

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

<b>PARTHENON UNIFIED MEMORY</b>	§	<b>Case No. 2:14-cv-690-JRG-RSP</b>
<b>ARCHITECTURE LLC,</b>	§	<b>(Lead)</b>
	§	
<b>Plaintiff,</b>	§	
<b>v.</b>	§	
	§	
<b>HTC CORPORATION and</b>	§	
<b>HTC AMERICA, INC.,</b>	§	
	§	
<b>LG ELECTRONICS, INC. and</b>	§	<b>Case No. 2:14-cv-691-JRG-RSP</b>
<b>LG ELECTRONICS USA, INC.,</b>	§	<b>(Consolidated)</b>
	§	
<b>Defendants.</b>	§	
	§	

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**PLAINTIFF PARTHENON UNIFIED MEMORY ARCHITECTURE LLC'S**  
**OPENING CLAIM CONSTRUCTION BRIEF**

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## I. INTRODUCTION

Plaintiff Parthenon Unified Memory Architecture LLC (“PUMA”) proposes constructions for the terms-in-dispute that are based on both the intrinsic and extrinsic evidence and that are consistent with a previous claim construction order signed by Judge Leonard Davis relating to the asserted patents. In contrast, Defendants HTC and LG propose constructions that improperly import limitations from the specification, add extraneous language not contemplated by the claims, and ignore the inventive features of the patents. PUMA’s proposed constructions more accurately convey the meaning of the terms in dispute.

PUMA has asserted nine patents against the Defendants relating to the implementation of shared memory in a computer system. All nine patents were originally assigned to STMicroelectronics, Inc. (“STMicro”), a semiconductor company based in Texas. STMicro filed the patent applications for U.S. Patent No. 5,812,789 and U.S. Patent No. 6,058,459 on the same day, and the two patents substantially overlap in their specifications, figures, and named inventors. Additionally, each of the ’789 Patent and the ’459 Patent explicitly incorporate by reference the specification of the other. Six additional asserted patents—U.S. Patent Nos. 6,427,194; 7,321,368; 7,542,045; 7,777,753; 8,054,315; and 8,681,164—are continuation applications of the ’459 Patent. Together, those eight patents describe inventive systems and methods for selectively allowing multiple devices, such as a CPU and an audio/video decoder, to access a shared memory. The ninth asserted patent, U.S. Patent No. 5,960,464, describes an inventive memory management system that allows a device that typically requires a large contiguous block of memory, such as a video decoder, to share noncontiguous memory with other devices.

STMicro previously asserted the ’789 Patent in a patent infringement suit against Motorola Inc. in the Eastern District of Texas, Sherman Division. As part of that case, on July

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