THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

DODOTS LICENSING SOLUTIONS LLC, Plaintiff, v. APPLE INC., BEST BUY STORES, L.P., BESTBUY.COM, LLC, and BEST BUY TEXAS.COM, LLC, Defendants.	Case No.: 6:22-cv-00533-ADA
DODOTS LICENSING SOLUTIONS LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., BESTBUY.COM, LLC, and BEST BUY TEXAS.COM, LLC, Defendants.	Case No.: 6:22-cv-00535-ADA-DTG

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Scheduling Order and the Standing Order Governing Proceedings, Plaintiff and Defendants submit this Joint Claim Construction Statement for U.S. Patent Nos. 9,369,545 ("the '545 patent"); 8,020,083 ("the '083 patent"); and 8,510,407 ("the '407 patent"):

I. Agreed-Upon Claim Terms:

Claim Term	Agreed Construction
"networked information monitor template" • '083 patent, claims 1, 2, 4-10, 12-16; • '407 patent, claims 1-4, 8, 10-13, 20, 22, 24; • '545 patent, claims 1, 5-9, 13, 15	"data structure which defines the characteristics of a NIM, including the NIM frame, view and control characteristics, and which excludes executable applications/compiled code"
"networked information monitor" • '083 patent, claims 1-6, 9-14; • '407 patent, claims 1, 11-13, 22, 24; • '545 patent, claims 1, 12-13	"fully configurable frame, with one or more controls, through which content is presented to the user"
"the application media package template" • '407 patent, claim 13	"the networked information monitor template"
"the networked information template" • '545 patent, claim 15	"the networked information monitor template"

II. Terms in Dispute

Claim Term	DoDots' Proposed Construction	Defendants' Proposed Construction	Proposing Party
"is accessible"/"is available" • '083 patent, claims 1, 4, 9, 12; • '407 patent, claims 1, 13	Plain and ordinary meaning	"can be transmitted at the time the content is requested"	Defendants
"lacks controls for manually navigating a network" • '083 patent, claims 1, 4, 9, 12	Plain and ordinary meaning	"lacks controls for manually navigating a network (e.g., a forward browsing button, a backward browsing button, a URL entry field, and/or other manual navigation controls)"	Defendants
"frame" • '083 patent, claims 1, 4, 9, 12; • '407 patent, claims 1, 13	"area upon a display of the Dot instantiation in which data may be rendered" or "area upon a display of a NIM instantiation in which data may be rendered"	Plain and ordinary meaning	Plaintiff
"web browser readable language" • '545 patent, claim 1; • '407 patent, claims 1, 13	"standard Internet content that is capable of being parsed by a browser"	"standard Internet content that is capable of being parsed by a browser, such content including HTML, Java script, XML, CSS, streaming media, Flash, HTTPS, cookies, etc."	Defendants

Claim Term	DoDots' Proposed Construction	Defendants' Proposed Construction	Proposing Party
"wherein accessing the networked information monitor defined by the networked information monitor template results in: transmission ... reception ... presentation" • '407 patent, claim 1	Plain and ordinary meaning	Indefinite	Defendants
"The method of claim 1, further comprising ..." • '407 patent, claim 2	Correction of a clear typographical error: "The client computing device of claim 1, further comprising…"	Indefinite	Defendants

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