



Further, the parties state that they have stipulated to the following constructions for the following claim terms:

- '791 patent, claims 1-3, 6-9, 12, 16, 19, 23-25: the **preambles** are limiting
- "master device time" / "slave device time" / "device time" of a "slave" means "time indicated by a designated clock of the [master/slave] device"

The parties jointly and respectfully request that, if the Court deems it appropriate, the Court include these stipulated constructions in its claim construction order.

The parties respectfully submit the following chart setting forth their proposed constructions and intrinsic evidence for the claim terms proposed for construction.

**Proposed Claim Constructions and Intrinsic Evidence<sup>1,2,3,4</sup>**

<b>Term/Phrase</b>	<b>Patents/Claims</b>	<b>Plaintiff's Proposed Construction and Intrinsic Evidence</b>	<b>Defendants' Proposed Construction and Intrinsic Evidence</b>
<b>"time domain"</b>	'791 patent, claims 1-3, 6-9, 12, 16, 19, 23-25	"the way a device clock tracks time"  '791 patent at 1:35-47, 1:66-68, 2:1-2, 3:27-59, 4:47-5:4, 5:6-35, 6:14-20, 6:51-59, 7:60-8:8, FIGS. 5, 6, 10, claims 1, 16, 23, 26, 27.	"a reference of time"  '791 patent at 1:36-49, 3:27-59, 4:28-33, 4:46-5:60, 6:24-34, 6:51-7:18, FIGS. 1-3, 6-7.

<sup>1</sup> The '252 patent is a continuation of the '791 patent and therefore shares a common specification with the '791 Patent. As such, each citation to disclosure in the '791 or '252 patent specification included in this chart shall be understood to encompass the corresponding disclosure from the other specification.

<sup>2</sup> Citations to a particular figure from the '791 or '252 Patent specification shall be understood to encompass any text referring to or discussing the figure (and vice versa).

<sup>3</sup> The parties reserve the right to rely upon, brief, and/or otherwise utilize any evidence identified by any other party in this JCCC or otherwise relating to the proper construction of these claim terms/phrases, including any language surrounding the cited intrinsic evidence that provides additional context of that passage's meaning.

<sup>4</sup> The parties reserve the right to rely upon any evidence identified by any other party relating to certain claim terms (such as, by way of example only, "time domain") as evidence relating to broader claim phrases that include those claim terms (such as, by way of example only, "determining a master device time domain, a slave device time domain, and a source time domain").

Term/Phrase	Patents/Claims	Plaintiff's Proposed Construction and Intrinsic Evidence	Defendants' Proposed Construction and Intrinsic Evidence
<p><b>“time domain differential”</b></p>	<p>'791 patent, claims 1-3, 6-9, 12, 16, 19</p>	<p>“a difference between time domains”</p> <p>'791 patent at 1:58-61, 3:27-59, 4:47-5:4, 5:5-35, 5:45-52, 7:7-17, FIGS. 2, 5, 7, claims 1, 7, 16, 17, 23, 24.</p>	<p>It is improper to construe this phrase in isolation. <i>See, e.g., Hockerson-Halberstadt, Inc. v. Converse Inc.</i>, 183 F.3d 1369, 1374 (Fed. Cir. 1999) (“Proper claim construction . . . demands interpretation of the entire claim in context, not a single element in isolation.”); <i>see also, e.g., Kyocera Wireless Corp. v. Int'l Trade Comm'n</i>, 545 F.3d 1340, 1347 (Fed. Cir. 2008) (“[The Federal Circuit] does not interpret claim terms in a vacuum, devoid of the context of the claim as a whole.”); <i>W.L. Gore &amp; Assocs., Inc. v. C.R. Bard, Inc.</i>, No. 11-515-LPS-CJB, 2014 WL 3950663, at *4 (D. Del. Aug. 8, 2014).</p> <p><i>See</i> “determining whether a time domain differential exists between the master rendering time, the slave rendering time” and “determining at least one time domain differential between the master rendering time and the slave rendering time between the master device and the one or more slave devices”</p>

Term/Phrase	Patents/Claims	Plaintiff's Proposed Construction and Intrinsic Evidence	Defendants' Proposed Construction and Intrinsic Evidence
<p><b>“master rendering time” / “slave rendering time” / “rendering time” of a “device”</b></p>	<p>’791 patent, claims 1-3, 6-9, 12, 16, 19, 23-25            ’252 patent, claims 1-3, 8, 11, 17</p>	<p>“a content position”            ’791 patent at Abstract, 2:13-61, 5:61-6:40, 7:60-8:59.</p>	<p>“a time measure of the amount of content of a particular presentation that has already been rendered by the [master/slave] device”             ’791 patent at Abstract, 1:19-52, 2:13-61, 3:60-4:8, 7:42-44.</p>

Term/Phrase	Patents/Claims	Plaintiff's Proposed Construction and Intrinsic Evidence	Defendants' Proposed Construction and Intrinsic Evidence
<p><b>“rendering time differential”</b></p>	<p>’252 patent claims 1-3, 8, 11, 17</p>	<p>“a difference between rendering times”</p> <p>’791 patent at 7:60-8:11, FIG. 10.</p>	<p>It is improper to construe this phrase in isolation. <i>See, e.g., Hockerson-Halberstadt, Inc. v. Converse Inc.</i>, 183 F.3d 1369, 1374 (Fed. Cir. 1999) (“Proper claim construction . . . demands interpretation of the entire claim in context, not a single element in isolation.”); <i>see also, e.g., Kyocera Wireless Corp. v. Int’l Trade Comm’n</i>, 545 F.3d 1340, 1347 (Fed. Cir. 2008) (“[The Federal Circuit] does not interpret claim terms in a vacuum, devoid of the context of the claim as a whole.”); <i>W.L. Gore &amp; Assocs., Inc. v. C.R. Bard, Inc.</i>, No. 11-515-LPS-CJB, 2014 WL 3950663, at *4 (D. Del. Aug. 8, 2014).</p> <p><i>See</i> “configured to smooth a rendering time differential” / “smoothing the rendering time differential,” “determining a smoothed rendering time differential,” and “rendering time differential that exists between the master device and the [first] slave device”</p>

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