Exhibit E-1 (Infringement Contentions for U.S. Patent No. 9,928,044 v. Google Docs)

Plaintiff Express Mobile accuses Defendant Google LLC ("Google") of making, using, offering for sale, and/or s[...]
States and/or importing into the United States Google's Docs platform, including docs.google.com and the Goog[...]
available for Apple iOS devices (including iPads, iPhones, and iPod Touch) on Apple's App Store, Android devi[...]
and tablets) on the Google Play Store, and related software and servers (the "Accused Instrumentalities"). The te[...]
Instrumentalities" includes the associated computer software and data, associated hardware, and processes and m[...]
thereto. Google directly infringes U.S. Patent No. 9,928,044 (the "'044 Patent") by making, using, offering for s[...]
importing into the United States the Accused Instrumentalities, which meet each and every limitation of the clai[...]
charts below. Google may have infringed and continues to infringe the '044 Patent through other software and s[...]
same or reasonably similar functionality, including other versions of the Accused Instrumentalities. Google has [...]
continues to infringe, at least the claims of the '044 Patent listed below in the United States by performing and/o[...]
perform one or more steps of the claims and/or conditioning the use of the Accused Instrumentalities and/or rece[...]
user's performance of one or more steps, and establishing the manner or timing of that performance. Google con[...]
service upon the performance of one or more steps of the claimed method of the '044 Patent by requiring a user t[...]
in an infringing manner, and profits from such an arrangement by charging the certain users a fee for subscribing[...]
service. Google also conditions the receipt of a benefit by a user, *i.e.*, the user benefits by being able to access th[...]
Google Docs document, by requiring the user to navigate its system in an infringing manner. Google establishes [...]
of a user's performance of one or more steps because the Google software limits how the user can interact with t[...]
system. The acts of Google's service providers, such as those that provide infrastructure, hosting, and/or trackin[...]
attributable to Google, at least because Google receives the services of these service providers by agreement. An[...]
contracts between these parties will be necessary to fully and accurately describe the reasons their acts are attribu[...]
accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is m[...]
Plaintiff.

Google markets Google Docs both individually and as a product through Google Workspace (formerly known as[...]
includes Google Docs as a service for a monthly per user fee. Plaintiff accuses both Google Docs in an individu[...]
Google Docs as part of Google Workspace, as well as any other offerings or versions of the Google Docs platfor[...]

Google induces infringement of the '044 Patent by providing to third parties including users, customers, agents a[...]
Accused Instrumentalities to utilize in an infringing manner, as charted below, and intends to cause infringement[...]
as Google instructs and/or controls and directs third parties to use the Accused Instrumentalities in an infringing [...]
without limitation by instructing the users to operate Google products, such as those located at docs.google.com. [...]
provides support services for the Accused Instrumentalities, including providing instructions, guides, online mate[...]
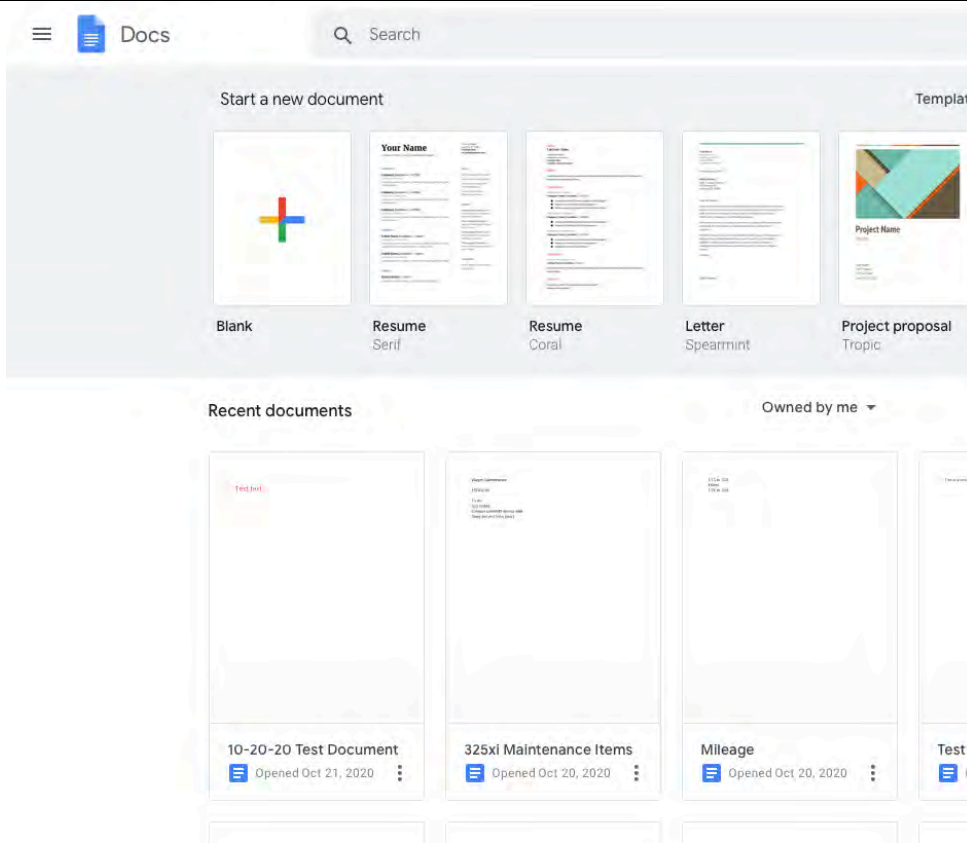support.

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Google contributes to infringement of the '044 Patent by providing its document creation service and/or software which comprises the claimed system and steps, as charted below. Google knows portions of the Accused Instrum especially made or especially adapted for use in infringement of the '044 Patent, and not to be staple articles, and commodities of commerce suitable for substantial noninfringing use.

The asserted claims include elements that are implemented, at least in part, by proprietary and specialized firmw the Accused Instrumentalities. The precise designs, processes, and algorithms used in them are held secret, at lea publicly available in their entirety. An analysis of Google's documentation and/or source code may be necessary accurately describe all infringing features and functionality of the Accused Instrumentalities and, accordingly, Pl right to supplement these contentions once such information is made available to Plaintiffs. Furthermore, Plainti revise these contentions, including as discovery in the case progresses, in view of any non-infringement argumen (e.g., to allege infringement under the doctrine of equivalents), in view of the Court's final claim construction in connection with the provision of expert reports.

Claim	Accused Instrumentalities
1. A system for generating code to provide content on a display of a device, said system comprising:	The Accused Instrumentalities comprise a system for generating code to pr device. As shown below, the Google Docs system provides dynamically generated comprising user-designed documents through an authoring tool and enviror

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Claim	Accused Instrumentalities

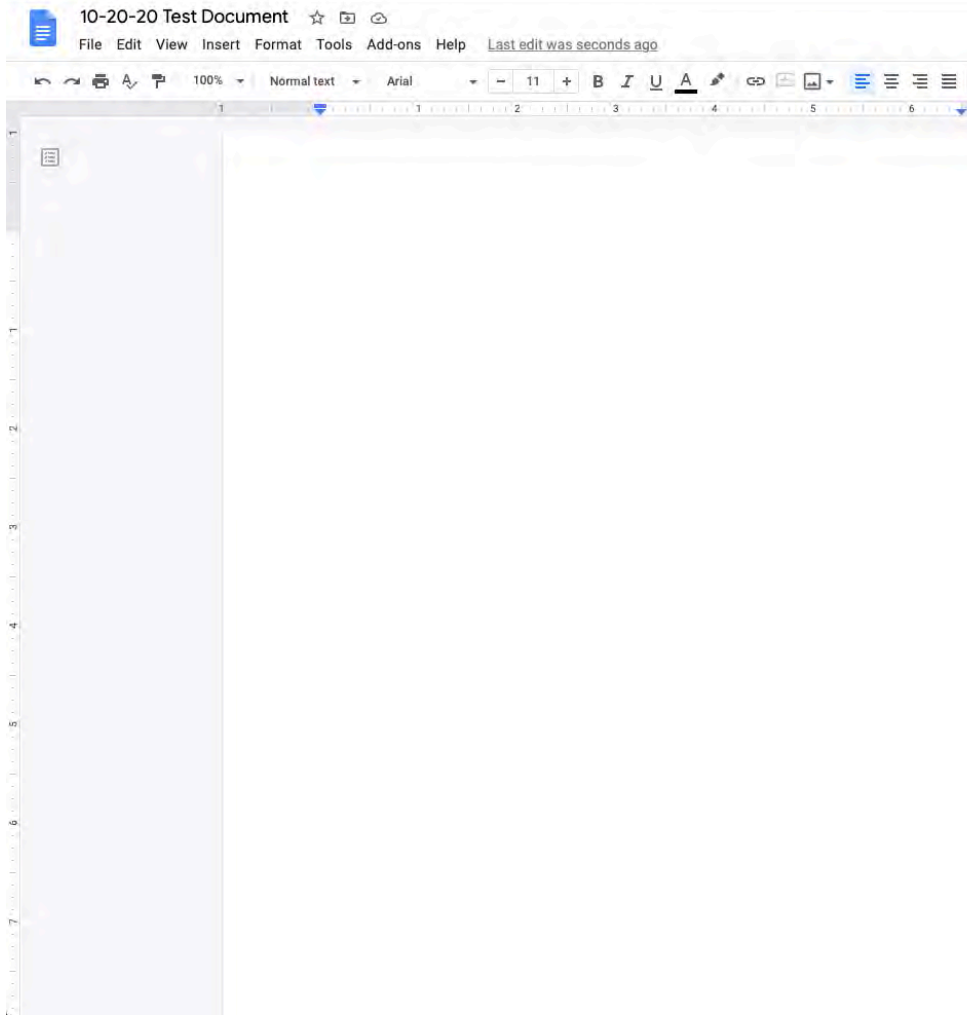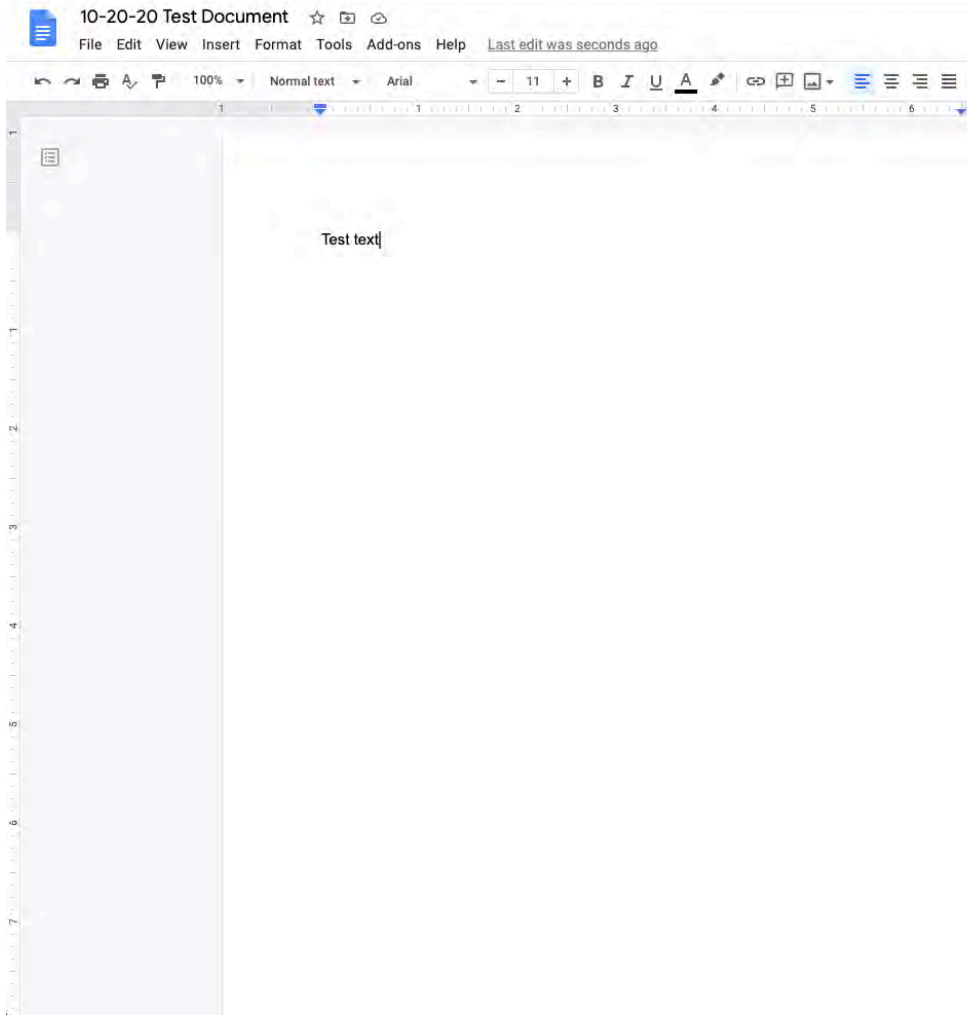**Exhibit E-1 (Infringement Contentions for U.S. Patent No. 9,928,044 v. Google Docs)**

Claim	Accused Instrumentalities

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Claim	Accused Instrumentalities

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