

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ANCORA TECHNOLOGIES, INC.,

Plaintiff,

v.

SONY MOBILE COMMUNICATIONS
AB, SONY MOBILE
COMMUNICATIONS (USA) INC.,
AND SONY MOBILE
COMMUNICATIONS, INC.,

Defendants.

C.A. No. 19-1703 (CFC)

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION CHART

Pursuant to the Court’s September 16, 2020 Scheduling Order (D.I. 24), Plaintiff Ancora Technologies, Inc. (“Ancora”) and Defendants Sony Mobile Communications AB, Sony Mobile Communications (USA) Inc., and Sony Mobile Communications, Inc. (collectively “Sony”) submit this Joint Claim Construction Chart.

Attached hereto as Exhibit A is a chart identifying the parties’ proposed agreed to and disputed constructions and citations to the intrinsic evidence in support of their respective constructions of certain terms of the asserted patent, U.S. Patent No. 6,411,941. The parties reserve the right to rely on additional intrinsic evidence to the extent it is necessary to provide additional context or to rebut arguments made

by other parties during the claim construction briefing. The parties reserve the right to rely on any intrinsic evidence identified by any other party, and also reserve the right to rely on extrinsic evidence. The parties reserve the right to update and/or supplement their proposed claim constructions with the Markman briefing in this case. Any citation to intrinsic evidence provided by the parties in support of their proposed claim constructions is intended as exemplary. Any additional evidence or reference within or encompassed by a particular citation is deemed incorporated by reference (e.g., references to a figure are incorporated by reference). Cited passages are intended to include all figures referenced therein whether referenced or not.

Attached hereto as Exhibit B is a text-searchable pdf of U.S. Patent No. 6,411,941.

Dated: April 6, 2021

SMITH, KATZENSTEIN &
JENKINS LLP

/s/ Eve H. Ormerod
Neal C. Belgam (No. 2721)
Eve H. Ormerod (No. 5369)
1000 N. West Street, Suite 1501
Wilmington, DE 19801
(302) 652-8400
nbelgam@skjlaw.com
eormerod@skjlaw.com

*Attorneys for Plaintiff
Ancora Technologies, Inc.*

MORRIS, NICHOLS, ARSHT &
TUNNELL LLP

/s/ Rodger D. Smith II
Jack B. Blumenfeld (No. 1014)
Rodger D. Smith II (No. 3778)
Michelle Streifthau-Livizos (No. 6584)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
rsmith@morrisnichols.com
mstreifthau-livizos@morrisnichols.com

Attorneys for Defendants

OF COUNSEL:

BROOKS KUSHMAN P.C.
John P. Rondini
Mark A Cantor
John S. LeRoy
Marc Lorelli
1000 Town Center, 22nd Floor
Southfield, MI 48075-1238
(248) 358-4400
jrondini@brookskushman.com
mcantor@brookskushman.com
jleroy@brookskushman.com
mlorelli@brookskushman.com

OF COUNSEL:

Gregory S. Gewirtz
Jonathan A. David
LERNER DAVID LITTENBERG
KRUMHOLZ & MENTLIK, LLP
20 Commerce Drive
Cranford, NJ 07016
(908) 654-5000
ggewirtz@lernerdavid.com
j david@lernerdavid.com

EXHIBIT A

JOINT CLAIM CONSTRUCTION CHART**I. Agreed To Terms of U.S. Pat. No. 6,411,941**

Claim Term	Agreed To Construction
BIOS	An acronym for Basic Input/Output System. It is the set of essential startup operations that run when a computer is turned on, which test hardware, starts the operating system, and supports the transfer of data among hardware devices.

II. Disputed Terms of U.S. Pat. No. 6,411,941

Claim Term	Plaintiff's Proposed Construction + Supporting Intrinsic Evidence	Defendants' Proposed Construction + Supporting Intrinsic Evidence
Preamble (“A method of restricting software operation within a license for use with a computer including an erasable, non-volatile memory area of a BIOS of the computer, and a volatile memory area”)	Preamble is not limiting, but Plaintiff agrees that the method is limited to use with “a computer including an erasable, non-volatile memory area of a BIOS of the computer, and a volatile memory area.”	Entire preamble is limiting '941 Patent: Claims 1, 10, 18; Figs. 1, 2; Title; Abstract; 1:6-8; 1:11-19; 1:39-43; 2:10-26; 2:62-3:3; 4:55-59; 5:58-65; 6:40-52 '941 Patent Prosecution History: 12/20/00 Office Action, p. 2-4, 8; 5/21/01 Amendment, p. 5, 9-10; 6/22/01 Office Action, p. 6, 8; 1/15/02 Office Action, p. 4-5; 3/28/02 Notice of Allowance, p. 3

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.