

# EXHIBIT 16

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11 BARBARO TECHNOLOGIES, LLC,

12 Plaintiff,

13 v.

14 NIANTIC, INC.,

15 Defendant.

16 Case No. 3:18-cv-02955-RS (DMR)

17 DEFENDANT NIANTIC, INC.'S  
RESPONSIVE CLAIM  
CONSTRUCTION BRIEF

18 Hon. Richard Seeborg  
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Courtroom 3, 17th Floor

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