

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

JAWBONE INNOVATIONS, LLC,	§	Case No. 2:21-cv-00186-JRG
	§	
Plaintiff,	§	<u>JURY TRIAL DEMANDED</u>
	§	
v.	§	
	§	
SAMSUNG ELECTRONICS CO., LTD. and	§	
SAMSUNG ELECTRONICS AMERICA,	§	
INC.,	§	
	§	
Defendants.	§	
	§	

**PLAINTIFF JAWBONE INNOVATIONS, LLC AND
DEFENDANTS SAMSUNG ELECTRONICS CO., LTD.’S AND
SAMSUNG ELECTRONICS AMERICA, INC.’S
JOINT CLAIM CONSTRUCTION CHART**

Pursuant to Local Patent Rule 4-5(d) and the Court’s Docket Control Order (Dkt. No. 38), Plaintiff Jawbone Innovations, LLC and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. hereby provide this Joint Claim Construction Chart containing the disputed claim terms and phrases for the asserted claims of U.S. Patent Nos. 7,246,058 (the “’058 patent”), 8,019,091 (the “’091 patent”), 8,467,543 (the “’543 patent”), 8,503,691 (the “’691 patent”), 10,779,080 (the “’080 patent”), and 11,122,357 (the “’357 patent”). A listing of the complete language of the asserted claims with disputed terms emphasized in bold type and agreed terms emphasized in underline (or bolded and underlined to indicate overlapping disputed or agreed terms) is attached herewith as Exhibit A; a separate chart comparing the parties’ respective proposed constructions for the asserted claims (as well as the agreed upon constructions) is attached herewith as Exhibit B. Due to the number of asserted claims, and the multiple disputed

limitations within each of those claims, the parties believe that this format will be most helpful to the Court in tracking and resolving the various claim construction issues presented in this case.

Dated: July 19, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 19, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Peter Lambrianakos
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