

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

**PARTHENON UNIFIED MEMORY
ARCHITECTURE LLC,**

Plaintiff,

v.

APPLE INC.,

Defendant.

§
§
§
§
§
§
§
§
§
§

Case No. 2:15-cv-00621

Jury Trial Requested

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to the Court’s Docket Control Order and P.R. 4-3, Plaintiff Parthenon Unified Memory Architecture LLC (“PUMA”) and Defendant Apple, Inc. (“Apple”) hereby submit their Joint Claim Construction and Prehearing Statement.

I. CONSTRUCTION OF CLAIM TERMS ON WHICH THE PARTIES AGREE

The parties are in agreement on the following terms. Additionally, for the agreed constructions of “bus,” “algorithmically translate the noncontiguous addresses to the contiguous addresses,” and the “arbiter” terms, the parties are in agreement with the Court’s prior constructions of these specific terms and request that the Court incorporate by reference its reasoning for those terms as fully stated in the Court’s claim construction opinions in Case No. 2:14-cv-690 (Dkt. 155), Case No. 2:14-cv-902 (Dkt. 902) and Case No. 2:15-cv-225 (Dkt. 80) in any claim construction opinion issued in the present case.

Term(s)	Agreed Construction
“bus” ’789 patent: claims 1, 13 ’368 patent: claims 1, 5, 7, 13, 19, 20, 23	“a signal line or set of associated signal lines to which a number of devices are coupled and over which information may be transferred between them”

'045 patent: claims 1, 4, 5, 12, 15 '753 patent: claims 1, 7	
“algorithmically translate the noncontiguous addresses to the contiguous addresses” '464 patent: claims 7, 22	“convert the noncontiguous addresses to the contiguous addresses according to at least one mathematical operation”
“display device” '368 patent: claims 1, 7, 13, 14, 20, 21 '045 patent: claims 1, 4-6, 12, 13 '753 patent: claims 1, 7	“screen and its circuitry”
“display adapter” '368 patent: claims 2, 3 '045 patent: claim 2 '753 patent: claim 3	“an adapter that processes images for a display device”
“arbiter” “arbitration circuit” “memory arbiter” “arbiter circuit” '789 patent: claims 1, 19 '368 patent: claims 1, 7, 13, 17, 19, 20, 23 '045 patent: claims 1, 4, 5, 9, 12, 15 '753 patent: claims 1, 7	“circuitry that uses a priority scheme to determine which requesting device will gain access”

II. DISPUTED CLAIM TERMS/PHRASES

The parties' proposed construction for each disputed term or phrase is set forth in Appendix A. PUMA's identification of evidence is set forth in Appendix B and Apple's identification of evidence is set forth in Appendix C.

III. ANTICIPATED LENGTH OF TIME FOR CLAIM CONSTRUCTION HEARING

The Claim Construction Hearing is set to begin at 9:00 a.m. in Marshall, Texas before Judge Payne on April 18, 2016. The parties anticipate that the Claim Construction hearing in this matter will take no more than 3 hours total.

IV. ANTICIPATED WITNESSES AT THE CLAIM CONSTRUCTION HEARING

The parties do not anticipate calling any witnesses at the claim construction hearing.

V. OTHER ISSUES TO BE ADDRESSED AT A PREHEARING CONFERENCE PRIOR TO CLAIM CONSTRUCTION HEARING

At this time, the parties are not aware of any other issues that might be appropriately addressed at a prehearing conference prior to the Claim Construction Hearing.

Dated: February 16, 2016

Respectfully submitted,

/s/ Michael McBride

Demetrios Anaipakos
Texas Bar No. 00793258
danaipakos@azalaw.com

Amir Alavi
Texas Bar No. 00793239
aalavi@azalaw.com

Michael McBride
Texas Bar No. 24065700
mmcbride@azalaw.com

Alisa A. Lipski
Texas Bar No. 24041345
alipski@azalaw.com

Justin Chen
Texas Bar No. 24074204
jchen@azalaw.com

AHMAD, ZAVITSANOS, ANAIPAKOS,
ALAVI & MENSING P.C.

1221 McKinney Street, Suite 3460
Houston, TX 77010
Telephone: 713-655-1101
Facsimile: 713-655-0062

T. John Ward, Jr.
Texas Bar No. 00794818
jw@wsfirm.com

WARD & SMITH LAW FIRM
P.O. Box 1231
Longview, TX 75606-1231
Telephone: 909-757-6400
Facsimile: 909-757-2323

**ATTORNEYS FOR PLAINTIFF
PARTHENON UNIFIED MEMORY
ARCHITECTURE LLC**

/s/ Marc Belloli

Margaret Elizabeth Day
(CA Bar No. 177125)
Admitted to Practice
David L. Alberti (*pro hac vice*)
Marc Belloli (*pro hac vice*)
Nickolas Bohl
FEINBERG DAY ALBERTI &
THOMPSON LP
1600 El Camino Real, Suite 280
Menlo Park, CA 94025
Telephone: (650) 618.4360
Facsimile: (650) 618.4368
eday@feinday.com
dalberti@feinday.com
nbohl@feinday.com
Michael E. Jones (SBN: 10929400)
Patrick C. Clutter (SBN: 2403634)
POTTER MINTON, PC
110 North College, Suite 500
Tyler, Texas 75702
Tel: 903-597-8311
Fax: 903-593-0846
mikejones@potterminton.com
patrickclutter@potterminton.com

**ATTORNEYS FOR DEFENDANT
APPLE, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 16, 2016.

/s/ Michael McBride _____

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.