

EXHIBIT A – PLAINTIFF R2 SOLUTIONS LLC’S PROPOSED CONSTRUCTIONS AND SUPPORT

A. U.S. Pat. No. 8,190,610

Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“identifiable to [that/the] data group”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning. See also the agreed construction for “data group.”	’610 patent at 3:58-64; 4:4-22; 4:36-62; 7:18-35; 7:36-60; FIG. 4 (and related text) <i>R2 Solutions LLC v. Deezer S.A.</i>, Civil Action No. 4:21-CV-00090-ALM, Dkt. No. 45, Claim Construction Memorandum Opinion and Order (E.D. Tex. Jan. 4, 2022) (Exhibit D to R2’s 4-2 Disclosures) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“the data of the first data group is mapped differently than the data of the second data group”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning. See also the agreed construction for “data group.”	’610 patent at 3:48-57; 6:56-7:16; FIG. 3 (and related text); FIG. 4 (and related text) <i>R2 Solutions LLC v. Deezer S.A.</i>, Civil Action No. 4:21-CV-00090-ALM, Dkt. No. 45, Claim Construction Memorandum Opinion and Order (E.D. Tex. Jan. 4, 2022) (Exhibit D to R2’s 4-2 Disclosures) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party

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Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“independently output a plurality of lists of values”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	’610 patent at Abstract; 2:1-8; 3:48-57; 6:56-7:16; 8:47-58; FIG. 4 (and related text); FIG. 5 (and related text) ’610 patent file history:11/09/2011 Amendment at 16 R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party

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B. U.S. Pat. No. 8,341,157

Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“keyword”	R2 Solutions contends that this term needs no construction and should be afforded its plain and ordinary meaning.	’157 patent at Abstract; 1:33-2:18; 4:1-15; 9:36-10:22; 11:47-12:5; 13:10-14:39 R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“token”	R2 Solutions contends that this term needs no construction and should be afforded its plain and ordinary meaning.	’157 patent at Abstract; 5:15-6:2; 9:26-41; 11:42-52; 13:10 – 14:39 R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“classifying the query ... into at least one of the plurality of intents”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	’157 patent at Abstract; FIG. 2 (and related text); FIG. 3 (and related text); 1:53-2:18; 3:46-5:14; 9:41-61; 11:53-12:5 ’157 patent file history: 12/23/2011 Amendment at 10-11 R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party

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Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“data object”	R2 Solutions contends that this term needs no construction and should be afforded its plain and ordinary meaning.	’157 patent at Abstract; FIG. 2 (and related text); FIG. 3 (and related text); 1:33-2:18; 4:1-15; 9:62-10:22; 11:64-12:33 ’157 patent file history: 05/18/2012 Amendment at 11-12; 12/23/2011 Amendment at 10-11 R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“display entry”	R2 Solutions contends that this term needs no construction and should be afforded its plain and ordinary meaning.	’157 patent at Abstract; FIG. 2 (and related text); FIG. 3 (and related text); 1:33 – 2:18 R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“at least some”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	’157 patent at Abstract; FIG. 2 (and related text); FIG. 3 (and related text); 1:33-2:18; 2:55-60; 3:46-48 “some” - Webster’s Encyclopedic Unabridged Dictionary of the English Language, Gramercy Books 1996, p. 1818. R2 reserves the right to rely on testimony from

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		Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“intents”	R2 Solutions contends that this term needs no construction and should be afforded its plain and ordinary meaning.	’157 patent at 3:46-67; 4:43-54; 5:17-19; columns 6-8; 10:11-15; 12:15-18; 9:42-61; 4:27-36; 9:1-16; 11:53-63; 13:11-23; 13:27-39; 5:58-64; 10:58-62; 13:47-63; 14:6-39; 5:1-13; 10:4-22; 2:38-67; 3:1-39 <i>R2 Solutions LLC v. Deezer S.A.</i>, Civil Action No. 4:21-CV-00090-ALM, Dkt. No. 45, Claim Construction Memorandum Opinion and Order (E.D. Tex. Jan. 4, 2022) (Exhibit D to R2’s 4-2 Disclosures) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“ranking”	R2 Solutions contends that this term needs no construction and should be afforded its plain and ordinary meaning.	’157 patent at 4:1-36; 8:58-67; 9:1-16; 10:4-22; 11:24-31; 12:6-33; 13:23-45; Abstract; FIG. 2 (and related text); FIG. 3 (and related text) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party

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C. U.S. Pat. No. 7,698,329

Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“ranking”	R2 Solutions contends that this term needs no construction and should be afforded its plain and ordinary meaning.	’329 patent at 1:60-2:5; 2:6-37; 3:1-31; 4:1-16; FIG. 3 (and related text) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“abstract”	R2 Solutions contends that this term needs no construction and should be afforded its plain and ordinary meaning.	’329 patent at 4:54-60 <i>R2 Solutions LLC v. Deezer S.A.</i>, Civil Action No. 4:21-CV-00090-ALM, Dkt. No. 45, Claim Construction Memorandum Opinion and Order (E.D. Tex. Jan. 4, 2022) (Exhibit D to R2’s 4-2 Disclosures) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“each document of said certain documents containing at least one section that is not used by said search engine for recall”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning. See also the agreed constructions for “document” “recall,” and “section.”	’329 patent at FIG. 1 (and related text) FIG. 3 (and related text); 2:31-33; 3:7-4:60 ’329 patent file history: 01/04/2010 Amendment at 6-9; 07/10/2009 Amendment at 6-10 <i>R2 Solutions LLC v. Deezer S.A.</i>, Civil Action No.

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Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
		4:21-CV-00090-ALM, Dkt. No. 45, Claim Construction Memorandum Opinion and Order (E.D. Tex. Jan. 4, 2022) (Exhibit D to R2’s 4-2 Disclosures) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“search engine index”	R2 Solutions contends that this term needs no construction and should be afforded its plain and ordinary meaning.	’329 patent at 1:33-59; 3:1-31; 4:1-16 ’329 patent file history: 07/10/2009 Amendment at 8 R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party

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D. U.S. Patent No. 8,209,317

Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“a database configured to store information about events in the computer database system”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	’317 patent at 1:60-2:5; 2:62-3:8; 3:60-4:32; FIG. 1 (and related text); FIG. 2 (and related text); FIG. 3 (and related text); FIG. 4 (and related text); FIG. 5 (and related text); FIG. 6 (and related text); FIG. 7 (and related text) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“storing in memory data about previously received queries at the computer database system”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	’317 patent at 2:62-3:8; 3:27-49; 4:6-32; FIG. 1 (and related text); FIG. 2 (and related text); FIG. 3 (and related text); FIG. 4 (and related text); FIG. 5 (and related text); FIG. 6 (and related text); FIG. 7 (and related text) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“submitted”	R2 Solutions contends that this term needs no construction and should be afforded its plain and ordinary meaning.	’317 patent at 2:62-5:2; FIG. 2 (and related text); FIG. 4 (and related text); FIG. 5 (and related text); FIG. 6 (and related text); FIG. 7 (and related text) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence

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Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
		relied on by Defendant. All evidence identified by any other party
“query data management server”	R2 Solutions contends that this term needs no construction and should be afforded its plain and ordinary meaning.	’317 patent at 4:6-13; 4:14-5:2; FIG. 1 (and related text); FIG. 3 (and related text); FIG. 4 (and related text); FIG. 5 (and related text) <i>R2 Solutions LLC v. Deezer S.A.</i>, Civil Action No. 4:21-CV-00090-ALM, Dkt. No. 45, Claim Construction Memorandum Opinion and Order (E.D. Tex. Jan. 4, 2022) (Exhibit D to R2’s 4-2 Disclosures) “server” – The New Penguin Dictionary of Computing, Penguin Books 2001, p. 441. R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“not fully representative of an entire search query desired by the user”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	’317 patent at 3:9-26; 3:27-40; 4:15-32; 4:54-66; 5:3-17; 5:18-46; FIG. 2 (and related text); FIG. 5 (and related text); FIG. 6 (and related text); FIG. 7 (and related text) <i>R2 Solutions LLC v. Deezer S.A.</i>, Civil Action No. 4:21-CV-00090-ALM, Dkt. No. 45, Claim Construction Memorandum Opinion and Order (E.D. Tex. Jan. 4, 2022) (Exhibit D to R2’s 4-2

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Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
		Disclosures) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party
“better representative of an entire search query desired by the user”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	’317 patent at 3:9-26; 3:27-40; 4:15-32; 4:54-66; 5:3-17; 5:18-46; FIG. 2 (and related text); FIG. 5 (and related text); FIG. 6 (and related text); FIG. 7 (and related text) <i>R2 Solutions LLC v. Deezer S.A.</i>, Civil Action No. 4:21-CV-00090-ALM, Dkt. No. 45, Claim Construction Memorandum Opinion and Order (E.D. Tex. Jan. 4, 2022) (Exhibit D to R2’s 4-2 Disclosures) R2 reserves the right to rely on testimony from Bill Davis in response to any expert evidence relied on by Defendant. All evidence identified by any other party