IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

Cardware Inc.,	§	
	§	
Plaintiff,	§	
v.	§	**CIVIL ACTION NO. 7:24cv00279-ADA**
	§	
Apple Inc.,	§	
	§	
Defendant.	§	**JURY TRIAL DEMANDED**
	§	
	§	
	§	

PLAINTIFF CARDWARE INC.'S PRELIMINARY INFRINGEMENENT CONTENTIONS

Pursuant to the Standing Order Governing Proceedings (OGP) 4.4—Patent Cases ("OGP"), Plaintiff CardWare Inc. ("CardWare") hereby discloses its accused products and asserted claims. CardWare's investigation of infringement by Defendant Apple Inc. ("Defendant" or "Apple") is on-going, and thus CardWare expressly reserves the right to amend or supplement these preliminary infringement contentions when additional information becomes available, including but not limited to Defendant's production of source code and other technical documents, interrogatory responses, and disclosures under the local patent rules.

I. Accused Products and Asserted Claims

CardWare presently asserts infringement, under at least 35 U.S.C. §§ 271(a)–(c), of the claims of U.S. Pat No. 10,339,520 ("the '520 Patent"); U.S. Pat. No. 10,628,820 ("the '820 Patent"); U.S. Pat. No. 10,810,579 ("the '579 Patent"); U.S. Pat. No. 11, 176,538 ("the '538 Patent"); U.S. Pat. No. 11,328,286 ("the '286 Patent"), and U.S. Patent No. 11,620,634 ("the '634 Patent") (collectively, "the Asserted Patents") by various instrumentalities, as identified in the chart below and the appended claim chart exhibits and appendices thereto.

Exhibit	Patent	Asserted Claims
A	’520	Claims 1–20, 22, 23
B	’820	Claims 1, 2, 4, 10-20
C	’579	Claims 1–23
D	’538	Claims 1–30
E	’286	Claims 1-27
F	’634	Claims 1–13, 15–53, 55–70, 72

The charts identifying where each element of each asserted claim is found within the accused products are attached hereto as Exhibits A through F.

II. Earliest Priority Dates

CardWare contends that every asserted claim of each asserted patent is entitled to a priority date no later than March 15, 2013, the filing date of U.S. Provisional Application No. 61/794,891.

III. Production Accompanying Preliminary Infringement Contentions

Pursuant to the OGP, CardWare’s production of (1) all documents evidencing conception and reduction to practice for each claimed invention and (2) a copy of the file history for each patent in the suit, bearing Bates Nos. CW-AAPL00000001 through CW-AAPL00003768 was served herewith.

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Dated: February 10, 2025

Respectfully submitted,

/s/ Matthew G. Berkowitz

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 10, 2025 a true and correct copy of the above and foregoing document and the exhibits and appendices thereto have been served by electronic email to all counsel of record that have appeared in this proceeding.

/s/ Matthew G. Berkowitz
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