

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Fare Technologies, LLC,

Plaintiff,

vs.

Uber Technologies, Inc. d/b/a UBER

Defendant

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Civil Action No. 6:22-cv-00317-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Notice of Agreed Extensions of Regarding Certain Claim Construction Deadlines (ECF No. 28), Fare Technologies LLC (“Fare”) and Defendant Uber Technologies, Inc. (“Uber”) submit this Joint Claim Construction Statement.

The asserted patent is U.S. Patent No. RE46,727 and the parties disputed claim constructions are provided in the table below.

DISPUTED CLAIM TERMS

Proposed by Uber			
Term, Phrase, or Clause	Patent Claims	Fare's Construction	Uber's Construction
taxi	1	plain and ordinary meaning, needing no construction	"an automobile licensed for hire as a taxi or taxicab and fitted with a meter"
trip meter	1	plain and ordinary meaning, needing no construction	"a device in the taxi that determines distance traveled using input collected from the taxi"
starting point	1, 7, 12	plain and ordinary meaning, needing no construction	"geographical location where the ride began"
destination point	1, 7, 12	plain and ordinary meaning, needing no construction	"geographical location where the ride ended"
waiting time encountered in traffic	12	plain and ordinary meaning, needing no construction	Indefinite. Alternatively, if the Court determines that the term can be construed: "amount of time spent stopped or below a predefined speed threshold"

Date: November 28, 2022

Respectfully submitted,

By: /s/ William P. Ramey, III

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CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system.

/s/ William P. Ramey, III

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