

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Intercurrency Software LLC,

Plaintiff,

v.

Nium Pte. Ltd.,

Defendant.

Case No. 2:25-cv-701

Jury Trial Demanded

PRELIMINARY INFRINGEMENT CONTENTIONS

In accordance with the Order Governing Proceedings issued in this case, Intercurrency Software LLC (“Plaintiff”) respectfully serves these Preliminary Infringement Contentions against Nium Pte. Ltd. (“Nium” or “Defendant”).

Appended hereto are charts setting forth where in the Accused Instrumentalities (as defined in the operative Complaint) each element of each Asserted Claim is found.

The Asserted Patents are as follows: U.S. Patent No. 11,620,701 (the “’701 Patent”) (hereinafter collectively referred to as “the Asserted Patents”).

The Asserted Claims are as follows:

- U.S. Patent No. 11,620,701 Claims 1.

The priority date of each of the Asserted Patents is April 18, 2007.

The expiration date of the Asserted Patents is October 28, 2033.

To the extent Defendant challenges either the priority date or the expiration date of any Asserted Patent or of individual Asserted Claim, Plaintiff contends that any such challenge must be raised with specificity contemporaneous with Defendant’s Invalidity Contentions. Given the central importance of

the priority date (the “date of invention”) to the issues of claim construction and validity, Plaintiff will move to preclude any such argument or challenge not timely raised.

In addition to the appended Claim Charts, Plaintiff is producing all document in its possession, custody, and control (if any) evidencing conception and reduction to practice of the Asserted Claims, as well as copies of the file histories for each of the Asserted Patents.

Dated: September 16, 2025

Respectfully Submitted

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ATTORNEYS FOR PLAINTIFF

Preliminary Infringement Claim Chart
Intercurrency Software LLC v. Nium Pte. Ltd.,
Case No. 2:25-cv-701

U.S. Patent No. 11,620,701

Asserted Claims: 1

Plaintiff provides this Infringement Chart based upon its best reasonable evaluation of publicly available information as of the date of service hereof. Most, if not all, of the infringing functionality is proprietary to Defendant; thus, Plaintiff reserves its right to supplement these Contentions as necessary following full technical production on the part of Defendant and following full review of the relevant historical source code for the Accused Instrumentalities by Plaintiff's experts to be designated in due course of this litigation.

As of the date of preparation of this Infringement Chart, which is being undertaken without the benefit of discovery, Plaintiff believes and alleges that each element is literally present in the Accused Instrumentalities. To the extent discovery reveals infringement occurs in manners or using systems different than those believed to be made, used, and sold by Defendant, Plaintiff intends to argue that such differences are nevertheless infringing under the Doctrine of Equivalents.

This Infringement Chart is applicable to methods practiced and/or implemented by or in connection with all iterations of the Accused Instrumentalities made, used, sold, and/or offered for sale, from and after the date falling prior to the date of filing of the Original Complaint in this litigation, and extending through the expiration of the '701 Patent. Plaintiff contends, and hereupon alleges, that all such iterations, versions, and progressively more robust implementations of the Accused Instrumentalities during the period of infringement nevertheless infringe the Asserted Claims in substantially the same or identical manner as is set forth herein.

In preparing these Charts, and for the sake of completeness, Plaintiff has included the preambles for each Asserted Claim. In so doing, Plaintiff does not contend that such preambles are in any way limiting on any Asserted Claim.

For each element of these Charts, it is herein alleged to infringe literally, or in the alternative, under the doctrine of equivalents.

U.S. Patent No. 11,620,701	Instaream (“the Accused Instrumentalities”)	
Asserted Claim Element	Preliminary Infringement Contention	
Claim 1 [1.P]: A platform for trading an asset, the platform comprising:	To the extent the preamble is limiting, the Accused Instrumentalities offers a platform for trading an asset (e.g. Instaream, accessed through Instaream.com website on desktop or mobile application Instaream App on a smartphone device). More specifically, the method of infringement involves offering a platform that empowers users to execute trades across various currency exchange markets such as AUD, EUR, GBP, USD utilizing diverse currencies within their trading account. Traders are afforded the flexibility to designate a base currency and first currency, including options like the GBP or USD which becomes the universal currency for all transactions on the platform, covering fees and commissions. Additionally, this facilitates the seamless conversion of multiple currencies trading in market into the selected market currency. Instaream offers real-time quotes for currency trading. This feature empowers users to engage in diverse markets using their preferred currency, whether it be USD, AUD, GBP, EUR or others.	

U.S. Patent No. 11,620,701

Instarex ("the Accused Instrumentalities")

Instarex.

Personal

Business

Trustpilot

4.4/5 - Excellent. From 8,000+ reviews

International money transfers

Send money overseas from USA. Make every dollar count with a trusted service preferred by customers worldwide. Experience the convenience of transferring money online from USA. Enjoy fast and secure transfers right at your fingertips.

You send

1,000

USD

They receive

88,035.70

INR

Our rates

1 USD = 87.4544 INR

88,035.70 INR

Payment by

ACH/Direct Debit

Fees

0 USD

Transfer time

within 2 days

First time transfer?

Get a special FX rate on your transfer! Send between USD 1 and USD 3,000 today.

T&Cs apply

Send money

Need to send over 25,000 USD? Enjoy special discounts. [Learn more](#)

Convert

Help

Blog

EN

Login

Sign up

See, <https://www.instarex.com/en-us/>

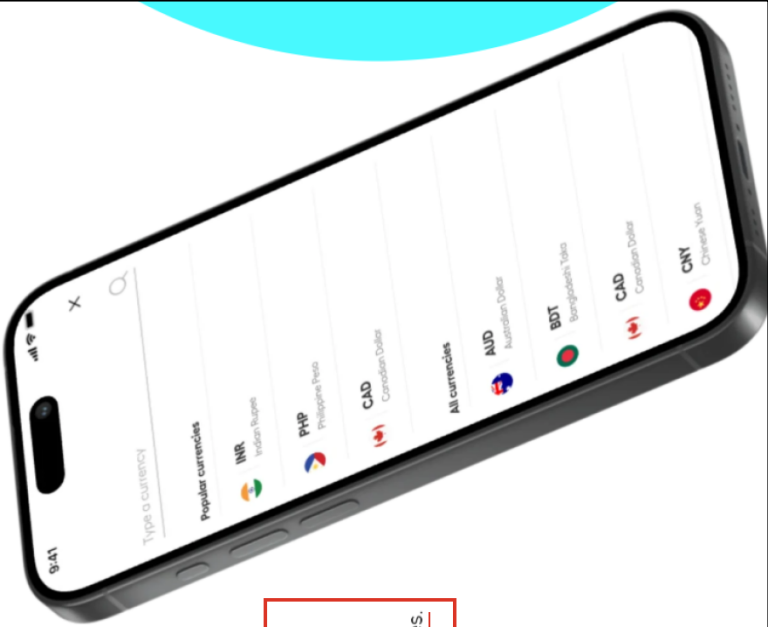
Page 3 | 28

U.S. Patent No. 11,620,701

Nium Pte. Ltd. Exhibit 1010
5 of 30

U.S. Patent No. 11,620,701	Instaream (“the Accused Instrumentalities”)
	See, https://www.instaream.com/en-us/business/ 02 How does the Instaream money transfer service work? Instaream allows you to make global money transfers effortlessly. You can send money online to your loved ones, pay for education fees, or transfer funds to your own account in over 60 countries. To get started, just create an account on instaream.com or download the Instaream app. Enter your sending amount and recipient's details and fund your transfer. Your recipient doesn't need an Instaream account to receive money. Once we get your funds, we send them directly to your recipient's bank account in their local currency. It's quick and easy, and with our favourable rates and fees, you can enjoy great value on every foreign currency transfer. See, https://www.instaream.com/en-us/ (<i>emphasis added</i>)

U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities)
	Who we are Part of NIUM, the first B2B payments unicorn in Southeast Asia. Instarem has been on a mission of making international payments <u>easy and affordable for everyone since 2014</u>. We are the go-to solution for businesses that need to move money quickly, reliably and at a lower cost than banks. USD 6BN+ Money moved annually 60+ Countries you can pay 11 Jurisdictions we are licensed in See, https://www.instarem.com/en-us/business/ (<i>emphasis added</i>)

U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities”)
	Fast and secure international transfers Send money confidently to 60+ countries in minutes. Sign up & send  <i>See, https://www.instarem.com/en-us/ (emphasis added)</i>

Your international business account

Make business payments

Pay your overseas suppliers or employees across 60+ countries and save money with great FX rates and low fees.

Learn more

A

Albania

Andorra

Angola

Argentina and Barbados

Australia

Bahrain

Belize

Anguilla

Angola

Armenia

Azerbaijan

Belgium

Brazil

Bulgaria

Canada

Chile

China

Colombia

Costa Rica

Croatia

Czech Republic

Denmark

Dominican Republic

Ecuador

El Salvador

Equatorial Guinea

Egypt

France

Germany

Ghana

Greece

Guatemala

Honduras

Hong Kong

Hungary

India

Indonesia

Israel

Italy

Jamaica

Japan

Kenya

Korea

Kuwait

Latvia

Lebanon

Libya

Lithuania

Luxembourg

Macao

Mexico

Moldova

Morocco

Myanmar

Netherlands

New Zealand

Nicaragua

Norway

Oman

Pakistan

Panama

Paraguay

Peru

Philippines

Poland

Portugal

Romania

Russia

Saudi Arabia

Senegal

Singapore

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South Africa

Spain

Sweden

Switzerland

Taiwan

Tanzania

Togo

Turkey

Ukraine

United Arab Emirates

United Kingdom

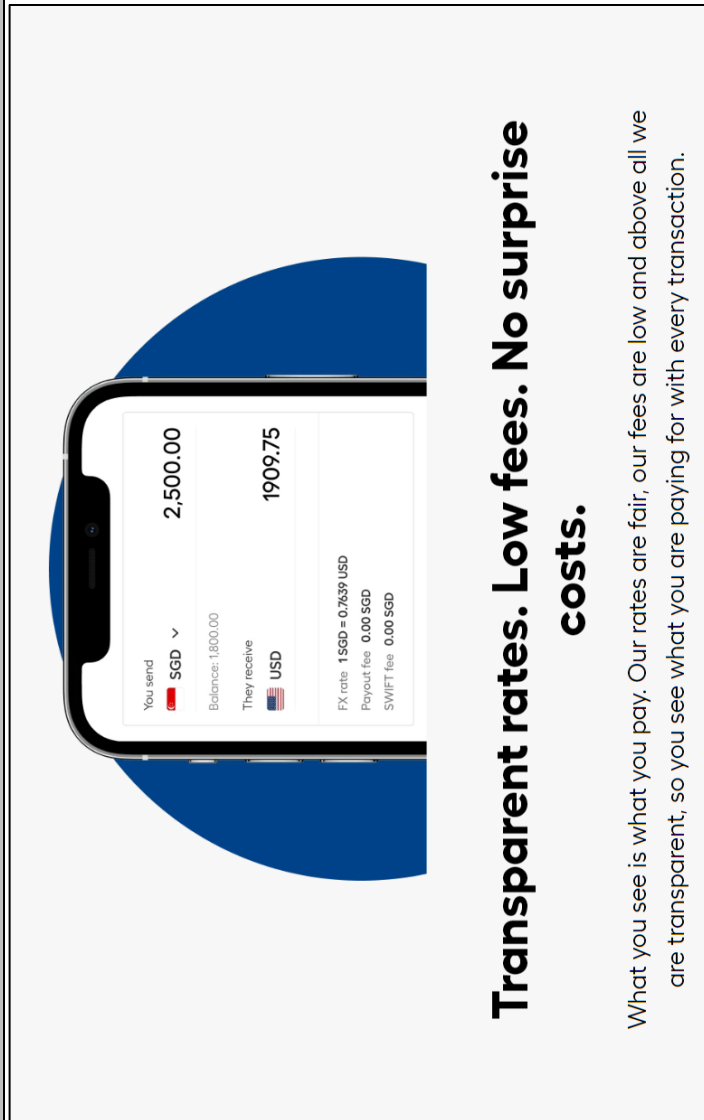
United States

Uruguay

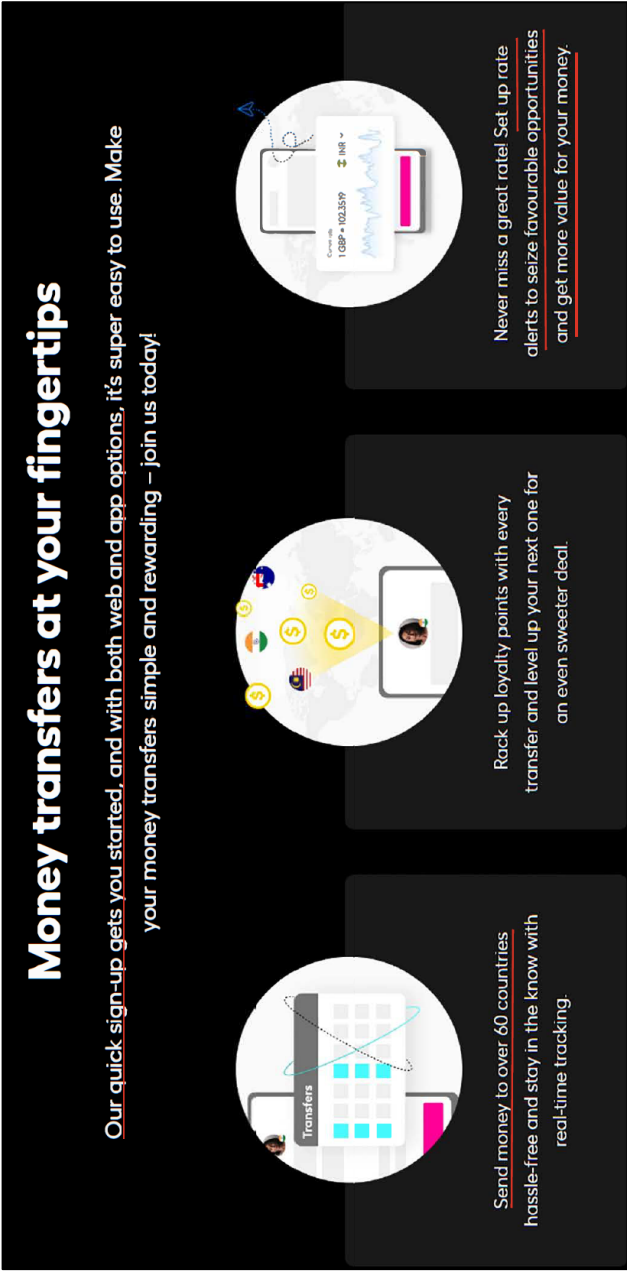
Venezuela

B

See, <https://www.instarem.com/en-us/business/> (emphasis added)



See, <https://www.instare.com/en-us/business/>

U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities”)
	 Money transfers at your fingertips Our quick sign-up gets you started, and with both web and app options, it's super easy to use. Make your money transfers simple and rewarding – join us today! Send money to over 60 countries hassle-free and stay in the know with real-time tracking. Rack up loyalty points with every transfer and level up your next one for an even sweeter deal. Never miss a great rate! Set up rate alerts to seize favourable opportunities and get more value for your money. See, https://www.instarem.com/en-us/ (emphasis added)

U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities”)
1[A]: a trading server, coupled to a client machine associated with a user, receiving an indicator of a first currency from the client machine, wherein the trading server is configured to couple to at least one currency exchange server and at least one market exchange server, the trading server is further configured to calculate costs and fees in the first currency to own or sell the asset being traded in a second currency, the costs and fees are caused to be displayed on a display device of the client machine and are dynamically changed in accordance with a first prevailing exchange rate between the first currency and the second currency, and even when a market value of the asset remains unchanged, and	The Accused Instrumentalities uses a trading server, coupled to a client machine associated with a user, receiving an indicator of a first currency from the client machine, wherein the trading server is configured to couple to at least one currency exchange server and at least one market exchange server, the trading server is further configured to calculate costs and fees in the first currency to own or sell the asset being traded in a second currency, the costs and fees are caused to be displayed on a display device of the client machine and are dynamically changed in accordance with a first prevailing exchange rate between the first currency and the second currency, and even when a market value of the asset remains unchanged. More Particularly, Instarem, in conjunction with the platform, offers a comprehensive trading experience accessible via both a web server and a mobile application on a user client machine or device. Users can open a trading account either through the website or its mobile app, which connects seamlessly to the web server. This integrated platform enables traders of currency assets, such as currencies, to access market data and currency conversion information all in one place through their Instarem account. The platform is compatible with various client devices, including smartphones, desktops, and laptops. When exchanging currency to buy or sell assets on Instarem, users incur commissions and currency conversion fees, which are displayed in the first currency of a currency pair, typically USD. The trading server provides real-time exchange rates between the first currency (e.g., USD) and the second currency (INR). As detailed in the provided evidence, Instarem’s currency exchange server calculates the prevailing exchange rate between first currency as USD and the selected second currency as INR. For example, if the current exchange rate is 1USD = 88.0357 INR.

Instaream.

Personal

Business

EN

Login

Sign up

Instaream (“the Accused Instrumentalities”)

★Trustpilot

4.4/5 – Excellent. From 8,000+ reviews

International money transfers

Send money overseas from USA. Make every dollar count with a trusted service preferred by customers worldwide. Experience the convenience of transferring money online from USA. Enjoy fast and secure transfers right at your fingertips.

You send

1,000

USD

▼

They receive

88,035.70

INR

▼

Our rates

1 USD = 87.6244 INR

88,035.7 INR

Payment by

ACH/Direct Debit

▼

Fees

0 USD

Transfer time

within 2 days

First time transfer?

Get a special FX rate on your transfer! Send between USD 1 and USD 3,000 today.

T&Cs apply

Send money

Need to send over 25,000 USD? Enjoy special discounts. [Learn more](#)

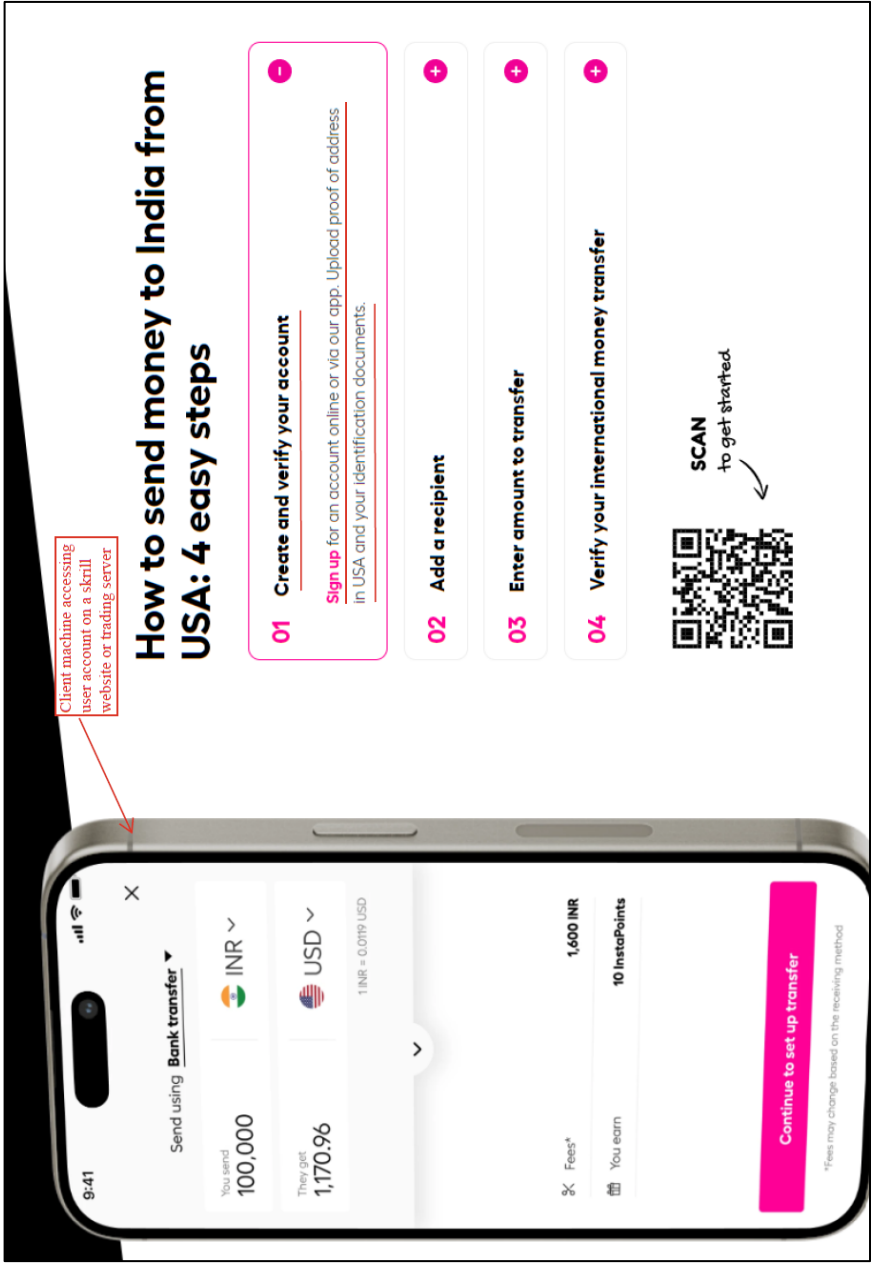
Converter

Help

Blog

See, <https://www.instaream.com/en-us/>

U.S. Patent No. 11,620,701	Instareem (“the Accused Instrumentalities”)
	02 How does the Instareem money transfer service work? Instareem allows you to make global money transfers effortlessly. You can send money online to your loved ones, pay for education fees, or transfer funds to your own account in over 60 countries. To get started, just create an account on instareem.com or download the Instareem app. Enter your sending amount and recipient's details and fund your transfer. Your recipient doesn't need an Instareem account to receive money. Once we get your funds, we send them directly to your recipient's bank account in their local currency. It's quick and easy, and with our favourable rates and fees, you can enjoy great value on every foreign currency transfer. See, https://www.instareem.com/en-us/ (annotated)

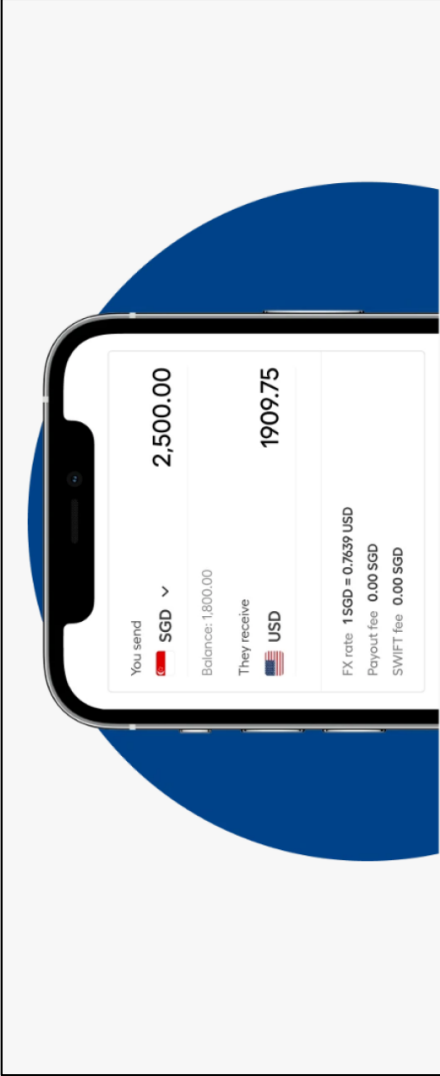


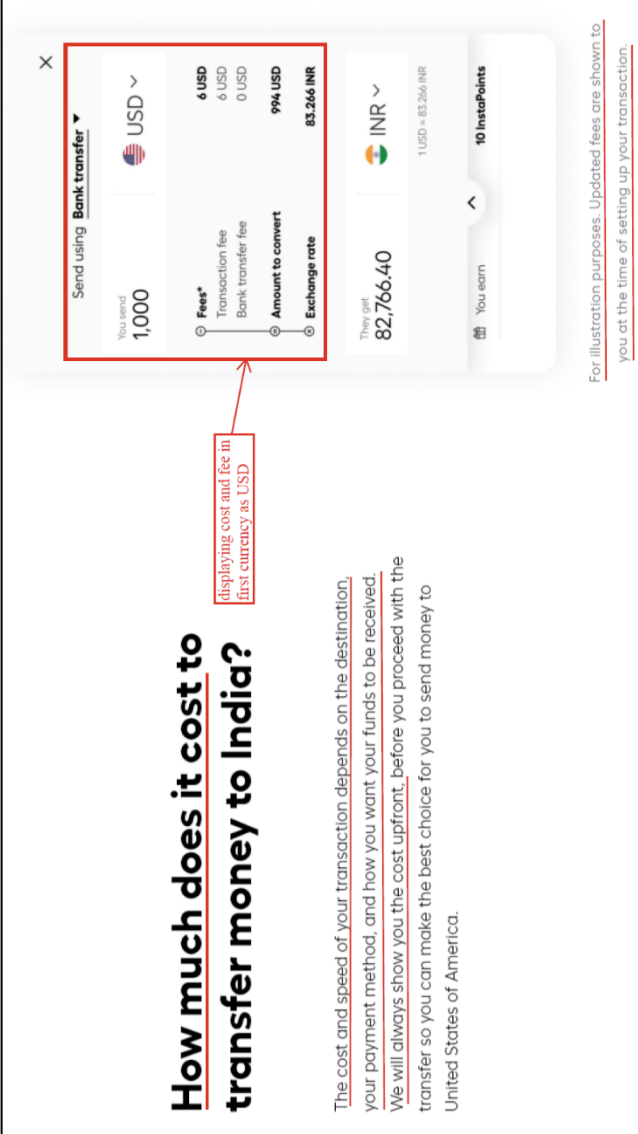
See, <https://www.instarem.com/en-us/currency-conversion/usd-to-inr/> (annotated)

U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities”)
	See, https://www.instarem.com/en-us/currency-conversion/usd-to-inr/ (annotated)
	See, https://www.instarem.com/en-us/currency-conversion/usd-to-inr/ (annotated)

U.S. Patent No. 11,620,701	Instarex ("the Accused Instrumentalities") USD to INR exchange rate chart ↑ 0.1960% (6M) 1 month 3 months YTD 1 year 6 months market exchange data accessed through a market exchange server Mid market rate Date range: Feb 28, 2025 - Aug 26, 2025 High: 87.8936 Low: 84.2211 
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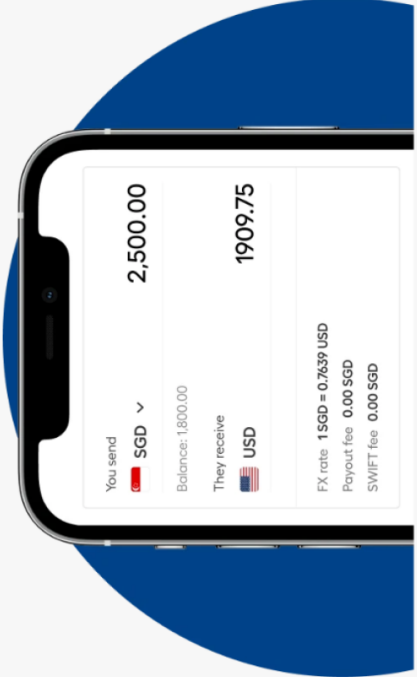
See, <https://www.instarex.com/en-us/currency-conversion/usd-to-inr/> (annotated)

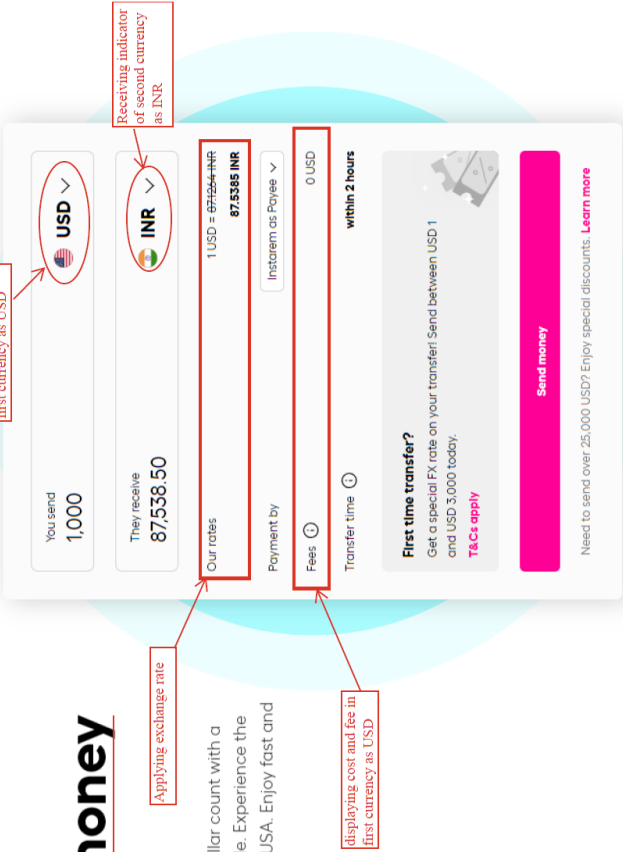
U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities”)  Transparent rates. Low fees. No surprise costs. What you see is what you pay. <u>Our rates are fair</u>, our fees are low and above all we are transparent, so you see what you are paying for with every transaction. <i>See, https://www.instarem.com/en-us/business/ (emphasis added)</i>
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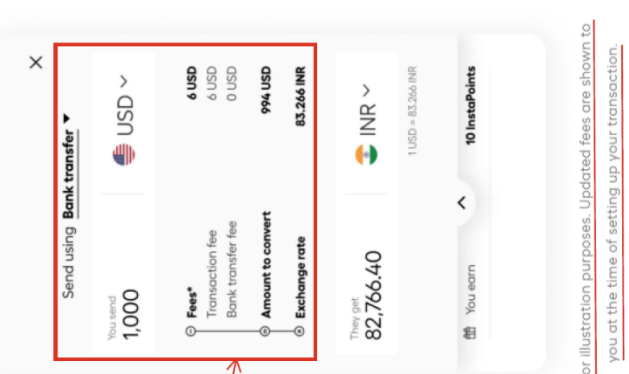
U.S. Patent No. 11,620,701	Instaream (“the Accused Instrumentalities”)
	<u>How much does it cost to transfer money to India?</u> displaying cost and fee in first currency as USD  See, https://www.instaream.com/en-us/send-money-to-india/ (annotated)
[1.B]: wherein the trading server is configured to conduct a transaction of the asset by transporting a transaction request to the market exchange server upon receiving an order from the trader, and reach a settlement based on a second prevailing exchange rate as soon as the transaction of the asset is performed in accordance with conditions set by the trader, and wherein the second prevailing exchange rate is calculated from the at least one currency exchange server right before the transaction takes place, executed costs and fees in the settlement per the second prevailing exchange rate are not identical to the displayed costs and fees with the first prevailing exchange before the transaction of the asset took place. More particularly, The Instaream account enables traders to specify the amount of first currency or preferred currency for trading an asset. After entering this information, traders can	The Accused Instrumentalities trading server is configured to conduct a transaction of the asset by transporting a transaction request to the market exchange server upon receiving an order from the trader, and reach a settlement based on a second prevailing exchange rate as soon as the transaction of the asset is performed in accordance with conditions set by the trader, and wherein the second prevailing exchange rate is calculated from the at least one currency exchange server right before the transaction takes place, executed costs and fees in the settlement per the second prevailing exchange rate are not identical to the displayed costs and fees with the first prevailing exchange before the transaction of the asset took place. More particularly, The Instaream account enables traders to specify the amount of first currency or preferred currency for trading an asset. After entering this information, traders can

U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities)
rate as soon as the transaction of the asset is performed in accordance with conditions set by the trader, and wherein the second prevailing exchange rate is calculated from the at least one currency exchange server right before the transaction takes place, executed costs and fees in the settlement per the second prevailing exchange rate are not identical to the displayed costs and fees with the first prevailing exchange before the transaction of the asset took place.	submit their order, which sends a transaction request to the market exchange server. The server then displays the status and details of the trading order on the screen. The Instarem platform continuously monitors market conditions to execute the received orders. Utilizing its advanced matching engines, Instarem has access to one of the largest and deepest spot liquidity pools in the U.S and around the world, ensuring efficient trade execution for its clients. Once an order is processed, the Instarem account provides detailed settlement information, including the quantity of currency, order types, preferred currency, and any associated fees and commissions. Order details also include the prevailing exchange rate at the time the order is placed, which is subject to constant fluctuations. As a result, the actual exchange rate used to execute the transaction just before it is completed in the liquidity market (the second prevailing exchange rate) may differ slightly from the initial exchange rate displayed on the platform when the order was placed (the first prevailing exchange rate). This mechanism ensures that traders have a comprehensive understanding of their transactions, accounting for any variations in exchange rates and associated costs.

U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities”)
	See, https://www.instarem.com/en-us/currency-conversion/usd-to-inr/ (annotated) See, https://www.instarem.com/en-us/currency-conversion/usd-to-inr/ (annotated)

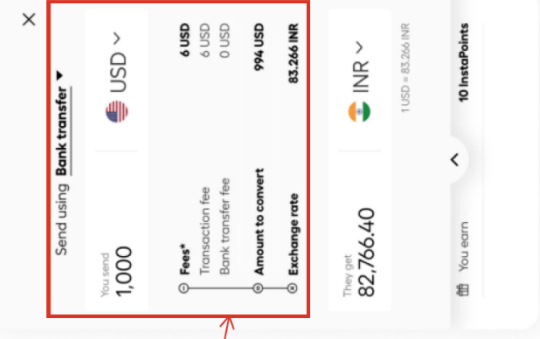
U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities”)
	 Transparent rates. Low fees. No surprise costs. What <u>you</u> see is what <u>you</u> pay. Our rates are fair, our fees are low and above all we are transparent, so you see what you are paying for with every transaction. See, https://www.instarem.com/en-us/business/ (<i>emphasis added</i>) 07 What are the currency exchange rates for transferring money from USA to another country? Instarem offers competitive exchange rates for international money transfers, and you can check the exchange rates for your specific transfer at Instarem website or Instarem app at any time. Instarem's exchange rates are updated in real-time to reflect the current market rates, which means that you can be sure that you are getting a fair rate for your transfer. See, https://www.instarem.com/en-us/currency-conversion/usd-to-inr/ (<i>emphasis added</i>)

U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities”) ★Trustpilot 4.4/5 – Excellent. From 8,000+ reviews International money transfers Send money overseas from USA. Make every dollar count with a trusted service preferred by customers worldwide. Experience the convenience of transferring money online from USA. Enjoy fast and secure transfers right at your fingertips. Receiving indicator of first currency as USD Receiving indicator of second currency as INR Applying exchange rate displaying cost and fee in first currency as USD  See, https://www.instarem.com/en-us/ (annotated)
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U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities”)
	How much does it cost to transfer money to India? The cost and speed of your transaction depends on the destination, your payment method, and how you want your funds to be received. We will always show you the cost upfront, before you proceed with the transfer so you can make the best choice for you to send money to United States of America. displaying cost and fee in first currency as USD  For illustration purposes. Updated fees are shown to you at the time of setting up your transaction. See, https://www.instarem.com/en-us/send-money-to-india/ (annotated)

U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities)
	★ Trustpilot 4.4/5 – Excellent. From 8,000+ reviews Conditions set by the traders in which user select first currency, second currency and payment method International money transfers Send money overseas from USA. Make every dollar count with a trusted service preferred by customers worldwide. Experience the convenience of transferring money online from USA. Enjoy fast and secure transfers right at your fingertips. Receiving indicator of first currency as USD Receiving indicator of second currency as INR Submit an order for transaction See, https://www.instarem.com/en-us/ (annotated) 03 Do banks offer better currency exchange rates for international money transfer? Not usually. In general, banks add high markups and extra fees to their exchange rates, making international transfers more expensive. If you compare money exchange rates provided by specialised money transfer services like Instarem, you will find that Instarem typically provides more competitive rates and transparent pricing compared to banks, saving you money on every transfer. See, https://www.instarem.com/compare-exchange-rates/ (emphasis added)

U.S. Patent No. 11,620,701	Instarex ("the Accused Instrumentalities")
	<i>See, https://www.instarex.com/compare-exchange-rates/ (emphasis added)</i>

U.S. Patent No. 11,620,701	Instareem (“the Accused Instrumentalities”)
	<u>How much does it cost to transfer money to India?</u> The cost and speed of your transaction depends on the destination, your payment method, and how you want your funds to be received. <u>We will always show you the cost upfront, before you proceed with the transfer so you can make the best choice for you to send money to United States of America.</u>  displaying cost and fee in first currency as USD For illustration purposes. Updated fees are shown to you at the time of setting up your transaction. See, https://www.instareem.com/en-us/send-money-to-india/ (annotated) 01 How many INR is 1 USD equal to? You can check the current rates on the calculator on this page. Please note that exchange rates fluctuate regularly due to market conditions. For the accurate rate we recommend checking the rates at the time of exchange or sending of money. See, https://www.instareem.com/en-us/currency-conversion/usd-to-inr/

U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities”)
	You paid 1,000 USD Transaction number: INT23456  Peter will receive 82,766.40 INR Transfer tracker Should be paid out by 1:30 PM CST, Jan 24 Processing Payment received and is being processed At recipient's bank Paid Start new transfer Go to home screen Applying second exchange rate at the time of processing of transaction which can be different from first exchange rate How long does it take to transfer money to India? Sending money to India with Instarem is lightning-fast. Money transfer from USA to India will typically zip through in just a few minutes. Sometimes, currency rules, bank processing, or holidays may cause a slight delay and it may take us a day or two. But no worries! Our top-notch technology and wide network of partners work together to get your money to India securely and quickly. <i>See, https://www.instarem.com/en-us/send-money-to-india/ (annotated)</i>

U.S. Patent No. 11,620,701	Instarem (“the Accused Instrumentalities”) Viewing and making transactions from the palm of your hands  Viewing transaction history on mobile device See, https://www.instaream.com/blog/upgraded-instaream-business-experience/ (annotated)
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