

Exhibit D

Invalidity of Claim 11 of U.S. Pat. No. 9,373,261 based on VACUUM-OUTLET.COM.

U.S. Pat. No. 9,373,261 – Claim 11	ECT’s Infringement Allegations	Prior Art – Vacuum-outlet.com.
<p>An automated notification system, comprising: one or more transceivers designed to communicate data; one or more memories; one or more processors; and computer program code stored in the one or more memories and executed by the one or more processors, the computer program code comprising:</p> <p>code that enables a first party associated with a personal communication device (PCD) to input or select authentication information for use in connection with a subsequent notification communication session involving advance notice of a delivery or pickup of a good or service at a stop location by a mobile thing (MT);</p>	<p>Brownies uses an automated order confirmation and shipment (“automated notification”) to send customers updated shipment information when products are being prepared for picked up [sic] and when products are shipped.</p> <p>Brownies automated notification systems comprises, one or more memories, one or more processors, and computer program code that is stored within one or more memories and executed by one or more processors, Brownies’s computer program code comprises:</p> <p>Brownies online code allows mobile customers to input personalized authentication information to be used at a future time when products are picked up and notifications emails are sent back to the customer.</p> <p>Brownies stores authentication information including a combination of these items; customer billing information such as billing person’s name (“Pete Sirianni”), billing address, billing telephone number and the billing</p>	<p>Vacuum-outlet.com uses an automated order confirmation and shipment (“automated notification”) to send customers updated shipment information when products are being prepared for picked up [sic] and when products are shipped.</p> <p>Vacuum-outlet.com automated notification systems comprises, one or more memories, one or more processors, and computer program code that is stored within one or more memories and executed by one or more processors, Vacuum-outlet.com’s computer program code comprises:</p> <p>Vacuum-outlet.com online code allows mobile customers to input personalized authentication information to be used at a future time when products are picked up and notifications emails are sent back to the customer.</p> <p>Vacuum-outlet.com stores authentication information including a combination of these items; customer billing information such as billing person’s name (“Pete Sirianni”), billing</p>

person's email address ("siriannip07@aol.com") are all used to authenticate the Brownies communications about their product being picked-up and shipped is an email from Brownies [sic]. When customers need to respond and enter account, login or different credit card(s) information they know the actual Brownies website is authentic/safe/trusted by viewing and responding to the message contents.

address, billing telephone number and the billing person's email address ("siriannip07@aol.com") are all used to authenticate the Vacuum-outlet.com communications about their product being picked-up and shipped is an email from Vacuum-outlet.com [sic]. When customers need to respond and enter account, login or different credit card(s) information they know the actual Vacuum-outlet.com website is authentic/safe/trusted by viewing and responding to the message contents.

Bill To:
Customer No: 55823538
Bill To: PETE SIRIANNI
2563 CHERRY HILL LN
HERMITAGE, PA 16148-2989
Phone: (561) 699-8043
Email: SIRIANNIP07@AOL.COM
Order Invoice#:
Order Status:
Entry Date:
Sales ID:
Priority Code:
Pay Method:

-----Payment Information-----

Name on Card: [REDACTED]
Card Type: visa

-----Shipping Information-----

Customer Address:
Name: [REDACTED]
Addr: [REDACTED]
Addr: San Francisco, CA 94117
Addr: USA

Customer Email: [REDACTED]
Customer Phone: [REDACTED]
Day/Night Phone: day

You may check your order status by writing to:
amcart@vacuum-outlet.com
For inquiries, please reference order# 1658-7621-3193

Visit us often at: <http://www.vacuum-outlet.com>

\$1.5209 | **Shop:** brownies.com
Cotton Center Blvd. Suite 100
Phoenix, AZ 85040

Delivery Confirmation

Order Status >

Invalidity of Claim 11 of U.S. Pat. No. 9,373,261 based on VACUUM-OUTLET.COM.

code that causes storage of the authentication information;	Brownies uses code to capture and store customer authentication information when (a.) users set up accounts, (b.) when users modify account information or (c.) when they purchase products from the Brownies website;	Vacuum-outlet.com uses code to capture and store customer authentication information when (a.) users set up accounts, (b.) when users modify account information or (c.) when they purchase products from the Vacuum-outlet.com website;
code that monitors location or travel information in connection with the MT;	Brownies uses computer program code to monitor products when moved from inventory, packaging, labeling, fulfillment, waiting to be picked up, picked up by a carrier, when the product leaves Brownies and is in route to the customer's address;	Vacuum-outlet.com uses computer program code to monitor products when moved from inventory, packaging, labeling, fulfillment, waiting to be picked up, picked up by a carrier, when the product leaves Vacuum-outlet.com and is in route to the customer's address;
code that causes initiation of the notification communication session to the PCD with the one or more transceivers, in advance of arrival of the MT at the stop location, based at least in part upon the location or travel information associated with the MT;	Brownies uses computer program code to determine and initiate notifications to mobile users (personal communication devices) using transceivers such as email and electronic communication systems, when products are designated for shipment, pulled from inventory, at fulfillment, at loading areas, picked up by couriers and before delivery at a customer's address, and before the shipment arrives at the delivery address.	Vacuum-outlet.com uses computer program code to determine and initiate notifications to mobile users (personal communication devices) using transceivers such as email and electronic communication systems, when products are designated for shipment, pulled from inventory, at fulfillment, at loading areas, picked up by couriers and before delivery at a customer's address, and before the shipment arrives at the delivery address.
code that, during the notification communication session, provides the authentication information to the PCD that	Brownies computer program code retrieves the authentication information	Vacuum-outlet.com computer program code retrieves the authentication

<p>indicates to the first party that the notification communication session was initiated by an authorized source; and</p>	<p>including customer billing information such as billing person's name ("Pete Sirianni"), billing address, billing telephone number and the billing person's email address ("siriannip07@aol.com) to confirm/authenticate the shipment confirmation email was initiated by Brownies (the authorized source), and</p> <div data-bbox="800 626 1360 812" style="border: 1px solid black; padding: 5px;"> <p>Bill To:</p> <table border="0"> <tr> <td>Customer No:</td> <td>55823538</td> <td>Order Invoice#:</td> <td></td> </tr> <tr> <td>Bill To:</td> <td>PETE SIRIANNI 2563 CHERRY HILL LN HERMITAGE, PA 16148-2989</td> <td>Order Status:</td> <td></td> </tr> <tr> <td>Phone:</td> <td>(561) 699-8043</td> <td>Entry Date:</td> <td></td> </tr> <tr> <td>Email:</td> <td>SIRIANNIP07@AOL.COM</td> <td>Sales ID:</td> <td></td> </tr> <tr> <td></td> <td></td> <td>Priority Code:</td> <td></td> </tr> <tr> <td></td> <td></td> <td>Pay Method:</td> <td></td> </tr> </table> </div> <p style="text-align: center;">\$1.5209 Shop: brownies.com Cotton Center Blvd. Suite 100 Phoenix, AZ 85040</p> <hr/> <p style="text-align: center;">Delivery Confirmation</p> <div data-bbox="842 1133 1157 1190" style="background-color: #76b82a; color: white; padding: 5px; text-align: center; margin-top: 10px;"> <p>Order Status ></p> </div>	Customer No:	55823538	Order Invoice#:		Bill To:	PETE SIRIANNI 2563 CHERRY HILL LN HERMITAGE, PA 16148-2989	Order Status:		Phone:	(561) 699-8043	Entry Date:		Email:	SIRIANNIP07@AOL.COM	Sales ID:				Priority Code:				Pay Method:		<p>information including customer billing information such as billing person's name ("Pete Sirianni"), billing address, billing telephone number and the billing person's email address ("siriannip07@aol.com) to confirm/authenticate the shipment confirmation email was initiated by Vacuum-outlet.com (the authorized source), and</p> <div data-bbox="1371 654 1919 1230" style="border: 1px solid black; padding: 5px;"> <p style="text-align: center;">-----Payment Information-----</p> <p>Name on Card: [REDACTED] Card Type: visa</p> <p style="text-align: center;">-----Shipping Information-----</p> <p>Customer Address: Name: [REDACTED] Addr: [REDACTED] Addr: San Francisco, CA 94117 Addr: USA</p> <p>Customer Email: [REDACTED] Customer Phone: [REDACTED] Day/Night Phone: day</p> <p style="text-align: center;">- - -</p> <p>You may check your order status by writing to: amcart@vacuum-outlet.com For inquiries, please reference order# 1658-7621-3193</p> <p>Visit us often at: http://www.vacuum-outlet.com</p> </div>
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<p>code that, during the notification communication session, enables the first party to select whether or not to engage in a communication session with a second party</p>	<p>Brownies computer program code sends shipment confirmation emails and embeds links within the notification to</p>	<p>Vacuum-outlet.com computer program code sends shipment confirmation emails and embeds links within the</p>																								

<p>having access to particulars of the pickup or delivery.</p>	<p>allow customers to get account information, edit shipment information, shipment tracking information, to the website and to customer service representatives – for additional information about the product(s).</p> <div data-bbox="800 513 1360 699"><p>Bill To:</p><table><tr><td>Customer No:</td><td>55823538</td><td>Order Invoice#:</td><td>-----Payment Information-----</td></tr><tr><td>Bill To:</td><td>PETE SIRIANNI 2563 CHERRY HILL LN HERMITAGE, PA 16148-2989</td><td>Order Status:</td><td></td></tr><tr><td>Phone:</td><td>(561) 699-8043</td><td>Entry Date:</td><td></td></tr><tr><td>Email:</td><td>SIRIANNIP07@AOL.COM</td><td>Sales ID:</td><td></td></tr><tr><td></td><td></td><td>Priority Code:</td><td></td></tr><tr><td></td><td></td><td>Pay Method:</td><td>-----Shipping Information-----</td></tr></table></div> <p>1.5209 Shop: brownies.com Cotton Center Blvd. Suite 100 Phoenix, AZ 85040</p> <hr/> <p>Delivery Confirmation</p> <div data-bbox="842 1019 1157 1076"><p>Order Status ></p></div>	Customer No:	55823538	Order Invoice#:	-----Payment Information-----	Bill To:	PETE SIRIANNI 2563 CHERRY HILL LN HERMITAGE, PA 16148-2989	Order Status:		Phone:	(561) 699-8043	Entry Date:		Email:	SIRIANNIP07@AOL.COM	Sales ID:				Priority Code:				Pay Method:	-----Shipping Information-----	<p>notification to allow customers to get account information, edit shipment information, shipment tracking information, to the website and to customer service representatives – for additional information about the product(s).</p> <div data-bbox="1373 591 1703 646"><p>Name on Card: [REDACTED] Card Type: visa</p></div> <div data-bbox="1373 721 1703 849"><p>Customer Address: Name: [REDACTED] Addr: [REDACTED] Addr: San Francisco, CA 94117 Addr: USA</p></div> <div data-bbox="1373 878 1822 954"><p>Customer Email: [REDACTED] Customer Phone: [REDACTED] Day/Night Phone: day</p></div> <p>You may check your order status by writing to: amcart@vacuum-outlet.com For inquiries, please reference order# 1658-7621-3193</p> <p>Visit us often at: http://www.vacuum-outlet.com</p>
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From: Vacuum Outlet <amcart@vacuum-outlet.com>
Subject: Vacuum Outlet Order Confirmation 1658-7621-3193
Date: July 15, 2001 at 9:23:00 PM PDT
To: [REDACTED]

This is an automated message acknowledging successful initial processing of your order placed on the World Wide Web.

You may check your order status by writing to:
amcart@vacuum-outlet.com
For inquiries, please reference order# 1658-7621-3193

Visit us often at: <http://www.vacuum-outlet.com>

Order Details:

-----Payment Information-----

Name on Card: [REDACTED]
Card Type: visa

-----Shipping Information-----

Customer Address:
Name: [REDACTED]
Addr: [REDACTED]
Addr: San Francisco, CA 94117
Addr: USA

Customer Email: [REDACTED]
Customer Phone: [REDACTED]
Day/Night Phone: day

-----Order Summary-----

Item Subtotal: \$10.47
Shipping Cost: \$5.00
GRAND TOTAL: \$15.47
NOTE:Customer declared exemption from 0.47 sales tax.

Shipping Method: USPS

-----Special Instructions-----

-----Individual Item Breakdown-----

Item Ref.	Price ea.	Qty.	Description
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ROR-1450 \$3.49 3 Dirt Devil F Bags (3 pk)

-----End of Order-----