

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

STA GROUP LLC,

Plaintiff,

v.

MOTOROLA SOLUTIONS, INC.,

Defendant.

Civil Action No. 2:22-CV-00381-JRG-RSP

MOTOROLA SOLUTIONS, INC.,

Counterclaim Plaintiff,

v.

**STA GROUP LLC, DILLON KANE
GROUP LLC, and INSTANT CONNECT
SOFTWARE LLC,**

Counterclaim Defendants.

JOINT CLAIM CONSTRUCTION CHARTS

Pursuant to Patent Rule 4-5(d) of the Eastern District of Texas and the Court's Docket Control Order (Dkt. No. 35), Plaintiff STA Group LLC ("Plaintiff" or "STA") and Motorola Solutions, Inc. ("Defendant" or "Motorola") submit these Joint Claim Construction Charts in advance of the December 1, 2023 hearing on claim construction.¹

The exhibits to this pleading contain the disputed and agreed-upon claim language for the patents-in-suit as follows:

- Exhibit A - U.S. Patent No. 8,994,830 ("830 patent");
- Exhibit B - U.S. Patent No. 7,324,802 ("802 patent");
- Exhibit C - U.S. Patent No. 8,489,134 ("134 patent"); and
- Exhibit D - U.S. Patent No. 8,831,664 ("664 patent").

DATED: November 17, 2023

Respectfully submitted,

¹ Motorola notes that STA's motion for leave to amend its infringement contentions and assert additional claims (Dkt. No. 82) remains pending. Therefore, the disputed terms identified here are limited to the patent claims that are currently asserted in the operative infringement contentions dated January 5, 2023. To the extent the Court grants STA's motion in whole or in part (which Motorola opposes), the parties had agreed to a schedule for addressing the construction of terms in any additional asserted claims. Dkt. No. 100 at 5; Dkt. No. 100-4. These dates have passed, but STA and Motorola agree to meet and confer regarding the need for additional claim construction proceedings.

K&L GATES LLP

By /s/ James A. Shimota

James A. Shimota (admitted p.h.v.)
Illinois Bar No. 6270603
Patrick D. Richards (admitted p.h.v.)
Illinois Bar No. 6272930
K&L GATES LLP
70 West Madison Street, Suite 3300
Chicago, IL 60602
Telephone: (312) 372-1121
Fax: (312) 827-8000
jim.shimota@klgates.com
patrick.richards@klgates.com

Brenna Legaard (admitted p.h.v.)
Oregon Bar No. 001658
Janjeera S. Hail (admitted p.h.v.)
Oregon Bar No. 225528
K&L GATES LLP
One SW Columbia Street, Suite 1900
Portland, OR 97204
Telephone: (503) 228-3200
Fax: (503) 248-9085
brenna.legaaard@klgates.com
janjeera.hail@klgates.com

J. Wesley Hill
Texas Bar No. 24032294
wh@wsfirm.com
Andrea L. Fair
Texas Bar No. 24078488
andrea@wsfirm.com
Garrett Parrish No. 24125824
gparrish@wsfirm.com
WARD, SMITH & HILL, PLLC
1507 Bill Owens Parkway
Longview, TX 75601
Telephone: (903) 757-6400
Fax: (903) 757-2323

Counsel for STA Group LLC

BAKER BOTTS LLP
GILLAM & SMITH, LLP

By /s/ Robert L. Maier

Robert L. Maier (admitted p.h.v.)
New York Bar No. 4123246
robert.maier@bakerbotts.com
Michael E. Knierim (admitted p.h.v.)
michael.knierim@bakerbotts.com
New York Bar No. 5034830
Stephen O'Donohue (admitted p.h.v.)
stephen.odonohue@bakerbotts.com
New York Bar No. 5231246
Frank Zhu (admitted p.h.v.)
New York Bar No. 5557822
frank.zhu@bakerbotts.com
BAKER BOTTS LLP
30 Rockefeller Plaza
New York, NY 10112
(212) 408-2500

Melissa R. Smith
Texas Bar No. 24001351
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, TX 75670
Telephone: (903) 034-8450
melissa@gillamsmithlaw.com

Katharine M. Burke
DC Bar No. 985333
katharine.burke@bakerbotts.com
Lauren Dreyer
DC Bar No. 1007189
lauren.dreyer@bakerbotts.com
Samuel Kassa
DC Bar No. 187255
samuel.kassa@bakerbotts.com
BAKER BOTTS LLP
700 K Street NW
Washington, DC 20001
(202) 639-7700

M. Natalie Alfaro Gonzales
Texas Bar No. 24069286
natalie.gonzales@bakerbotts.com

BAKER BOTTS LLP
910 Louisiana Street
Houston, TX 77002
(713) 229-1318

Counsel for Motorola Solutions, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served on November 17, 2023, with a copy of the foregoing document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

DATED: November 17, 2023

/s/ James A. Shimota

James A. Shimota

EXHIBIT A

Exhibit A – Joint Claim Construction Chart

'830 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
Order of steps (Claim 1) A method comprising:	The “monitoring a selection of a communication channel” must be performed before the “identifying” step. AGREED.	The “monitoring a selection of a communication channel” must be performed before the “identifying” step. AGREED.	
monitoring a selection of a communication channel by a user of a mobile communication device; providing a plurality of radio frequencies on a display of the mobile communication device, each radio frequency being associated with a geographical zone from which a plurality of video feeds associated with the geographic zone are sourced; monitoring a selection of a radio frequency of the plurality of radio frequencies by the user; identifying at least one video feed by selecting the at least one video feed from the plurality of video feeds associated with the geographic zone, wherein the at least one video feed is associated with the selected communication channel based on a user policy that identifies one or	The “providing a plurality of radio frequencies...” step and the “monitoring a selection of a radio frequency” step must be performed before the “identifying ...” step.	Plain and ordinary meaning.	

Exhibit A – Joint Claim Construction Chart

'830 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
more video feeds that are relevant to the user when the user accesses the selected communication channel, the one or more video feeds being independent of the selected communication channel; and providing access to the identified at least one video feed to the mobile communication device based on the user policy.			
(Claim 1) A method comprising: monitoring a selection of a communication channel by a user of a mobile communication device; providing a plurality of radio frequencies on a display of the mobile communication device, each radio frequency being associated with a geographical zone from which a plurality of video feeds associated with the geographic zone are sourced;	Indefinite.	Plain and ordinary meaning.	

Exhibit A – Joint Claim Construction Chart

'830 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
monitoring a selection of a radio frequency of the plurality of radio frequencies by the user; identifying at least one video feed by selecting the at least one video feed from the plurality of video feeds associated with the geographic zone, wherein the at least one video feed is associated with the selected communication channel based on a user policy that identifies one or more video feeds that are relevant to the user when the user accesses the selected communication channel, the one or more video feeds being independent of the selected communication channel; and providing access to the identified at least one video feed to the mobile communication device based on the user policy.			
(Claim 5) The method of claim 1, wherein the communication channel is a Push-To-Talk (PTT) channel in a PTT communication network and the	“a channel for transmitting half-duplex communications in a Push-to-Talk communication network” AGREED.	“a channel for transmitting half-duplex communications in a Push-to-Talk communication network” AGREED.	

Exhibit A – Joint Claim Construction Chart

'830 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
mobile communication device is a PTT radio.			

EXHIBIT B

Exhibit B – Joint Claim Construction Chart

'802 Patent Claim Term	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
Order of steps (Claim 1) A method of managing communication in a communication system, the communication system receiving messages from a plurality of channels, the method comprising:	The “receiving” and “determining” steps must occur before the “storing at least one message...” step, and the “storing at least one message...” step must occur before the “playing the stored message” step. AGREED.	The “receiving” and “determining” steps must occur before the “storing at least one message...” step, and the “storing at least one message...” step must occur before the “playing the stored message” step. AGREED.	
receiving a first message on a first dedicated channel from amongst the plurality of channels at the communication system, the plurality of channels being dedicated to different entities, the first dedicated channel being dedicated to receiving messages from a first entity; receiving a second message on a second dedicated channel being dedicated to receiving messages from a second entity from amongst the plurality of channels at the communication system, the second message overlapping with the first message in time; determining one or more priorities for the first message received on	The remaining steps must be performed in the recited order.	Plain and ordinary meaning.	

Exhibit B – Joint Claim Construction Chart

'802 Patent Claim Term	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
the first dedicated channel from the first entity and the second message received on the second dedicated channel from the second entity based on at least one pre-defined parameter; determining which message out of the first message and the second message should be stored and subsequently played based on the second message overlapping with the first message in time and one or more priorities assigned to the first and the second message; playing the message having a higher priority between the first and the second message; storing at least one message having a lower priority between the first and the second message based on the determination; and playing the stored message subsequent to completing playing of the message having higher priority.			
A method of managing communication in a communication system, the communication system	"the second message and the first message are received overlapping in time."	"the second message and the first message are received overlapping in time."	

Exhibit B – Joint Claim Construction Chart

'802 Patent Claim Term	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
receiving messages from a plurality of channels, the method comprising: receiving a first message on a first dedicated channel from amongst the plurality of channels at the communication system, the plurality of channels being dedicated to different entities, the first dedicated channel being dedicated to receiving messages from a first entity; receiving a second message on a second dedicated channel being dedicated to receiving messages from a second entity from amongst the plurality of channels at the communication system, the second message overlapping with the first message in time; determining one or more priorities for the first message received on the first dedicated channel from the first entity and the second message received on the second dedicated channel from the second entity based on at least one pre-defined parameter;	AGREED.	AGREED.	

Exhibit B – Joint Claim Construction Chart

'802 Patent Claim Term	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
determining which message out of the first message and the second message should be stored and subsequently played based on the second message overlapping with the first message in time and one or more priorities assigned to the first and the second message; playing the message having a higher priority between the first and the second message; storing at least one message having a lower priority between the first and the second message based on the determination; and playing the stored message subsequent to completing playing of the message having higher priority. (Claim 1)			

EXHIBIT C

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
(Claim 8) A method to be executed in conjunction with a processor to perform the steps of comprising: interacting, via a first communication resource manager located in a first domain, with a second communication resource manager located in a second domain; determining to establish a link for multicasting between users in the first domain and users in the second domain based on presence data of at least one user in the first domain and at least one user in the second domain; determining an application to be used in a communication session over the link; allocating a bandwidth level to be used for the link to accommodate the application; increasing the bandwidth level for the link based on a change in the application and based on an	“software and/or hardware that controls a satellite link for multicasting and tracks presence data” AGREED.	“software and/or hardware that controls a satellite link for multicasting and tracks presence data” AGREED.	

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
identification of additional presence data for additional users that have joined the communication session, wherein the communication resource managers each includes respective trunking element that is automatically configured to select a transcoding based on available bandwidth; adjusting the bandwidth level based on a determination which of the additional users and the users in the first and second domains can transmit data simultaneously during the communication session; detecting an absence of active users in the first domain and the second domain; and tearing down the link based on the absence; wherein the link is a satellite communication link.			
(Claim 8) A method to be executed in conjunction with a processor to perform the steps of comprising: interacting, via a first communication resource manager	“satellite link that simultaneously delivers information between a group of users in the first domain and a group of users in the second domain using the most efficient strategy”	Plain and ordinary meaning.	

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
located in a first domain, with a second communication resource manager located in a second domain; determining to establish a link for multicasting between users in the first domain and users in the second domain based on presence data of at least one user in the first domain and at least one user in the second domain; determining an application to be used in a communication session over the link; allocating a bandwidth level to be used for the link to accommodate the application; increasing the bandwidth level for the link based on a change in the application and based on an identification of additional presence data for additional users that have joined the communication session, wherein the communication resource managers each includes respective trunking element that is automatically configured to select a			

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
transcoding based on available bandwidth; adjusting the bandwidth level based on a determination which of the additional users and the users in the first and second domains can transmit data simultaneously during the communication session; detecting an absence of active users in the first domain and the second domain; and tearing down the link based on the absence; wherein the link is a satellite communication link.			
(Claim 8) A method to be executed in conjunction with a processor to perform the steps of comprising: interacting, via a first communication resource manager located in a first domain, with a second communication resource manager located in a second domain;	“a status indicator that conveys an ability and/or willingness of a potential communication partner to communicate”	Plain and ordinary meaning	

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
determining to establish a link for multicasting between users in the first domain and users in the second domain based on presence data of at least one user in the first domain and at least one user in the second domain; determining an application to be used in a communication session over the link; allocating a bandwidth level to be used for the link to accommodate the application; increasing the bandwidth level for the link based on a change in the application and based on an identification of additional presence data for additional users that have joined the communication session, wherein the communication resource managers each includes respective trunking element that is automatically configured to select a transcoding based on available bandwidth; adjusting the bandwidth level based on a determination which of the additional users and the users in the			

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
first and second domains can transmit data simultaneously during the communication session; detecting an absence of active users in the first domain and the second domain; and tearing down the link based on the absence; wherein the link is a satellite communication link.			
(Claim 8) A method to be executed in conjunction with a processor to perform the steps of comprising: interacting, via a first communication resource manager located in a first domain, with a second communication resource manager located in a second domain; determining to establish a link for multicasting between users in the first domain and users in the second domain based on presence data of at least one user in the first	“presence data of both of at least one user in the first domain and at least one user in the second domain.” AGREED.	“presence data of both of at least one user in the first domain and at least one user in the second domain.” AGREED.	

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
domain and at least one user in the second domain; determining an application to be used in a communication session over the link; allocating a bandwidth level to be used for the link to accommodate the application; increasing the bandwidth level for the link based on a change in the application and based on an identification of additional presence data for additional users that have joined the communication session, wherein the communication resource managers each includes respective trunking element that is automatically configured to select a transcoding based on available bandwidth; adjusting the bandwidth level based on a determination which of the additional users and the users in the first and second domains can transmit data simultaneously during the communication session;			

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
detecting an absence of active users in the first domain and the second domain; and tearing down the link based on the absence; wherein the link is a satellite communication link.			
(Claim 8) A method to be executed in conjunction with a processor to perform the steps of comprising: interacting, via a first communication resource manager located in a first domain, with a second communication resource manager located in a second domain; determining to establish a link for multicasting between users in the first domain and users in the second domain based on presence data of at least one user in the first domain and at least one user in the second domain;	“software and/or hardware in the communication resource manager that establishes, tears down, and controls the bandwidth of the satellite link”	Plain and ordinary meaning.	

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
determining an application to be used in a communication session over the link; allocating a bandwidth level to be used for the link to accommodate the application; increasing the bandwidth level for the link based on a change in the application and based on an identification of additional presence data for additional users that have joined the communication session, wherein the communication resource managers each includes respective trunking element that is automatically configured to select a transcoding based on available bandwidth; adjusting the bandwidth level based on a determination which of the additional users and the users in the first and second domains can transmit data simultaneously during the communication session; detecting an absence of active users in the first domain and the second domain; and			

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
tearing down the link based on the absence; wherein the link is a satellite communication link. (Claim 8)			
Order of steps (Claims 8, 9) A method to be executed in conjunction with a processor to perform the steps of comprising: interacting, via a first communication resource manager located in a first domain, with a second communication resource manager located in a second domain; determining to establish a link for multicasting between users in the first domain and users in the second domain based on presence data of at least one user in the first domain and at least one user in the second domain; determining an application to be used in a communication session over the link;	The steps must be performed in the recited order.	Plain and ordinary meaning.	

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
allocating a bandwidth level to be used for the link to accommodate the application; increasing the bandwidth level for the link based on a change in the application and based on an identification of additional presence data for additional users that have joined the communication session, wherein the communication resource managers each includes respective trunking element that is automatically configured to select a transcoding based on available bandwidth; adjusting the bandwidth level based on a determination which of the additional users and the users in the first and second domains can transmit data simultaneously during the communication session; detecting an absence of active users in the first domain and the second domain; and tearing down the link based on the absence; wherein the link is a satellite communication link.			

Exhibit C – Joint Claim Construction Chart

'134 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
The method of claim 8, wherein the link is a satellite communication link, and wherein the users of the first domain comprise a virtual talking group (VTG).			

EXHIBIT D

Exhibit D – Joint Claim Construction Chart

'664 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
(Claims 1-3, 5) A method, comprising: monitoring media streams associated with channels in a communication environment; receiving an alert in one of the media streams; and elevating a priority associated with the media stream receiving the alert, such that an adjustment is made to how the media stream is provisioned to an endpoint in the communication environment. 2. The method of claim 1, wherein elevating the priority comprises increasing the volume of the media stream receiving the alert. 3. The method of claim 1, wherein elevating the priority comprises changing a spatial direction for rendering the media stream receiving the alert. 5.The method of claim 1, wherein elevating the priority comprises rendering the media stream	“a continuous sequence of audio or audio-and-video, which may include associated data, through a network”	Plain and ordinary meaning.	

Exhibit D – Joint Claim Construction Chart

'664 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
receiving the alert to a priority spatial direction.			
(Claim 1) A method, comprising: monitoring media streams associated with channels in a communication environment; receiving an alert in one of the media streams; and elevating a priority associated with the media stream receiving the alert, such that an adjustment is made to how the media stream is provisioned to an endpoint in the communication environment.	“two or more paths of differing priority”	Plain and ordinary meaning, or “two or more paths”	
(Claim 1) A method, comprising: monitoring media streams associated with channels in a communication environment;	“end-user device capable of exchanging audio or other data in the architecture”	Plain and ordinary meaning.	

Exhibit D – Joint Claim Construction Chart

'664 Patent Claim Terms	Motorola's Proposed Construction	STA's Proposed Construction	Court's Construction
receiving an alert in one of the media streams; and elevating a priority associated with the media stream receiving the alert, such that an adjustment is made to how the media stream is provisioned to an endpoint in the communication environment.			
Order of steps (Claim 1) A method, comprising: monitoring media streams associated with channels in a communication environment; receiving an alert in one of the media streams; and elevating a priority associated with the media stream receiving the alert, such that an adjustment is made to how the media stream is provisioned to an endpoint in the communication environment.	The steps must be performed in the recited order.	Plain and ordinary meaning.	