

**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

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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

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