

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

FERID ALLANI

Plaintiff,

v.

APPLE, INC.,

Defendant.

CIVIL ACTION NO. 6:24-cv-304-ADA

JURY TRIAL DEMANDED

PLAINTIFF’S FINAL INFRINGEMENT CONTENTIONS

Plaintiff Ferid Allani (“Plaintiff”) provides the following Final Infringement Contentions to Defendant Apple, Inc. (“Defendant”). This disclosure is based on the information available to Plaintiff as of the date of this disclosure, and Plaintiff reserves the right to amend this disclosure to the full extent consistent with the Court’s Rules and Orders.

I. INFRINGEMENT

Plaintiff asserts that Defendant infringes one or more of the following claims (collectively, “Asserted Claims”) of the following patents (collectively, “Asserted Patents”):

U.S. Patent No. 8,271,877 (“the ’877 patent”), claims 12, 15, 17-19.

U.S. Patent No. 10,943,058 (“the ’058 patent”), claims 24-27.

Plaintiff asserts that the Asserted Claims of the ’877 patent are infringed by the various apparatuses used, made, sold, offered for sale, or imported into the U.S. by Defendant, including the Apple iPhone, iPhone 6, iPhone 6S, iPhone 6 Plus, iPhone 6S Plus, iPhone SE, iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X, iPhone XR, iPhone XS, iPhone XS Max, iPhone 11, iPhone 11 Pro, iPhone 11 Pro Max, iPhone 12, iPhone 12 Mini, iPhone 12 Pro, iPhone 12 Pro Max, iPhone SE (Second Generation), iPhone 13, iPhone 13 Mini, iPhone 13 Pro, iPhone 13 Pro

Max, iPhone SE (Third Generation), iPhone 14, iPhone 14 Plus, iPhone 14 Pro, iPhone 14 Pro Max, iPhone 15, iPhone 15 Plus, iPhone 15 Pro, iPhone 15 Pro Max, iPhone 16, iPhone 16 Plus, iPhone 16 Pro, iPhone 16 Pro Max, iPhone 16e, iPad Air, iPad mini, iPad Pro, Apple Watch (First through Seventh Generation), and other iOS enabled mobile devices (e.g., iPod Touches) (the “Accused Products”). Plaintiff asserts that the Asserted Claims of the ’058 patent are infringed by the various apparatuses used, made, sold, offered for sale, or imported into the U.S. by Defendant, and the methods performed thereon, including the Apple iPhone, iPhone 6, iPhone 6S, iPhone 6 Plus, iPhone 6S Plus, iPhone SE, iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X, iPhone XR, iPhone XS, iPhone XS Max, iPhone 11, iPhone 11 Pro, iPhone 11 Pro Max, iPhone 12, iPhone 12 Mini, iPhone 12 Pro, iPhone 12 Pro Max, iPhone SE (Second Generation), iPhone 13, iPhone 13 Mini, iPhone 13 Pro, iPhone 13 Pro Max, iPhone SE (Third Generation), iPhone 14, iPhone 14 Plus, iPhone 14 Pro, iPhone 14 Pro Max, iPhone 15, iPhone 15 Plus, iPhone 15 Pro, iPhone 15 Pro Max, iPhone 16, iPhone 16 Plus, iPhone 16 Pro, iPhone 16 Pro Max, and iPhone 16e. The Accused Products infringe substantially in the way described in the claim charts attached hereto as Exhibits 1-2. All accused iPhone products version 8 or later use or used IOS version 16, which was the current version as of the filing of the Complaint and is still supported. See <https://en.wikipedia.org/wiki/IPhone> (last visited July 24, 2025). Discovery is ongoing. To the extent that Apple has committed infringing acts with respect to earlier iPhone products or products using earlier versions of IOS, Plaintiff reserves the right to amend or supplement these disclosures to the full extent consistent with the Court’s Rules and Orders.

Exhibits 1-2, which Plaintiff incorporates by reference, identify each element of the Asserted Claims of the Asserted Patents found in the exemplary Accused Product. Plaintiff

reserves the right to amend or supplement these disclosures to the full extent consistent with the Court's Rules and Orders.

Plaintiff in no way intends that the Accused Products are limited to the methods and apparatuses that are identified in the Exhibits, but instead contends that the Accused Products are meant to refer to all methods and apparatuses that involve all similar products that practice at least one of the Asserted Claims. For example, Plaintiff does not intend to limit the Accused Products to devices that include the specific icons and navigation paths identified in Exhibits 1-2. Unless otherwise stated, Plaintiff's assertions of infringement apply to all models, variations, versions, and applications of each of the Accused Products since issuance of the Asserted Patents, and, on information and belief, that different models, variations, versions, and applications of each of the Accused Products all operate in the substantially the same manner for purposes of infringement of the Asserted Claims.

With respect to the Asserted Patents, each element of each Asserted Claim is considered to be literally present. Plaintiff also contends that each Asserted Claim is infringed or has been infringed under the Doctrine of Equivalents in Defendant's Accused Products. Plaintiff also contends that Defendant directly and indirectly infringes the Asserted Claims. For example, the Accused Products are provided by Defendant to others (including distributors, dealers, and customers), who are actively encouraged and instructed (for example, through online instructions on their website, user manuals, and information and instructions supporting sales and services by others) by Defendant to use the Accused Products in ways that directly infringe at least one claim of each of the Asserted Patents. Defendant therefore specifically intends for and induces its customers to practice at least one claim of each of the Asserted Patents through the others' normal

and customary use of the Accused Products. Other theories of infringement are set forth in Exhibits 1-2.

II. PRIORITY DATES

The Asserted Claims of the '877 patent are entitled to a priority date at least as early as December 30, 1999. At this time, and based on currently available evidence, Plaintiff contends the earliest corroborated date of invention for the '877 patent is December 30, 1999. The Asserted Claims of the '058 patent are entitled to a priority date at least as early as December 30, 1999. At this time, and based on currently available evidence, Plaintiff contends the earliest corroborated date of invention for the '058 patent is December 30, 1999.

III. DOCUMENT PRODUCTION

Allani has produced copies of the file histories for the Asserted Patents and documents relating to the priority of the Asserted Patents at ALL_000001-ALL_002029.

Dated: July 24, 2025

By: /s/Lewis E. Hudnell, III
Lewis E. Hudnell, III
lewis@hudnellaw.com
Hudnell Law Group P.C.
800 W. El Camino Real Suite 180
Mountain View, California 94040
T: 650.564.3698
F: 347.772.3034

**ATTORNEYS FOR PLAINTIFF
FERID ALLANI**

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the PLAINTIFF'S PRELIMINARY INFRINGEMENT CONTENTIONS via electronic mail this 24th day of July, 2025.

By: /s/Lewis E. Hudnell, III

Lewis E. Hudnell, III

lewis@hudnelllaw.com

Hudnell Law Group P.C.

800 W. El Camino Real Suite 180

Mountain View, California 94040

T: 650.564.3698

F: 347.772.3034

EXHIBIT 1

US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
➤ A second selection page (screen page) reached from the <i>Weather</i> icon further includes direct access icons and a selection icon. To the extent that the accused products do not literally satisfy this claim limitation, this difference is insubstantial. The accused products perform the same function of accessing an information- or service-providing remote service, in the same way by transmitting data such as a resource address or the like identifying the requested data, to achieve the same result of having the remote service return the requested data for display on the iOS Device.		