

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

ALACRITECH, INC.,  Plaintiff,  v.  CENTURYLINK COMMUNICATIONS LLC, et al.  Defendants.	Case No. 2:16-cv-693-JRG-RSP  LEAD CASE  JURY TRIAL DEMANDED
ALACRITECH, INC.,  Plaintiff,  v.  WINSTRON CORPORATION, et al.,  Defendants.	Case No. 2:16-cv-692-JRG-RSP  JURY TRIAL DEMANDED  MEMBER CASE
ALACRITECH, INC.,  Plaintiff,  v.  DELL INC.,  Defendant.  INTEL CORPORATION,  Intervenor.	Case No. 2:16-cv-695-RWS-RSP  JURY TRIAL DEMANDED  MEMBER CASE

**JOINT CLAIM CONSTRUCTION AND PRE-HEARING STATEMENT  
PURSUANT TO PATENT RULE 4-3**

Pursuant to Patent Rule 4-3 and the Court's Docket Control Order, Plaintiff Alacritech, Inc. ("Alacritech") and Intervenor and Defendants (collectively, "Defendants") hereby submit this Joint Claim Construction Statement.

**A. CONSTRUCTION OF THOSE CLAIM TERMS, PHRASES, OR CLAUSES ON WHICH THE PARTIES AGREE**

The parties do not presently agree on the constructions of any terms.

**B. EACH PARTY'S PROPOSED CONSTRUCTION OF EACH DISPUTED CLAIM TERM, PHRASE, OR CLAUSE, TOGETHER WITH AN IDENTIFICATION OF INTRINSIC AND OTHER EVIDENCE**

Exhibits A and B, attached hereto, identify the disputed claim terms. Exhibit A contains Alacritech's proposed constructions for each disputed claim term and intrinsic and other evidence in support; Exhibit B contains Defendants' proposed constructions for each disputed claim term and intrinsic and other evidence in support.

**C. THE ANTICIPATED LENGTH OF TIME NECESSARY FOR THE CLAIM CONSTRUCTION HEARING**

The parties anticipate that two hours per side will be sufficient time to present the parties' respective positions.

**D. POSSIBLE WITNESSES AT THE CLAIM CONSTRUCTION HEARING**

The parties do not presently intend to call any witnesses at the Claim Construction Hearing.

**E. OTHER ISSUES WHICH MIGHT APPROPRIATELY BE TAKEN UP AT A PREHEARING CONFERENCE PRIOR TO THE CLAIM CONSTRUCTION HEARING**

The parties are not aware of any other issues that should be taken up at a pre-hearing conference before the Claim Construction Hearing.

Dated: February 21, 2017

Respectfully submitted,

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