

Exhibit 7 - Invalidity of U.S. Patent No. 9,772,193 in view of U.S. Patent Publication No. US20030055560A1 (“Phillips”)

This chart is subject to all reservations, objections, and disclaimers in Defendants’ Invalidity Contentions and any amendment, supplement, or modification thereof, which are incorporated herein by reference in their entirety.

Phillips was originally filed September 20, 2001 and was published March 20, 2003, and thus is available as prior art to U.S. Patent No. 9,772,193 (the “’193 Patent”) under at least pre-AIA 35 U.S.C. § 102(b) or AIA 35 U.S.C. § 102(a) under the various potential priority dates described in Part II.B.1 of Defendants’ Invalidity Contentions.

Phillips anticipates the Asserted Claims of the ’193 Patent. To the extent it is found Phillips does not expressly disclose certain limitations in the Asserted Claims, such limitations are at least implicitly or inherently disclosed. Moreover, to the extent it is found that Phillips does not anticipate the Asserted Claims, it renders obvious the Asserted Claims either alone or in combination with other prior art identified in the cover pleading or herein, and/or in combination with the general knowledge of a person having ordinary skill in the art.

In these contentions, Defendants have relied in part on Plaintiff’s Infringement Contentions. In those contentions, Plaintiff appears to pursue overly broad claim constructions in an effort to assert infringement where none exists, and to accuse products that do not infringe the claims. Defendants’ assertion that a particular limitation is disclosed by a prior art reference and/or is disclosed in a particular manner may be based in part on Plaintiff’s apparent claim interpretations. In relying on Plaintiff’s apparent claim interpretations, Defendants do not admit that Plaintiff’s apparent claim interpretations are supportable or proper or that the claim limitations in question are definite or otherwise amenable to construction.

Defendants have endeavored to provide as much detail as possible in these contentions and, in doing so, have exceeded the level of detail required. The inclusion of specific details in some areas is not a concession that such details are required or that the omission of similar details in other areas is a defect. These citations to portions of any reference in this chart are exemplary only. Defendants will rely on the entirety of the references cited in this chart to show that the Asserted Claims are invalid.

Claim 12, U.S. Patent No. 9,772,193

Claim Limitation	Disclosure
[12.PRE] A method of utilizing a Bluetooth transceiver for conveying desired information, the method comprising steps of:	To the extent the preamble is limiting, Phillips expressly and/or inherently discloses and/or renders obvious a method of utilizing a Bluetooth transceiver for conveying desired information. For example: Phillips discloses the following at [0008]: In one aspect, the system may comprise a terminal configured to receive vehicle location information from a vehicle over a communication link, compare the vehicle location information with the location of the terminal, and display information to a user enabling the user to locate the vehicle. Phillips discloses the following at [0029]: In one aspect of the present disclosure, the location information is transmitted over a wireless communication link. It is contemplated that a wide variety of communication protocols may be suitable for use, such as Bluetooth[registered trademark]. To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
[12.A] employing the Bluetooth transceiver integrated within a vehicle, the Bluetooth transceiver configured to transmit a Bluetooth signal detectable by	Phillips expressly and/or inherently discloses and/or renders obvious employing the Bluetooth transceiver integrated within a vehicle, the Bluetooth transceiver configured to transmit a Bluetooth signal detectable by a Bluetooth circuit of a mobile device located within a communication range of the respective Bluetooth transceiver. For example:

a Bluetooth circuit of a mobile device located within a communication range of the respective Bluetooth transceiver;

Phillips discloses the following at [0029]:

In one aspect of the present disclosure, the location information is transmitted over a wireless communication link. It is contemplated that a wide variety of communication protocols may be suitable for use, such as Bluetooth[registered trademark].

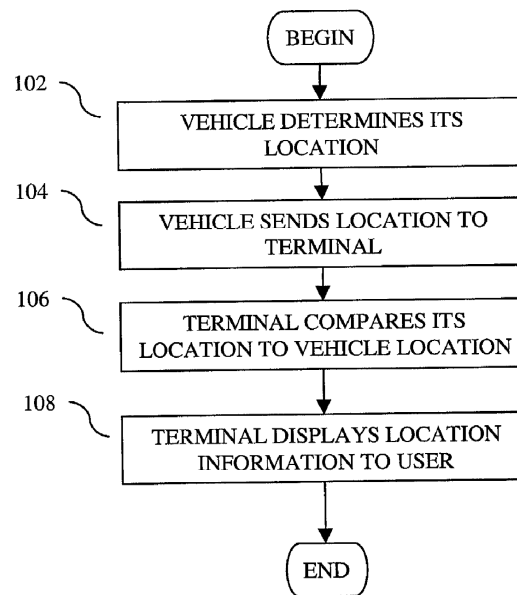


FIG. 1

Phillips discloses the following at [0039] (discussing FIG. 1 & 3):

The vehicle **110** may include a location module **302** for determining the location of the vehicle. The location module **302** may also include transmitting means (TX) **304** and receiving means (RX) **306**. The location module may be operatively disposed within the vehicle **110** at any convenient location.

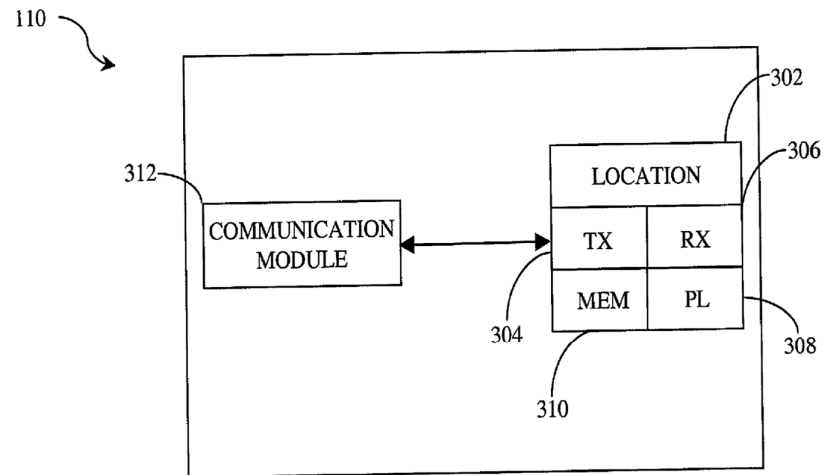


FIG. 3

Phillips discloses the following at [0044]:

The vehicle **110** of FIG. 3 may further include a communication module for providing communications with the terminal **120**. The communications module may also be operatively coupled to the location module **302**.

	Phillips discloses the following at [0045]: In one aspect of the disclosed system, the communication module 312 may be configured to provide communication according to the Bluetooth protocols. Thus, the communication link 130 of FIG. 2 may comprise a Bluetooth link. Phillips discloses the following at [0070]: A vehicle configured in accordance with the present disclosure may determine its current location, and send its current location to a terminal (e.g., cellular phone) configured according to the present invention, preferably via a Bluetooth signal. To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
[12.B] registering an exact parking space location of the vehicle on the mobile device using information provided by the Bluetooth transceiver; and	Phillips expressly and/or inherently discloses and/or renders obvious registering an exact parking space location of the vehicle on the mobile device using information provided by the Bluetooth transceiver. For example: Phillips discloses the following at [0028] (discussing FIG. 1): [A] vehicle configured in accordance with one aspect of the present disclosure determines its location. This act may be triggered by any number of events, such as the vehicle being shut off, or a user activating a button or other switching means.

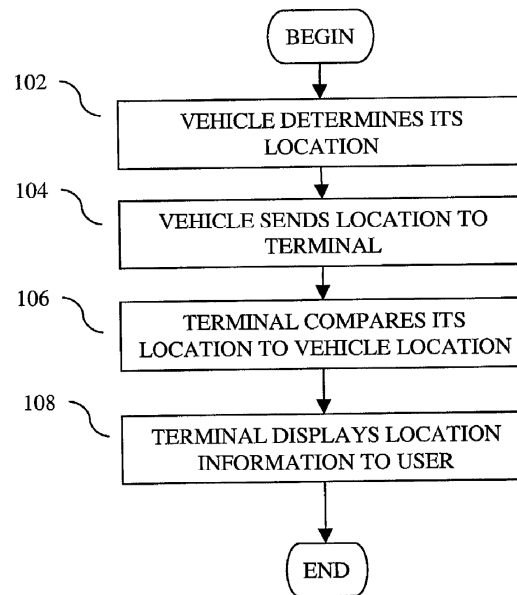


FIG. 1

Phillips discloses the following at [0029] (discussing FIG. 1):

Then, in act **104**, the vehicle will provide its location information to a terminal configured in accordance with the present invention. In one aspect of the present disclosure, the location information is transmitted over a wireless communication link. It is contemplated that a wide variety of communication protocols may be suitable for use, such as Bluetooth[registered trademark].

Phillips discloses the following at [0035]:

The system **100** of FIG. 2 may be disposed in a GPS (Global Positioning System) environment having several GPS satellites, of which four are shown (**140**, **150**, **160**, and **170**).

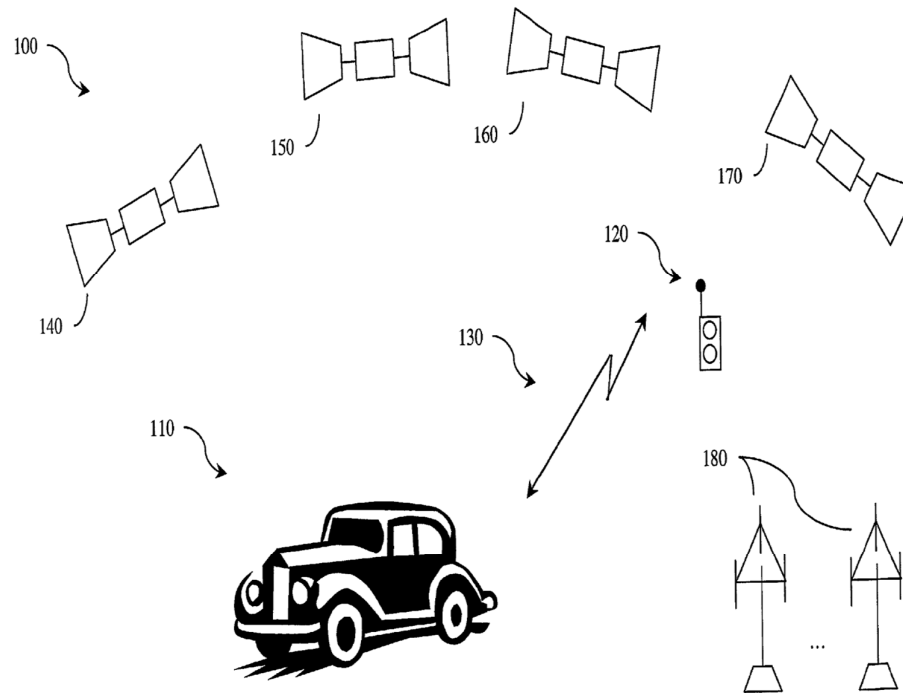


FIG. 2

Phillips discloses the following at [0070]:

	A vehicle configured in accordance with the present disclosure may determine its current location, and send its current location to a terminal (e.g., cellular phone) configured according to the present invention, preferably via a Bluetooth signal. To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
[12.C] subsequently using the mobile device to provide navigation to the parking space location where the vehicle is parked.	Phillips expressly and/or inherently discloses and/or renders obvious subsequently using the mobile device to provide navigation to the parking space location where the vehicle is parked. For example:

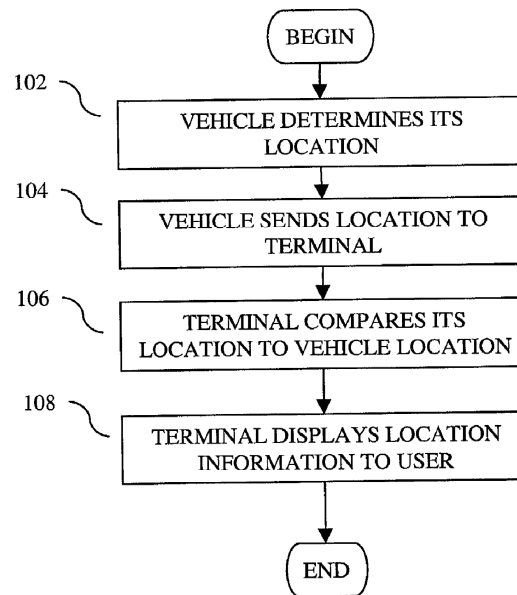


FIG. 1

Phillips discloses the following at [0030] (discussing FIG. 1):

[I]n act **106**, the terminal will determine its own location, and compare its location against the location of the vehicle previously received.

Phillips discloses the following at [0031] (discussing FIG. 1):

Having determined the difference in location between the terminal and the vehicle, the terminal may then display location information enabling the user to locate their vehicle in act **108**.

Phillips discloses the following at [0043]:

[V]arious aspects of the present disclosure may be configured to allow the position of a mobile unit to [be] identified using a minimum number of GPS satellites

Phillips discloses the following at [0067]:

The terminal **120** may further include a location processor **518** for determining the location of the mobile unit and for comparing the location of the terminal **120** to a set of coordinates stored in memory **520**. The coordinates may comprise the location of the vehicle **110**.

Phillips discloses the following at [0070]:

“A vehicle configured in accordance with the present disclosure may determine its current location, and send its current location to a terminal (e.g., cellular phone) configured according to the present invention, preferably via a Bluetooth signal.

Phillips discloses the following at [0072]:

When a user realizes that they don't know where their car is, the user may hit a button on their phone. When so activated, the phone may first determine the user's current location. The phone may then compare the user's location to that of the vehicle. For example, the phone may compare the latitude and longitude to that of the vehicle. In one embodiment the phone may use a cached location of the vehicle. In an alternative embodiment the phone will bring up a cellular link to request the current location of the vehicle.

Phillips discloses the following at [0073]:

The phone may then display a map which displays the user's location and the vehicle location.

Phillips discloses the following at [0074]:

Referring now to FIG. 6A, a diagram of a location display **600** is shown. The display **600** may include a user location indicator **602** and a vehicle location indicator **604** that may be displayed as dots, or any other suitable character. Display **600** may further include a distance indicator **606** appearing as a line between the user and vehicle location indicators **602** and **604**, and may further include a numeric indicator for displaying the distance needed to travel by the user to reach their vehicle. The distance may be displayed in any desired units, such as metric or English units. The display **600** may be aligned such that North is oriented towards the top of the phone.

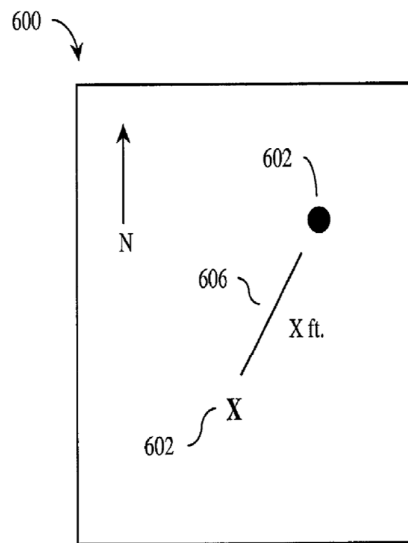


FIG. 6A

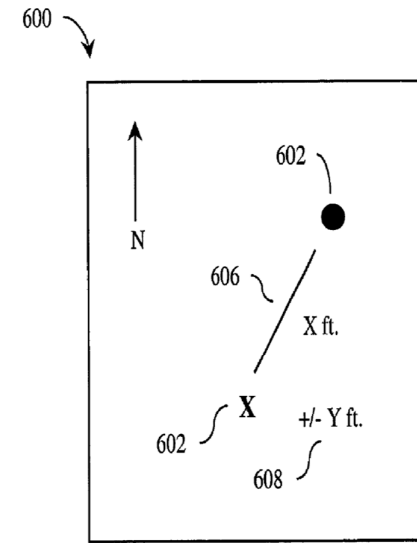


FIG. 6B

Phillips discloses the following at [0076]:

For example, maps of the parking lot or the mall may be overlaid atop of the user and vehicle location indicators **602** and **604** to aid the navigation of the user.

To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.

Claim 13, U.S. Patent No. 9,772,193

Claim Limitation	Disclosure
[13] The method as recited in claim 12, further comprising a step of:	<i>See e.g.</i>, 12.PRE. To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
[13.A] displaying on a display of the mobile device, a map between a current location of the mobile device and the exact parking space location of the vehicle	Phillips expressly and/or inherently discloses and/or renders obvious displaying on a display of the mobile device, a map between a current location of the mobile device and the exact parking space location of the vehicle. For example: Phillips discloses the following at [0012]: Further aspects of the disclosed system may overlay a map on the display, and display a pointer configured to direct the user to the vehicle. Phillips discloses the following at [0043]: [V]arious aspects of the present disclosure may be configured to allow the position of a mobile unit to [be] identified using a minimum number of GPS satellites. Phillips discloses the following at [0067]: The terminal 120 may further include a location processor 518 for determining the location of the mobile unit and for comparing the location of the terminal 120 to a set of coordinates stored in memory 520. The coordinates may comprise the location of the vehicle 110.

Phillips discloses the following at [0070]:

A vehicle configured in accordance with the present disclosure may determine its current location, and send its current location to a terminal (e.g., cellular phone) configured according to the present invention, preferably via a Bluetooth signal.

Phillips discloses the following at [0072]:

When a user realizes that they don't know where their car is, the user may hit a button on their phone. When so activated, the phone may first determine the user's current location. The phone may then compare the user's location to that of the vehicle. For example, the phone may compare the latitude and longitude to that of the vehicle. In one embodiment the phone may use a cached location of the vehicle. In an alternative embodiment the phone will bring up a cellular link to request the current location of the vehicle.

Phillips discloses the following at [0073]:

The phone may then display a map which displays the user's location and the vehicle location.

Phillips discloses the following at [0074]:

Referring now to FIG. 6A, a diagram of a location display **600** is shown. The display **600** may include a user location indicator **602** and a vehicle location indicator **604** that may be displayed as dots, or any other suitable character. Display **600** may further include a distance indicator **606** appearing as a line between the user and vehicle location indicators **602** and **604**, and may further include a numeric indicator for displaying the distance needed to travel by the user to reach their vehicle. The distance may be displayed in any desired units, such as metric or English units. The display **600** may be aligned such that North is oriented towards the top of the phone.

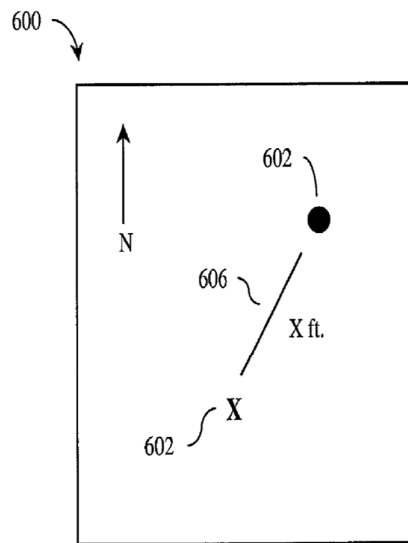


FIG. 6A

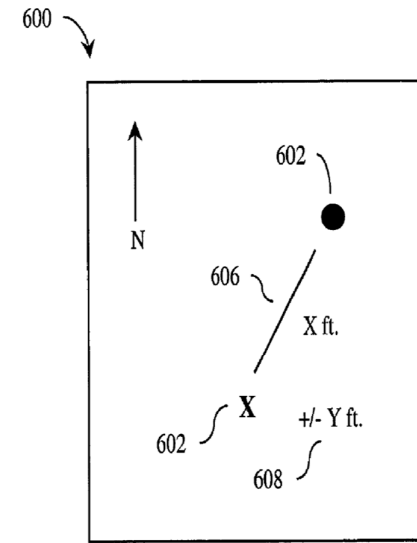


FIG. 6B

Phillips discloses the following at [0076]:

For example, maps of the parking lot or the mall may be overlaid atop of the user and vehicle location indicators **602** and **604** to aid the navigation of the user.

To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.

Claim 15, U.S. Patent No. 9,772,193

Claim Limitation	Disclosure
[15] The method as recited in claim 12, further comprising a step of:	<i>See e.g.</i>, 12.PRE. To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
[15.A] employing a Global Positioning System (GPS) to register the location of the exact parking space location of the vehicle.	Phillips expressly and/or inherently discloses and/or renders obvious employing a Global Positioning System (GPS) to register the location of the exact parking space location of the vehicle. For example: Phillips discloses the following at [0035]: The system 100 of FIG. 2 may be disposed in a GPS (Global Positioning System) environment having several GPS satellites, of which four are shown (140, 150, 160, and 170).

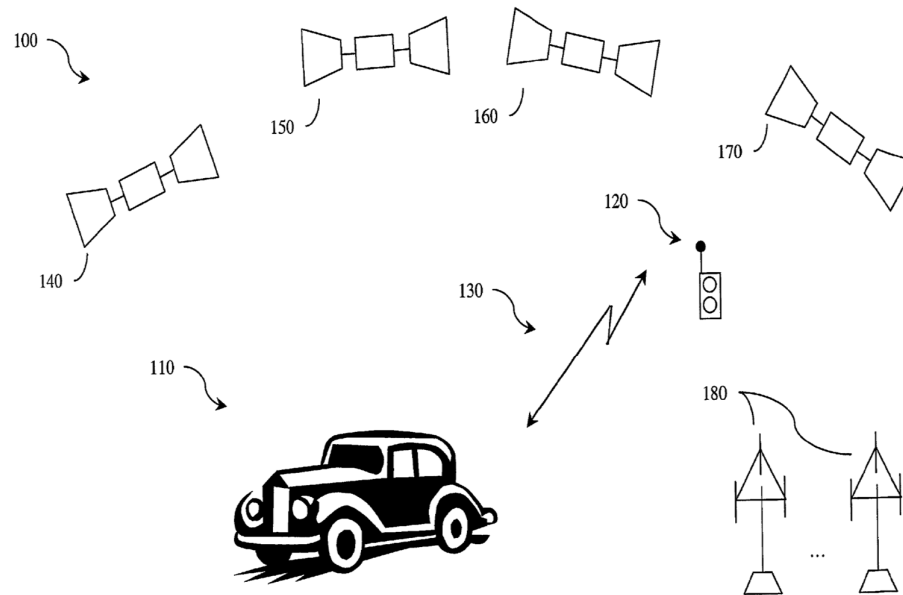


FIG. 2

Phillips discloses the following at [0043]:

It is contemplated that any GPS-based location system known in the art may be used in the present disclosure[.]

To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.

Claim 16, U.S. Patent No. 9,772,193

Claim Limitation	Disclosure
[16] The method as recited in claim 12, further comprising steps of:	<i>See e.g.</i>, 12.PRE. To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
[16.A] employing a Global Positioning System (GPS) to register a location of the vehicle; and	Phillips expressly and/or inherently discloses and/or renders obvious employing a Global Positioning System (GPS) to register a location of the vehicle. For example: Phillips discloses the following at [0035]: The system 100 of FIG. 2 may be disposed in a GPS (Global Positioning System) environment having several GPS satellites, of which four are shown (140, 150, 160, and 170).

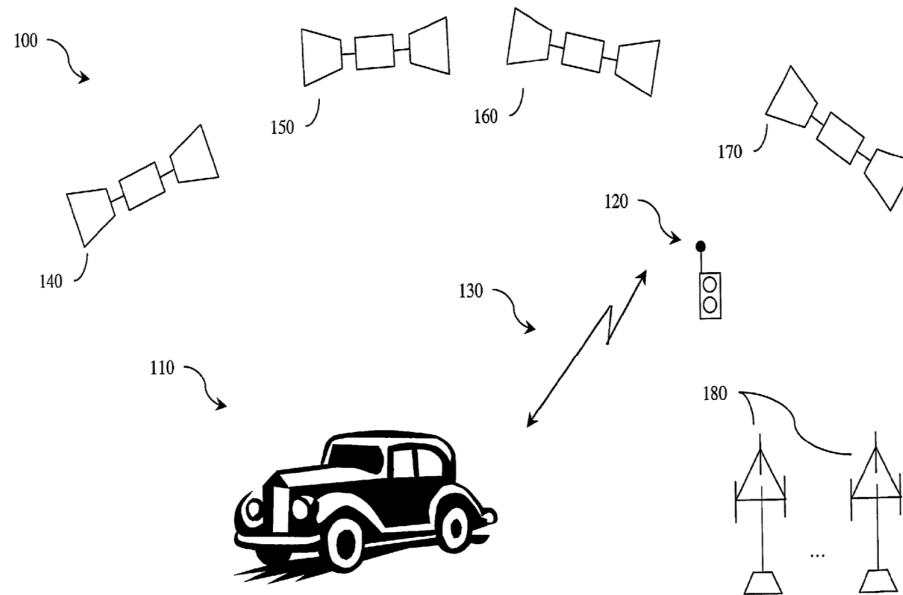


FIG. 2

Phillips discloses the following at [0043]:

It is contemplated that any GPS-based location system known in the art may be used in the present disclosure[.]

To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.

[16.B] subsequently using the registered location of the vehicle to provide navigation to the parking space location where the vehicle is parked.	Phillips expressly and/or inherently discloses and/or renders obvious subsequently using the registered location of the vehicle to provide navigation to the parking space location where the vehicle is parked. For example: Phillips discloses the following at [0043]: [V]arious aspects of the present disclosure may be configured to allow the position of a mobile unit to [be] identified using a minimum number of GPS satellites. Phillips discloses the following at [0067]: The terminal 120 may further include a location processor 518 for determining the location of the mobile unit and for comparing the location of the terminal 120 to a set of coordinates stored in memory 520. The coordinates may comprise the location of the vehicle 110. Phillips discloses the following at [0070]: A vehicle configured in accordance with the present disclosure may determine its current location, and send its current location to a terminal (e.g., cellular phone) configured according to the present invention, preferably via a Bluetooth signal. Phillips discloses the following at [0072]: When a user realizes that they don't know where their car is, the user may hit a button on their phone. When so activated, the phone may first determine the user's current location. The phone may then compare the user's location to that of the vehicle. For example, the phone may compare the latitude and longitude to that of the vehicle. In one embodiment the phone may use a cached location of the vehicle. In an alternative embodiment the phone will bring up a cellular link to request the current location of the vehicle. Phillips discloses the following at [0073]:
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The phone may then display a map which displays the user's location and the vehicle location.

Phillips discloses the following at [0074]:

Referring now to FIG. 6A, a diagram of a location display **600** is shown. The display **600** may include a user location indicator **602** and a vehicle location indicator **604** that may be displayed as dots, or any other suitable character. Display **600** may further include a distance indicator **606** appearing as a line between the user and vehicle location indicators **602** and **604**, and may further include a numeric indicator for displaying the distance needed to travel by the user to reach their vehicle. The distance may be displayed in any desired units, such as metric or English units. The display **600** may be aligned such that North is oriented towards the top of the phone.

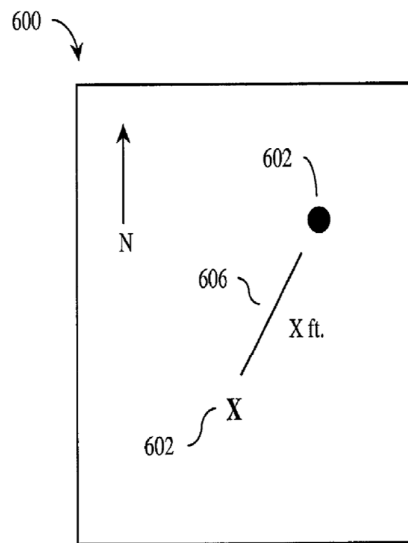


FIG. 6A

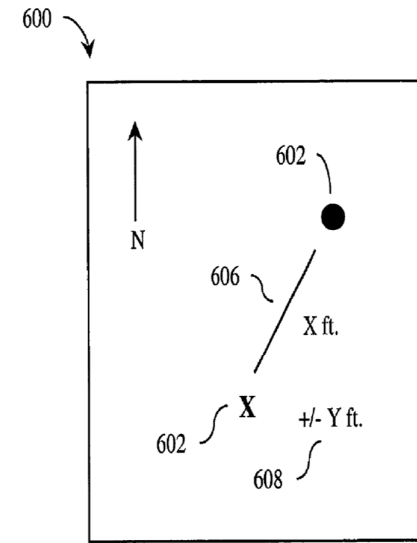


FIG. 6B

Phillips discloses the following at [0076]:

For example, maps of the parking lot or the mall may be overlaid atop of the user and vehicle location indicators **602** and **604** to aid the navigation of the user.

To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.

Claim 17, U.S. Patent No. 9,772,193

Claim Limitation	Disclosure
[17] The method as recited in claim 12, further comprising steps of:	<i>See e.g.</i>, 12.PRE. To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
[17.A] employing a Global Positioning System (GPS) to register a location of the vehicle; and	Phillips expressly and/or inherently discloses and/or renders obvious employing a Global Positioning System (GPS) to register a location of the vehicle. <i>See, e.g.</i>, 16.A. To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
[17.B] displaying on a display of the mobile device, a map between a current location of the mobile device and the registered location of the vehicle.	Phillips expressly and/or inherently discloses and/or renders obvious displaying on a display of the mobile device, a map between a current location of the mobile device and the registered location of the vehicle. For example: Phillips discloses the following at [0012]: Further aspects of the disclosed system may overlay a map on the display, and display a pointer configured to direct the user to the vehicle.

Phillips discloses the following at [0043]:

[V]arious aspects of the present disclosure may be configured to allow the position of a mobile unit to [be] identified using a minimum number of GPS satellites.

Phillips discloses the following at [0067]:

The terminal **120** may further include a location processor **518** for determining the location of the mobile unit and for comparing the location of the terminal **120** to a set of coordinates stored in memory **520**. The coordinates may comprise the location of the vehicle **110**.

Phillips discloses the following at [0070]:

A vehicle configured in accordance with the present disclosure may determine its current location, and send its current location to a terminal (e.g., cellular phone) configured according to the present invention, preferably via a Bluetooth signal.

Phillips discloses the following at [0072]:

When a user realizes that they don't know where their car is, the user may hit a button on their phone. When so activated, the phone may first determine the user's current location. The phone may then compare the user's location to that of the vehicle. For example, the phone may compare the latitude and longitude to that of the vehicle. In one embodiment the phone may use a cached location of the vehicle. In an alternative embodiment the phone will bring up a cellular link to request the current location of the vehicle.

Phillips discloses the following at [0073]:

The phone may then display a map which displays the user's location and the vehicle location."

Phillips discloses the following at [0074]:

Referring now to FIG. 6A, a diagram of a location display **600** is shown. The display **600** may include a user location indicator **602** and a vehicle location indicator **604** that may be displayed as dots, or any other suitable character. Display **600** may further include a distance indicator **606** appearing as a line between the user and vehicle location indicators **602** and **604**, and may further include a numeric indicator for displaying the distance needed to travel by the user to reach their vehicle. The distance may be displayed in any desired units, such as metric or English units. The display **600** may be aligned such that North is oriented towards the top of the phone.

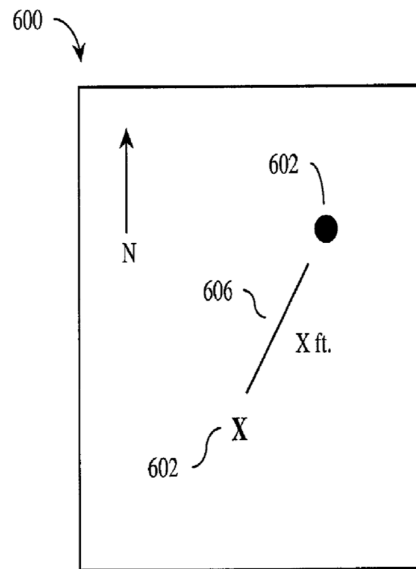


FIG. 6A

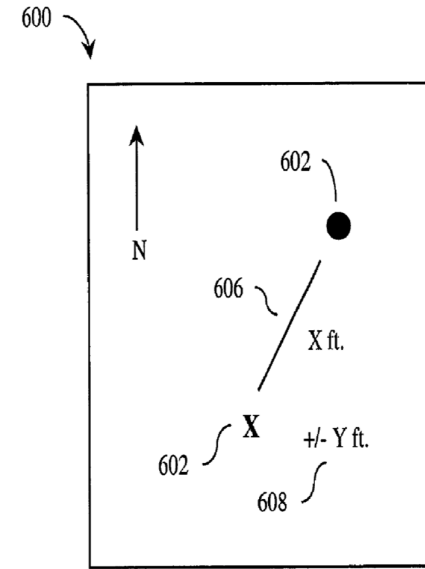


FIG. 6B

Phillips discloses the following at [0076]:

For example, maps of the parking lot or the mall may be overlaid atop of the user and vehicle location indicators **602** and **604** to aid the navigation of the user.

To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i)

	the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
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Claim 18, U.S. Patent No. 9,772,193

Claim Limitation	Disclosure
[18] The method as recited in claim 12, further comprising steps of:	<i>See e.g.</i>, 12.PRE. To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
[18.A] employing a Global Positioning System (GPS) to register a location of the vehicle;	Phillips expressly and/or inherently discloses and/or renders obvious employing a Global Positioning System (GPS) to register a location of the vehicle. <i>See, e.g.</i>, 16.A. To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
[18.B] displaying on a display of the mobile device, a map between the current location of the mobile device and the registered location of the vehicle; and	Phillips expressly and/or inherently discloses and/or renders obvious displaying on a display of the mobile device, a map between the current location of the mobile device and the registered location of the vehicle. For example: <i>See, e.g.</i>, 17.B.

	To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.
[18.C] providing navigation from the current location of the mobile device and the registered location of the vehicle.	Phillips expressly and/or inherently discloses and/or renders obvious providing navigation from the current location of the mobile device and the registered location of the vehicle. For example: Phillips discloses the following at [0067]: The terminal 120 may further include a location processor 518 for determining the location of the mobile unit and for comparing the location of the terminal 120 to a set of coordinates stored in memory 520. The coordinates may comprise the location of the vehicle 110. Phillips discloses the following at [0043]: [V]arious aspects of the present disclosure may be configured to allow the position of a mobile unit to [be] identified using a minimum number of GPS satellites. Phillips discloses the following at [0070]: A vehicle configured in accordance with the present disclosure may determine its current location, and send its current location to a terminal (e.g., cellular phone) configured according to the present invention, preferably via a Bluetooth signal. Phillips discloses the following at [0072]: When a user realizes that they don't know where their car is, the user may hit a button on their phone. When so activated, the phone may first determine the user's current location. The phone may then compare the user's location to that of the vehicle. For example, the phone may compare the latitude and longitude to that of the vehicle. In one embodiment the

phone may use a cached location of the vehicle. In an alternative embodiment the phone will bring up a cellular link to request the current location of the vehicle

Phillips discloses the following at [0073]:

The phone may then display a map which displays the user's location and the vehicle location.

To the extent Plaintiff contends that Phillips fails to disclose this limitation, it would have been obvious to one of ordinary skill in the art based on this reference alone or in combination with (i) the general knowledge of one of ordinary skill in the art and/or (ii) the teachings of any of the charted references with respect to this limitation.