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.

Dated: February 10, 2025

Respectfully submitted,

/s/ Matthew G. Berkowitz

Matthew G. Berkowitz
Yue (Joy) Wang
Navid C. Bayar
Reichman Jorgensen Lehman & Feldberg LLP
100 Marine Parkway, Suite 300
Redwood Shores, CA 94065
Tel: (650) 623-1401
mberkowitz@reichmanjorgensen.com
ywang@reichmanjorgensen.com
nbayar@reichmanjorgensen.com

Caroline Walters
Khue Hoang
Patrick Colsher
Reichman Jorgensen Lehman & Feldberg LLP
400 Madison Avenue, Suite 14D
New York, NY 10017
Tel: (212) 381-1965
cwalters@reichmanjorgensen.com
khoang@reichmanjorgensen.com
pcolsher@reichmanjorgensen.com

Eric H. Findlay
State Bar No. 00789668
Brian Craft
State Bar No. 04972020
FINDLAY CRAFT, P.C.
102 N. College Avenue, Suite 900
Tyler, Texas 75702
Tel: (903)534-1100
Fax: (903)534-1137
efindlay@findlaycraft.com
bcraft@findlaycraft.com

Attorneys for Plaintiff

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
Matthew G. Berkowitz