

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PPC BROADBAND, INC.

Plaintiff,

v.

CHARLES INDUSTRIES, LLC AND

AMPHENOL CORPORATION,

Defendants.

C.A. No. 22-1517-GBW

JOINT CLAIM CONSTRUCTION CHART

Pursuant to paragraph 8 of the Scheduling Order (D.I. 22) in the above-captioned action, Plaintiff PPC Broadband (“PPC”) and Defendants Charles Industries, LLC and Amphenol (“Amphenol”) hereby submit this Joint Claim Construction Chart for the claim terms/phrases in U.S. Patent No. 9,008,483 (“the ’483 Patent”) that are currently in dispute.

Appendix A is a chart identifying: (1) the disputed terms/phrases; (2) each party’s proposed construction of the disputed claim language; and (3) citation(s) to the intrinsic evidence in support of the parties’ respective proposed constructions. *See* D.I. 22 at ¶ 8. Additionally, a text searchable .PDF copy of the ’483 Patent is attached as Appendix B.

The parties reserve the right to rely upon other portions of the intrinsic record, including any portion cited or relied upon by the opposing party as well as its context. The parties further reserve the right to rely upon extrinsic evidence and expert testimony in support of their proposed constructions.

This litigation is in its early stages, and discovery is ongoing. Accordingly, in the event one or more of the parties later identifies terms that it believes require claim construction, each

party reserves the right to seek construction of such terms and to supplement the intrinsic and extrinsic records.

Dated: September 7, 2023

Respectfully submitted,

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Appendix A

Appendix A

Claims	Term(s)	PPC's Proposed Construction	PPC's Intrinsic Support	Amphenol's Proposed Construction	Amphenol's Intrinsic Support
1, 2, and 10-13	Amphenol: "drop cable" PPC: "... a drop cable from an optical fiber service provider distribution point"	No construction necessary, or in the alternative to the extent construction is necessary: "a cable that connects the drop interface box to an optical fiber service provider"	'483 Patent: Abstract; FIGS. 2-2, 4-2; 1:16–2:20; 3:17-34 (FIGS. 1, 5-4); 3:58-4:37 (FIGS. 3-1 through 3-4); 4:58–5:2 (FIGS. 5-4); 5:21-61 (FIGS. 4-1, 5-1 through 5-3); 6:19-21 (FIG. 5-4); 7:1-7 (FIG. 6-4); Claims 1, 14, 15.	"externally jacketed (e.g., heavy, hardened, or outdoor jacket) multi-fiber cable"	'483 Patent (App. B): Abstract, 1:15-19, 1:39-49, 1:50-59, 2:3-10, 3:9-14, 3:24-31, 5:21-29, Fig. 5-4.