

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNILOC USA, INC., et al,	§	
Plaintiffs,	§	
	§	Case No. 2:16-cv-00393-RWS
v.	§	LEAD CASE
	§	
AVG TECHNOLOGIES USA, INC.,	§	
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BITDEFENDER LLC,	§	Case No. 2:16-cv-00394-RWS
PIRIFORM, INC.,	§	Case No. 2:16-cv-00396-RWS
UBISOFT, INC.,	§	Case No. 2:16-cv-00397-RWS
KASPERSKY LAB, INC.,	§	Case No. 2:16-cv-00871-RWS
SQUARE ENIX, INC.,	§	Case No. 2:16-cv-00872-RWS
Defendants.		

UNILOC USA, INC., et al,	§	
Plaintiffs,	§	
	§	Case No. 2:16-cv-00741-JRG
v.	§	LEAD CASE
	§	
ADP, LLC,	§	
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BIG FISH GAMES, INC.,	§	Case No. 2:16-cv-00858-JRG
BLACKBOARD, INC.,	§	Case No. 2:16-cv-00859-JRG
BOX, INC.,	§	Case No. 2:16-cv-00860-JRG
ZENDESK, INC.,	§	Case No. 2:16-cv-00863-JRG
Defendants.		

JOINT CLAIM CONSTRUCTION CHART

Pursuant to the Fourth Amended Docket Control Order in Case No. 2:16-cv-00741-RWS (Dkt. No. 143) and the Docket Control Order in Case No. 2:16-cv-00393-RWS (Dkt. No. 73), Plaintiffs Uniloc USA, Inc. and Uniloc Luxembourg, S.A. (collectively “Uniloc”), and Defendants BitDefender Inc., Piriform, Inc., Ubisoft, Inc., Kaspersky Lab, Inc., Square Enix, Inc., ADP, LLC, Big Fish Games, Inc., Blackboard, Inc., Box, Inc., and Zendesk Inc. (“Defendants”) hereby submit their Joint Claim Construction Chart Pursuant to Local Patent Rule 4-5(d). Plaintiffs and Defendants met and conferred in good faith on what information to

include and format to use for the P.R. 4-5(d) Chart, but could not agree on a common format. Accordingly, the parties submit two charts, Exhibit A prepared by Defendants and Exhibit B by Plaintiff.

In addition, the parties agree that many of the claim limitations in dispute are drafted in “means-plus-function” format and are thus subject to construction according to 35 U.S.C. §112, ¶ 6. The parties have exchanged several-rounds of competing identifications of specific structure for each of these terms, and are continuing to work in good faith to resolve their remaining disagreements. At this time, the parties do not believe that the Court needs to address these disagreements as part of the claim construction process. The parties have not included the § 112, ¶ 6 terms drafted in this submission, but will promptly supplement the attached, if necessary.

Dated: June 16, 2017

Respectfully submitted,

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