

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

PARTHENON UNIFIED MEMORY ARCHITECTURE LLC,	§	Case No. 2:15-cv-00621
	§	
Plaintiff,	§	Jury Trial Requested
v.	§	
	§	
APPLE INC.,	§	
	§	
Defendant.	§	
	§	

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

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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 _____

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