

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

COLLABO INNOVATIONS, INC.,

Plaintiff,

v.

**QUALCOMM INCORPORATED and
QUALCOMM TECHNOLOGIES, INC.,**

Defendant.

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Civil Action No. 6:24-CV-00472-ADA

Jury Trial Demanded

PRELIMINARY INFRINGEMENT CONTENTIONS

Pursuant to the Court's Order Governing Proceedings in Patent Cases, Plaintiff Collabo Innovations, Inc. ("Collabo") serves the following preliminary infringement contentions for U.S. Patent 7,930,575 ("575 Patent"). Collabo reserves the right to amend or supplement its contentions to address any issues to account for new information that becomes available.

(a) Identification of Asserted Claims

'575 Patent: Claims 1-3, 5, 8, 11, 12, 15, 16.

(b) Identification of Accused Products

Collabo contends that all Qualcomm processor products that support a reduced power operating state with power collapse and similar functionality infringe each of the asserted claims of the '575 Patent. This specifically includes but is not limited to processors with cores having microarchitectures belonging to the following families:

- Snapdragon 2 Series
- Snapdragon 4 Series
- Snapdragon 6 Series
- Snapdragon 7 Series
- Snapdragon 8 Series
- Mobile Compute Platforms
- Automotive Platforms

Qualcomm products belonging to each product family are identified in Exhibit A. Collabo reserves the right to amend or supplement its identification of accused products as Qualcomm provides more information.

(c) Claim Charts

Claim charts for each asserted claims corresponding to each representative accused product can be found in Exhibit A.

(d) Doctrine of Equivalents

Except as set forth in the charts attached hereto as Exhibit A, Collabo contends that each limitation in each asserted claim is met literally. Collabo reserves the right to amend or supplement

its contentions to assert additional doctrine of equivalents theories as Qualcomm provides technical materials or in response to any non-infringement contentions provided by Qualcomm.

(c) Identification of Priority Date

'575 Patent: Each asserted claim of the '575 Patent is entitled to a priority date at least as early as September 12, 2006.

Dated: December 6, 2024

Respectfully submitted,

/s/ Edward R. Nelson III

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**Attorneys for Collabo Innovations,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on Defendants through its respective counsel via e-mail on December 6, 2024.

/s/ Edward R. Nelson III