

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

GROUPCHATTER, LLC,

Plaintiff,

v.

GENERAL ELECTRIC COMPANY,
GE ENERGY MANAGEMENT
SERVICES, INC., and GE GRID
SOLUTIONS, LLC,

Defendants.

CIVIL ACTION FILE

**NO. 1:16-cv-00486-WSD
[LEAD CASE]**

**PLAINTIFF'S PRELIMINARY CLAIM
CONSTRUCTIONS PURSUANT TO
LOCAL PATENT RULE 6.2**

Pursuant to the Court's Docket Control Order and P.R. 6.2, Plaintiff proposes the following preliminary claim constructions and identifies the following extrinsic evidence. Plaintiff reserves the right not to rely upon any identified references listed here and to supplement with additional extrinsic evidence based upon Defendants' proposed constructions and conferences between the parties.

Subject to any agreement of the parties limiting or focusing the subject matter or form of expert or percipient witness testimony presented in connection

with claim construction, Plaintiff may rely upon testimony concerning the level and perspective of one skilled in the art at the time of the inventions, the ordinary meaning of claim terms and words used in the patents, the technology described in the patents-in-suit, operation and function of two-way data networks including without limitation addressing schemes, multicast, broadcast, and unicast communication methods, the relevant technical standards including their purpose, breadth and relevance to the construction issues, and the context of the inventions claimed in the patents-in-suit.

The substance of testimony by GroupChatter witnesses may also include background technical information including the state of the art, problems solved by the claimed subject matter, and technical limitations present at the time of the inventions. GroupChatter may present witness testimony concerning the functionality of two-way ReFLEX networks, machine-to-machine communication networks, command structure, data transmission, and challenges faced in effecting acknowledged two-way communication at the time of the inventions.

October 21, 2016
 Plaintiff's 6.2 Disclosures

Claim Terms that Either Party Requests the Court to Construe			
	Claim Term	Affected Claims	GroupChatter's Proposed Construction Evidence
1	Mobile device	<p>959: 1, 2, 3, 8, 10, 13, 14, 17, 18, 20, 21, 22, 29, 30</p> <p>740: 1, 2, 3, 4, 5, 10</p> <p>207: 1, 2, 3, 8, 9, 11</p> <p>659: 1, 2, 3, 4, 8, 10, 11, 12, 13, 16</p>	<p><i>A two way communication device that moves and establish a connection with the network, within range</i></p> <p>For the 959 Patent asserted claims, "mobile c preamble and is non-limiting.</p> <p><u>Extrinsic Evidence</u></p> <p>Jun-Zhao Sun and Jaakko Sauvola, On Funda of Mobility for Mobile Communications, Ma Media Process. Unit, Infotech Oulu, Finland, <i>available at</i> http://ieeexplore.ieee.org/xpl/login.jsp?tp=&2&url=http%3A%2F%2Fieeexplore.ieee.org%2F22451%2F01047332.pdf%3Farnumber%2F22451%2F01047332.pdf</p> <p>Thomas F. La Porta, Krishan K. Sabnani, Ric Challenges for Nomadic Computing: Mobilit and Wireless, Mobile Networks and Applicat 1996, Vol. 1, Issue 1, pages 3-16, 2002, <i>ava</i></p>

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Claim Terms that Either Party Requests the Court to Construe			
	Claim Term	Affected Claims	GroupChatter's Proposed Construction Evidence
			<p>http://www.cs.bilkent.edu.tr/~korpe/courses/fall2002/papers/challenges-mobile-computin</p> <p><i>Inverness Medical Switzerland GmbH, et al. Biomeditech Corp.</i>, 309 F.3d 1365 (Fed. Cir. movement easier”).</p> <p>U.S. Patent No. 7,936,163.</p> <p>Jaydip Sen, <i>Mobility and Handoff Management Networks</i>, 2010, <i>available at</i> https://arxiv.org/ftp/arxiv/papers/1011/1011.5)</p> <p>Deepneel Majumdar, Pragyam Paramita Das, <i>Mobility based Real Time Communication in Networks</i>, <i>Int'l Journal of Computer Applica</i> 2011, <i>available at</i> http://www.ijcaonline.org/volume17/number (Exhibit 6)</p> <p>WiseGEEK Mobile Node definition, <i>availabl</i></p>

October 21, 2016
 Plaintiff's 6.2 Disclosures

Claim Terms that Either Party Requests the Court to Construe			
	Claim Term	Affected Claims	GroupChatter's Proposed Construction Evidence
			<p>http://www.wisegeek.com/what-is-a-mobile- Shanzhi Chen, Yan Shi, Bo Hu and Ming Ai. Management, Principle, Technology and Appl available at https://books.google.com/books?id=InKADA A11&lpg=PA11&dq=nomadic+mobility+ne &ots=1cRBz6Pip1&sig=UbuH- pF7baFqnqjYiNb8Dy9gCOY&hl=en&sa=X 9laSr6-zPAhVH1WMKHc- HDfgQ6AEIQTAE#v=onepage&q=nomadic network&f=false</p>
2	Assigned primary identifying address/ identifying addresses		<p><i>a specified address used to identify, locate, o with a device on a network</i></p> <p><u>Extrinsic Evidence</u></p> <p>Microsoft Computer Dictionary, 5th ed. (200 "A name or token specifying a particular con</p>

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