
CText IP, LLC
6500 Greenville Ave., Suite 100
Dallas, Texas 75214

January 5, 2023

FRE 408 COMMUNICATION

Apple Inc.
Attn: Legal Department, Patent Licensing Counsel
One Apple Park Way
Cupertino, CA 95014

Dear Apple Inc. Patent Licensing Counsel:

My name is Anthony Vecchione, and I am the managing member of CText IP LLC ("CText"). It has recently come to my attention that Apple Inc. ("Apple") is infringing U.S. Patent Nos. 9,246,857 ("the '857 patent") and 10,009,304 ("the '304 patent"), owned by CText. Apple, via its iMessage functionality, is currently making, using, selling, and/or offering for sale products that infringe at least claims 1 and 15 of the '857 patent and at least claims 1 and 14 of the '304 patent under 35 U.S.C. Section 271. Those products include all of Apple's products that utilize the iMessage functionality, including each of Apple's Mac, iPad, and iPhone products. Specifically, the "Reply" functionality of iMessage, which is present in these devices, practices at least claim 1 of the '857 and '304 patents. In addition to Section 271(a), CText also believes that it has claims under Section 271(b) (induced infringement) and 271(c) (contributory infringement) as Apple is providing the infrastructure and actively inviting and encouraging others to practice at least those claims.

Claim charts detailing examples of Apple's infringement of claims 1 and 15 of the '857 patent and claims 1 and 14 of the '304 patent are attached to this letter and provided confidentially and under F.R.E. 408.

CText recognizes that it would be prudent to seek an amicable resolution and therefore proposes a fully paid up, non-exclusive license pertaining to the past, present, and future use of the iMessage functionality of Apple's products as it relates to the '857 and '304 patents. Please let me know when you are available to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Vecchione', with a stylized, cursive script.

Anthony Vecchione
CText IP, LLC

Enclosures: '304 Patent EOU; '857 Patent EOU