IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

SYNKLOUD TECHNOLOGIES, LLC,
 	
      Plaintiffs,
 	
  vs.
 	
ADOBE, INC.,
 	
      Defendant.
	C.A. No. 6:19-cv-00527-ADA
	
	JURY TRIAL DEMANDED

DEFENDANT ADOBE, INC.'S DISCLOSURE OF PROPOSED CONSTRUCTIONS

Pursuant to this Court's Order Governing Proceedings, Defendant Adobe Inc. ("Adobe") discloses its Preliminary Proposed Claim Constructions as follows:

Adobe's preliminary proposed claim constructions are attached as Exhibit A.

Adobe reserves the right to amend these preliminary constructions as the parties proceed with the meet and confer process, claim construction briefing, potential claim construction discovery, and the preparation of a Joint Claim Construction Statement. Adobe also reserves the right to add to or subtract from the list of proposed claim terms as part of this process. The following terms and preliminary constructions may not be used in any way in any subsequent claim construction briefing or argument in this case. Nothing herein should be construed as an admission that Adobe accepts or endorses any construction impliedly or expressly adopted in Plaintiff's infringement contentions. In addition, by proposing the below constructions, Adobe makes no admission that any of the claims of the patents-in-suit are valid and/or infringed, both of which Adobe expressly denies.

Notwithstanding its submission of these proposed constructions, Adobe reserves the right

to assert defenses under 35 U.S.C. §112 relating to the scope and meaning of the claim terms, including defenses regarding the indefiniteness, lack of written description, or non-enablement of certain claim language. Adobe further reserves the right to assert that any proposed constructions raised by the Plaintiff results in the claims being indefinite, lack a sufficient written description, or are not enabled under 35 U.S.C. §112.

Dated: May 15, 2020   Respectfully submitted,

                                                             /s/ Eugene Y. Mar

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 15th day of May 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through via electronic mail.

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/s/ Ashleigh Nickerson
Ashleigh Nickerson

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EXHIBIT A

	Claim Term	Asserted Patent	Proposed C
1.	"a server"	US 8,606,880 US 8,856,195 US 8,868,690 US 9,219,780 US 9,239,686 US 10,015,254	"one server
2.	"wireless device"	US 8,606,880 US 8,856,195 US 8,868,690 US 9,219,780 US 9,239,686 US 10,015,254	"a cell phone, PDA, or laptop, desktop, or
3.	"allocate […] a storage space of a predefined capacity"	US 8,606,880 US 8,856,195	"allocate, not simply r size of real storage s

		US 8,868,690	
	"allocating […] a first one of the storage spaces of a predefined capacity" "configured with a storage space of a predefined capacity allocated"	US 9,239,686	"allocating, not simply one of the defined size on the s "configured with a storage space on the simply re
4.	"the storing of the data including to download a file from a remote server into the first one of the storage spaces" "the storing of said data including to download a file from a remote server across a network into the first one of the storage spaces"	US 9,219,780 US 9,239,686 US 10,015,254	"the storing of the download a file from a first one of the stora ability to download w the wireles "the storing of said download a file from a

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