IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION

WECREVENTION, INC.,	§	Case No.7:25-cv-00458-ADA
Plaintiff,	§	**JURY TRIAL DEMANDED**
v.	§	
APPLE INC.	§	
Defendant.	§	

PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS
AND INFRINGEMENT CONTENTIONS

Plaintiff WeCrevention, Inc. ("WeCrevention" or "Plaintiff") hereby makes the following infringement disclosures under the Standing Order Governing Patent Proceedings with respect to U.S. Patent No. 9,201,834 (the "'834 Patent"), U.S. Patent No. 10,998,017 (the "'017 Patent"), U.S. Patent No. 11,894,098 (the "'098 Patent"), U.S. Patent No. 12,154,652 (the "'652 Patent"), and U.S. Patent No. 9,164,942 (the "'942 Patent") (collectively, the "Asserted Patents"). WeCrevention's investigation is ongoing and discovery is not open. Accordingly, these disclosures are based on information available to WeCrevention at this time. WeCrevention reserves the right to supplement these disclosures after further discovery from Defendant and non-parties, particularly documents and other discovery regarding the Accused Products as defined below. WeCrevention also reserves the right to accuse different products or find alternative literal and/or equivalent infringing elements in the Accused Products.

I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

A. ASSERTED CLAIMS

Defendant Apple Inc. (hereinafter, "Apple" or "Defendant") has infringed and/or continues to infringe one or more of the following claims of the Asserted Patents in connection with the Accused Products set forth below:

- Claims 1, 2, 4, 21, and 23 of the '834 Patent;
- Claims 1-2 of the '017 Patent;
- Claims 1-9 of the '098 Patent;
- Claims 1-6 of the '652 Patent; and
- Claims 1, 5, 6, 7, 8, 9, 19, 23, and 25-26 of the '942 Patent.

B. ACCUSED INSTRUMENTALITIES

1. Accused Products

The Accused Products, as defined herein, include all versions and variants of Apple products made, sold, offered for sale, used, or imported in the United States since September 2019, that include LPDDR5 DRAM or LPDDR5x DRAM, including without limitation, the iPhone 14 or later (*e.g.*, iPhone 14; iPhone 14 Pro; iPhone 14 Pro Max; iPhone 15; iPhone 15 Plus; iPhone 15 Pro; iPhone 15 Pro Max; iPhone 16; iPhone 16 Plus; iPhone 16 Pro; and iPhone 16 Pro Max; iPhone Air; iPhone 17 Pro; and iPhone 17 Pro Max), the MacBook (*e.g.*, MacBook Air (M2, 2022); MacBook Air (M3, 2024); 13-inch MacBook Pro (M2, 2022); MacBook Pro (14-inch, M3 Pro or M3 Max, Nov 2023); and MacBook Pro (16-inch, M3 Max, late 2023), and the iPad (*e.g.*, iPad (11th generation); iPad Air; and iPad Pro).

2. Claim Charts

A claim chart identifying a location of every element of every Asserted Claim of the '834

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Patent within the Accused Products is attached hereto as **Appendix A**. WeCrevention believes the chart is representative because the Accused Products all share the same capabilities with respect to the elements of the Asserted Claims, including all generations and versions. WeCrevention further contends that Apple directs and controls its customers, at least as illustrated in the attached charts, to use the Accused Products and to make and/or use the Accused Products in an infringing manner.

A claim chart identifying a location of every element of every Asserted Claim of the ’017 Patent within the Accused Products is attached hereto as **Appendix B**. WeCrevention believes the chart is representative because the Accused Products all share the same capabilities with respect to the elements of the Asserted Claims, including all generations and versions. WeCrevention further contends that Apple directs and controls its customers, at least as illustrated in the attached charts, to use the Accused Products and to make and/or use the Accused Products in an infringing manner.

A claim chart identifying a location of every element of every Asserted Claim of the ’098 Patent within the Accused Products is attached hereto as **Appendix C**. WeCrevention believes the chart is representative because the Accused Products all share the same capabilities with respect to the elements of the Asserted Claims, including all generations and versions. WeCrevention further contends that Apple directs and controls its customers, at least as illustrated in the attached charts, to use the Accused Products and to make and/or use the Accused Products in an infringing manner.

A claim chart identifying a location of every element of every Asserted Claim of the ’652 Patent within the Accused Products is attached hereto as **Appendix D**. WeCrevention believes the chart is representative because the Accused Products all share the same capabilities with respect

to the elements of the Asserted Claims, including all generations and versions. WeCrevention further contends that Apple directs and controls its customers, at least as illustrated in the attached charts, to use the Accused Products and to make and/or use the Accused Products in an infringing manner.

A claim chart identifying a location of every element of every Asserted Claim of the ’942 Patent within the Accused Products is attached hereto as **Appendix E**. WeCrevention believes the chart is representative because the Accused Products all share the same capabilities with respect to the elements of the Asserted Claims, including all generations and versions. WeCrevention further contends that Apple directs and controls its customers, at least as illustrated in the attached charts, to use the Accused Products and to make and/or use the Accused Products in an infringing manner.

WeCrevention reserves the right to amend these claim charts, as well as other information contained in this document and the Appendices attached hereto, to incorporate new information learned during the course of discovery including, but not limited to, information that is not publicly available or readily discernible without discovery. WeCrevention further reserves the right to amend these claim charts, as well as other information contained in this document and the exhibits attached hereto.

C. LITERAL INFRINGEMENT AND DOCTRINE OF EQUIVALENTS

WeCrevention asserts that, under the proper construction of the Asserted Claims and their claim terms, the limitations of the Asserted Claims of the ’834,’017, ’098, ’652, and ’942 Patents are literally present in the Accused Products, as set forth in the claim charts attached hereto as **Appendices A** through **E**. WeCrevention contends that any and all elements found not to be literally met are met under the doctrine of equivalents because the differences between the claimed inventions and the accused instrumentalities, if any, are insubstantial.

WeCrevention also contends that Defendant has directly infringed and/or continues to directly infringe the Asserted Claims by making, using, offering for sale, and/or importing into the United States the Accused Products. Moreover, Defendant has directly infringed and/or continues to directly infringe the asserted method claims by using the Accused Products in the United States. Furthermore, Defendant has indirectly infringed and/or continues to indirectly infringe by contributing to and/or inducing others (*e.g.*, Defendant's suppliers, Defendant's customers or their customers' customers) to directly infringe those claims by making, using, and/or offering for sale, the Accused Products. WeCrevention also contends that Defendant has contributorily infringed and/or continues to contributorily infringe with the knowledge that the Accused Products, or the use thereof, infringe the Asserted Patents. Defendant has knowingly and intentionally contributed to the direct infringement of the Asserted Patents by others by supplying the Accused Products and/or associated software that embody a material part of the claimed invention of the Asserted Patents that are known by Defendant to be specially made or adapted for use in an infringing manner and are not staple articles with substantial non-infringing uses.

Pursuant to the Standing Order Governing Patent Proceedings, WeCrevention reserves the right to amend its infringement contentions as to literal infringement and/or infringement under the doctrine of equivalents in light of the Court's claim construction.

D. INFRINGEMENT BY DIRECTION AND CONTROL

Apple directs and controls all aspects of the alleged infringement. Such control is evidenced by Defendant's technical materials and marketing materials including, but not limited to, marketing materials, product briefs, product specifications, troubleshooting guides, technical support websites, reference manuals, and/or other business documents and communications conveyed to Defendant's customers. For example, Apple's website offers customers downloadable

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User Manuals for the Accused Products that instruct Apple's customers to, among other things, set up and use applications and products.

WeCrevention reserves the right to amend its infringement contentions as to Apple's direction and control in light of the Court's claim construction.

E. APPLICATION PRIORITY DATES

Each of the Asserted Claims of the '834 Patent claim priority to provisional application No. 61/546,039, filed on Oct. 11, 2011, and Provisional application No. 61/555,468, filed on Nov. 3, 2011. The '834 Patent is a Continuation-in-part of application No. 13/649,131, filed on Oct. 11, 2012.

Each of the Asserted Claims of the '017 Patent claim priority to provisional application No. 61/672,287, filed on Jul. 17, 2012, and provisional application No. 61/768,406, filed on Feb. 23, 2013. The '017 Patent is a continuation of application No. 13/922,242, filed on Jun. 19, 2013.

Each of the Asserted Claims of the '098 Patent claim priority similarly to the '017 Patent, as the '098 Patent is a continuation of the '017 Patent.

Each of the Asserted Claims of the '652 Patent claim priority similarly to the '098 Patent, as the '652 Patent is a continuation of the '098 Patent.

Each of the Asserted Claims of the '943 Patent claim priority to provisional application No. 61/546,039, filed on Oct. 11, 2011.

F. PRODUCTS THAT PRACTICE THE ASSERTED PATENTS

In addition to the Accused Products, WeCrevention is continuing to investigate what current and/or historical products and/or services may practice the claimed inventions, including those products and/or services of third parties of the Asserted Patents. WeCrevention's investigation is ongoing, and WeCrevention will supplement these contentions following its investigation (and claim construction as necessary).

II. PRODUCTION OF DOCUMENTS

WeCrevention is producing or making available for inspection documents that are in WeCrevention's possession, custody, or control pursuant to the Standing Order Governing Patent Proceedings. A production Index identifying these documents is attached hereto.

This preliminary identification of documents is for convenience and is not an admission that each document falls within any exemplary categories covered by the Standing Order Governing Patent Proceedings, or that any document qualifies as prior art. Thus, WeCrevention reserves its right to add to, delete from, or otherwise modify its disclosures in this section as its investigation proceeds.

Production of these documents with the exception of public documents listed in the infringement charts, are considered "Confidential – Outside Attorneys Eyes Only" and disclosure of the confidential document or information, shall be limited to each party's outside attorney(s) of record and the employees of such outside attorney(s).

Dated: January 20, 2026

Respectfully submitted,

/s/ Alfred R. Fabricant

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CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2026, a true and correct copy of the above and foregoing document has been served by email on:

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