Exhibit 25

From:	Sharma, Anupam
To:	Steve Seigel; Chiaviello, Elizabeth M.; Andres Healy; Zach Savage; Lexie White; Chris Bunt; Charley Ainsworth; melissa-gillamsmithlaw.com; Carter, Winn; Park, Collin W.; Davis, Thomas R.; Chris Henry; Lisa Cavazos
Cc:	Samsung-COV-Ancora
Subject:	RE: Ancora v LG et al (WDTX): Proposed claim constructions
Date:	Friday, March 13, 2020 4:10:35 PM
Attachments:	Defendants Revised List of Constructions 03132020.pdf

Steve

The attached document has our updated constructions.

Regards,

Anupam

From: Steve Seigel <SSeigel@susmangodfrey.com>
Sent: Thursday, March 12, 2020 3:35 PM
To: Sharma, Anupam <asharma@cov.com>; Chiaviello, Elizabeth M.
<elizabeth.chiaviello@morganlewis.com>; Andres Healy <AHealy@susmangodfrey.com>; Zach
Savage <ZSavage@susmangodfrey.com>; Lexie White <lwhite@susmangodfrey.com>; Chris Bunt
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<collin.park@morganlewis.com>; Davis, Thomas R. <thomas.davis@morganlewis.com>; Chris Henry
<CHenry@susmangodfrey.com>; Lisa Cavazos <LCavazos@susmangodfrey.com>
Cc: Samsung-COV-Ancora <Samsung-COV-Ancora@cov.com>
Subject: RE: Ancora v LG et al (WDTX): Proposed claim constructions

[EXTERNAL]
Anupam,

Thanks for your email. Our responses to your points are in-line below in red.
Please also let us know which construction you intend to propose for "license
record."

Thank you,
Steve

Steve Seigel
Susman Godfrey L.L.P.
o: 206-505-3842 | c: 303-902-0049

From: Sharma, Anupam <asharma@cov.com>

Sent: Thursday, March 12, 2020 2:38 PM
To: Chiaviello, Elizabeth M. <elizabeth.chiaviello@morganlewis.com>; Andres Healy
<AHealy@susmangodfrey.com>; Zach Savage <ZSavage@susmangodfrey.com>; Lexie White
<lwhite@susmangodfrey.com>; Chris Bunt <rcbunt@pbatyler.com>; Charley Ainsworth
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Cavazos <LCavazos@susmangodfrey.com>; Steve Seigel <SSeigel@susmangodfrey.com>
Cc: Samsung-COV-Ancora <Samsung-COV-Ancora@cov.com>
Subject: Ancora v LG et al (WDTX): Proposed claim constructions

Dear Ancora counsel

Following up our conversation regarding the claim construction issues, the defendants have
conferred. Below are our responses to the issues raised during the meet and confer:

- volatile memory: We do not agree with Ancora's proposed construction. We suggest
  reconsidering Defendants' proposed construction, with which Ancora has already agreed in
  the HTC case.
  [Ancora: ok. We will stay with our proposed construction.]

- BIOS: We cannot accept Ancora's proposal to keep "run automatically" but drop "stored in the
  ROM."
  [Ancora: ok. We will stay with our proposed construction.]

- "acting" limitation: We cannot accept Ancora's proposal. We believe that the third limitation
  forms the antecedent basis for the "verification" referenced in the last limitation.
  [Ancora: ok. We will stay with our proposed construction.]

- Order of steps: We propose that the order of steps be limited such that steps 3 and 4 occur, in
  order, after steps 1 and 2. As we discussed on the call, steps 1 and 2 can be performed in
  either order, e.g., the steps may be performed 1-2-3-4 or 2-1-3-4. We agree that additional,
  non-recited steps can occur between steps 3 and 4 so that they don't contradict the
  limitations of claim 1.
  [Ancora: We do not agree with your proposal.]

- Preamble: We accept Ancora's suggestion that the parties agree that the second half of the
  preamble ("including an erasable, non-volatile memory . . . a volatile memory area;") is
  limiting. However, the parties continue to disagree whether the remainder of the preamble
  ("restricting software . . . with a computer") is limiting. The parties can brief this issue.
  [Ancora: Ok.]

- "license record": As discussed on the call, we propose that the term be construed as "a record
  associated with a program with information for verifying that the program is licensed." Please
  let us know if Ancora is in agreement.

[Ancora: We do not agree with your proposal and will stay with our proposed construction. Please confirm whether you will advocate for the above proposal or your original proposed construction.]

- "using the key": Defendants agree with Ancora's proposed construction of "using the pseudo-unique key" so the parties now have an agreed construction for the term.
  [Ancora: Ok – thank you for the clarification.]

Regards,

Anupam

Anupam Sharma | Attorney | **Covington & Burling LLP** | 3000 El Camino Real, 5 Palo Alto Square, Palo Alto, CA 94306 | **(650) 632-4709** | asharma@cov.com

Defendants' Revised List of Terms and Constructions

Claim Term/Phrase	Preliminary Proposed Construction
"using an agent to set up a verification structure in the erasable, non-volatile memory of the BIOS" (claim 1)	This limitation is a means plus function limitation governed by pre-AIA 35 U.S.C. § 112 ¶ 6. Function: "set up a verification structure in the erasable, non-volatile memory of the BIOS" Structure: Algorithm found at 6:18-28; if not, indefinite due to a lack of corresponding structure
"set up a verification structure" (claim 1)	"forming a structure by encrypting a license record using a pseudo-unique key for each computer"
"BIOS" (claim 1)	"An acronym for **B**asic **I**nput / **O**utput **S**ystem. It is the set of essential startup operations stored in ROM that run automatically when a computer is turned on, which test hardware, starts the operating system, and support the transfer of data among hardware devices"
"memory of the BIOS"	"a memory that: (i) stores the BIOS; (ii) is not recognized by an operating system as a storage device; and (iii) does not have a file system"
Order of steps	The "verifying the program" step and "acting on the program" step of claim 1 must occur, in order, after the "selecting a program" step and "using an agent step"
"program" (claim 1)	"a set of instructions that can be executed by a computer"
"license"/"license record"	The preamble of the claim is limiting. "license" means "a legal contract between a software provider and a user that specifies the rights of the user to use, distribute or resell the software" "license record" means "a record associated with a program with information for verifying that the program is licensed"
"verifying the program using at least the verification structure" (claim 1)	"confirming through an operating system (OS) level application whether a program is licensed using at least the verification structure"

1

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