

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

WAG ACQUISITION, L.L.C.,

Plaintiff,

v.

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

Defendants.

Civil Action No. 6:21-cv-00815-ADA

**REPLY CLAIM CONSTRUCTION BRIEF OF AMAZON.COM, INC.,
AMAZON WEB SERVICES, INC., AND AMAZON.COM SERVICES LLC**

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Table of Exhibits¹

Exhibit	Description
1	<i>Duodecad IT Services Luxembourg S.a.r.l v. WAG Acquisition, LLC</i> , IPR2015-01036, Paper 8 (Oct. 23, 2015)
2	<i>Duodecad IT Services Luxembourg S.a.r.l v. WAG Acquisition, LLC</i> , IPR2015-01036, Paper 17 (Oct. 20, 2016)
3	Harry Newton, <i>Newton's Telecom Dictionary</i> (14th ed. 1998) (excerpt)
4	Brad Hansen, <i>The Dictionary of Computing & Digital Media</i> (1999) (excerpt)
5	<i>The Concise Oxford Dictionary</i> (9th ed. 1995) (excerpt)
6	<i>The American Heritage Dictionary</i> (3d ed. 1996) (excerpt)
7	<i>Webster's Third New International Dictionary</i> (1993) (excerpt)
8	<i>Webster's Dictionary of American English</i> (1997) (excerpt)
9	<i>The Oxford American Dictionary of Current English</i> (1999) (excerpt)
10	WAG's Proposed Claim Constructions (Feb. 18, 2022)
11	U.S. Patent No. 8,364,839, titled "Streaming Media Delivery System"
12	WAG's Disclosure of Extrinsic Evidence (Feb. 25, 2022)
13	Reexamination No. 90/014,836 of U.S. Patent No. 8,364,839, Mar. 14, 2022 Resp. to Office Action and Ex. A, Decl. of Harold Price

¹ Exhibits 1-12 are filed with Amazon's Opening Claim Construction Brief. See Dkts. 37-4 to 37-15. Exhibit 13 is attached to the Declaration of Saina S. Shamilov ("Shamilov Decl."), filed concurrently herewith.

Table of Abbreviations

Abbreviation	Term
Amazon	Defendants Amazon.com, Inc., Amazon Web Services, Inc., and Amazon.com Services LLC
WAG	Plaintiff WAG Acquisition, L.L.C.
Amz. Op.	Amazon's Opening Claim Construction Brief (Dkt. 37)
Schonfeld Decl.	Declaration of Dr. Dan Schonfeld (Dkt. 37-1)
Br.	WAG's Responsive Claim Construction Brief (Dkt. 38)
Teruya Decl.	Declaration of Keith J. Teruya (Dkt. 38-1)
'594 or '594 patent	U.S. Patent No. 9,729,594
'824 or '824 patent	U.S. Patent No. 9,742,824
'636 or '636 patent	U.S. Patent No. 9,762,636
asserted patents	U.S. Patent Nos. 9,729,594, 9,742,824, and 9,762,636
'839 patent	U.S. Patent No. 8,364,839

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