THE HONORABLE JAMES L. ROBART

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SRC LABS, LLC & SAINT REGIS MOHAWK TRIBE,
 	
  Plaintiffs,
 	
  v.
 	
AMAZON WEB SERVICES, INC., AMAZON.COM, INC., & VADATA INC.,
 	
  Defendant.
	CASE NO. 2:18-cv-00317-JLR
	
	PLAINTIFFS' OPENING CLAIM CONSTRUCTION BRIEF
	
	ORAL ARGUMENT REQUESTED
	
	JURY TRIAL DEMANDED
	
	DUE DATE:
	November 16, 2018

PLAINTIFFS' OPENING
CLAIM CONSTRUCTION BRIEF
CASE NO. 2:18-CV-317-JLR

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I. INTRODUCTION

Plaintiffs have proposed claim constructions for the disputed terms of U.S. Patent Nos. 7,225,324 (the "'324 Patent"), 7,620,800 (the "'800 Patent"), 9,153,311 (the "'311 Patent"), and 7,149,867 (the "'867 Patent") and, collectively with the '324 Patent, the '800 Patent, and the '311 Patent, the "patents-in-suit") that are fully supported by the intrinsic and extrinsic evidence. By contrast, Amazon has proposed constructions that do not comport with either the intrinsic or extrinsic record and are, in some cases, contradicted by positions Amazon has advanced in its petition for *inter partes* review of the '867 patent.

II. TECHNICAL BACKGROUND

A. Conventional Computer Architecture.

Conventional computers utilize general-purpose processors from Intel or AMD and employ a Von Neumann architecture. In a conventional computer, "hardware is fixed and cannot be changed after manufacturing."[1] In Von Neumann machines both the "software program and the data to operate on reside in the main memory and therefore the processor is connected to the main memory through bus lines that include [a] data bus and address bus."[2] To execute a software program, the processor "goes through a fixed routine of steps":[3]

> 1. **Instruction Fetch** - read the instruction whose address is specified by the program counter into the designated processor internal register, and advance the program counter to point to the next instruction
>
> 2. **Instruction Decode** - Decipher the work needed by the instruction

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[1] Declaration of Christopher L. Evans in support of Plaintiffs' Opening Claim Construction Brief (hereinafter "Evans Decl."), Ex. 18: Decl. of Dr. El-Ghazawi at ¶ 9.
[2] *Id.*
[3] *Id.*

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