

Exhibit B

Defendants' Contentions regarding Asserted Claims

Patent No.	"Standard Essential Patent Claims" ¹	Non-Essential Claims
5,740,366	5-16, 19-29, 32	
5,940,771	1-7	
6,374,311	20-24, 26-30, 32-37, 39, 40, 41, 43-51, 53-56, 60, 64	
7,457,646	14-22, 26-35, 39, 40, 43-45, 47, 49-51, 53-56, 59-64, 66-69, 71-73, 79, 82-93, 98-104, 107, 108, 111, 112, 114-123, 125-128, 130, 135-137, 143, 144	
7,536,137	73-77, 79-83, 85, 89-97, 100, 102-107, 109-113, 115, 119-127, 130, 132-134, 203	
7,873,343	1-6, 8-12, 15-20, 22, 23, 25, 28-36, 38-42, 45-50, 52, 53, 55, 58-60	
6,714,559	6-8	
7,386,002	1, 2, 4, 6, 7, 14, 16, 18, 19	
7,535,921	1-5, 7, 8	

¹ Defendants' contentions are based upon the features identified by Innovatio in its preliminary and final infringement contentions, which rely almost exclusively on standards citations in an effort to establish infringement, and interrogatory responses and other discovery provided by Innovatio in this action. Specifically, Defendants contend that the claims identified herein as "essential" are essential if, and only to the extent that, Innovatio's infringement contentions are correct. Defendants do not agree with Innovatio's infringement contentions and deny infringement by their standards-based products or otherwise. Defendants also believe that Innovatio's infringement contentions are deficient and, in particular, believe that (i) Innovatio's contentions do not contain necessary product-specific contentions or evidence, despite Defendants' long-standing requests that Innovatio do so, and (ii) Innovatio's almost exclusive reliance on standards documents to prove infringement is insufficient to establish infringement by Defendants' products. Defendants' contentions herein do not constitute an admission that Innovatio's standards-based infringement contentions are sufficient to establish infringement and Defendants affirmatively state that they are not.

Patent No.	“Standard Essential Patent Claims” ¹	Non-Essential Claims
7,548,553	10-12, 17, 19, 20	
7,916,747	1-3, 5-8, 11, 13, 16, 17, 20, 21, 22-25	
5,546,397	1-5	
5,844,893	7-11	
6,665,536	1, 5, 8, 10, 11, 13-17, 19-21, 23, 24, 27, 30, 32, 36, 37, 39-42, 49, 50	
6,697,415	11, 12, 15	
7,013,138	1, 5, 8, 10, 11, 13-15, 17, 18, 21, 24, 26, 28, 36-39	
7,710,907	1, 7, 10, 12, 13, 15-17, 20, 21, 23, 24, 30, 33, 35, 36, 38-40, 43, 44, 46-50	
7,107,052	1, 5, 6, 8-12, 15, 16	
7,710,935	1, 5, 6, 8-12, 15, 16, 25-28, 32-35, 37-42, 44-47	
5,295,154	1-7	
5,428,636	1-13	
5,504,746	13-17	
6,826,165	16-20	