UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

KAIFI LLC, Plaintiff, vs. AMAZON.COM, INC.; AMAZON.COM SERVICES LLC; and AMAZON WEB SERVICES, INC., Defendants.	Case No. 2:24-cv-00542-JRG JURY TRIAL DEMANDED

DEFENDANTS AMAZON.COM, INC.'S, AMAZON.COM SERVICES LLC, AND AMAZON WEB SERVICES, INC.'S AMENDED SUBJECT MATTER ELIGIBILITY CONTENTIONS

IPR2025-00625
Amazon v. KAIFI
Kaifi Ex. 2014

Pursuant to Rule 3-3 of the Local Patent Rules ("P.R.") of the Eastern District of Texas, the Court's Docket Control Order (Dkt. No. 37) and the Court's Standing Order Regarding Subject Matter Eligibility Contentions, Defendants Amazon.com, Inc., Amazon.com Services LLC (collectively, "Defendants") submit the following Amended Eligibility Contentions to Plaintiff KAIFI LLC ("KAIFI").

The Amended Eligibility Contentions address the following claims ("Asserted Claims" or "Challenged Claims"):

- U.S. Patent No. 8,930,196, Claims 1-20;
- U.S. Patent No. 8,040,232, Claims 1-12;
- U.S. Patent No. 11,082,518, Claims 1-20; and
- U.S. Patent No. 7,689,001, Claims 1-3, 5,7-8, 10-11.

The patent claims listed above are the only claims alleged by KAIFI to be infringed by Defendants in KAIFI's Amended Infringement Contentions (served January 10, 2025). KAIFI's Amended Infringement Contentions are deemed to be its final contentions pursuant to Patent Local Rule 3-6. However, should the Court allow KAIFI to later assert infringement of additional claims not asserted in KAIFI's Amended Infringement Contentions, or to supplement its Amended Infringement Contentions with additional infringement theories with respect to the asserted claims, Defendants reserve the right to supplement their Amended Eligibility Contentions in response to information learned in fact or expert discovery, including identification of additional prior art.

I. PRELIMINARY MATTERS

Defendants' Amended Eligibility Contentions are based in whole or in part on its present understanding of the Asserted Claims and KAIFI's Amended Infringement Contentions,

including the priority dates of each of the patents-in-suit as asserted by KAIFI in its Amended Infringement Contentions. By setting forth these Amended Eligibility Contentions, Defendants are not admitting the correctness or accuracy of KAIFI's asserted priority dates or apparent constructions and/or interpretations of the Challenged Claims. KAIFI's apparent constructions may be inconsistent with the constructions that Defendants ultimately will proffer in this case. By setting forth these Amended Eligibility Contentions, Defendants are not adopting KAIFI's claim constructions, nor are Defendants admitting to the accuracy of any particular claim construction. The Court has established deadlines for the parties' proposed claim constructions, and Defendants will disclose their proposed constructions according to those deadlines. Defendants reserve all rights to amend these Amended Eligibility Contentions after the Court issues its claim construction ruling, or if the Court permits KAIFI to further amend its Amended Infringement Contentions.

Defendants' discovery and investigation in connection with this lawsuit is continuing. Thus, these Amended Eligibility Contentions are based on information obtained to date. Among other things, discovery is still underway, witnesses remain to be deposed, and the Court has not yet construed any terms of the patents-in-suit. Accordingly, Defendants' Amended Eligibility Contentions are subject to modification, amendment, or supplementation in accordance with the Court's Docket Control Order, other orders and rulings from the Court, the Local and Patent Rules of the Eastern District of Texas, and/or the Federal Rules of Civil Procedure as this action progresses and additional information is obtained.

II. DISCLOSURES PURSUANT TO STANDING ORDER (a)

Attached as **Appendices A-D** hereto are charts that identify: (1) each exception to

eligibility (e.g., abstract idea, law of nature, and natural phenomenon) to which each Challenged Claim is directed and the factual and legal basis therefor; (2) a description of the industry, at the relevant time, in which the Challenged Claims are alleged to be well understood, routine, and conventional, and the factual and legal basis therefor; and (3) a description of how each element of each Challenged Claim, both individually and in combination with other elements of that claim, was: (i) well understood, (ii) routine; and (iii) conventional, in the relevant industry at the relevant time, and the legal and factual basis therefor. These charts also identify whether one or more of the Challenged Claims are representative of any other Challenged Claims.

III. DISCLOSURES PURSUANT TO STANDING ORDER (b)

Defendants' Amended Invalidity Contentions, provided concurrently herewith and incorporated fully herein by reference, include claim charts identifying and providing the required information regarding each prior art reference upon which Defendants currently intend to rely regarding patent eligibility. In addition, Defendants' Patent Local Rule 3-4(b) production, provided concurrently herewith, includes each prior art reference upon which Defendants currently intend to rely regarding patent eligibility.

Dated: March 14, 2025

HUESTON HENNIGAN LLP

By: /s/ Christina V. Rayburn
Christina V. Rayburn Christine Woodin
Thomas King
Karen Younkins
Neil G. Anderson
Attorneys for Defendants Amazon.com, Inc., Amazon.com Services LLC, and Amazon Web Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via email on March 14, 2025.

/s/ Christina V. Rayburn
Christina V. Rayburn