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

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

v.

ADOBE, INC.,

DEFENDANT.

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.

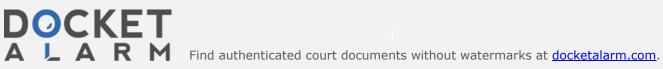
No.	Patent No.	Claim Nos.	Term	Plaintiff Proposed Construction
1	8,606,880	2, 11	[allocating/allocate]	[reserving/reserve] [] a [first
	8,856,195	15,	[] a [first one of the]	one of the] storage space[s] of a
	8,868,690	1, 9, 10, 14,	storage space[s] of a	capacity defined in advance
		16	predefined capacity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



No.	Patent No.	Claim Nos.	Term	Plaintiff Proposed Construction
2	9,219,780 9,239,686 10,015,254	9, 10 1, 2, 13 9	download[ing] [a/the] file [from a remote server] [across a network] into the first one of the storage spaces	Plain and ordinary meaning
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 9,219,780 9,239,686 10,015,254	1, 10, 16 9, 15 1, 4, 12, 16 9, 15	[storing/store]or [retrieving/retrieve]	Plain and ordinary meaning



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,	wireless device	Plain and ordinary meaning
		11, 12, 13,		including a laptop, desktop or
		14, 16, 17		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) ilord@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

