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

| UNILOC USA, INC., UNILOC | |
|-----------------------------------|--|
| LUXEMBOURG, S.A., and UNILOC 2017 | Civil Action No. 2:18-cv-00042 (JRG-RSP) |
| LLC, | |
| | |
| Plaintiffs, | |
| | |
| V. | |
| GANGURAG ELEGERONAGO ANGERICA |) |
| SAMSUNG ELECTRONICS AMERICA, |) |
| INC. and SAMSUNG ELECTRONICS CO. | |
| LTD., | |
| | |
| Defendants. | |

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Under P.R. 4-3 and the Court's Docket Control Order, Plaintiffs Uniloc USA, Inc., Uniloc Luxembourg, S.A., and Uniloc 2017 LLC (together, "Uniloc") and Defendants Samsung Electronics America, Inc. and Samsung Electronics Co. Ltd. (together, "Samsung") submit the parties' Joint Claim Construction and Prehearing Statement.

I. P.R. 4-3(a): AGREED CLAIM CONSTRUCTIONS

There is one patent in suit, U.S. Patent No. 6,868,079 (the "'079 patent"). The parties have not reached an agreement as to the construction of any claim terms/phrases.

II. P.R. 4-3(b): DISPUTED CLAIM CONSTRUCTIONS

The parties' proposed constructions of disputed claim terms, phrases, or clauses are reflected in the attached Exhibits A, B, and C, as listed below.

Exhibit A contains the parties' respective positions concerning the disputed claim terms, phrases, and clauses.

Exhibit B contains Uniloc's identification of intrinsic and extrinsic evidence supporting its proposed constructions.



Exhibit C contains Samsung's identification of intrinsic and extrinsic evidence supporting its proposed constructions.

Either party may rely on any intrinsic and extrinsic evidence identified by the other party.

The parties may continue to attempt to narrow their claim construction disputes. The parties may seek to change their positions, either by agreement or leave of Court. The parties will evaluate any proposal to change position, if and when the proposal is made.

III. P.R. 4-3(c): LENGTH OF CLAIM CONSTRUCTION HEARING

Uniloc and Samsung anticipate the claim construction hearing will take three hours. This would allow each side one and a half hours to argue the disputed terms, phrases, and clauses.

IV. P.R. 4-3(d): LIVE WITNESS TESTIMONY

The parties do not expect to present live witness testimony.

V. P.R. 4-3(e): OTHER ISSUES

The parties do not currently have any issues that need to be taken up with the Court at a prehearing conference. Should any outstanding issues arise, they will be addressed in the briefing.



Date: December 4, 2018 Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record via email on December 4, 2018.

/s/ Aaron S. Jacobs

