. https://econsultancy.com/how-retailers-are-using-geofencing-to-improve-in-store-cx/ Home Depot has an app that senses when people walk into one of its physical stores, then gives them extra content to simplify the shopping experience. For example, they can rely on their phones to scan barcodes on merchandise or use the Product Locator, which has a mapping function to help people know exactly where to go in a specific store to find the stuff they need. About 45 percent of Home Depot purchases people make online get picked up in local stores. The content that arrives through the app once individuals get within the required distance from the store could spur them to do more inside than merely go to retrieve the items they bought. https://www.reflectivedata.com/how-geofencing-works-for-brick-and-mortar-businesses/

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

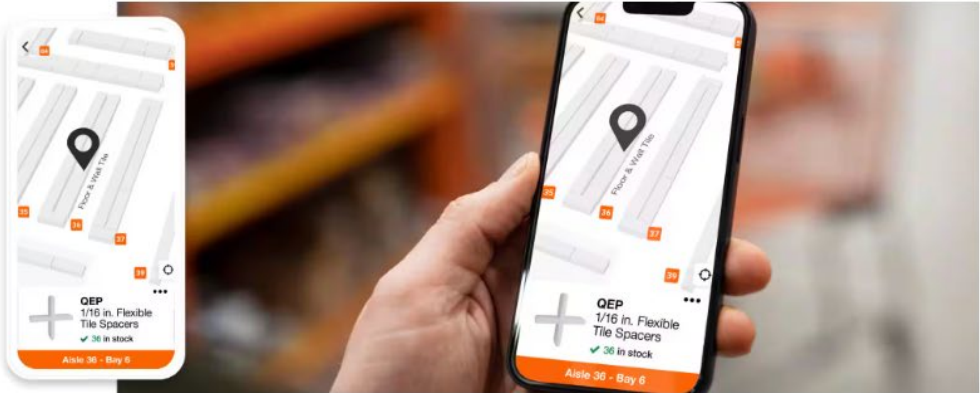
Claim Element	The Accused Products
	 https://www.youtube.com/watch?v=-5sGrZkkzjE

Claim Element	The Accused Products
	Home Depot Mobile Application In Home Depot's next iteration, customers had to text or call when they arrived at the store. Eventually, they transitioned to a process fully embedded in their app using geofencing so that most of the communication and data exchange happened automatically. Home Depot was able to do this quickly by leveraging solutions like DataStax built on Apache Cassandra.

U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart

Claim Element	The Accused Products
	https://radar.com/blog/retail-showdown-curbside-pickup And then with the rapid testing in two weeks, majority of our US stores implemented curbside pickup. And the first one, customers are manually checked in by a Greeter, and there was manual release of the order by the Runners. In the next iteration, customers could text us or call when they were in the parking lot. And associates had an app guiding through the order release using the first one mobile devices. Then we embedded the application of that into our app and brought geo-fencing in, automatically we can communicate to a customer in the parking lot, what car they are in, and our associate knows and can deliver the order. https://www.zdnet.com/article/how-home-depot-navigated-a-demand-boom-during-covid-19/ Home Depot’s revamped mobile app highlights engaging features like barcode search, voice search and visual search. When a user walks into a Home Depot store, the app will automatically switch to in-store mode. Then, the shopper can use the app to navigate to the aisle in which a product is located. Home Depot also works with Adobe on mobile analytics, geofencing and mobile content optimization to drive offline sales and in-store pickups.

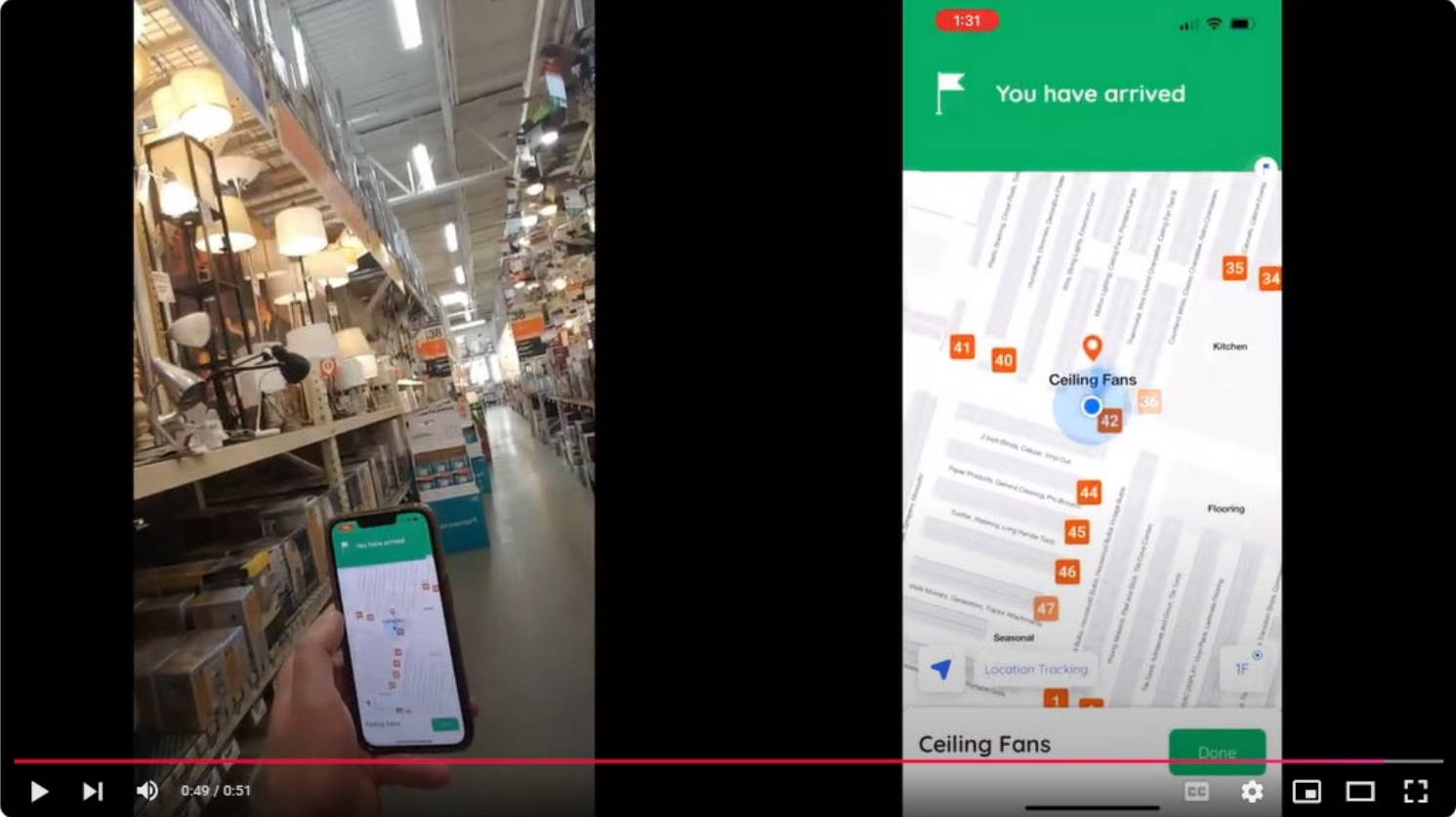
**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
[1h] receiving, from a registered application program, a request for content to be used within the registered application program;	https://digiday.com/marketing/how-home-depot-uses-mobile-to-drive-sales/ The Accused Products perform and/or facilitate receiving, from a registered application program, a request for content to be used within the registered application program. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element: Product Locator No need to wander. The app helps you navigate to the aisle and bay to find the item you need.  https://www.homedepot.com/c/mobile-app 2. The Home Depot The Home Depot used geofencing to engage customers in-store. Users received notifications with discounts and product recommendations when they entered a Home Depot location. The campaign was a great success, driving more in-store purchases. https://raincross.com/unlocking-the-power-of-data-for-geofencing-campaigns/

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
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Claim Element	The Accused Products
	Geofencing can be another valuable element of brand apps, further enhancing the experience of browsing and shopping in a physical location. Home Depot is one effective example, first rolled out in 2014. Its app automatically switches to an ‘in-store’ mode when a consumer enters, allowing them to gain additional features like the ‘product locator’ tool. By using location-based technology, the app automatically detects which store the user is in, giving them a map to specific products based on their exact position. https://econsultancy.com/how-retailers-are-using-geofencing-to-improve-in-store-cx/ Home Depot has an app that senses when people walk into one of its physical stores, then gives them extra content to simplify the shopping experience. For example, they can rely on their phones to scan barcodes on merchandise or use the Product Locator, which has a mapping function to help people know exactly where to go in a specific store to find the stuff they need. About 45 percent of Home Depot purchases people make online get picked up in local stores. The content that arrives through the app once individuals get within the required distance from the store could spur them to do more inside than merely go to retrieve the items they bought. https://www.reflectivedata.com/how-geofencing-works-for-brick-and-mortar-businesses/

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
[1i] in response to receiving the request:	The Accused Products perform and/or facilitate the subsequent steps in response to receiving the request. For example, screenshots are shown below with respect to each step [1i]–[1j] and are incorporated by reference herein.
[1j] selecting content from at least one sponsor to be delivered to the registered application program, subject to the reserving; and	The Accused Products perform and/or facilitate selecting content from at least one sponsor to be delivered to the registered application program, subject to the reserving. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element:  https://www.youtube.com/watch?v=-5sGrZkkzjE

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	2. The Home Depot The Home Depot used geofencing to engage customers in-store. Users received notifications with discounts and product recommendations when they entered a Home Depot location. The campaign was a great success, driving more in-store purchases. https://raincross.com/unlocking-the-power-of-data-for-geofencing-campaigns/

Claim Element	The Accused Products
	Home Depot Mobile Application In Home Depot's next iteration, customers had to text or call when they arrived at the store. Eventually, they transitioned to a process fully embedded in their app using geofencing so that most of the communication and data exchange happened automatically. Home Depot was able to do this quickly by leveraging solutions like DataStax built on Apache Cassandra.

U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart

Claim Element	The Accused Products
	https://radar.com/blog/retail-showdown-curbside-pickup And then with the rapid testing in two weeks, majority of our US stores implemented curbside pickup. And the first one, customers are manually checked in by a Greeter, and there was manual release of the order by the Runners. In the next iteration, customers could text us or call when they were in the parking lot. And associates had an app guiding through the order release using the first one mobile devices. Then we embedded the application of that into our app and brought geo-fencing in, automatically we can communicate to a customer in the parking lot, what car they are in, and our associate knows and can deliver the order. https://www.zdnet.com/article/how-home-depot-navigated-a-demand-boom-during-covid-19/ Home Depot’s revamped mobile app highlights engaging features like barcode search, voice search and visual search. When a user walks into a Home Depot store, the app will automatically switch to in-store mode. Then, the shopper can use the app to navigate to the aisle in which a product is located. Home Depot also works with Adobe on mobile analytics, geofencing and mobile content optimization to drive offline sales and in-store pickups. https://digiday.com/marketing/how-home-depot-uses-mobile-to-drive-sales/

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
[1k] providing the content from the at least one sponsor to the registered application program.	The Accused Products perform and/or facilitate providing the content from the at least one sponsor to the registered application program. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element: https://www.youtube.com/watch?v=-5sGrZkkzjE

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	2. The Home Depot The Home Depot used geofencing to engage customers in-store. Users received notifications with discounts and product recommendations when they entered a Home Depot location. The campaign was a great success, driving more in-store purchases. https://raincross.com/unlocking-the-power-of-data-for-geofencing-campaigns/

Claim Element	The Accused Products
	Home Depot Mobile Application In Home Depot's next iteration, customers had to text or call when they arrived at the store. Eventually, they transitioned to a process fully embedded in their app using geofencing so that most of the communication and data exchange happened automatically. Home Depot was able to do this quickly by leveraging solutions like DataStax built on Apache Cassandra.

U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart

Claim Element	The Accused Products
	https://radar.com/blog/retail-showdown-curbside-pickup And then with the rapid testing in two weeks, majority of our US stores implemented curbside pickup. And the first one, customers are manually checked in by a Greeter, and there was manual release of the order by the Runners. In the next iteration, customers could text us or call when they were in the parking lot. And associates had an app guiding through the order release using the first one mobile devices. Then we embedded the application of that into our app and brought geo-fencing in, automatically we can communicate to a customer in the parking lot, what car they are in, and our associate knows and can deliver the order. https://www.zdnet.com/article/how-home-depot-navigated-a-demand-boom-during-covid-19/ Home Depot’s revamped mobile app highlights engaging features like barcode search, voice search and visual search. When a user walks into a Home Depot store, the app will automatically switch to in-store mode. Then, the shopper can use the app to navigate to the aisle in which a product is located. Home Depot also works with Adobe on mobile analytics, geofencing and mobile content optimization to drive offline sales and in-store pickups.

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	https://digiday.com/marketing/how-home-depot-uses-mobile-to-drive-sales/
[2] The method of claim 1, further comprising:	See analysis and exemplary screenshots for claim 1 above, which is incorporated by reference here.
[2a] recording a request identifier associated with the request; and	Upon information and belief, the Accused Products perform and/or facilitate recording a request identifier associated with the request. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element: Home Depot has an app that senses when people walk into one of its physical stores, then gives them extra content to simplify the shopping experience. For example, they can rely on their phones to scan barcodes on merchandise or use the Product Locator, which has a mapping function to help people know exactly where to go in a specific store to find the stuff they need. About 45 percent of Home Depot purchases people make online get picked up in local stores. The content that arrives through the app once individuals get within the required distance from the store could spur them to do more inside than merely go to retrieve the items they bought. https://www.reflectivedata.com/how-geofencing-works-for-brick-and-mortar-businesses/
[2b] providing the request identifier to the registered application program.	Upon information and belief, the Accused Products perform and/or facilitate providing the request identifier to the registered application program.

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	Home Depot has an app that senses when people walk into one of its physical stores, then gives them extra content to simplify the shopping experience. For example, they can rely on their phones to scan barcodes on merchandise or use the Product Locator, which has a mapping function to help people know exactly where to go in a specific store to find the stuff they need. About 45 percent of Home Depot purchases people make online get picked up in local stores. The content that arrives through the app once individuals get within the required distance from the store could spur them to do more inside than merely go to retrieve the items they bought. https://www.reflectivedata.com/how-geofencing-works-for-brick-and-mortar-businesses/
[3] The method of claim 2, further comprising:	<i>See</i> analysis and exemplary screenshots for claims 1 and 2 above, which are incorporated by reference here.
[3a] receiving information related to user interaction with the provided content, the information including the request identifier; and	Upon information and belief, the Accused Products perform and/or facilitate receiving information related to user interaction with the provided content, the information including the request identifier.

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	Home Depot has an app that senses when people walk into one of its physical stores, then gives them extra content to simplify the shopping experience. For example, they can rely on their phones to scan barcodes on merchandise or use the Product Locator, which has a mapping function to help people know exactly where to go in a specific store to find the stuff they need. About 45 percent of Home Depot purchases people make online get picked up in local stores. The content that arrives through the app once individuals get within the required distance from the store could spur them to do more inside than merely go to retrieve the items they bought. https://www.reflectivedata.com/how-geofencing-works-for-brick-and-mortar-businesses/

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	<i>How does mobile technology fit into seamless holiday shopping at Home Depot?</i> Home Depot is always looking for ways to improve the shopping experience for customers, both at home and in store – and mobile technology is a cornerstone of our strategy. Anyone can download the Home Depot app on their iPhone, iPad or Android devices to make a purchase. Shoppers can use the app’s product locator to find items they need to start and finish any home improvement job, and use our project guides to help find solutions. If they need several items, they can use the app to build a digital shopping list they’ll never lose and keep track of orders and receipts. They may even discover savings in their cart with our ‘Special Buy of the Day’ and other promotional offers. People can leverage these features while purchasing from home or while out shopping. And now that more and more people are doing the majority of their holiday shopping online, it’s important to us that customers experience all The Home Depot has to offer – from our inventory to our expertise – at their fingertips. https://chainstoreage.com/exclusive-qa-home-depot-senior-vp-technology Home Depot’s revamped mobile app highlights engaging features like barcode search, voice search and visual search. When a user walks into a Home Depot store, the app will automatically switch to in-store mode. Then, the shopper can use the app to navigate to the aisle in which a product is located. Home Depot also works with Adobe on mobile analytics, geofencing and mobile content optimization to drive offline sales and in-store pickups. https://digiday.com/marketing/how-home-depot-uses-mobile-to-drive-sales/

U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart

Claim Element	The Accused Products
	2. The Home Depot The Home Depot used geofencing to engage customers in-store. Users received notifications with discounts and product recommendations when they entered a Home Depot location. The campaign was a great success, driving more in-store purchases. https://raincross.com/unlocking-the-power-of-data-for-geofencing-campaigns/
[3b] providing additional content to the registered application in response to the received information.	Upon information and belief, the Accused Products perform and/or facilitate providing additional content to the registered application in response to the received information. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element: Home Depot has an app that senses when people walk into one of its physical stores, then gives them extra content to simplify the shopping experience. For example, they can rely on their phones to scan barcodes on merchandise or use the Product Locator, which has a mapping function to help people know exactly where to go in a specific store to find the stuff they need. About 45 percent of Home Depot purchases people make online get picked up in local stores. The content that arrives through the app once individuals get within the required distance from the store could spur them to do more inside than merely go to retrieve the items they bought.

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	https://www.reflectivedata.com/how-geofencing-works-for-brick-and-mortar-businesses/ How does mobile technology fit into seamless holiday shopping at Home Depot? Home Depot is always looking for ways to improve the shopping experience for customers, both at home and in store – and mobile technology is a cornerstone of our strategy. Anyone can download the Home Depot app on their iPhone, iPad or Android devices to make a purchase. Shoppers can use the app’s product locator to find items they need to start and finish any home improvement job, and use our project guides to help find solutions. If they need several items, they can use the app to build a digital shopping list they’ll never lose and keep track of orders and receipts. They may even discover savings in their cart with our ‘Special Buy of the Day’ and other promotional offers. People can leverage these features while purchasing from home or while out shopping. And now that more and more people are doing the majority of their holiday shopping online, it’s important to us that customers experience all The Home Depot has to offer – from our inventory to our expertise – at their fingertips. https://chainstoreage.com/exclusive-qa-home-depot-senior-vp-technology Home Depot’s revamped mobile app highlights engaging features like barcode search, voice search and visual search. When a user walks into a Home Depot store, the app will automatically switch to in-store mode. Then, the shopper can use the app to navigate to the aisle in which a product is located. Home Depot also works with Adobe on mobile analytics, geofencing and mobile content optimization to drive offline sales and in-store pickups. https://digiday.com/marketing/how-home-depot-uses-mobile-to-drive-sales/

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	2. The Home Depot The Home Depot used geofencing to engage customers in-store. Users received notifications with discounts and product recommendations when they entered a Home Depot location. The campaign was a great success, driving more in-store purchases. https://raincross.com/unlocking-the-power-of-data-for-geofencing-campaigns/
[4] The method of claim 1, further comprising:	See analysis and exemplary screenshots for claims 1 and 3 above, which are incorporated by reference here.
[4a] determining whether at least one of the plurality of sponsors is associated with a geographical representation lying at least partially within a predetermined radial distance of a target location;	The Accused Products perform and/or facilitate determining whether at least one of the plurality of sponsors is associated with a geographical representation lying at least partially within a predetermined radial distance of a target location. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element:

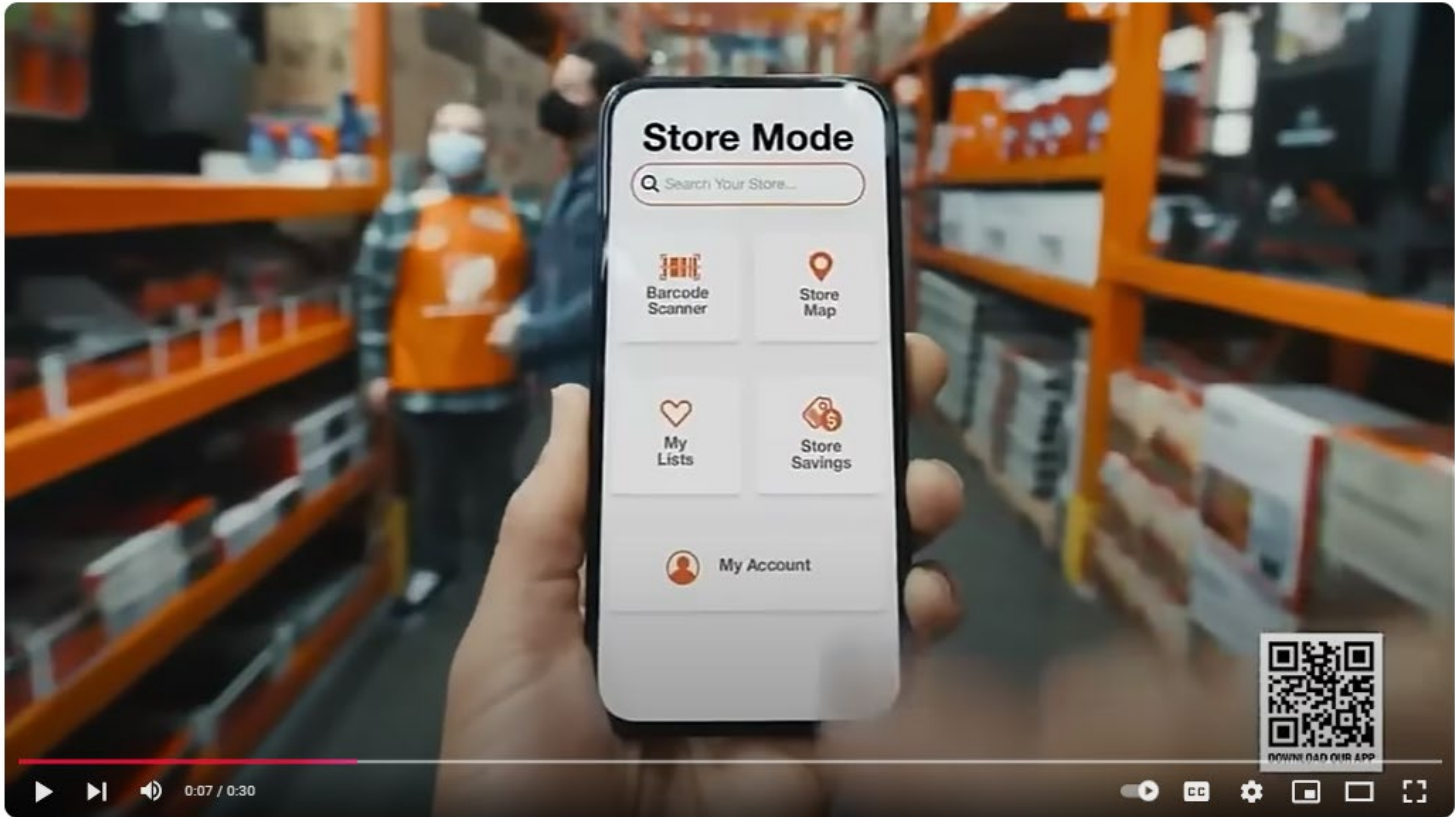
**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	Home Depot has an app that senses when people walk into one of its physical stores, then gives them extra content to simplify the shopping experience. For example, they can rely on their phones to scan barcodes on merchandise or use the Product Locator, which has a mapping function to help people know exactly where to go in a specific store to find the stuff they need. About 45 percent of Home Depot purchases people make online get picked up in local stores. The content that arrives through the app once individuals get within the required distance from the store could spur them to do more inside than merely go to retrieve the items they bought. https://www.reflectivedata.com/how-geofencing-works-for-brick-and-mortar-businesses/
[4b] in response to a negative determination, increasing the predetermined radial distance.	The Accused Products perform and/or facilitate increasing the predetermined radial distance in response to a negative determination. <i>See</i> analysis and exemplary screenshots for claim element 4a above.
[5] The method of claim 1, further comprising: reserving a specific one of the plurality of geographic areas for exclusive delivery of content associated with a particular one of the plurality of sponsors to registered application	The Accused Products perform the method of claim 1, further comprising reserving a specific one of the plurality of geographic areas for exclusive delivery of content associated with a particular one of the plurality of sponsors to registered application programs and having a target location contained within the specific one of the plurality of geographic areas. <i>See</i> analysis and exemplary screenshots for claims 1 above, which are incorporated by reference here. Further, example screenshots are shown below of documentation for each of the Accused Products which demonstrate this element:

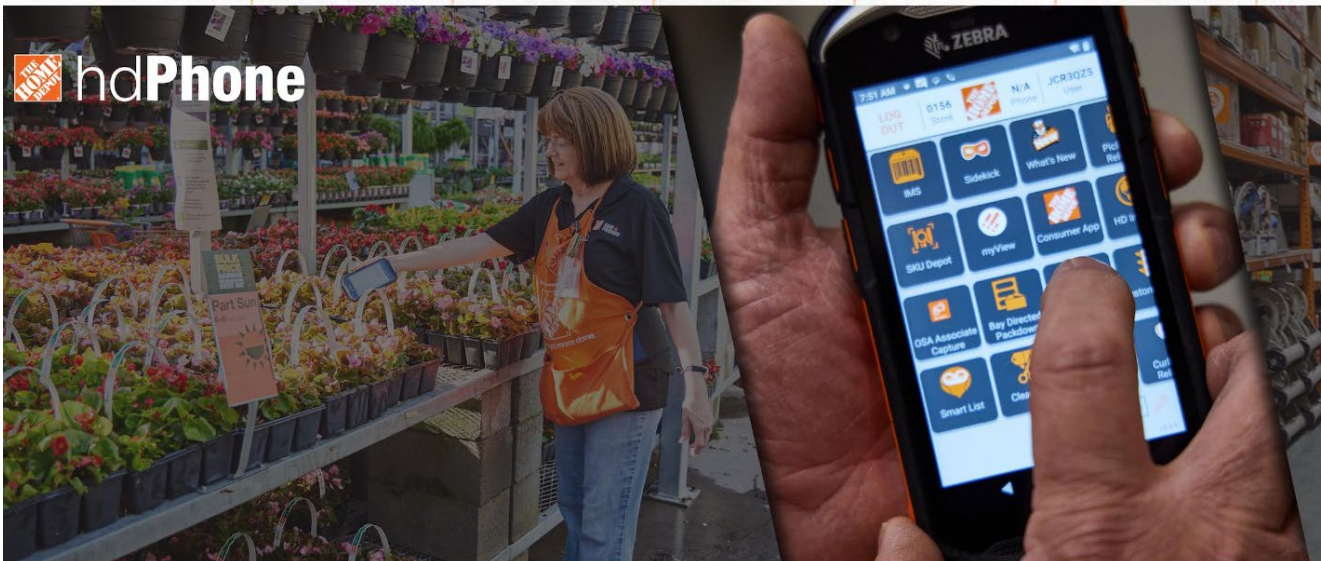
**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
programs and having a target location contained within the specific one of the plurality of geographic areas.	Home Depot has an app that senses when people walk into one of its physical stores, then gives them extra content to simplify the shopping experience. For example, they can rely on their phones to scan barcodes on merchandise or use the Product Locator, which has a mapping function to help people know exactly where to go in a specific store to find the stuff they need. About 45 percent of Home Depot purchases people make online get picked up in local stores. The content that arrives through the app once individuals get within the required distance from the store could spur them to do more inside than merely go to retrieve the items they bought. https://www.reflectivedata.com/how-geofencing-works-for-brick-and-mortar-businesses/
[6 pre] A system comprising:	See analysis and exemplary screenshots for claim element 1 pre above, which is incorporated by reference here.
[6a] memory;	The Accused Products include memory. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element:

U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart

Claim Element	The Accused Products
	 The Home Depot Commercial 2022 - (USA) https://www.youtube.com/watch?v=bLbiUqIu8WE

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	 The image is a composite of two photographs. The left photograph shows a Home Depot employee, a woman with short brown hair wearing a dark blue polo shirt and an orange apron, standing in a garden center aisle. She is holding a small, dark-colored mobile device and pointing it towards a display of potted plants. A sign for 'hdPhone' is visible in the upper left corner of this photo. The right photograph is a close-up of a hand holding a ZEBRA-branded mobile device. The screen displays a grid of application icons including 'LOG OUT', 'SIDELICK', 'What's New', 'Pict', 'myView', 'Consumer App', 'HD', 'SKU Depot', 'myView', 'Consumer App', 'HD', 'OSA Associate Capture', 'Buy Director Packdown', 'Smart List', and 'Clear'. The status bar at the top of the screen shows the time as 7:51 AM, battery level at 15%, and signal strength. https://corporate.homedepot.com/news/company/home-depot-upgrades-store-network-and-mobile-devices-enhance-interconnected-experience

U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart

Claim Element	The Accused Products
	Home Depot has rolled out 125,000 hdPhones across its stores  https://www.heyinnovations.com/resources/iot-retail

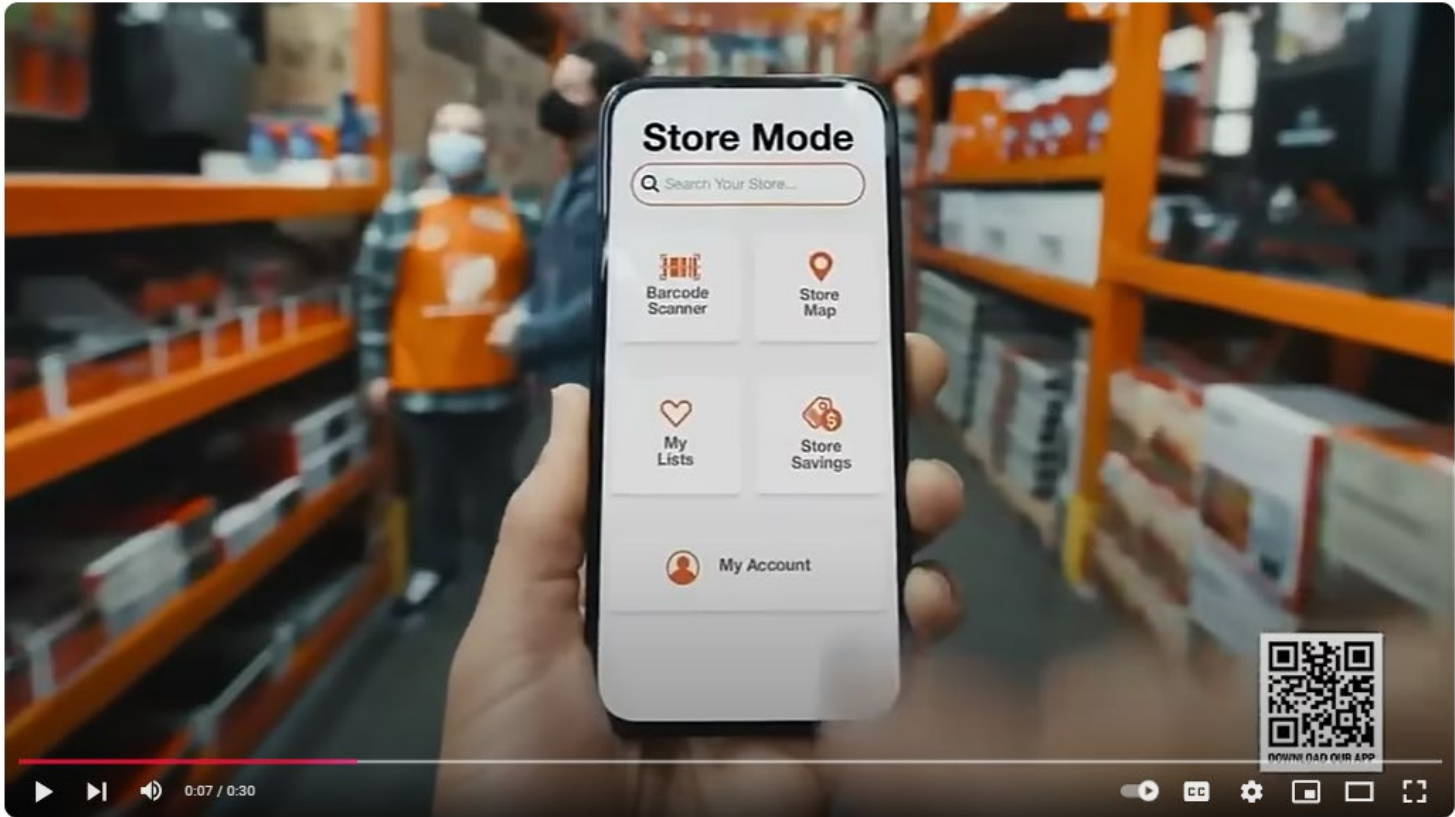
**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	<i>The Home Depot logo. (PRNewsFoto/The Home Depot)</i> <u>The Home Depot</u> is rolling out more than 125,000 new hdPhones, in collaboration with Zebra Technologies, HPE, and Aruba, to make it faster and more convenient for associates to serve customers. The hdPhone is a mobile in-store device dedicated to improving the customer and store associate experience, according to Home Depot. “Our customers expect a frictionless experience, in our stores and on their mobile devices,” Fahim Siddiqui, executive vice president and chief information office of The Home Depot, said in a news release. “The enhanced digital in-store environment allows our customers to quickly get what they need to complete their projects with the help of a more connected associate.” The new mobile devices allow for increased capabilities, including the ability for associates to communicate throughout the entire store and into the parking lots and advanced-range barcode scanning for product location and price checking. The mobile devices also feature docking with Zebra’s Workstation Connect, enabling associates to view and demo products and specifications on larger screens, helping customers find products to complete their products. Additional capabilities include multi-device integration, more efficient app speeds, in-store texting, and direct walkie talkie communication, according to The Home Depot. https://www.prosalesmagazine.com/news/the-home-depot-introduces-new-in-store-network-and-mobile-devices_o

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products								
	Performance Characteristics <table border="1" data-bbox="514 354 1770 979"> <tr> <td data-bbox="514 354 730 475">CPU</td><td data-bbox="730 354 1770 475">TC52x/TC57x/TC52ax: Qualcomm Snapdragon™ 660 octa-core, 2.45 GHz</td></tr> <tr> <td data-bbox="514 475 730 643">Operating System</td><td data-bbox="730 475 1770 643">TC52x: Upgradeable to Android 14 TC57x: Upgradeable to Android 14 TC52ax: Upgradeable to Android 14</td></tr> <tr> <td data-bbox="514 643 730 764">Memory</td><td data-bbox="730 643 1770 764">TC52x/TC57x: 4GB RAM/32GB UFS Flash TC52ax: 4GB RAM/64GB UFS Flash</td></tr> <tr> <td data-bbox="514 764 730 979">Security</td><td data-bbox="730 764 1770 979">FIPS 140-2 Validated (ISO 19790) and Common Criteria certified (ISO 15408); FIPS 140-2 cryptography can be enabled on select configurations through a custom SKU request; Supports Secure Boot and Verified Boot.</td></tr> </table> https://www.zebra.com/us/en/products/spec-sheets/mobile-computers/handheld/tc5x-series.html Upon information and belief, some Accused Products utilize memory and processors such as that shown above. Further, upon information and belief, some Accused Products utilize memory associated with servers owned, directed, or controlled by Home Depot.	CPU	TC52x/TC57x/TC52ax: Qualcomm Snapdragon™ 660 octa-core, 2.45 GHz	Operating System	TC52x: Upgradeable to Android 14 TC57x: Upgradeable to Android 14 TC52ax: Upgradeable to Android 14	Memory	TC52x/TC57x: 4GB RAM/32GB UFS Flash TC52ax: 4GB RAM/64GB UFS Flash	Security	FIPS 140-2 Validated (ISO 19790) and Common Criteria certified (ISO 15408); FIPS 140-2 cryptography can be enabled on select configurations through a custom SKU request; Supports Secure Boot and Verified Boot.
CPU	TC52x/TC57x/TC52ax: Qualcomm Snapdragon™ 660 octa-core, 2.45 GHz								
Operating System	TC52x: Upgradeable to Android 14 TC57x: Upgradeable to Android 14 TC52ax: Upgradeable to Android 14								
Memory	TC52x/TC57x: 4GB RAM/32GB UFS Flash TC52ax: 4GB RAM/64GB UFS Flash								
Security	FIPS 140-2 Validated (ISO 19790) and Common Criteria certified (ISO 15408); FIPS 140-2 cryptography can be enabled on select configurations through a custom SKU request; Supports Secure Boot and Verified Boot.								
[6b] a communications interface operably coupled to the memory; and	The Accused Products include a communications interface operably coupled to the memory. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element:								

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	 The Home Depot Commercial 2022 - (USA) https://www.youtube.com/watch?v=bLbiUqIu8WE

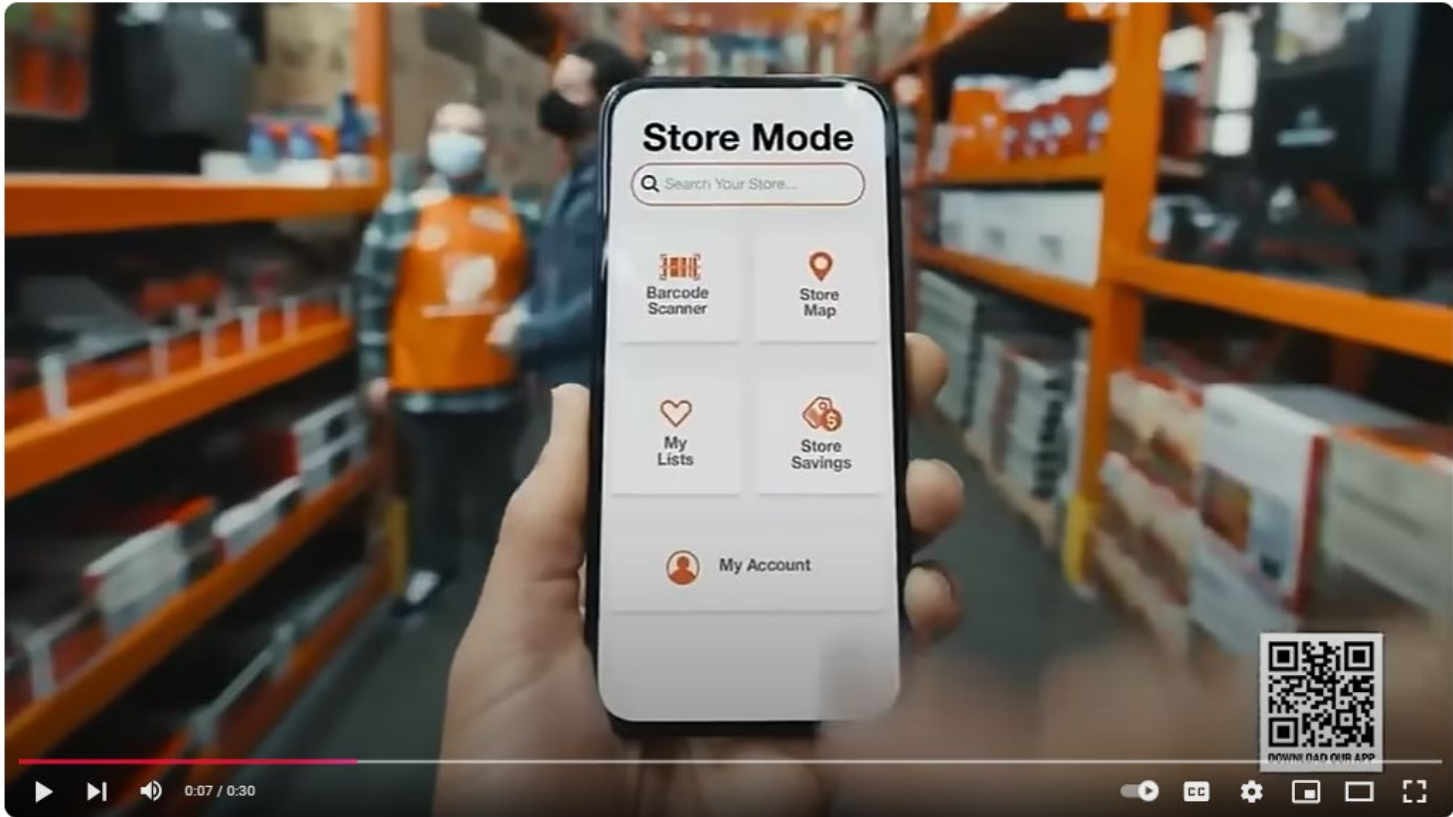
U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart

Claim Element	The Accused Products
	Home Depot has rolled out 125,000 hdPhones across its stores  https://www.heyinnovations.com/resources/iot-retail

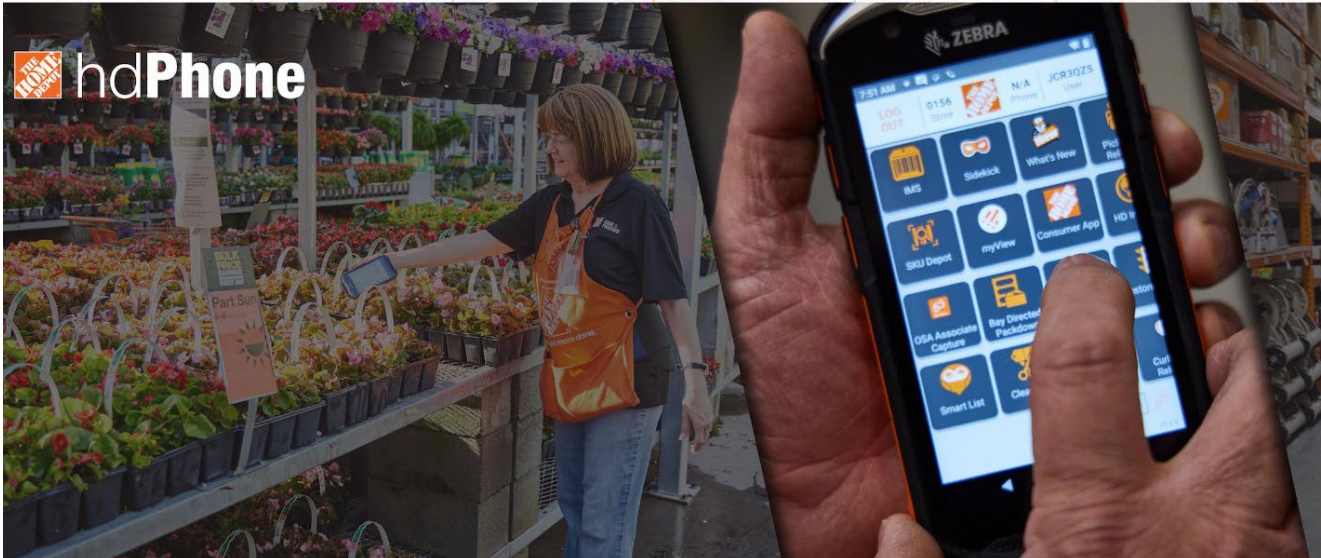
U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart

Claim Element	The Accused Products
	<i>The Home Depot logo. (PRNewsFoto/The Home Depot)</i> The Home Depot is rolling out more than 125,000 new hdPhones, in collaboration with Zebra Technologies, HPE, and Aruba, to make it faster and more convenient for associates to serve customers. The hdPhone is a mobile in-store device dedicated to improving the customer and store associate experience, according to Home Depot. “Our customers expect a frictionless experience, in our stores and on their mobile devices,” Fahim Siddiqui, executive vice president and chief information office of The Home Depot, said in a news release. “The enhanced digital in-store environment allows our customers to quickly get what they need to complete their projects with the help of a more connected associate.” The new mobile devices allow for increased capabilities, including the ability for associates to communicate throughout the entire store and into the parking lots and advanced-range barcode scanning for product location and price checking. The mobile devices also feature docking with Zebra’s Workstation Connect, enabling associates to view and demo products and specifications on larger screens, helping customers find products to complete their products. Additional capabilities include multi-device integration, more efficient app speeds, in-store texting, and direct walkie talkie communication, according to The Home Depot. https://www.prosalesmagazine.com/news/the-home-depot-introduces-new-in-store-network-and-mobile-devices_o The new mobile devices allow for increased capabilities: • Communicate anywhere throughout the entire store and into the parking lots. • Advanced-range barcode scanning enables associates to locate products, check pricing and inventory availability in hand or from more than 40 feet away, which is helpful when serving customers and locating products in overhead storage. • Docking with Zebra’s Workstation Connect enables associates to view and demo products and specifications on larger screens, helping customers find products to complete their projects. • Additional capabilities include multi-device integration, more efficient app speeds, in-store texting, direct walkie talkie communication, and more. https://corporate.homedepot.com/news/company/home-depot-upgrades-store-network-and-mobile-devices-enhance-interconnected-experience

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Claim Element	The Accused Products
[6c] at least one processor operably coupled to the memory and the communications interface, the processor configured to execute a program of instructions, the program of instructions comprising:	The Accused Products include at least one processor operably coupled to the memory and the communications interface, the processor configured to execute a program of instructions. For example, screenshots are shown below of documentation for each of the Accused Products which demonstrate this element:  The Home Depot Commercial 2022 - (USA) https://www.youtube.com/watch?v=bLbiUqIu8WE

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	 The image is a composite of two photographs. The left photograph shows a Home Depot employee, a woman with short brown hair wearing a dark blue polo shirt and an orange apron, standing in a garden center aisle. She is holding a handheld mobile device and pointing it towards a display of potted plants. A sign in the foreground reads 'hdPhone'. The right photograph is a close-up of a hand holding a ZEBRA-branded mobile device. The screen displays a grid of application icons including 'LOG OUT', '0154 Store', 'N/A Phone', 'JCR3025 User', 'WMS', 'Sidekick', 'What's New', 'Pic', 'SKU Depot', 'myView', 'Consumer App', 'HD', 'OSA Associate Capture', 'Buy Director Packdown', 'Smart List', and 'Clear'. The background of the right photo shows store shelves. https://corporate.homedepot.com/news/company/home-depot-upgrades-store-network-and-mobile-devices-enhance-interconnected-experience

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Claim Chart

Claim Element	The Accused Products
	Home Depot has rolled out 125,000 hdPhones across its stores  https://www.heyinnovations.com/resources/iot-retail

**U.S. Patent No. 8,433,296 (the “’296 Patent”)
Claim Chart**

Claim Element	The Accused Products
	<i>The Home Depot logo. (PRNewsFoto/The Home Depot)</i> <u>The Home Depot</u> is rolling out more than 125,000 new hdPhones, in collaboration with Zebra Technologies, HPE, and Aruba, to make it faster and more convenient for associates to serve customers. The hdPhone is a mobile in-store device dedicated to improving the customer and store associate experience, according to Home Depot. “Our customers expect a frictionless experience, in our stores and on their mobile devices,” Fahim Siddiqui, executive vice president and chief information office of The Home Depot, said in a news release. “The enhanced digital in-store environment allows our customers to quickly get what they need to complete their projects with the help of a more connected associate.” The new mobile devices allow for increased capabilities, including the ability for associates to communicate throughout the entire store and into the parking lots and advanced-range barcode scanning for product location and price checking. The mobile devices also feature docking with Zebra’s Workstation Connect, enabling associates to view and demo products and specifications on larger screens, helping customers find products to complete their products. Additional capabilities include multi-device integration, more efficient app speeds, in-store texting, and direct walkie talkie communication, according to The Home Depot. https://www.prosalesmagazine.com/news/the-home-depot-introduces-new-in-store-network-and-mobile-devices_o

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Claim Element	The Accused Products								
	Performance Characteristics <table border="1" data-bbox="514 354 1770 979"> <tr> <td data-bbox="514 354 730 475">CPU</td><td data-bbox="730 354 1770 475">TC52x/TC57x/TC52ax: Qualcomm Snapdragon™ 660 octa-core, 2.45 GHz</td></tr> <tr> <td data-bbox="514 475 730 643">Operating System</td><td data-bbox="730 475 1770 643">TC52x: Upgradeable to Android 14 TC57x: Upgradeable to Android 14 TC52ax: Upgradeable to Android 14</td></tr> <tr> <td data-bbox="514 643 730 760">Memory</td><td data-bbox="730 643 1770 760">TC52x/TC57x: 4GB RAM/32GB UFS Flash TC52ax: 4GB RAM/64GB UFS Flash</td></tr> <tr> <td data-bbox="514 760 730 979">Security</td><td data-bbox="730 760 1770 979">FIPS 140-2 Validated (ISO 19790) and Common Criteria certified (ISO 15408); FIPS 140-2 cryptography can be enabled on select configurations through a custom SKU request; Supports Secure Boot and Verified Boot.</td></tr> </table> https://www.zebra.com/us/en/products/spec-sheets/mobile-computers/handheld/tc5x-series.html Upon information and belief, some Accused Products utilize memory and processors such as that shown above. Further, upon information and belief, some Accused Products utilize memory and processors associated with servers owned, directed, or controlled by Home Depot.	CPU	TC52x/TC57x/TC52ax: Qualcomm Snapdragon™ 660 octa-core, 2.45 GHz	Operating System	TC52x: Upgradeable to Android 14 TC57x: Upgradeable to Android 14 TC52ax: Upgradeable to Android 14	Memory	TC52x/TC57x: 4GB RAM/32GB UFS Flash TC52ax: 4GB RAM/64GB UFS Flash	Security	FIPS 140-2 Validated (ISO 19790) and Common Criteria certified (ISO 15408); FIPS 140-2 cryptography can be enabled on select configurations through a custom SKU request; Supports Secure Boot and Verified Boot.
CPU	TC52x/TC57x/TC52ax: Qualcomm Snapdragon™ 660 octa-core, 2.45 GHz								
Operating System	TC52x: Upgradeable to Android 14 TC57x: Upgradeable to Android 14 TC52ax: Upgradeable to Android 14								
Memory	TC52x/TC57x: 4GB RAM/32GB UFS Flash TC52ax: 4GB RAM/64GB UFS Flash								
Security	FIPS 140-2 Validated (ISO 19790) and Common Criteria certified (ISO 15408); FIPS 140-2 cryptography can be enabled on select configurations through a custom SKU request; Supports Secure Boot and Verified Boot.								
[6d] at least one instruction to register a plurality of application programs for use with a content delivery platform, wherein the plurality of registered application programs are	See analysis and exemplary screenshots for claim element 1a above, which is incorporated by reference here.								

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Claim Element	The Accused Products
each associated with at least one application program type;	
[6e] at least one instruction to establish a plurality of perimeters defining a plurality of geographic areas;	<i>See analysis and exemplary screenshots for claim element 1b above, which is incorporated by reference here.</i>
[6f] at least one instruction to maintain at least one record indicating content delivery reservations associating each of a plurality of sponsors with specific registered application program types and at least one of the plurality of geographic areas;	<i>See analysis and exemplary screenshots for claim element 1c above, which is incorporated by reference here.</i>
[6g] at least one instruction to receive, from a sponsor, a request to obtain an interest in a selected one of the plurality of geographic areas;	<i>See analysis and exemplary screenshots for claim element 1d above, which is incorporated by reference here.</i>
[6h] at least one instruction to provide the sponsor a response to the request;	<i>See analysis and exemplary screenshots for claim element 1e above, which is incorporated by reference here.</i>
[6i] at least one instruction to store a record of the interest in the selected one	<i>See analysis and exemplary screenshots for claim element 1f above, which is incorporated by reference here.</i>

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Claim Element	The Accused Products
of the plurality of geographic areas;	
[6j] at least one instruction to receive, from the sponsor, content to be delivered to registered application programs having target locations contained within the selected one of the plurality of geographic areas;	<i>See analysis and exemplary screenshots for claim element 1g above, which is incorporated by reference here.</i>
[6k] at least one instruction to receive a request from a registered application program for content to be used within the registered application program;	<i>See analysis and exemplary screenshots for claim element 1h above, which is incorporated by reference here.</i>
[6l] at least one instruction to select content associated with at least one of the plurality of sponsors, to be delivered to the registered application program of a specific type, in accordance with a content delivery reservation associating the at least one sponsor with a geographic area and a registered	<i>See analysis and exemplary screenshots for claim elements 1c and 1j above, which are incorporated by reference here.</i>

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Claim Element	The Accused Products
application program type; and	
[6m] at least one instruction to provide the selected content to the registered application program.	<i>See analysis and exemplary screenshots for claim element 1k above, which is incorporated by reference here.</i>
[7] The system of claim 6, wherein the program of instructions further comprises:	<i>See analysis and exemplary screenshots for claims 1 and 6 above, which are incorporated by reference here.</i>
[7a] at least one instruction to record a request identifier associated with the request; and	<i>See analysis and exemplary screenshots for claim element 2a above, which is incorporated by reference here.</i>
[7b] at least one instruction to provide the request identifier to the registered application program.	<i>See analysis and exemplary screenshots for claim element 2b above, which is incorporated by reference here.</i>
[8] The system of claim 7, wherein the program of instructions further comprises:	<i>See analysis and exemplary screenshots for claims 1, 6, and 7 above, which are incorporated by reference here.</i>
[8a] at least one instruction to receive information related to user interaction with the provided content, the information including the request identifier; and	<i>See analysis and exemplary screenshots for claim element 3a above, which is incorporated by reference here.</i>
[8b] at least one instruction to provide additional	<i>See analysis and exemplary screenshots for claim elements 3b above, which is incorporated by reference here.</i>

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Claim Element	The Accused Products
content to the registered application in response to the received information.	
[9] The system of claim 6, wherein the program further comprises:	<i>See analysis and exemplary screenshots for claims 1 and 6 above, which is incorporated by reference here.</i>
[9a] at least one instruction to determine whether at least one of the plurality of sponsors is associated with a geographical representation lying at least partially within a predetermined radial distance of a target location; and	<i>See analysis and exemplary screenshots for claim element 4a above, which is incorporated by reference here.</i>
[9b] at least one instruction to increase the predetermined radial distance in response to the at least one instruction to determine.	<i>See analysis and exemplary screenshots for claim element 4b above, which is incorporated by reference here.</i>
[10] The system of claim 6, wherein the program of instructions further comprises: at least one instruction to reserve a specific one of the plurality of geographic areas for exclusive delivery of content associated with a	<i>See analysis and exemplary screenshots for claims 1, 5, and 6, which are incorporated by reference here.</i>

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Claim Element	The Accused Products
particular one of the plurality of sponsors to registered application programs and having a target location contained within the specific one of the plurality of geographic areas.	
[11 pre] A non-transitory computer readable medium tangibly embodying a program of computer executable instructions, the program of instructions comprising:	<i>See analysis and exemplary screenshots for claim element 1 pre above, which is incorporated by reference here.</i>
[11a] at least one instruction to register a plurality of application programs for use with a content delivery platform, wherein the plurality of registered application programs are each associated with at least one application program type;	<i>See analysis and exemplary screenshots for claim element 1a above, which is incorporated by reference here.</i>
[11b] at least one instruction to establish a plurality of perimeters defining respective geographic areas;	<i>See analysis and exemplary screenshots for claim element 1b above, which is incorporated by reference here.</i>

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Claim Element	The Accused Products
[11c] at least one instruction to maintain at least one record indicating content delivery reservations associating each of a plurality of sponsors with specific registered application program types and at least one of the plurality of geographic areas;	<i>See analysis and exemplary screenshots for claim element 1c above, which is incorporated by reference here.</i>
[11d] at least one instruction to receive, from a sponsor, a request to obtain an interest in a selected one of the plurality of geographic areas;	<i>See analysis and exemplary screenshots for claim element 1d above, which is incorporated by reference here.</i>
[11e] at least one instruction to provide the sponsor a response to the request;	<i>See analysis and exemplary screenshots for claim element 1e above, which is incorporated by reference here.</i>
[11f] at least one instruction to store a record of the interest in the selected one of the plurality of geographic areas;	<i>See analysis and exemplary screenshots for claim element 1f above, which is incorporated by reference here.</i>
[11g] at least one instruction to receive, from the sponsor, content to be	<i>See analysis and exemplary screenshots for claim element 1g above, which is incorporated by reference here.</i>

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Claim Chart**

Claim Element	The Accused Products
delivered to application programs having target locations contained within the selected one of the plurality of geographic areas;	
[11h] at least one instruction to receive a request from a registered application program for content to be used within the registered application program;	<i>See analysis and exemplary screenshots for claim element 1h above, which is incorporated by reference here.</i>
[11i] at least one instruction to select content associated with at least one of the plurality of sponsors to be delivered to the registered application program of a specific type, in accordance with a content delivery reservation associating the at least one sponsor with a geographic area and a registered application program type; and	<i>See analysis and exemplary screenshots for claim element 1j above, which is incorporated by reference here.</i>
[11j] at least one instruction to provide the selected content to the	<i>See analysis and exemplary screenshots for claim element 1k above, which is incorporated by reference here.</i>

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Claim Element	The Accused Products
registered application program.	
[12] The non-transitory computer readable medium of claim 11, wherein the program of instructions further comprises:	<i>See analysis and exemplary screenshots for claim element 1 above, which is incorporated by reference here.</i>
[12a] at least one instruction to record a request identifier associated with the request; and	<i>See analysis and exemplary screenshots for claim element 2a above, which is incorporated by reference here.</i>
[12b] at least one instruction to provide the request identifier to the registered application program.	<i>See analysis and exemplary screenshots for claim element 2b above, which is incorporated by reference here.</i>
[13] The non-transitory computer readable medium of claim 12, wherein the program of instructions further comprises:	<i>See analysis and exemplary screenshots for claim 1 above, which is incorporated by reference here.</i>
[13a] at least one instruction to receive information related to user interaction with the provided content, the information including the request identifier; and	<i>See analysis and exemplary screenshots for claim element 3a above, which is incorporated by reference here.</i>
[13b] at least one instruction to provide	<i>See analysis and exemplary screenshots for claim element 3b above, which is incorporated by reference here.</i>

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Claim Element	The Accused Products
additional content to the registered application in response to the received information.	
[14] The non-transitory computer readable medium of claim 11, wherein the program of instructions further comprises:	<i>See analysis and exemplary screenshots for claim 1 above, which is incorporated by reference here.</i>
[14a] at least one instruction to determine whether at least one of the plurality of sponsors is associated with a geographical representation lying at least partially within a predetermined radial distance of a target location; and	<i>See analysis and exemplary screenshots for claim element 4a above, which is incorporated by reference here.</i>
[14b] at least one instruction to increase the predetermined radial distance in response to a negative determination.	<i>See analysis and exemplary screenshots for claim element 4b above, which is incorporated by reference here.</i>
[15] The non-transitory computer readable medium of claim 11, wherein the program of instructions further comprises: at least one instruction to reserve a specific one of the plurality	<i>See analysis and exemplary screenshots for claims 1, 5 and 10 above, which are incorporated by reference here.</i>

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Claim Element	The Accused Products
of geographic areas for exclusive delivery of content associated with a particular one of the plurality of sponsors to application programs and having a target location contained within the specific one of the plurality of geographic areas.	