

Patent(s), Claim(s)	Term/Phrase	Touchstream's Proposed Construction	Cross-reference to Related Paragraphs of Touchstream's Infringement Contentions	Vizbee's Proposed Construction	C Re V
<p>'251 patent, claims 1, 8, 9, 11, 19, 20, 22</p> <p>'528 patent, claims 1, 12, 16, 25, 27</p>	<p>"synchronization code"</p>	<p>No construction necessary. This term should be given its plain and ordinary meaning, which is "an identifier that can be used to facilitate a connection between two or more devices."</p>	<p>Pages 2, 3, 10, 16, and 17 of Exhibit A to Touchstream's Infringement Contentions (Exhibit 4 at pp. 4-2, 4-3, 4-10, 4-16, and 4-17).</p> <p>Pages 3, 6, 13 and 19 of Exhibit B to Touchstream's Infringement Contentions (Exhibit 4 at pp. 4-25, 4-28, 4-35, and 4-41).</p>	<p>"a unique identifier associated with a particular display device [or content presentation device]"</p>	<p>Exh Viz Cor 10,</p> <p>Exh Viz Cor 13,</p> <p>Exh Viz Cor 12,</p> <p>Exh Viz Cor 10,</p> <p>Exh Viz Cor 8-1</p> <p>Exh Viz</p>

Exhibit 1 to Joint Disputed Claim Terms Charts for
 U.S. Pat. Nos. 8,356,251 (“the ’251 patent”), 8,782,528 (“the ’528 patent”) and 8,904,289 (“the ’289 patent”)
Touchstream Technologies, Inc. v. Vizbee, Inc. Case No. 1:17-cv-06247-PGG

Patent(s), Claim(s)	Term/Phrase	Touchstream’s Proposed Construction	Cross-reference to Related Paragraphs of Touchstream’s Infringement Contentions	Vizbee’s Proposed Construction	Other References
					Cor 9, 1
’251 patent, claims 1, 4, 11-15, 22 ’528 patent, claims 1-7, 10, 16-24, 27, 28, 30 ’289 patent, claims 1, 5, 6, 10, 15, 16 ¹	“storing”/”store”	No construction necessary. This term should be given its plain and ordinary meaning, which is “placing in a location for subsequent use.”	Pages 3, 6, 10, and 14-16 of Exhibit A to Touchstream’s Infringement Contentions (Exhibit 4 at pp. 4-3, 4-6, 4-10, and 4-13 to 4-16). Pages 6, 16, 19, and 22 of Exhibit B to Touchstream’s Infringement Contentions (Exhibit 4 at pp. 4-28, 4-38, 4-41, and 4-44). Pages 5, 9, 11, 13, and 15-17 of Exhibit C to Touchstream’s	Plain and ordinary meaning, which is: “persistently retaining data or instructions to enable subsequent retrieval” / “to persistently retain data or instructions to enable subsequent retrieval”	Exh Viz Cor 20, Exh Viz Cor 19-35- Exh Viz Cor 19, 62, Exh Viz

¹ Touchstream reserves its right to object to Vizbee’s identification of claims 4, 14, and 15 of the ’251 patent, claim 30 of the ’528 patent, and claims 5 and 15 of the ’289 patent on the grounds that these claims were not identified in the claim constructions pursuant to Section 8(b) of the Court’s Case Management Plan and Scheduling Order.

Exhibit 1 to Joint Disputed Claim Terms Charts for
 U.S. Pat. Nos. 8,356,251 (“the ’251 patent”), 8,782,528 (“the ’528 patent”) and 8,904,289 (“the ’289 patent”)
Touchstream Technologies, Inc. v. Vizbee, Inc. Case No. 1:17-cv-06247-PGG

Patent(s), Claim(s)	Term/Phrase	Touchstream’s Proposed Construction	Cross-reference to Related Paragraphs of Touchstream’s Infringement Contentions	Vizbee’s Proposed Construction	C Re V
			Infringement Contentions (Exhibit 4 at pp. 4-51, 4-55, 4-57, 4-59, and 4-61 to 4-63).		Cor 11, 26. Exh Viz Cor 8, 1 30, Exh Viz Cor 11, 30, Exh Viz Cor 7, 1 Exh Viz Cor 9, 1 Exh

Exhibit 1 to Joint Disputed Claim Terms Charts for
 U.S. Pat. Nos. 8,356,251 (“the ’251 patent”), 8,782,528 (“the ’528 patent”) and 8,904,289 (“the ’289 patent”) in
Touchstream Technologies, Inc. v. Vizbee, Inc. Case No. 1:17-cv-06247-PGG

Patent(s), Claim(s)	Term/Phrase	Touchstream’s Proposed Construction	Cross-reference to Related Paragraphs of Touchstream’s Infringement Contentions	Vizbee’s Proposed Construction	Cite to Relevant Case
					Vizbee v. Vizbee, Inc., No. 17-10009-1
’251 patent, claims 1, 3, 11-13, 22 ’528 patent, claims 1, 9, 14, 16, 24, 27, 28, 29 ’289 patent, claims 1, 2, 4, 6, 8, 10, 12, 14, 16	“programming code”	No construction necessary. This term should be given its plain and ordinary meaning, which is “instructions for a computer.”	Pages 5, 6, 8, 14-15, 17 and 18 of Exhibit A to Touchstream’s Infringement Contentions (Exhibit 4 at pp. 4-5, 4-6, 4-8, 4-13 to 4-15, 4-17, and 4-18). Pages 6-8, 10, 12, 13, 15-18, 20, 21, and 23 of Exhibit B to Touchstream’s Infringement Contentions (Exhibit 4 at pp. 4-28 to 4-30, 4-32, 4-34, 4-35, 4-37 to 4-40, 4-42, 4-43, and 4-45). Pages 6, 7, 10, 11, 13, 14, 17, and 18 of	“display-device- or media-player-specific executable code”	Exhibit 1 to Vizbee v. Vizbee, Inc., No. 17-10009-1 Exhibit 1 to Vizbee v. Vizbee, Inc., No. 17-10009-1, 18, 37. Exhibit 1 to Vizbee v. Vizbee, Inc., No. 17-10009-1, 18, 54, Exhibit 1 to Vizbee v. Vizbee, Inc., No. 17-10009-1, 10, 31.

Exhibit 1 to Joint Disputed Claim Terms Charts for
 U.S. Pat. Nos. 8,356,251 (“the ’251 patent”), 8,782,528 (“the ’528 patent”) and 8,904,289 (“the ’289 patent”)
Touchstream Technologies, Inc. v. Vizbee, Inc. Case No. 1:17-cv-06247-PGG

Patent(s), Claim(s)	Term/Phrase	Touchstream’s Proposed Construction	Cross-reference to Related Paragraphs of Touchstream’s Infringement Contentions	Vizbee’s Proposed Construction	C Re V
			Exhibit C to Touchstream’s Infringement Contentions (Exhibit 4 at pp. 4-52, 4-53, 4-56, 4-57, 4-59, 4-60, 4-63, and 4-64).		Exl Viz Cor 9, 1 26, Exl Viz Cor 13, Exl Viz Cor 11- Exl Viz Cor 8, 1 Exl Viz Cor 8, 1

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.