UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NETWORK-1 TECHNOLOGIES, INC., Plaintiff, v. GOOGLE LLC and YOUTUBE, LLC, Defendants.	14 Civ. 2396 (PGG) 14 Civ. 9558 (PGG)

AMENDED JOINT CLAIM CONSTRUCTION CHART

Pursuant to Paragraph 10(b) of the Joint Proposed Civil Case Management Plan and Scheduling Order filed on January 17, 2019 (Dkt. No. 137-1),[1] Plaintiff Network-1 Technologies, Inc. and Defendants Google LLC and YouTube, LLC (collectively, "Defendants") submit this Joint Claim Construction Chart for certain limitations of the asserted claims of U.S. Patent Nos. 8,010,988 ("the '988 patent"), 8,205,237 ("the '237 patent"), and 8,904,464 ("the '464 patent").

[1] Citations to the docket correspond to documents filed in Case No. 14 Civ. 2396 (PGG).

I. Agreed Upon Constructions

The parties agree upon the following constructions:

Claim Term	Asserted Claims[2] in which Term Appears	Agreed Construction
"sublinear" [search]	'988 patent: **17** '237 patent: **33**, 34, 35	"A search whose execution time scales with a less than linear relationship to the size of the data set to be searched, assuming computing power is held constant."
"neighbor" "near neighbor"	'988 patent: (**15**), 17 '464 patent: **1**, 8, 10, 16, **18**, 25, 27, 33	"A close, but not necessarily exact or the closest, match of a feature vector, compact electronic representation, or set of extracted features to another, wherein the distance or difference between the two feature vectors, compact electronic representations, or sets of extracted features falls within a defined threshold."
"near neighbor search"	'464 patent: **1**, 8, 10, 16, **18**, 25, 27, 33	"A search using an algorithm designed to identify a close, but not necessarily exact or the closest, match of a feature vector, compact electronic representation, or set of extracted features to another, wherein the distance or difference between the two feature vectors, compact electronic representations, or sets of extracted features falls within a defined threshold."
"approximate nearest neighbor search"	'237 patent: **33**, 34, 35	"A search using an algorithm designed to identify a close, but not necessarily exact or the closest, match of a feature vector, compact electronic representation, or set of extracted features to another, wherein the distance or difference between the two feature vectors, compact electronic representations, or sets of extracted features falls within a defined threshold."
"machine-readable instructions"	'464 patent: **1**, 8, 10, **16**, **18**, 25, 27, **33**	"code or pseudocode that is executed using a computer processor, *i.e.*, that is discernable by a computer processor and dictates steps to be carried out by one or more computer processors"

[2] Bold numbers indicate claims explicitly reciting the claim term. Non-bold numbers indicate claims depending from claims that explicitly recite the claim term. Numbers in parentheses indicate a claim that is not currently asserted recites the claim term, and a claim depending from that non-asserted claim is asserted.

II. Disputed Constructions

The parties propose different constructions for the following terms:

Claim Term	Asserted Claims in which Term Appears	Network-1's Proposed Construction	Defendants' Proposed Construction
"non-exhaustive search" "non-exhaustive . . . search"	'988 patent: (**15**), **17** '464 patent: **1**, 8, 10, 16, **18**, 25, 27, 33	"A search designed to locate a [near] neighbor without comparing to all possible matches (*i.e.*, all records in the reference data set), even if the search does not locate a [near] neighbor."	Indefinite.
"correlation information"	'464 patent: **1**, 8, 10, 16, **18**, 25, 27, 33	Ordinary meaning. Alternatively: "information that associates the first electronic media work with an electronic media work identifier"	Indefinite.
"extracted features"	'988 patent: (**15**), 17 '237 patent: **33**, 34, 35	"Electronic data sampled, calculated, or otherwise derived from a work itself, as opposed to from information added or appended to the work."	"Electronic data derived from a work itself, as opposed to from information added or appended to the work."
"extracting features"	'988 patent: (**15**), 17	"Sampling, calculating, or otherwise deriving electronic data from a work itself, as opposed to from information added or appended to the work."	"Deriving electronic data from a work itself, as opposed to from information added or appended to the work."

Dated: April 30, 2019

Respectfully submitted,

RUSS, AUGUST & KABAT

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