

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

NOBOTS LLC,

Plaintiff,

v.

GOOGLE, LLC,

Defendant.

Case No. 1:22-cv-585-ADA

PLAINTIFF’S FIRST AMENDED INFRINGEMENT CONTENTIONS

In accordance with the Court’s Order Governing Proceedings – Patent Cases (January 23, 2024), Plaintiff Nobots LLC (“Nobots”) hereby serves its first amended infringement contentions.

With respect to its amended contentions related to U.S. Patent No. 9,595,008 (“the ’008 Patent”), Plaintiff certifies that reasonable efforts to prepare preliminary contentions were undertaken, and Plaintiff’s amendment is based on material identified after those preliminary contentions were served. Plaintiff has amended seasonably upon identifying any such material, particularly in light of the stay in this case, which was lifted yesterday. Plaintiff reserves its right to further supplement and/or amend these contentions, including in light of discovery, invalidity, prior art, claim construction, and/or any additional information provided by Defendant.

Plaintiff further states that it intends to seek leave to amend its complaint to assert infringement of U.S. Patent No. 11,810,014 (“the ’014 Patent”), which issued after the filing of the complaint during the pendency of the stay in this matter. With respect to all contentions related to the ’014 Patent, Plaintiff makes these contentions based on the information reasonably available at this time and reserves its right to supplement and/or amend these contentions,

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including in light of discovery, invalidity, prior art, claim construction, and/or any additional information provided by Defendant.

Asserted Claims & Accused Products

Plaintiff asserts that Defendant's products and software systems, including its reCAPTCHA utilities and Ad Traffic Quality systems, infringe Claim 18 of the '008 Patent and Claims 1 through 30 of the '014 Patent.

A chart attached as Exhibit A sets forth where in the accused reCAPTCHA products and/or software systems each element of the asserted claims of the '008 Patent is found. A chart attached as Exhibit B sets forth where in the accused Ad Traffic Quality products and/or software systems each element of the asserted claims of the '008 Patent is found. A chart attached as Exhibit C sets forth where in the accused reCAPTCHA products and/or software systems each element of the asserted claims of the '014 Patent is found. A chart attached as Exhibit D sets forth where in the accused Ad Traffic Quality products and/or software systems each element of the asserted claims of the '014 Patent is found.

Priority Date

Plaintiff states that all asserted claims are entitled to a priority date of no later than February 17, 2007.

Document Production

Documents evidencing conception and reduction to practice for the '008 Patent and a copy of its file history have previously been produced. The same documents evidence conception and reduction to practice for the '014 Patent. A copy of the file history of the '014 Patent is attached as Exhibit E. Some of these documents have been marked "Confidential – Outside Attorneys' Eyes Only" pursuant to the Protective Order entered at Dkt. No. 37.

DATED: February 18, 2026

/s/ Andres Healy

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**COUNSEL FOR PLAINTIFF NOBOTS
LLLC**

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2026, the foregoing document was served via e-mail to all counsel of record.

/s/ *Andres Healy*
Andres Healy