

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

UNILOC 2017 LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 2:18-cv-00502-JRG-RSP

JURY TRIAL DEMANDED

DEFENDANT GOOGLE LLC'S CLAIM TERM DISCLOSURES

Pursuant to Patent Rule 4-2 and Docket Control Order (D.I. 39), Defendant, Google LLC, submits its preliminary claim constructions below. Defendant bases these constructions upon its current knowledge, understanding, and belief as to the facts and information as of this date. Defendant reserves the right to modify this list of terms and constructions as claim construction proceeds and in response to proposed constructions by Uniloc 2017 LLC ("Uniloc"), any changes to Uniloc's infringement allegations, or any new information learned through discovery.

Term	Proposed Construction	Extrinsic Evidence
web page/ webpage	html file identified by a web address that is sent by a web server	Random House Concise Dictionary of Science & Computers © 2004 "Web page" in computing, a hypertext document on the World Wide Web The Penguin Concise Dictionary of Computing © 2003 "Web page" The basic unit of information published on the World Wide Web. It consists of a document (perhaps including multimedia content such as images, video clips and sounds) that is encoded in HTML and stored on a computer running a web server, so that it can viewed remotely via the Internet using

		<p>a web browser. The Hypertext Transfer Protocol (HTTP) that lies at the heart of the web works by requesting a single web page at a time, so a new page is requested every time the user clicks on a link. Beyond the limited formatting features supported by HTML (variable type sizes and colours, tables, etc) many more functions (such as database searches, calculations, or complex graphical animations) can be embedded into web pages by creating links to external programs, using various methods including CGI scripts, JAVA applets, and ACTIVEX objects.</p> <p>The Authoritative Dictionary of IEEE Standards Terms, 7th Ed. © 2000 “Web page” A digital multimedia object as delivered to a client system. A web page may be generated dynamically from the server side and may incorporate applets or other elements active on either the client or server side.</p> <p>Oxford Dictionary of Computing, 6th Ed. © 2008, “Web Page” A *hypertext document on the *world wide web.</p> <p>Oxford Dictionary of Computing, 6th Ed. © 2008, “Hypertext.” A generic term covering a number of techniques used to create and view multidimensional documents, which may be entered at many points and which may be browsed in any order by interactively choosing words or key phrases as search parameters for the next text image to be viewed (<i>see</i> HOT LINK). Generally a *wimp style interface is used and tools are provided to help structure the text, create indexes of the text of a document, and to cross-reference between documents. The technique is related to full-text database systems. Hypertext systems provide facilities for windowing viewed text, selecting next view by mouse/keyboard marking of text</p>
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		<p>fragments, searching the text database or indexes, and displaying the new text. <i>See also</i> HYPERMEDIA.</p> <p>Oxford Dictionary of Computing, 6th Ed. © 2008, “World Wide Web” (Web, WWW, W3, W3) A distributed information service that was developed at CERN, the European Laboratory for Particle Physics, Geneva, in the early 1990’s. The Web is a large-scale distributed *hypermedia system that is based on cooperating *servers attached to a network, usually the *Internet, and allows access to “documents” containing “links”. It is accessed using a workstation that is connected to the network and is running a suitable utility program, usually a web browser. Within the Web, documents are presented in hypertext mark-up language (*HTML), and may consist of textual material or a number of other forms, such as graphics, still or moving video images, or audio clips. Within a document there will be material to be displayed and usually one or more links, which in a text document appear as highlighted words or phrases, or as icons. The links hold embedded pointers to other documents located elsewhere on the Web by the use of a *URL. A URL contains information specifying the network protocols to be used, the network address of the server holding the document, and the local index entry for that document. Activating a link, typically by positioning the mouse pointer over the highlighted text and clicking, will cause the workstation to connect via the network to the corresponding server, load the document and the means of presenting the document, and display the document. Browsers also allow the workstation to download programs and other files, either for immediate execution or to be saved for future use. Such files are a major source of *malware.</p>
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		<p>Newton Telecom Dictionary 24th Edition © 2008, “Web Page” An HTML document on the Web, usually one of many that together make up a Web site.</p> <p>Testimony of Dr. Henry Houh. Dr. Houh may provide testimony or a written declaration regarding how a person of ordinary skill in the art would understand the term “web page/webpage.”</p>
<p>wherein each provided web page causes</p> <p>[wherein each provided web page causes corresponding digital media presentation data to be streamed]</p>	<p>wherein each provided html file includes and executes the instructions for the¹</p> <p>[wherein each provided html file includes and executes the instructions to stream the corresponding digital media presentation data]</p>	<p>Random House Concise Dictionary of Science & Computers © 2004 “Web page” in computing, a hypertext document on the World Wide Web</p> <p>The Penguin Concise Dictionary of Computing © 2003 “Web page” The basic unit of information published on the World Wide Web. It consists of a document (perhaps including multimedia content such as images, video clips and sounds) that is encoded in HTML and stored on a computer running a web server, so that it can viewed remotely via the Internet using a web browser. The Hypertext Transfer Protocol (HTTP) that lies at the heart of the web works by requesting a single web page at a time, so a new page is requested every time the user clicks on a link. Beyond the limited formatting features supported by HTMP (variable type sizes and colours, tables, etc) many more functions (such as database searches, calculations, or complex graphical animations) can be embedded into web pages by creating links to external programs, using various methods including CGI scripts, JAVA applets, and ACTIVEX objects.</p> <p>The Authoritative Dictionary of IEEE Standards Terms, 7th Ed. © 2000 “Web page” A digital multimedia object as delivered to a client system. A web page</p>

¹ Accounts for antecedent basis

		<p>may be generated dynamically from the server side and may incorporate applets or other elements active on either the client or server side.</p> <p>Oxford Dictionary of Computing, 6th Ed. © 2008, “Web Page” A *hypertext document on the *world wide web.</p> <p>Oxford Dictionary of Computing, 6th Ed. © 2008, “Hypertext.” A generic term covering a number of techniques used to create and view multidimensional documents, which may be entered at many points and which may be browsed in any order by interactively choosing words or key phrases as search parameters for the next text image to be viewed (<i>see</i> HOT LINK). Generally a *wimp style interface is used and tools are provided to help structure the text, create indexes of the text of a document, and to cross-reference between documents. The technique is related to full-text database systems. Hypertext systems provide facilities for windowing viewed text, selecting next view by mouse/keyboard marking of text fragments, searching the text database or indexes, and displaying the new text. <i>See also</i> HYPERMEDIA.</p> <p>Oxford Dictionary of Computing, 6th Ed. © 2008, “World Wide Web” (Web, WWW, W3, W3) A distributed information service that was developed at CERN, the European Laboratory for Particle Physics, Geneva, in the early 1990’s. The Web is a large-scale distributed *hypermedia system that is based on cooperating *servers attached to a network, usually the *Internet, and allows access to “documents” containing “links”. It is accessed using a workstation that is connected to the network and is running a suitable utility program, usually a web browser. Within the Web, documents are</p>
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