

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

XR COMMUNICATIONS, LLC, dba VIVATO  
TECHNOLOGIES,

Plaintiff,

v.

AMAZON.COM, INC., AMAZON.COM  
SERVICES LLC, and EERO LLC.

Defendants.

Case No. 6:21-cv-619-ADA

**JURY TRIAL DEMANDED**

XR COMMUNICATIONS, LLC, dba VIVATO  
TECHNOLOGIES,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:21-cv-620-ADA

**JURY TRIAL DEMANDED**

XR COMMUNICATIONS, LLC, dba VIVATO  
TECHNOLOGIES,

Plaintiff,

v.

Case No. 6:21-cv-622-ADA

**JURY TRIAL DEMANDED**

ASUSTEK COMPUTER INC.

Defendant.

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XR COMMUNICATIONS, LLC, dba VIVATO  
TECHNOLOGIES,

Plaintiff,

v.

CISCO SYSTEMS, INC.  
MERAKI LLC

Defendants.

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XR COMMUNICATIONS, LLC, dba VIVATO  
TECHNOLOGIES,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

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XR COMMUNICATIONS, LLC, dba VIVATO  
TECHNOLOGIES,

Plaintiff,

v.

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SAMSUNG ELECTRONICS CO., LTD. AND

Case No. 6:21-cv-623-ADA

JURY TRIAL DEMANDED

Case No. 6:21-cv-625-ADA

JURY TRIAL DEMANDED

Case No. 6:21-cv-626-ADA

JURY TRIAL DEMANDED

SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

XR COMMUNICATIONS, LLC, dba VIVATO  
TECHNOLOGIES,

Plaintiff,

v.

DELL TECHNOLOGIES INC. AND DELL  
INC.,

Defendants.

XR COMMUNICATIONS, LLC, dba VIVATO  
TECHNOLOGIES,

Plaintiff,

v.

HP INC.,

Defendant.

XR COMMUNICATIONS, LLC, dba VIVATO  
TECHNOLOGIES,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 6:21-cv-646-ADA

JURY TRIAL DEMANDED

Case No. 6:21-cv-694-ADA

JURY TRIAL DEMANDED

Case No. 6:21-cv-695-ADA

JURY TRIAL DEMANDED

## **JOINT CLAIM CONSTRUCTION STATEMENT**

Pursuant to the Scheduling Orders in these cases (*see, e.g.*, Dkt. No. 39 in Case No. 6:21-cv-619) and the Court’s Updated Order Governing Proceedings – Patent Case (“Updated OGP”),<sup>1</sup> Plaintiff XR Communications LLC dba Vivato Technologies (“Plaintiff” or “Vivato”) and Defendants Amazon.com, Inc., Amazon.com Services LLC, and eero LLC; Apple Inc.; ASUSTeK Computer Inc.; Cisco Systems, Inc. and Meraki LLC; Google LLC; Samsung Electronics Co. Ltd. and Samsung Electronics America Inc.; Dell Technologies Inc. and Dell Inc.; HP Inc.; and Microsoft Corporation (collectively “Defendants”) file this Joint Claim Construction Statement.

### **I. AGREED CONSTRUCTIONS**

There are no agreed-upon constructions.

### **II. DISPUTED TERMS FOR CONSTRUCTION**

Exhibit A sets forth the parties’ respective proposed constructions for each of the disputed claim terms and phrases of U.S. Patent Nos. 8,289,939, 10,594,376, and 10,715,235.

Dated: June 8, 2022

Respectfully submitted,

*/s/ Reza Mirzaie*

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<sup>1</sup> OGP Version 4.1, available at <https://www.txwd.uscourts.gov/wp-content/uploads/Standing%20Orders/Waco/Albright/Standing%20Order%20Governing%20Proceedings%20Patent%20Cases%20041422.pdf>.

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***EERO LLC***

/s/ Michael T. Pieja

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