IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

FALL LINE PATENTS, LLC,
 	
    Plaintiff,
 	
      v.
 	
7-ELEVEN, INC.,
 	
    Defendant.
	CIVIL ACTION NO. 5:24-cv-167-RWS
	
	(Consolidated Lead Case)
	
	<u>**JURY TRIAL DEMANDED**</u>

<u>DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS</u>

Fall Line provides the following disclosures under Patent Local Rules 3-1 and 3-2. These disclosures and contentions are made with respect to United States Patent No. 9,454,748 ("Asserted Patent").

I.   PATENT RULE 3-1

(a) <u>Identification of Infringed Claims</u>

7-Eleven: claim 7 of the Asserted Patent.

Academy: claim 7 of the Asserted Patent.

Advance Auto Parts: claim 7 of the Asserted Patent.

ALDI: claim 7 of the Asserted Patent.

AutoZone: claim 7 of the Asserted Patent.

Best Buy: claim 7 of the Asserted Patent.

Brookshire: claim 7 of the Asserted Patent.

Cracker Barrel: claim 7 of the Asserted Patent.

DoorDash: claim 7 of the Asserted Patent.

Enterprise: claim 7 of the Asserted Patent.

Lowe's: claim 7 of the Asserted Patent.

Olive Garden: claim 7 of the Asserted Patent.

LongHorn Steakhouse: claim 7 of the Asserted Patent.

Sprouts: claim 7 of the Asserted Patent.

(b) Identification of Accused Instrumentalities/Methods

For each of the above claims, the Accused Instrumentalities are as follows:

For 7-Eleven, the 7-Eleven and 7NOW mobile Android apps, the 7-Eleven and 7NOW mobile iOS apps, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

For Academy, the Academy Sports + Outdoors mobile Android app, the Academy Sports + Outdoors mobile iOS app, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

For Advance Auto Parts, the Advance Auto Parts mobile Android app, the Advance Auto Parts mobile iOS app, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

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For ALDI, the ALDI mobile Android app, the ALDI mobile iOS app, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

For AutoZone, the AutoZone mobile Android app, the AutoZone mobile iOS app, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

For Best Buy, the Best Buy mobile Android app, the Best Buy mobile iOS app, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

For Brookshire, the Brookshire's, Super 1 Foods, and FRESH by Brookshire's mobile Android apps; the Brookshire's, Super 1 Foods, and FRESH by Brookshire's mobile iOS apps; the use of the mobile apps; the mobile apps running on a mobile device; and the associated back-end servers.

For Cracker Barrel, the Cracker Barrel mobile Android app, the Cracker Barrel mobile iOS app, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

For DoorDash, the DoorDash mobile Android app, the DoorDash mobile iOS app, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

For Enterprise, the Enterprise, National, and Alamo mobile Android apps; the Enterprise, National, and Alamo mobile iOS apps; the use of the mobile apps; the mobile apps running on a mobile device; and the associated back-end servers.

For Lowe's, the Lowe's mobile Android app, the Lowe's mobile iOS app, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

For Olive Garden, the Olive Garden mobile Android app, the Olive Garden mobile iOS app, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

For LongHorn Steakhouse, the LongHorn Steakhouse mobile Android app, the LongHorn Steakhouse mobile iOS app, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

For Sprouts, the Sprouts Farmers Market mobile Android app, the Sprouts Farmers Market mobile iOS app, the use of the mobile apps, the mobile apps running on a mobile device, and the associated back-end servers.

(c) **Claim Charts**

The claim charts required by Patent Local Rule 3-1(c) are attached as Exhibits 1–20.

(d) <u>**Doctrine of Equivalents**</u>

In the attached claim charts, Fall Line asserts that each claim limitation is literally infringed. Fall Line reserves the right to assert additional theories under the doctrine of equivalents in response to claim construction positions that defendants may take.

(e) <u>**Priority Claims to Earlier Patent Applications**</u>

The asserted claim of the Asserted Patent is entitled to a priority date of August 19, 2002.

(f) <u>**Fall Line's Instrumentalities**</u>

Fall Line does not intend to rely on the assertion that any of its own applications practice the Asserted Patent.

II.   PATENT RULE 3-2

(a)   Fall Line is producing documents responsive to Patent Rule 3-2(a) numbered FALL_0002668–2738. These documents have been designated as confidential under the protective order and are required to be treated as attorneys' eyes only.

(b)   Fall Line is producing documents responsive to Patent Rule 3-2(b) numbered FALL_0002602–2738. These documents have been designated as confidential under the protective order and are required to be treated as attorneys' eyes only.

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