

**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

Deron Dacus (Texas Bar No. 00790553)  
The Dacus Firm, P.C.  
821 Ese Loop 323, Suite 430  
Tyler, TX 75701  
Tel.: (903) 705-1117  
Fax: (903) 581-2543  
E-mail: ddacus@dacusfirm.com

Eugene Y. Mar (admitted *pro hac vice*)  
emar@fbm.com  
Sushila Chanana (admitted *pro hac vice*)  
schanana@fbm.com  
Winston Liaw (admitted *pro hac vice*)  
wliaw@fbm.com  
FARELLA BRAUN + MARTEL LLP  
235 Montgomery Street, 17th Floor  
San Francisco, CA 94104  
Telephone: (415) 954-4400  
Facsimile: (415) 954-4480

Attorneys for Defendant Adobe Inc.

**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.

/s/ Ashleigh Nickerson  
Ashleigh Nickerson

**EXHIBIT A**

	<b>Claim Term</b>	<b>Asserted Patent</b>	<b>Proposed C</b>
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

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

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