

EXHIBIT B

CLAIM CHARTS BASED ON PRELIMINARY INFRINGEMENT ANALYSIS
U.S. Patent No. 9,191,629

U.S. Patent No. 9,191,629– Motorola Mobility LLC

Claim 1

Script Transform LLC (“Script Transform”) provides evidence of infringement of claim 1 of U.S. Patent No. 9,191,629 (hereinafter “the ‘629 patent”) by Motorola Mobility LLC (“Motorola”). In support thereof, Script Transform provides the following claim charts.

“Accused Instrumentalities” as used herein refers to at least the following products and services: Video Baby Monitor products models such as MBP36XL and others available online at the Motorola store (See <https://www.motorolastore.com/baby-monitors/video-monitoring>). Product documentation reveals that the Video Baby Monitor products have been available at least since 2011. Therefore, the infringement has been occurring at least that time. These claim charts demonstrate Motorola’s infringement, and provide notice of such infringement, by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Instrumentalities. These claim charts are not intended to constitute an expert report on infringement. These claim charts include information provided by way of example, and not by way of limitation.

The analysis set forth below is based only upon information from publicly available resources regarding the Infringing Instrumentalities, as Motorola has not yet provided any non-public information. An analysis of Motorola’s (or other third parties’) technical documentation, and/or source code, may assist in fully identify all infringing features and functionality. Accordingly, Script Transform reserves the right to supplement this infringement analysis once such information is made available to Script Transform. Furthermore, Script Transform reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claim.

Unless otherwise noted, Script Transform contends that Motorola directly infringes the ‘629 patent in violation of 35 U.S.C. § 271(a) by making, offering to sell, making, using, and/or importing the Infringing Instrumentalities. The following exemplary analysis demonstrates that infringement. Unless otherwise noted, Script Transform further contends that the evidence below supports a finding of indirect infringement under 35 U.S.C. §§ 271(b) and/or (c), in conjunction with other evidence of liability under one or more of those subsections. Motorola makes, uses, sells, imports, or offers for sale in the United States, or has made, used, sold, imported, or offered for sale in the past, without authority, or induces others to make, use, sell, import, or offer for sale in the United States, or has induced others to make, use, sell, import, or offer for sale in the past, without authority products, equipment, or services that infringe claim 1 of the ‘629 patent, including without limitation, the Accused Instrumentalities.

Unless otherwise noted, Script Transform believes and contends that each element of each claim asserted herein is literally met through Motorola’s provision of the Infringing Instrumentalities. However, to the extent that Motorola attempts to allege that any asserted claim element is not literally met, Script Transform believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its

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Investigation and analysis of the Infringing Instrumentalities, Script Transform did not identify any substantial differences between the elements of the patent claim and the corresponding features of the Infringing Instrumentalities, as set forth herein. In each instance, the identified feature of the Infringing Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

To the extent the chart of an asserted claim relies on evidence about certain specifically identified Accused Instrumentalities, Script Transform asserts that, on information and belief, any similarly-functioning instrumentalities also infringes the charted claim. Script Transform reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by Motorola. Script Transform also reserves the right to amend this infringement analysis by citing other claims of the '629 patent, not listed in the claim chart, that are infringed by the Accused Instrumentalities. Script Transform further reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the "Accused Instrumentalities" column of each chart.

CLAIM CHARTS BASED ON PRELIMINARY INFRINGEMENT ANALYSIS
U.S. Patent No. 9,191,629**Motorola Mobility LLC**

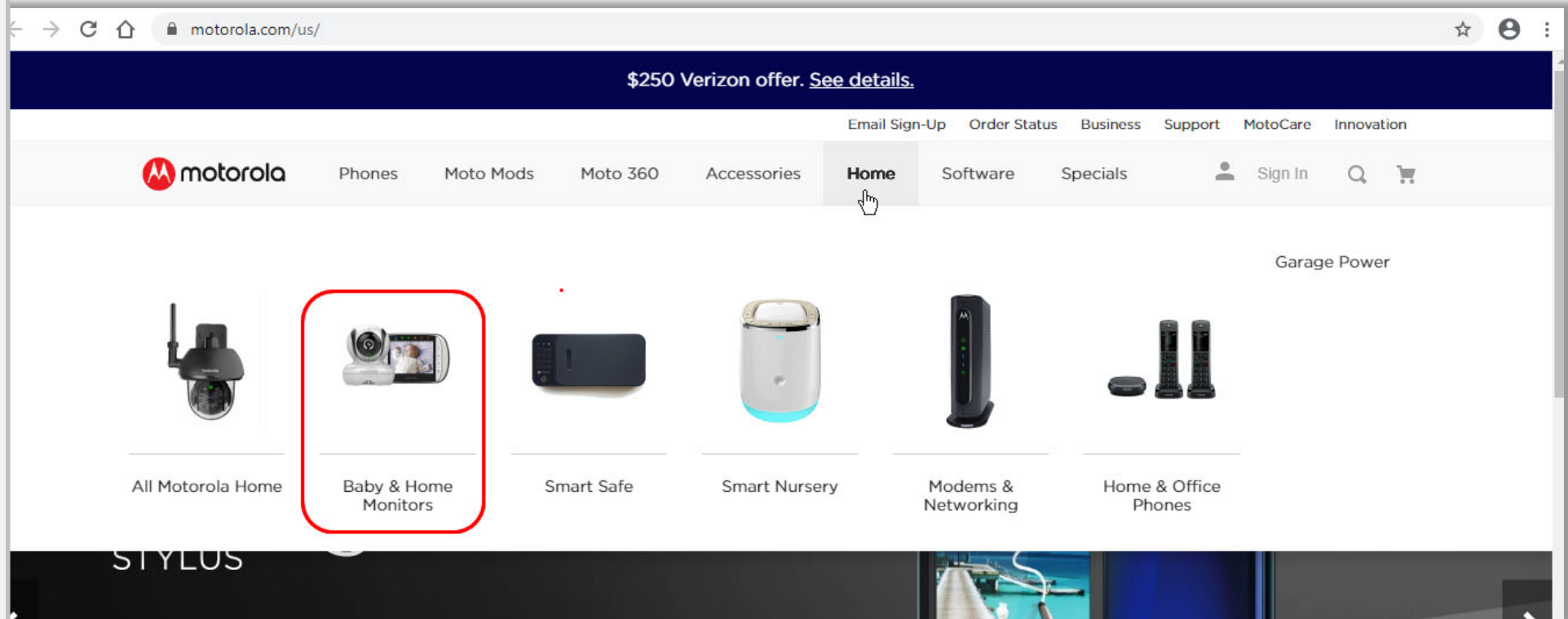
Motorola Mobility LLC, marketed as simply Motorola, is an American consumer electronics and telecommunications subsidiary company owned by Chinese technology firm Lenovo.

Motorola Mobility was formed on January 4, 2011, after a split of Motorola into two separate companies, with Motorola Mobility assuming the company's consumer-oriented product lines (including its mobile phone business, as well as its cable modems and pay television set-top boxes), while Motorola Solutions assuming the company's enterprise-oriented product lines.

Source: https://en.wikipedia.org/wiki/Motorola_Mobility#Brand_licensing

Motorola Mobility LLC	
	motorola
Type	Subsidiary
ISIN	US6200971058
Industry	Consumer electronics
Predecessor	Motorola, Inc.
Founded	January 4, 2011; 9 years ago
Headquarters	Merchandise Mart Chicago, Illinois, U.S.
Area served	Worldwide
Key people	Sergio Buniac, President ^[1]
Products	Smartphones Smartwatches Smartphone accessories Televisions
Number of employees	1,001-5,000 ^[2]
Parent	Google (2012–2014) Lenovo (2014–present)
Website	www.motorola.com 

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Source: <https://www.motorola.com/us/> (Annotation added)

: All internet sources last accessed and downloaded July 1, 2020.

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