**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARENDI S.A.R.L.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 12-1595-LPS
	)	
LG ELECTRONICS, INC.,	)	
LG ELECTRONICS USA, INC. and	)	
LG ELECTRONICS MOBILECOMM U.S.A.,	)	
INC.,	)	
	)	
Defendants.	)	
	)	
ARENDI S.A.R.L.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 12-1596-LPS
	)	
APPLE INC.,	)	
	)	
Defendant.	)	
	)	
ARENDI S.A.R.L.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 12-1597-LPS
	)	
BLACKBERRY LIMITED and	)	
BLACKBERRY CORPORATION,	)	
	)	
Defendants.	)	
	)	

ARENDI S.A.R.L.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 12-1599-LPS
	)	
MICROSOFT MOBILE, INC.,	)	
	)	
Defendants.	)	
	)	
ARENDI S.A.R.L.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 12-1601-LPS
	)	
MOTOROLA MOBILITY LLC	)	
f/k/a MOTOROLA MOBILITY, INC.,	)	
	)	
Defendant.	)	
	)	
ARENDI S.A.R.L.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 12-1602-LPS
	)	
SONY MOBILE COMMUNICATIONS (USA)	)	
INC., f/k/a SONY ERICSSON MOBILE	)	
COMMUNICATIONS (USA) INC.,	)	
SONY CORPORATION and	)	
SONY CORPORATION OF AMERICA,	)	
	)	
Defendants.	)	
	)	
ARENDI S.A.R.L.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 13-919-LPS
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	
	)	

2

ARENDI S.A.R.L.,	)
	)
Plaintiff,	)
	)
v.	)
	)
OATH HOLDINGS INC. and	)
OATH INC.,	)
	)
Defendants.	)

C.A. No. 13-920-LPS

JOINT CLAIM CONSTRUCTION CHART

Pursuant to the Second Amended Stipulated Scheduling Order (Dkt. No. 85 (Case No. 13-919); Dkt. No. 87 (Case No. 12-1595)), Defendants LG Electronics Inc., LG Electronics USA, Inc. and LG Electronics MobileComm U.S.A., Inc.; Blackberry Limited and Blackberry Corporation; Microsoft Mobile, Inc.; Motorola Mobility LLC, f/k/a Motorola Mobility Inc.; Sony Mobile Communications (USA) Inc. f/k/a Sony Ericsson Mobile Communications (USA) Inc., Sony Corporation, and Sony Corporation of America; Google LLC; Apple Inc.; Oath Holdings Inc., and Oath Inc., (collectively, "Defendants") and Plaintiff Arendi S.A.R.L. ("Arendi") have met and conferred in an attempt to narrow their disputes and jointly provide this Joint Claim Construction Chart identifying for the Court the terms and phrases of the claims at issue in   U.S. Patent Nos. 7,917,843 ("the '843 patent"); 8,306,993 ("the '993 patent"); 7,496,854 ("the '854 patent"); and 7,921,356 ("the '356 patent") (collectively, "patents-in-suit") that have been identified for construction. The parties also have attached copies of the above identified patents as well as those portions of the intrinsic record upon which they rely in issue and each party's proposed constructions of the disputed claim term.

The following constructions reflect a narrowing of disputes between the parties to account for the claim construction briefing and hearing limits set forth in the Court's Scheduling Order.

Proposed Claim Constructions

Term/Phrase	Claims	Plaintiff's Proposed Construction	Defendants' Proposed Construction
"document"	All claims	"electronic document containing textual information"	"a word processing or spreadsheet file into which text can be entered"
		Ex. 1 Col. 1, ll. 28-43 Col. 3, ll. 42-48 Col. 4, ll. 12-18 Col. 4, ll. 25-39	('843 Patent, Ex. 1 at Abstract; 1:18-26; 1:28-50; 2:14-39; 3:35-54; 4:25-39; 5:63-6:3, 6:10-35; 6:45-57; 6:66-7:19; 7:30-8:2; 8:12-45; 8:55-65; 9:50-67; 10:1-7; 10:20-27 (and corresponding figures); Figs, 1, 2, 3, 4, 5, 14, 15 (and corresponding text).)[1]
		Ex. 2 Col. 1, ll. 32-39 Col. 4, ll. 1-24 Col. 4, ll. 42-48 Col. 4, ll. 55-5:2 Col. 12, ll. 57-64	('993 Patent, Ex. 2 at 1:20-1:30; 1:32-56; 2:32-49; 4:1-16; 4:55-5:2;6:23-30; 7:27-7:47; 7:58-8:30; 8:40-61; 9:16-32; 11:63-12:13; 12:14-20; 12:38-45 (and corresponding figures); Figs. 1, 2, 3, 4, 5, 14, 15 (and corresponding text).)
		Ex. 3 Col. 1, ll. 28-43 Col. 3, ll. 42-48 Col. 4, ll. 12-18 Col. 4, ll. 25-39	('993 Patent File History, Response After Final Action, 2011-08-16, Ex.6A at p. 26; Response Made in Amendment, 2011-09-09, Ex.6B at pp. 2-3, 21-22.)
		Ex. 4 Col. 1, ll. 31-45 Col. 2, ll. 38-51 Col. 4, ll. 15-21 Col. 4, ll. 28-43	(IPR2014-00452, PO Preliminary

[1] The '843, '854 and '356 Patents all share a common specification, though specific line numberings may differ from patent to patent. To simplify this chart and to avoid potential confusion, where Defendants cite to column and line numbers (and/or figure numbers) in the '843 Patent, Defendants also are effectively citing, are incorporating by reference, and will rely on the equivalent text (and/or figures) in the '854 and '356 Patent specifications. Additionally, any reference or citation to a figure (e.g., Fig. 1) in any patent specification includes the specification text identifying, explaining, characterizing and/or describing that figure, and Defendants may rely on such specification text relating to the identified figure.

Term/Phrase	Claims	Plaintiff's Proposed Construction	Defendants' Proposed Construction
			Response, Ex. 6C at pp. 6, 8-9; Institution Decision, Ex. 6D at p. 12; PO Post-Institution Response, Ex. 6E at pp. 8, 10.) (IPR2014-00450, PO Preliminary Response, Ex. 6F at pp. 21-22.) (IPR2014-00208, PO Preliminary Response, Ex.6G at pp. 1-2; Final Written Decision, Ex. 6H at pp. 2-4.) (IPR2014-00203, PO Preliminary Response, Ex.6I at pp. 1-3, 42)
"computer program"	'843: 1, 17, 19, 23 '854: 93, 98, 101	"independently executable computer application" **Ex .1** Col. 1, ll. 28-42 Col. 1, ll. 56-2:13 Col. 2, ll. 14-23 Col. 3, ll. 35-41 Col. 4, ll. 12-18 Col. 9, ll. 61-67 Col. 10, ll. 1-7 **Ex. 3** Col. 1, ll. 29-43 Col. 1, l. 57 - Col. 2, l. 13 Col. 2, ll. 14-23 Col. 3, ll. 35-41 Col. 4, ll. 12-18 Col. 9, l. 64 – Col. 10, l. 3 Col. 10, ll. 4-10 **Ex. 5A** Final Written Decision, IPR2014-00206 (June 9, 2015)	"a self-contained set of instructions, as opposed to a routine or library, intended to be executed on a computer so as to perform some task" *See* intrinsic evidence cited in Arendi's Supplemental Opening Brief in Support of its Proposed Claim Construction for "Computer Program," (Ex.6J) *Arendi S.A.R.L. v. Microsoft Corp.*, Case No. 09-119, DE 285 (1/21/2011) at pp. 2-4. *See* intrinsic evidence cited in Arendi's Supplemental Answering Brief in Support of its Proposed Claim Construction for "Computer Program," (Ex.6K) *Arendi S.A.R.L. v. Microsoft Corp.*, Case No. 09-119, DE 292 (2.4//2011) at pp. 2-7. ('843 Patent, Ex. 1 at Abstract, References Cited Section, 1:18-26; 1:28-50; 1:53-2:13; 2:14-39; 3:35-41; 9:25-45; 9:50-60 (and

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.

fastcase®
Smarter legal research.