

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Vervain, LLC

Plaintiff,

v.

Micron Technology, Inc.;
Micron Semiconductor Products, Inc.; and
Micron Technology Texas, LLC

Defendants.

Civil Action No. 6:21-cv-487-ADA

Vervain, LLC

Plaintiff,

v.

Western Digital Corporation;
Western Digital Technologies Inc.; and
HGST, Inc.

Defendants.

Civil Action No. 6:21-cv-488-ADA

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TABLE OF EXHIBITS

Exhibit	Description
25	U.S. Patent Application Publication No. 2009/0172267 (“Oribe”)
26	U.S. Patent Application Publication No. 2010/0172179 (“Gorobets”)
27	U.S. Patent Application Publication No. 2008/0181000 (“Lasser”)
28	U.S. Patent Application Publication No. 2009/0268513 (“De Ambroggi”)
29	U.S. Patent Application Publication No. 2011/0271043 (“Segal”)
30	Arpaci-Dusseau, Operating Systems: Three Easy Pieces, chapter 43 (2013), available at: http://web.archive.org/web/20131013025741/https://pages.cs.wisc.edu/~remzi/OSTEP/file-integrity.pdf

DISPUTED CLAIM CONSTRUCTIONS (PLAIN MEANING TERMS)

#	Claim(s)	Terms	Vervain	Micron	WD ¹
1	298:1, 5 385:1, 5 240:1, 6 300:1, 3, 4, 7, 12	SLC non-volatile memory SLC nonvolatile memory	Plain and ordinary meaning, where the plain and ordinary meaning is “nonvolatile memory that stores one bit of information per cell”		non-volatile memory where each cell is capable of storing no more than one bit of information per cell
2	298:1, 4 385:1, 4 240:1, 6 300:1, 3, 4, 12	MLC non-volatile memory MLC nonvolatile memory	Plain and ordinary meaning, where the plain and ordinary meaning is “nonvolatile memory that stores multiple bits of information per cell”		non-volatile memory where each cell is capable of storing multiple bits of information per cell
3	298:1 385:1 240:1, 6 300:1, 7, 12	data integrity test	Plain and ordinary meaning	<i>Current proposal:</i> “testing data for errors after the data has been written to flash” <i>Former proposal:</i> Plain and ordinary meaning, which is “a test conducted on data after it has been written to flash to ensure that the data was written correctly”	
4	300:1, 12	comparing the stored data to the retained data in the random access volatile memory	Plain and ordinary meaning	comparing the data obtained by reading the nonvolatile memory space to the data retained as part of a Write access operation, wherein both sets of the data are in the same random access volatile memory	
5	300:1, 12	to achieve enhanced endurance	Plain and ordinary meaning	Plain and ordinary meaning, which is “to achieve endurance (i.e., lifetime) superior to that of the MLC nonvolatile memory element	

¹ All 10 terms were identified by Defendants. Terms 1-2, 6, and 9 were identified by Western Digital (WD), and Micron takes no position. Terms 3, 5, and 10 were identified by Micron, and WD takes no position. Terms 4 and 7-8 were identified by Micron and WD.

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