

THE HONORABLE JAMES L. ROBERT

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

SRC LABS, LLC & SAINT REGIS
MOHAWK TRIBE,

Plaintiffs,

v.

MICROSOFT CORPORATION,

Defendant.

CASE NO. 2:18-cv-00321-JLR

**PLAINTIFFS' PRELIMINARY CLAIM
CONSTRUCTIONS**

JURY TRIAL DEMANDED

Per Local Patent Rule 131, attached as **Exhibit A** are Plaintiffs' preliminary proposed constructions for each claim term, phrase, or clause that the parties have identified for claim construction purposes. Also included in Exhibit A are Plaintiffs' preliminary identification of extrinsic evidence. Plaintiffs' expressly reserve the right to modify or amend their proposed construction and add extrinsic evidence based on (1) Microsoft's proposed construction, (2) the parties meet and confer that is intended to narrow the list of terms for construction, or (3) after the exchange of expert reports (including rebuttal expert reports) on Markman issues.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2018, *Plaintiffs' Preliminary Claim Constructions* was served upon all counsel of record via electronic mail.

Dated: August 17, 2018

/s/ Christopher L. Evans

Christopher L. Evans

Exhibit A

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A. '152 Patent /110 Patent

| Claim # | Claim Term | Proposed Construction | Evidence |
|-------------------------------------------|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| '152 patent claims 1, 3, 11 | memory bank | physical locations viewed by the data processor as part of the memory subsystem having a range of memory addresses that may be accessed using only memory access methods | Intrinsic: '152 patent, Fig. 1, Fig. 3, 2:15-18, 3:10-17, 3:47-67, 4:1-6 |
| '110 patent claims 1, 3, 11 | | | '110 patent, Fig. 1, Fig. 3, 2:23-25, 3:17-23, 3:54-4:13 '152 patent file history: SRC00002102-2103 Extrinsic: U.S. Patent No. 5,367,494 SRC00005005-5008 SRC00004583-4587 SRC00034244-34251 SRC00034385-34392 SRC00034352-34360 |
| '152 patent claims 1-5, 7, 11, 12, 15, 21 | plurality of memory algorithm processors | reconfigurable hardware elements, such as a field programmable gate array | Expert testimony from Jon Huppenthal, Tarek El-Ghazawi, and/or Houman Homayoun concerning the terms meaning. Intrinsic: '152 patent, Abstract, Fig. 3, 1:52-59, 7:7-9, 8:42-45 '152 patent file history: SRC00002103-104 |

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