

**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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