

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

K.MIZRA LLC	)	
	)	
Plaintiff,	)	
	)	Case No. 6:20-cv-01031
v.	)	
	)	JURY TRIAL DEMANDED
CISCO SYSTEMS, INC.	)	
	)	
Defendants.	)	
	)	
	)	
	)	
	)	

PLAINTIFF’S PRELIMINARY INFRINGEMENT CONTENTIONS

Plaintiff K.Mizra LLC (“K.Mizra”) hereby provides its Preliminary Infringement Contentions to Defendant Cisco Systems, Inc. (“Cisco”) as to U.S. Patent Nos. 8,834,705 (the “’705 Patent”) and 8,965,892 (the “’892 Patent”) (collectively, “the Asserted Patents”). This disclosure is without any concession, agreement, admission or waiver of any ultimate determination of relevance, admissibility or discoverability of particular information for any purpose, and without waiver of any attorney-client, work product or other privilege or immunity. K.Mizra makes this disclosure based on its present information, without the benefit of discovery. Moreover, to the extent the Court construes the claims of any of the asserted patents, additional arguments and/or information may be relevant in light of any such construction. K.Mizra, therefore, reserves the right to supplement and/or amend this disclosure at any time in view of the Court’s construction, in view of any new information learned during fact and expert discovery, or for any other reason permissible under the Federal and Local Rules.

The Preliminary Infringement Contentions attached as Exhibits A and B hereto are based on information presently available to K.Mizra. Based upon that information, the attached Contentions include claim charts that show that Cisco's Identity Services Engine and Email Security Suite including Cisco's Talos and Syslog products and services infringe one or more of the Asserted Patents either literally or under the doctrine of equivalents.

K.Mizra presently asserts that the priority dates for all asserted claims of the '705 Patent and '892 Patent are those reflected on the face of the patents—*i.e.*, September 27, 2004 and January 4, 2007, respectively. To the extent that the dates of K.Mizra's conception and reduction to practice becomes a relevant disputed issue, K.Mizra reserves the right to supplement and/or amend this disclosure at any time in view of the Court's construction, in view of any new information learned during fact and expert discovery, or for any other reason permissible under the Federal and Local Rules.

Pursuant to the Court's Order Governing Proceedings, K.Mizra will produce today copies of any non-privileged documents relating to K.Mizra's conception and reduction to practice of the inventions claimed in the '705 and '892 Patents of which K.Mizra is presently aware, including copies of the '705 and '892 Patents' file histories.

Date: February 5, 2021

Respectfully submitted,

/s/ Cliff Win, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2021, I served copies of the documents identified below upon the following individuals at the addresses listed, and in the manner indicated:

PLAINTIFF'S PRELIMINARY INFRINGEMENT CONTENTIONS

Via email

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