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May 21, 2024

VIA CM/ECF

Honorable Jennifer L. Hall
United States District Court for the District of Delaware
844 North King Street
Wilmington, DE 19801

RE: *Robocast, Inc. v. YouTube, LLC*, C.A. No. 22-304-JLH
Robocast, Inc. v. Netflix, Inc., C.A. No. 22-305-JLH

Dear Judge Hall:

Plaintiff Robocast, Inc. (“Plaintiff”) and Defendants Netflix, Inc. (“Netflix”) and YouTube, LLC and Google LLC (together, “Google”) (collectively, “Defendants”) respectfully submit this joint letter pursuant to the Court’s April 5, 2024 Oral Order (D.I. 242), directing the parties to provide the Court with a joint letter identifying no greater than 10 disputed claim terms to be construed in the above case.

The parties propose the following nine disputed terms for construction at a claim construction hearing to be set by the Court:

- node
- show structure of nodes
- creating [...] a [multidimensional] show structure of nodes
- user
- content ... in an organized arrangement
- interactively variable duration information
- advertisement content
- performing an on-line search
- accessing a ... network-accessible resource

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In addition, Netflix and Google each believes that, in light of the differences in the accused functionalities in the two cases, an additional term requires construction to reach resolution in their respective cases, as set forth below:

- Netflix: plurality of accessible resources
- Google: each of said nodes

Robocast does not agree that any differences in the accused functionalities warrant expansion of the number of terms for construction from the limit of 10 set by the Court's Oral Order. The parties recognize the Court's limit of 10 and defer completely to the Court as to whether and when to construe these proposed tenth terms, but wanted to apprise the Court of the issue as it considers when to construe the disputed claim terms. *Robocast, Inc. v. Netflix, Inc.*, C.A. No. 22-305-JLH, D.I. 149; *Robocast, Inc. v. YouTube, LLC*, C.A. No. 22-304-JLH, D.I. 122.

Should Your Honor have any questions or comments, the undersigned is available at the convenience of this Court.

Respectfully Submitted,

/s/ Stephen B. Brauerman

Stephen B. Brauerman (#4952)

cc: Counsel of Record