

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

SYNKLOUD TECHNOLOGIES, LLC,

PLAINTIFF,

v.

ADOBE, INC.,

DEFENDANT.

Civil Action No. 6:19-cv-00527-ADA

JURY TRIAL DEMANDED

**PLAINTIFF SYNKLOUD TECHNOLOGIES, LLC’S
REVISED CLAIM CONSTRUCTION CHART**

Pursuant to the CMC Order, Plaintiff SynKloud Technologies, LLC (“SynKloud” or “Plaintiff”) hereby submits this revised proposed claim construction chart in connection with disputed terms in the Patents-in-Suit. SynKloud does not contend that any claim terms of the asserted claims require construction by the Court. The constructions proposed herein are in response to the disputed claim construction terms proposed by Defendant. Plaintiff reserves the right to revise it further.

No.	Patent No.	Claim Nos.	Term	Plaintiff Proposed Construction
1	8,606,880	2, 11	[allocating/allocate] [...] a [first one of the] storage space[s] of a predefined capacity configured with a storage space of a predefined capacity allocated	[reserving/reserve] [...] a [first one of the] storage space[s] of a capacity defined in advance organized a storage space of a capacity defined in advance
	8,856,195	15,		
	8,868,690	1, 9, 10, 14, 16		
	9,239,686	1,12		

No.	Patent No.	Claim Nos.	Term	Plaintiff Proposed Construction
2	9,219,780	9, 10	download[ing] [a/the] file [from a remote server] [across a network] into the first one of the storage spaces	Plain and ordinary meaning
	9,239,686	1, 2, 13		
	10,015,254	9		
3	9,219,780	9	the storing of the data including to download a file from a remote server into the first one of the storage spaces	Plain and ordinary meaning
4	9,239,686	1, 13	download a file from a remote server across a network into the first one of the storage spaces	Plain and ordinary meaning
5	9,239,686	1	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	Plain and ordinary meaning
6	10,015,254	9	downloading a file from a remote server across a network into the first one of the storage spaces	Plain and ordinary meaning
7	10,015,254	9	the storing data further comprises program instructions for the server downloading a file from a remote server across a network into the first one of the storage spaces	Plain and ordinary meaning
8	8,868,690	1, 10, 16	[storing/store] ...or [retrieving/retrieve]	Plain and ordinary meaning
	9,219,780	9, 15		
	9,239,686	1, 4, 12, 16		
	10,015,254	9, 15		

No.	Patent No.	Claim Nos.	Term	Plaintiff Proposed Construction
9	8,606,880	2, 11	a server	One or more servers
	8,856,195	15		
	8,868,690	1, 10, 16		
	9,219,780	9		
	9,239,686	1, 12		
	10,015,254	9		
10	8,606,880	2, 7, 8, 10, 11, 12, 13, 14, 16, 17	wireless device	Plain and ordinary meaning including a laptop, desktop or server computer
	8,856,195	15, 16, 17, 18, 19, 20		
	8,868,690	1, 2, 4, 5, 6, 8, 9, 10, 11, 12, 14, 16, 17, 19, 20		
	9,219,780	9, 10, 11, 12, 13, 14		
	9,239,686	1, 2, 5, 6, 7, 8, 9, 10, 12, 13, 14, 15, 17, 20		
	10,015,254	9, 10, 11, 12, 14, 15		

Dated: June 12, 2020

Local Counsel:

Kevin J. Terrazas (SBN 24060708)
kterrazas@clevelandterrazas.com
CLEVELAND TERRAZAS PLLC
4611 Bee Cave Road, Suite 306B
Austin, TX 78746
Telephone: (512) 680-3257

Of Counsel:

John Lord (*Pro Hac Vice*)
jlord@onellp.com
ONE LLP
9301 Wilshire Blvd.
Penthouse Suite
Beverly Hills, CA 90210
Telephone: (310) 866-5157
Facsimile: (310) 943-2085

Respectfully,

/s/ Deepali Brahmbhatt

Deepali Brahmbhatt (*Pro Hac Vice*)
dbrahmbhatt@onellp.com
ONE LLP
4000 MacArthur Blvd.
East Tower, Suite 500
Newport Beach, CA 92660
Telephone: (949) 502-2870
Facsimile: (949) 258-5081

*Attorneys for Plaintiff
SynKloud Technologies, LLC*

CERTIFICATE OF SERVICE

The undersigned certifies that on June 12, 2020 all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via electronic mail.

/s/ Deepali Brahmbhatt

Deepali Brahmbhatt