**TPL's Motion to Correct
Preliminary Infringement Contentions**

Exhibit 1

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TEXAS

MARSHALL DIVISION

Technology Properties Limited, Inc.,	§	Case No. 2:05-CV-00494 (TJW)
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
Fujitsu Limited, Fujitsu General America, Inc.,	§	
Fujitsu Computer Products of America, Inc.,	§	
Fujitsu Computer Systems Corp., Fujitsu	§	
Microelectronics America, Inc., Fujitsu Ten	§	
Corporation of America, Matsushita Electrical	§	
Industrial Co., Ltd., Panasonic Corporation of	§	
North America, JVC Americas Corporation,	§	
NEC Corporation, NEC Electronics America,	§	
Inc., NEC America, Inc., NEC Display	§	
Solutions of America, Inc., NEC Solutions	§	
America, Inc., NEC Unified Solutions, Inc.,	§	
Toshiba Corporation, Toshiba America, Inc.,	§	
Toshiba America Electronic Components, Inc.,	§	
Toshiba America Information Systems, Inc. and	§	
Toshiba America Consumer Products, LLC,	§	
	§	
Defendants.	§	
	§	

**TECHNOLOGY PROPERTIES, LIMITED, INC.'S
CORRECTED DISCLOSURE OF ASSERTED CLAIMS
AND PRELIMINARY INFRINGEMENT CONTENTIONS**

Pursuant to Patent Rule 3-1, Plaintiff Technology Properties Limited, Inc. ("TPL")

hereby provides its Corrected Disclosure of Asserted Claims and Preliminary Infringement

Contentions. TPL's statements are based on publicly available materials regarding the accused

infringing devices of Defendants that describe or discuss aspects of operation of the accused

devices.

I.   INFRINGEMENT OF U.S. PATENT NO. 5,809,336

A.   Infringed Claims

Based on the information presently available to it, TPL asserts that Defendants NEC

Corporation, NEC Electronics America, Inc., NEC America, Inc., NEC Display Solutions of

America, Inc., NEC Solutions America, Inc., NEC Unified Solutions, Inc. ("NEC") infringe

directly or indirectly, claims 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 of United States Patent No. 5,809,336

(the "'336 Patent"). Each of the NEC products identified by "Chip Part Number" in the table

captioned "NEC Accused Chips [Exhibit A]" infringes claims of the '336 Patent identified in the

claim charts attached as Exhibit A[1]; and is representative for purposes of infringement of its

associated Chip Family. Each of the NEC products identified by "Chip Family" in that table

infringes the same claims as the associated representative chip, with additional information on

each NEC Chip Family shown in Exhibit H; and each of NEC's End-User Products identified in

the list attached as Exhibit D infringes a claim of the '336 Patent, as set forth in the claim charts

attached as Exhibit A, B, C and G, if discovery establishes that it embodies an NEC Accused

Chip, Toshiba Accused Chip, MEI Accused Chip or Covered Fujitsu Chip which infringes or is

covered by such claim.

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[1] All exhibits referenced herein are attached to the previous version of this document served July
17, 2006, with the exception of Exhibits H, I, J and K, which are web pages from the
Defendants' websites in furtherance of Defendants' requests that additional information be
provided on the Chip Families.

Based on the information presently available to it, TPL asserts that Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Electronic Components, Inc., Toshiba America Information Systems, Inc. and Toshiba America Consumer Products, LLC ("Toshiba") infringe directly or indirectly, claims 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 of the '336 Patent. Each of the Toshiba products identified by 'Chip Part Number' in the table captioned "Toshiba Accused Chips [Exhibit B]" infringes claims of the '336 Patent identified in the claim charts attached as Exhibit B, and is representative for purposes of infringement of its associated Chip Family. Each of the Toshiba products identified by "Chip Family" in that table infringes the same claims as the associated representative chip, with additional information on each Toshiba Chip Family shown in Exhibit I; and each of Toshiba's End-User Products identified in the list attached as Exhibit E infringes a claim of the '336 Patent, as set forth in the claim charts attached as Exhibit A, B, C and G, if discovery establishes that it embodies an NEC Accused Chip, Toshiba Accused Chip, MEI Accused Chip or Covered Fujitsu Chip which infringes or is covered by such claim.

Based on the information presently available to it, TPL asserts that Defendants Matsushita Electrical Industrial Co., Ltd., Panasonic Corporation of North America, JVC Americas Corporation ("MEI") infringe directly or indirectly, claims 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 of the'336 Patent. Each of the MEI products identified by "Chip Part Number" in the table captioned "MEI Accused Chips [Exhibit C]" infringes claims of the '336 Patent identified in the claim charts attached as Exhibit C, and is representative for purposes of infringement of its associated Chip Family. Each of the MEI products identified by "Chip Family" in that table infringes the same claims as the associated representative chip, with additional information on each MEI Chip Family shown in Exhibit J; and each of MEI's End-User Products identified in the list attached as Exhibit F infringes a claim of the '336 Patent, as set forth in the claim charts attached as Exhibit A, B, C and G, if discovery establishes that it embodies an NEC Accused

Chip, Toshiba Accused Chip, MEI Accused Chip or Covered Fujitsu Chip which infringes or is covered by such claim.

Discovery only recently commenced, and TPL's preliminary infringement contentions, including all claim charts and figures, are based on information reasonably available to TPL at this time. The accused devices and instrumentalities listed herein include only those of which TPL is presently aware. Accordingly, TPL reserves the right to supplement these Preliminary Infringement Contentions based on information developed in the course of this lawsuit through discovery or additional factual investigation, in view of the Court's claim construction ruling respecting the '336 Patent or as other circumstances may require.

B.   Infringement Claim Charts

Attached hereto as Exhibit A are infringement claim charts showing how each NEC Accused Chip infringes asserted claims of the '336 Patent.

Attached hereto as Exhibit B are infringement claim charts showing how each Toshiba Accused Chip infringes asserted claims of the '336 Patent.

Attached hereto as Exhibit C are infringement claim charts showing how each MEI Accused Chip infringes asserted claims of the '336 Patent.

Attached hereto as Exhibit G are coverage claim charts showing how each Fujitsu Covered Chip is covered by asserted claims of the 336 Patent.

C.   Infringing And Covered Chips

The NEC, Toshiba, and MEI Accused Chips, and Fujitsu Covered Chips, including each member of each Chip Family, listed herein below infringe the asserted claims of the '336 Patent as explained in the claims charts attached hereto as Exhibits A, B, C and G respectively.

NEC's Accused Chips [Exhibit A]

Representative Chip Part Number	Part Description	Chip Family (see, e.g., Exhibit H)	Claims Asserted
Microcomputer uPD17717	Microcomputer	4-Bit 17K Series (DTS)	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller uPD178078	Microcontroller	8-Bit 178K Series (DTS)	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller uPD780058	Microcontroller	8-Bit 78K0 Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcomputer uPD78F9328	Microcomputer	8-Bit 179K Series (78KOS core)	1, 2, 3, 4, 6, 7, 8, 9, 10
Microcontroller uPD789478	Microcontroller	8-Bit 78KOS Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcomputer uPD703212	Microcomputer	32-Bit V850 Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Digital Signal Processor uPD77111	Digital Signal Processor	Digital Signal Processor Devices	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
USB Interface uPD720130	USB Interface	USB Devices	1, 2, 3, 4, 6, 7, 9, 10
Microcontroller uPD750008	Microcontroller	4-Bit 75XL Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Automotive Microcontroller uPD789850A	Automotive Microcontroller	8-Bit 78KOS Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller uPD78F0537	Microcontroller	8-Bit 78KO Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller uPD784218AY	Microcontroller	16-Bit 78K4 Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller uPD703003A	Microcontroller	32-Bit V853 Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller uPD70F3116	Motor Control	32-Bit V850 Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microprocessor uPD30671 (Vr 7001)	Digital AV	Vr 64-Bit/32-Bit Microprocessors	1, 2, 3, 4, 6, 7, 9, 10
Microprocessor uPD30181A	Microprocessor	Vr 64-Bit Microprocessors	1, 2, 3, 4, 6, 7, 9, 10

Representative Chip Part Number	Part Description	Chip Family (see, e.g., Exhibit H)	Claims Asserted
Melody LSI uPD9993	Digital AV	Melody LSI	1, 3
MPEG Encoder uPD61151	Digital AV	MPEG Encoders	1, 2, 3, 4, 5, 6, 7, 9, 10
Network Controller uPD98501	Communication Device	Network Controller Devices	1, 2, 3, 4, 5, 6, 7, 8, 9, 10

Toshiba's Accused Chips [Exhibit B]

Representative Chip Part Number	Part Description	Chip Family (see, e.g., Exhibit I)	Claims Asserted
ASIC TC220	ASIC	TC220 Family	1, 2, 3, 4, 6, 7, 9, 10
ASIC TC260	ASIC	TC260 Family	1, 2, 3, 4, 6, 7, 9, 10
ASIC TC280	ASIC	TC280 Family	1, 2, 3, 4, 6, 7, 9, 10
ASIC TC300	ASIC	TC300 Family	1, 2, 3, 4, 6, 7, 9, 10
Bluetooth Baseband IC TC35651	Microcontroller	Bluetooth Baseband IC	1, 2, 3, 4, 5, 6, 7, 9, 10
Microcontroller TMP88CK49 & TMP88CM49	Microcontroller	8-Bit TLCS-870/X Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller TMP87CH48 & TMP87CM48	Microcontroller	8-Bit TLCS-870 Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller TMP86CH06	Microcontroller	8-Bit TLCS-870/C Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Automotive Microcontroller TMP86C407 and TMP86C807	Automotive Microcontroller	8-Bit TLCS-870/C Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller TMP96C031Z	Microcontroller	16-Bit TLCS-900 Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller TMP95CU54A	Microcontroller	16-Bit TLCS-900/H Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller TMP93CS44 and TMP93CS45F	Microcontroller	16-Bit TLCS-900/L Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10

Representative Chip Part Number	Part Description	Chip Family (see, e.g., Exhibit I)	Claims Asserted
Microcontroller TMP92C820	Microcontroller	32-Bit TLCS-900/H1 Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller TMP91C016F	Microcontroller	16-Bit TLCS-900/L1 Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller TMP92CZ26	Microcontroller	32-Bit TLCS-900/H1 Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microprocessor TMPR3916F	Microprocessor	TX39 / 32-Bit TX System RISC	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microprocessor TMP1941AF	Microprocessor	TX19 / 32-Bit TX System RISC	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller TMP94C241CF	Microcontroller	32-Bit TLCS-900/H2 Series	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microprocessor TMPR4937	Microprocessor	TX-49 / 64-Bit TX System RISC	1, 2, 3, 4, 5, 6, 7, 9, 10
MPEG-4 Decoder TC35274	MPEG-4 Video Decoder	MPEG-4 Video Decoder Devices	1, 2, 3, 4, 5, 6, 9, 10
MPEG-4 Audiovisual TC35273	MPEG-4 Codec	MPEG-4 AV Codec Devices	1, 2, 3, 4, 5, 6, 7, 9, 10

MEI's Accused Chips [Exhibit C]

Representative Chip Part Number	Part Description	Chip Family (see, e.g., Exhibit J)	Claims Asserted
Microcomputer MN101CF91D	8 Bit Microcomputer	MN101(AM1)	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcontroller MN102xx19	16 Bit Microcomputer	MN102(AM2)	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcomputer MN1A7T0200	32 Bit Microcomputer	ARM	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcomputer MN103SC2A	32 Bit Microcomputer	MN103(AM3)	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcomputer MN103E010H	32 Bit Microcomputer	MN103(AM3)	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Microcomputer MN1872423	MOS LSI	MOS LSI	1, 2, 3, 4, 6, 7, 8, 9, 10

Fujitsu's Covered Chips [Exhibit G]

Representative Chip Part Number	Part Description	Chip Family (see, e.g., Exhibit K)	Claims Asserted
Accel Array Mega Platform	ASIC	Structured ASIC - AccelArray	1, 2, 3, 4, 5, 6, 7, 9, 10
ASIC Bluetooth IPWare & Cores MB86C00-MBG011	Bluetooth Baseband Processor	IPWare & Cores - Bluetooth	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
CMOS Standard Cell CS91 Series	ASIC	Standard Cell	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Embedded Array CE81 Series	ASIC	Embedded Array	1, 2, 3, 4, 6, 7, 9, 10
VOIP Codec Raptor	ASIC	IPWare & Cores - VOIP	1, 2, 3, 4, 6, 7, 9, 10
Graphics Display Controller MB86296S	PCI Graphic Display Controller	Graphic Display Controller	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
16-bit Microcontroller MB90650A	16-bit Microcontroller	F^2M-16L	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
16-bit Microcontroller MB90860A	16-bit Microcontroller	F^2M-16LX	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
32-bit Microcontroller MB91133	32-bit Microcontroller	FR30	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
32-bit Microcontroller MB91191	32-bit Microcontroller	FR20	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
32-bit Microcontroller MB91270/280	32-bit Microcontroller	FR60Lite	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
32-bit Microcontroller MB91301	32-bit Microcontroller	FR60	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
32-bit Microcontroller MB91360	32-bit Microcontroller	FR50	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
8-bit Microcontroller MB89497	8-bit Microcontroller	F^2MC-8L	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
8-bit Microcontroller MB95FV100	8-bit Microcontroller	F^2MC-8FX	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
Mobile Media Processor MB86V00/01	Media Processor	Mobile Media Processor	1, 2, 3, 4, 6, 7, 9, 10

D.   Doctrine of Equivalents

TPL contends that each element of the asserted claims is literally present in the accused

products listed above. In the alternative, TPL contends that any element not found to be literally

present in an accused product is present under the doctrine of equivalents.

II.   INFRINGEMENT OF U.S. PATENT NO. 5,784,584

A.   Infringed Claims

Based on the information presently available to it, TPL asserts that Defendants NEC

infringe directly or indirectly, at least claim 29 of United States Patent No. 5,784,584 (the "'584

Patent"). Each of the NEC products identified by "Chip Part Number" in the table captioned

"NEC Accused Chips [Exhibit A]" infringes claim 29 of the '584 Patent identified in the claim

charts attached as Exhibit A, and is representative for purposes of infringement of its associated

Chip Family. Each of the NEC products identified by "Chip Family" in that table infringes the

same claim as the associated representative chip, with additional information on each NEC Chip

Family shown in Exhibit H; and each of NEC's End-User Products identified in the list attached

as Exhibit D infringes a claim of the '584 Patent, as set forth in the claim charts attached as

Exhibit A, B, C and G, if discovery establishes that it embodies an NEC Accused Chip, Toshiba

Accused Chip, MEI Accused Chip or Covered Fujitsu Chip which infringes or is covered by

such claim.

Based on the information presently available to it, TPL asserts that Defendants Toshiba

infringe directly or indirectly, at least claim 29 of the '584 Patent. Each of the Toshiba products

identified by "Chip Part Number" in the table captioned "Toshiba Accused Chips [Exhibit B]"

infringes claim 29 of the '584 Patent identified in the claim charts attached as Exhibit B, and is

representative for purposes of infringement of its associated Chip Family. Each of the Toshiba

products identified by "Chip Family" in that table infringes the same claim as the associated

representative chip, with additional information on each Toshiba Chip Family shown in Exhibit

I; and each of Toshiba's End-User Products identified in the list attached as Exhibit E infringes a claim of the '584 Patent, as set forth in the claim charts attached as Exhibit A, B, C and G, if discovery establishes that it embodies an NEC Accused Chip, Toshiba Accused Chip, MEI Accused Chip or Covered Fujitsu Chip which infringes or is covered by such claim.

Based on the information presently available to it, TPL asserts that Defendants MEI infringe directly or indirectly, at least claim 29 of the '584 Patent. Each of the MEI products identified by "Chip Part Number" in the table captioned "MEI Accused Chips [Exhibit C]" infringes claim 29 of the '584 Patent identified in the claim charts attached as Exhibit C, and is representative for purposes of infringement of its associated Chip Family. Each of the MEI products identified by "Chip Family" in that table infringes the same claim as the associated representative chip, with additional information on each Chip Family shown in Exhibit J; and each of MEI's End-User Products identified in the list attached as Exhibit F infringes a claim of the '584 Patent, as set forth in the claim charts attached as Exhibit A, B, C and G, if discovery establishes that it embodies an NEC Accused Chip, Toshiba Accused Chip, MEI Accused Chip or Covered Fujitsu Chip which infringes or is covered by such claim.

Discovery only recently commenced, and TPL's preliminary infringement contentions, including all claim charts and figures, are based on information reasonably available to TPL at this time. The accused devices and instrumentalities listed herein include only those of which TPL is presently aware. Accordingly, TPL reserves the right to supplement these Preliminary Infringement Contentions based on information developed in the course of this lawsuit through discovery or additional factual investigation, in view of the Court's claim construction ruling respecting the '584 Patent or as other circumstances may require.

B.   Infringement Claim Charts

Attached hereto as Exhibit A are infringement claim charts showing how each NEC Accused Chip infringes asserted claims of the '584 Patent.

Attached hereto as Exhibit B are infringement claim charts showing how each Toshiba

Accused Chip infringes asserted claims of the '584 Patent.

Attached hereto as Exhibit C are infringement claim charts showing how each MEI

Accused Chip infringes asserted claims of the '584 Patent.

Attached hereto as Exhibit G are infringement claim charts showing how each Fujitsu

Covered Chip is covered by the asserted claims of the '584 Patent.

C.   Infringing Products

The NEC, Toshiba, MEI and Fujitsu products listed below, including each member of

each Chip Family, infringe or are covered by the asserted claims of the '584 Patent as explained

in the claims charts attached hereto as Exhibits A, B, C and G, respectively.

NEC's Accused Chips [Exhibit A]

Representative Chip Part Number	Part Description	Chip Family (see, e.g., Exhibit H)	Claims Asserted
V850E2	Microcomputer	32-Bit V850 Series	29
Gate Array SoC Lite uPD65977	ASIC	Gate Array (ARM7TDMI core)	29
Structured ASIC ISSP90	ASIC	Structured ASICs	29

Toshiba's Accused Chips [Exhibit B]

Representative Chip Part Number	Part Description	Chip Family (see, e.g., Exhibit I)	Claims Asserted
ASIC TC240 (ARM7TDMI)	ASIC	TC240 Family	29
ASIC TC260 (ARM926EJ-S)	ASIC	TC260 Family	29
ASIC TC280 (ARM946ES)	ASIC	TC280 Family	29
ASIC TC300	ASIC	TC300 Family	29

Representative Chip Part Number	Part Description	Chip Family (see, e.g., Exhibit I)	Claims Asserted
(ARM1026EJ-S)			
Bluetooth Baseband IC TC35651 (ARM7TDMI)	Automotive Microcontroller	Bluetooth Baseband IC	29
Microcontroller TMP 94C241C	Microcontroller	32-Bit TLCS-900/H2 Series	29
Microcontroller TMP92C820	Microcontroller	32-Bit TLCS-900/H1 Series	29
Automotive Microcontroller TMP92CD54IF	Automotive Microcontroller	32-Bit TLCS-900/H1 Series	29
MPEG-4 Codec (Mobile Turbo) TC35295 (ARM926EJ-S)	MPEG-4 Codec	MPEG-4 Codec (Mobile Turbo) Devices	29

MEI's Accused Chips [Exhibit C]

Representative Chip Part Number	Part Description	Chip Family (see, e.g., Exhibit J)	Claims Asserted
Microcomputer MN101CF91D	8 Bit Microcomputer	MN101(AM1)	29
Microcontroller MN101C78A	8 Bit Microcontroller	MN101(AM1)	29
Microcomputer MN103SC2A	32 Bit Microcomputer	MN103(AM3)	29
Microcomputer MN103E010H	32 Bit Microcomputer	MN103(AM3)	29
Microcomputer MN102xx19	16 Bit Microcomputer	MN102(AM2)	29
Microcomputer MN1A92070R	MPEG-4 Codec LSI	ARM	29
Microcomputer MN1A7T0200	32 Bit Microcomputer	ARM	29

Fujitsu's Covered Chips [Exhibit G]

Representative Chip Part Number	Part Description	Chip Family (see, e.g., Exhibit K)	Claims Asserted
Accel Array Mega Platform	ASIC	Structured ASIC - AccellArray	29
ASIC Bluetooth IPWare & Cores MB86C00-MBG011	Bluetooth Baseband Processor	IPWare & Cores - Bluetooth	29
CMOS Standard Cell CS91 Series	ASIC	Standard Cell	29
LSI MB87Q1100	Multi-CPU Evaluation Chip	Multi-CPU Evaluation Chip	29
Mobile Media Processor MB86V00/01	Media Processor	Mobile Media Processor	29
WiMAX MB87M3400	System on Chip (SoC)	WiMAX 802.16-2004 SoC	29

D.   Doctrine of Equivalents

TPL contends that each element of the asserted claims is literally present in the accused products listed above. In the alternative, TPL contends that any element not found to be literally present in an accused product is present under the doctrine of equivalents.

III.   INFRINGEMENT OF U.S. PATENT NO. 6,598,148

A.   Infringed Claims

Based on the information presently available to it, TPL asserts that Defendants NEC, Toshiba and MEI infringe directly or indirectly, at least claims 4, 7, 8, and 10 of United States Patent No. 6,598,148 (the "'148 Patent"). All of the NEC, Toshiba and MEI products identified below as "NEC Accused Chips," "Toshiba Accused Chips," and "MEI Accused Chips" infringe claims of the '148 Patent as indicated in the claim charts attached as Exhibits A, B and C.

Discovery only recently commenced, and TPL's preliminary infringement contentions, including all claim charts and figures, are based on information reasonably available to TPL at

this time. The accused devices and instrumentalities listed herein include only those of which

TPL is presently aware. Accordingly, TPL reserves the right to supplement these Preliminary

Infringement Contentions based on information developed in the course of this lawsuit through

discovery or additional factual investigation, in view of the Court's claim construction ruling

respecting the '148 Patent or as other circumstances may require. TPL believes that discovery

will reveal that many additional NEC, Toshiba and MEI Accused Chips and Fujitsu Covered

Chips infringe, or are covered by, the '148 Patent.

B.   Infringement Claim Charts

Attached hereto as Exhibits A, B and C are infringement claim charts showing how each

of the NEC, Toshiba and MEI Accused Chips infringes asserted claims of the '148 Patent.

C.   Infringing Products

The NEC, Toshiba and MEI products identified below by "Chip Part Number" infringe

the asserted claims of the '148 Patent as explained in the claims charts attached hereto as

Exhibits A, B and C.

NEC's Accused Chips [Exhibit A]

Chip Part Number	Part Description	Claims Asserted
Microcontroller uPD70F3017A	Microcontroller	4, 7, 8, 10
Microcontroller uPD70F3032BY	Microcontroller	4, 7, 8, 10

Toshiba's Accused Chips [Exhibit B]

Chip Part Number	Part Description	Claims Asserted
Microcontroller TMP88CU74	Microcontroller	4, 7, 8
Microcontroller TMP88CU77F	Microcontroller	4, 7, 8
MPEG-4 Audiovisual TC35273	MPEG-4 AV Codec	4, 7, 8
MPEG-4 Codec TC35280 (T4)	MPEG-4 Codec	4, 7, 8

MEI's Accused Chips [Exhibit C]

Chip Part Number	Part Description	Claims Asserted
Microcomputer MN101EF01MAF LSI	Microcomputer	4, 7, 8

Exhibits D, E and F contain lists of NEC, Toshiba, and Matsushita end user products which are likely to infringe if further discovery proves that they contain the accused chips listed herein.

D.   Doctrine of Equivalents

TPL contends that each element of the asserted claims is literally present in the accused products listed above. In the alternative, TPL contends that any element not found to be literally present in an accused product is present under the doctrine of equivalents.

DATED: August 14, 2006   Respectfully submitted,

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60844630 v1

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing:

1) **TECHNOLOGY PROPERTIES, LIMITED, INC.'S CORRECTED DISCLOSURE OF ASSERTED CLAIMS AND PRELIMINARY INFRINGEMENT CONTENTIONS**

was served as indicated below on August ___, 2006, on the following attorneys of record:

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