

EXHIBIT 22

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

OZMO LICENSING LLC,

Plaintiff,

v.

ACER INC. and
ACER AMERICA CORPORATION,

Defendants.

Civil Action No. 6:21-cv-01225-ADA

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Plaintiff, Ozmo Licensing LLC (“Ozmo”), submits this Sur-Reply Claim Construction Brief to supplement its Responsive Claim Construction Brief, ECF 29 (“Ozmo Br.”), and in response to Acer’s Reply Claim Construction Brief, ECF 31 (“Acer Rep. Br.”).

In this Sur-Reply, Ozmo modifies its proposed constructions for the terms listed in sections A-C. Where that occurs, Ozmo notes the change with italics and provides an explanation for the change.

A. “Logic for processing data received via wireless radio circuit” (’814 patent claim 1 and all asserted dependent claims)

Acer’s Proposed Construction	Ozmo’s Proposed Construction
Means-plus-function limitation	Ordinary meaning (not means-plus-function)
<u>Function</u> : processing data received from the wireless circuit	<u>Function</u> : processing data received via the wireless radio circuit
<u>Corresponding Structure</u> : Processing Unit 28 (Fig. 6) along with associated software platform 36.	<u>Structure</u> : <i>Hub (in all claims)</i> ¹ . Also, processing unit 28 coupled to or integrated with wireless circuit 27 ² , software platform 36, and operating system 37 and their equivalents

and

B. “Logic for generating data to be transmitted by the wireless radio circuit (’814 patent claim 1 and all asserted dependent claims)

Acer’s Proposed Construction	Ozmo’s Proposed Construction
Means-plus-function limitation	Ordinary meaning (not means-plus-function)
<u>Function</u> : generating data to be sent by the wireless circuit	<u>Function</u> : generating data to be transmitted via the wireless radio circuit
<u>Corresponding Structure</u> : Processing Unit 28 (Fig. 6) along with associated software platform 36.	<u>Structure</u> : <i>Hub (in all claims)</i> ³ . Also, processing unit 28 coupled to or integrated with wireless circuit 27 ⁴ , software platform 36, and operating system 37, and their equivalents

¹ See discussion below.

² Due to an editing error, the listing of structures Ozmo previously submitted incorrectly listed wireless circuit 19 instead of wireless circuit 27.

³ See discussion below.

⁴ Due to an editing error, the listing of structures Ozmo previously submitted incorrectly listed wireless circuit 19 instead of wireless circuit 27.

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