

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

VIDEO SOLUTIONS PTE. LTD.,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civil Action No. 2:23-cv-222-JRG

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

In the above-captioned patent action, pursuant to Patent Local Rule 4-3, Plaintiff Video Solutions PTE. LTD. (“Video Solutions” or “Plaintiff”) and Defendant Cisco Systems, Inc. (“Cisco” or “Defendant”) hereby provide this Joint Claim Construction and Prehearing Statement regarding Video Solutions’ asserted U.S. Patent Nos. 8,446,452 (the “’452 patent”), 8,446,823 (the “’823 patent”), 8,649,426 (the “’426 patent”), and 9,204,099 (the “’099 patent”) (collectively, the “Asserted Patents”). Each of the parties to this action hereby reserves its rights to supplement, modify and/or amend these proposed constructions or the rebuttal to same.

I. AGREED TERMS (P.R. 4-3(a)(1))

(“The construction of those claim terms, phrases, or clauses on which the parties agree.”)

The parties agree that the term “undelayed round trip delay” as recited in the asserted claim 1 of the ’823 patent means “round trip delay without including any additional delay introduced as a result of limitation [1.G].” However, the parties continue to dispute the proper construction of “round trip delay.” Also, limitation [1.G]—the final limitation recited in claim 1 of the ’823 patent—contains multiple disputed claim terms, phrases, or clauses about which the parties do not agree on any constructions.

The parties also agree that the Preamble of claim 10 of the '099 patent is limiting. However, this Preamble contains multiple disputed claim terms, phrases, or clauses about which the parties do not agree on any constructions.

If the parties are able to reach agreement concerning the constructions of any further claim terms, phrases, or clauses at issue, they will supplement the present Joint Claim Construction and Prehearing Statement.

II. DISPUTED TERMS (P.R. 4-3(a)(2))

("Each party's proposed claim construction or indefiniteness position for each disputed claim term, phrase, or clause, together with an identification of all references from the specification or prosecution history that support that position, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its position or to oppose any other party's position, including, but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses.")

Attached hereto as Exhibits A and B, respectively, are separate charts for Video Solutions and Cisco, setting forth the constructions and indefiniteness positions (if any) proposed by each side for each disputed claim term, phrase, or clause of the Asserted Patents, together with an identification of the information (if any) set forth in the above paragraph.

Video Solutions and Cisco hereby each reserves their right to rely upon all evidence cited or referenced in the opposing side's chart and exhibit relating to disputed terms.

III. TIME FOR THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(a)(3))

("The anticipated length of time necessary for the Claim Construction Hearing.")

At this time, the parties anticipate a combined total of about three hours for presentation at the Claim Construction Hearing, with each side, namely Video Solutions and Cisco, having equal time.

IV. WITNESSES AT THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(a)(4))

(“Whether any party proposes to call one or more witnesses, including experts, at the Claim Construction Hearing and the identity of each such witness.”)

At this time, neither party proposes to call any witnesses at the Claim Construction Hearing. Once claim construction briefing is done and each side has had an opportunity to review the other side’s briefs and proffered evidence, the parties respectfully propose that they should be permitted to confer and assess at that time whether there would be any need for such live testimony at the Hearing.

V. ADDITIONAL ISSUES (P.R. 4-3(a)(5))

(“A list of any other issues which might appropriately be taken up at a Prehearing Conference prior to the Claim Construction Hearing, and proposed dates, if not previously set, for any such Prehearing Conference at this time.”)

At this time, neither party is aware of any other issues that might be appropriately addressed at a prehearing conference prior to the Claim Construction Hearing.

Dated: May 21, 2024

Respectfully submitted,

/s/ Jared Bobrow

Jared Bobrow (CA State Bar No. 133712)
Jason Lang (CA State Bar No. 255642)
Diana Rutowski (CA State Bar No. 233878)
Parth Sagdeo (CA State Bar No. 325269)
Orrick, Herrington & Sutcliffe LLP
1000 Marsh Road
Menlo Park, CA 94025
Tel: (650) 614-7400
Fax: (650) 614-7401
jbobrow@orrick.com
jlang@orrick.com
drutowski@orrick.com
psagdeo@orrick.com

Sarah K. Mullins (CA State Bar No. 324558)

/s/ Mark C. Nelson

Mark C. Nelson
Texas Bar No. 00794361
Juanita DeLoach
Texas Bar No. 24064218
Daniel A. Valenzuela
Texas Bar No. 24067918
David Lisch
Texas Bar No. 24077179
BARNES & THORNBURG LLP
2121 North Pearl Street, Ste. 700
Dallas, TX 75201
Tel: (214) 258-4200
Fax: (214) 258-4199
mark.nelson@btlaw.com
juanita.deloach@btlaw.com

Orrick, Herrington & Sutcliffe LLP
405 Howard Street
San Francisco, CA 94105-2669
Tel: (415) 773-4572
Fax: (631) 790-4932
sarahmullins@orrick.com

Ernest Fok (CA State Bar No. 341927)
Orrick, Herrington & Sutcliffe LLP
631 Wilshire Boulevard, Suite 2-C
Santa Monica, CA 90401
Tel: (310) 633 2800
Fax: (310) 633 2849
efok@orrick.com

Melissa R. Smith
Texas Bar No. 24001351
Gillam & Smith LLP
303 South Washington Avenue
Marshall, Texas 75670
Tel: (903) 934-8450
Fax: (903) 934-9257
melissa@gillamsmithlaw.com

**COUNSEL FOR DEFENDANT
CISCO SYSTEMS, INC.**

dvalenzuela@btlaw.com
david.lisch@btlaw.com

Todd G. Vare
Texas Bar No. 1845849
BARNES & THORNBURG LLP
11 South Meridian Street
Indianapolis, IN 46204
Tel: (317) 231-7735
Fax: (317) 231-7433
todd.vare@btlaw.com

Jason M. Zucchi
(Admitted Pro Hac Vice)
BARNES & THORNBURG LLP
225 S. Sixth Street
Suite 2800
Minneapolis, MN 55402
Tel: (612) 367-8764
jason.zucchi@btlaw.com

Wesley Hill
Texas Bar No. 24032294
Andrea Fair
Texas Bar No. 24078488
Garrett Parish
Texas Bar No. 24125824
WARD, SMITH & HILL, PLLC
1507 Bill Owens Parkway
Longview, TX 75604
Tel: (903) 757-6400
Fax: (903) 757-2323
wh@wsfirm.com
andrea@wsfirm.com
gparish@wsfirm.com

**COUNSEL FOR PLAINTIFF
VIDEO SOLUTIONS PTE. LTD.**

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2024 a copy of the foregoing document was served via e-mail on all parties who are deemed to have consented to electronic service.

/s/ Mark C. Nelson

Mark C. Nelson

EXHIBIT A – VIDEO SOLUTIONS’ PROPOSED CONSTRUCTIONS AND EVIDENCE

Pursuant to Local Patent Rule 4-3(a)(2), Plaintiff Video Solutions Pte. Ltd. (“Video Solutions” or “Plaintiff”) hereby provides its “proposed claim construction or indefiniteness position for each disputed claim term, phrase, or clause, together with an identification of all references from the specification or prosecution history that support that position, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its position or to oppose any other party’s position, including, but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses.”

Pursuant to Local Patent Rule 4-3(b), Video Solutions will also serve on Defendant Cisco Systems, Inc. (“Cisco” or “Defendant”) a copy of the Expert Declaration of Dr. Eric Cole in Support of Plaintiff Video Solutions Pte. Ltd.’s Claim Constructions (“Cole Declaration”).

Video Solutions contends that no construction is necessary for any of the disputed claim terms Cisco has proposed for construction. Video Solutions reserves the right to supplement, amend, and/or modify the following positions and rebuttals to Cisco’s proposed constructions and indefiniteness positions for any reason. Moreover, Video Solutions further reserves the right to provide additional positions and/or constructions once Cisco makes its position clear and/or offers evidence and/or argument regarding the construction and/or alleged indefiniteness of any claim term, including during claim construction briefing.

With respect to the “Supporting or Potential Rebuttal Intrinsic Evidence” cited in the below chart, Video Solutions states that, in addition to the specific intrinsic evidence cited for each disputed claim term, Video Solutions also intends to rely on the Figures

associated with and/or referenced in any citations of the Asserted Patents. Moreover, also with respect to the “Supporting or Potential Rebuttal Intrinsic Evidence” cited in the below chart, Video Solutions further states that, for each disputed claim term shown below, Video Solutions also intends to rely on the prosecution history of the Asserted Patents, including all pages of any filings cited below, all of the original claims filed in the applications that led to the Asserted Patents, amended claims during prosecution, and all claims that ultimately issued in the Asserted Patents, as well as all Figures and the descriptions of same in the Asserted Patents at issue.

Cisco has noticed depositions for the named inventors of the Asserted Patents. Video Solutions reserves the right to rely on inventor testimony with respect to any disputed claim term, as well as the right to rely on rebuttal testimony in response to any inventor testimony relied on by Cisco.

A. U.S. PATENT NO. 8,446,452

Disputed Claim Term(s)	Video Solutions’ Proposed Construction	Video Solutions’ Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions’ Supporting or Potential Rebuttal Extrinsic Evidence
“endpoint” (Claims 1, 2, 9, 15, 21) (Proposed by Cisco)	Video Solutions’ position is that no construction is necessary for this term. If construed, Video Solutions proposes that this term be construed according to its plain and ordinary meaning which is “device or collection of devices on a network that	<u>Specification of ’452 patent</u> Abstract; Figs. 1-2; 1:13-24, 1:37-2:10, 2:57-4:3, 4:19-5:43; 5:51-6:5, 9:29-10:11; Claims 1-2, 9, 15, 21.	Exhibits 1-7 from Video Solutions’ disclosures pursuant to LPR 4-2, served on Cisco on May 2, 2024: Exhibit 1 – “What is an endpoint,” Microsoft Security. Exhibit 2 – “What Is an Endpoint, and What Are Best Practices for Protection?” Cisco Systems, Inc.

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
	enable(s) an end user to exchange information with computers over the network”		Exhibit 3 – “What is an Endpoint?” Perimeter 81. Exhibit 4 – “What are Endpoint Devices? Examples and Top Security Risks,” Tanium Inc. Exhibit 5 – Held, G. (1995). <i>Dictionary of Communications Technology</i>. (p. 150). John Wiley & Sons, Ltd. Exhibit 6 – “Hybrid Branch Office VPN Architecture (Partial Mesh) - Configuration Example,” WatchGuard Technologies, Inc. Exhibit 7 – Institute of Electrical and Electronics Engineers. (2000). <i>IEEE 100: The Authoritative Dictionary of IEEE Standards Terms</i>. (7th ed., p. 381). Standards Information Network IEEE Press. Cole Declaration

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
			Video Solutions reserves the right to provide rebuttal expert testimony to any expert testimony provided by Cisco.

B. U.S. PATENT NO. 8,446,823

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
“endpoint(s)” (Claims 1, 7) (Proposed by Cisco)	<i>See</i> Video Solutions' position and proposed construction for “endpoint” in the '452 patent.	<u>Specification of '823 patent</u> Abstract; Figs. 1-3, 6, 1:5-2:49, 2:54-55, 2:58-3:6, 3:15-20, 3:30-39, 4:4-5:17, 5:40-6:63; Claims 1, 7, 10, 18. <u>File History of '823 patent</u> June 23, 2009 Original Claims at 13-16 May 14, 2012 Office Action Requirement for Restriction/Election June 4, 2012 Response to Restriction Requirement Mailed May 14, 2012	Exhibits 1-7 from Video Solutions' disclosures pursuant to LPR 4-2, served on Cisco on May 2, 2024: Exhibit 1 – “What is an endpoint,” Microsoft Security. Exhibit 2 – “What Is an Endpoint, and What Are Best Practices for Protection?” Cisco Systems, Inc. Exhibit 3 – “What is an Endpoint?” Perimeter 81. Exhibit 4 – “What are Endpoint Devices? Examples and Top Security Risks,” Tanium Inc.

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
		January 17, 2013 Amendment and Remarks at 2-9.	Exhibit 5 – Held, G. (1995). <i>Dictionary of Communications Technology</i>. (p. 150). John Wiley & Sons, Ltd. Exhibit 6 – “Hybrid Branch Office VPN Architecture (Partial Mesh) - Configuration Example,” WatchGuard Technologies, Inc. Exhibit 7 – Institute of Electrical and Electronics Engineers. (2000). <i>IEEE 100: The Authoritative Dictionary of IEEE Standards Terms</i>. (7th ed., p. 381). Standards Information Network IEEE Press. Cole Declaration Video Solutions reserves the right to provide rebuttal expert testimony to any expert testimony provided by Cisco.
“establishing logical two-way connections	Video Solutions' position is that no construction is necessary for this term.	<u>Specification of '823 patent</u> Abstract; Figs. 1-6; 1:5-3:6, 3:15-39, 4:4-5:39, 6:46-63;	See Extrinsic Evidence for “endpoint(s)” for the '452 patent, above.

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
through the common communications resource between one or more near [endpoints]¹ and one or more far [endpoints]" (Claim 1) (Proposed by Cisco)	If construed, Video Solutions proposes that this term be construed according to its plain and ordinary meaning which is "establishing one or more logical two-way connections through the common communications resource between each of one or more near [endpoints] and each of one or more far [endpoints]"	Claims 1, 3, 7, 10, 18. <u>File History of '823 patent</u> June 23, 2009 Original Claims at 13-16 May 14, 2012 Office Action Requirement for Restriction/Election June 4, 2012 Response to Restriction Requirement Mailed May 14, 2012 January 17, 2013 Amendment and Remarks at 2-9. February 21, 2013 Notice of Allowability	
"round trip delay" (Claim 1) (Proposed by Cisco)	Video Solutions' position is that no construction is necessary for this term. If construed, Video	<u>Specification of '823 patent</u> Abstract; Figs. 1-2, 5-6; 1:55-2:49, 2:53-55, 3:40-4:3; 4:32-48, 4:59-6:24; Claims 1, 3-5, 10, 12-13,	Exhibits 8-15 from Video Solutions' disclosures pursuant to LPR 4-2, served on Cisco on May 2, 2024:

¹ Throughout this chart, unless otherwise noted, all terms shown in bold text and surrounded by brackets have been separately proposed for construction. For each of these terms, Video Solutions incorporates its own proposed construction by reference.

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
	Solutions proposes that this term be construed according to its plain and ordinary meaning which is "interval of time required for data to travel over the network from one device to another and back"	18. June 23, 2009 Original Claims at 13-16 January 17, 2013 Amendment and Remarks at 2-9 February 21, 2013 Notice of Allowability	Exhibit 8 – <i>Round-trip delay</i>. (2024, April 26). Wikipedia. https://en.wikipedia.org/w/index.php?title=Round-trip_delay&oldid=1220930329 Exhibit 9 – “What is Network Round-Trip Delay?” Livaction. Exhibit 10 – “RTT (Round-trip Time),” Capterra Inc. Exhibit 11 – Ford, M. (1997). <i>Internetworking Technologies Handbook</i>. (p. 644). New Riders Publishing. Exhibit 12 – Ford, M. (1997). <i>Internetworking Technologies Handbook</i>. (p. 645). New Riders Publishing. Exhibit 13 – Odom, W., & Knott, T. (2006). <i>Networking Basics CCNA 1 Companion Guide</i>. (p. 557). Cisco Press. Exhibit 14 – Harte, L. (2007). <i>Telecom Dictionary</i>. (p. 474). Althos

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
			Publishing. Exhibit 15 – <i>Definition of RTT (Round-trip Time) - Gartner Information Technology Glossary</i>. (2024, May 2). Gartner, Inc. https://www.gartner.com/en/information-technology/glossary/rtt-round-trip-time
“determining the location of said data peaks in said data streams” (Claim 1) (Proposed by Cisco)	Video Solutions' position is that no construction is necessary for this term. If construed, Video Solutions proposes that this term be construed according to its plain and ordinary meaning which is “determining the location of data peaks in each data stream”	<u>Specification of '823 patent</u> Abstract; Figs. 1-6; 1:23-45, 1:54-65, 2:8-39, 2:43-55, 2:58-3:39, 4:4-6:63; Claims 1-3, 6, 8, 10-11, 15-16, 18. <u>File History of '823 patent</u> June 23, 2009 Original Claims at 13-16 January 17, 2013 Amendment and Remarks at 2-9 February 21, 2013 Notice of Allowability	Exhibits 18-21 from Video Solutions' disclosures pursuant to LPR 4-2, served on Cisco on May 2, 2024: Exhibit 18 – Newton, H. (1998). <i>Newton's Telecom Dictionary</i>. (14th ed., p. 202). Flatiron Publishing. Exhibit 19 – Harte, L. (2007). <i>Telecom Dictionary</i>. (p. 158). Althos Publishing. Exhibit 20 – Mastin, R. (2001). <i>Telecom & Networking Glossary: Understanding Communications Technology</i>. (2nd ed., p. 72). Aegis

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
			Publishing Group, Ltd. Exhibit 21 – <i>Identifying Peaks in Data: Harnessing Peak Crosscorrelation</i>. (2024, May 2). FasterCapital. https://fastercapital.com/content/Identifying-Peaks-in-Data--Harnessing-Peak-Crosscorrelation.html Cole Declaration Video Solutions reserves the right to provide rebuttal expert testimony to any expert testimony provided by Cisco.
“dependent on the location of said data peaks” (Claim 1) (Proposed by Cisco)	Video Solutions' position is that no construction is necessary for this term. If construed, Video Solutions proposes that this term be construed according to its plain and ordinary meaning which is “according to the location of the data peaks in the data streams”	<u>Specification of '823 patent</u> Abstract; Figs. 1-6; 1:23-45, 1:54-65, 2:8-39, 2:43-55, 2:58-3:39, 4:4-6:63; Claims 1-3, 6, 8, 10-11, 15-16, 18. <u>File History of '823 patent</u> June 23, 2009 Original Claims at 13-16 January 17, 2013 Amendment and Remarks at	See Extrinsic Evidence for “determining the location of said data peaks in said data streams,” above. Cole Declaration Video Solutions reserves the right to provide rebuttal expert testimony to any expert testimony provided by Cisco.

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
		2-9. February 21, 2013 Notice of Allowability	
“without increasing the maximum [round-trip delay] for the logical two-way connections” (Claim 1) (Proposed by Cisco)	Video Solutions' position is that no construction is necessary for this term. If construed, Video Solutions proposes that this term be construed according to its plain and ordinary meaning which is “without increasing the maximum value of the [round trip delay] for any of the logical two way connections”	<u>Specification of '823 patent</u> Abstract; Figs. 1-6; 1:11-22, 1:55-2:55, 2:58-3:6, 3:15-3:34, 3:40-4:20, 4:32-48, 4:59-6:45; Claims 1, 3-5, 10, 12-13, 18. <u>File History of '823 patent</u> June 23, 2009 Original Claims at 13-16 January 17, 2013 Amendment and Remarks at 2-9. February 21, 2013 Notice of Allowability	See Extrinsic Evidence for “round trip delay,” above.

C. U.S. PATENT NO. 8,649,426

No terms disputed by either party at this time.

D. U.S. PATENT NO. 9,204,099

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
“endpoint(s)” (Claims 3, 4, 5, and 10) (Proposed by Cisco)	<i>See</i> Video Solutions' position and proposed construction for “endpoint” in the '452 patent.	<u>Specification of '099 patent</u> Figs. 1-10; 1:19-2:47, 3:9-22, 3:56-4:46, 4:52-6:9, 7:1-17, 7:38-67, 8:8-21, 15:4-17:67; Claims 1-5, 7, 9-10.	Exhibits 1-7 from Video Solutions' disclosures pursuant to LPR 4-2, served on Cisco on May 2, 2024: Exhibit 1 – “What is an endpoint,” Microsoft Security. Exhibit 2 – “What Is an Endpoint, and What Are Best Practices for Protection?” Cisco Systems, Inc. Exhibit 3 – “What is an Endpoint?” Perimeter 81. Exhibit 4 – “What are Endpoint Devices? Examples and Top Security Risks,” Tanium Inc. Exhibit 5 – Held, G. (1995). <i>Dictionary of Communications Technology</i>. (p. 150). John Wiley & Sons, Ltd. Exhibit 6 – “Hybrid Branch Office VPN Architecture (Partial Mesh) - Configuration Example,”

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
			WatchGuard Technologies, Inc. Exhibit 7 – Institute of Electrical and Electronics Engineers. (2000). <i>IEEE 100: The Authoritative Dictionary of IEEE Standards Terms</i>. (7th ed., p. 381). Standards Information Network IEEE Press. Cole Declaration Video Solutions reserves the right to provide rebuttal expert testimony to any expert testimony provided by Cisco.
“[a plurality of [endpoints], at least some of which are connected in a] mesh configuration” (Claims 3, 10) (Proposed by Cisco)	Video Solutions' position is that no construction is necessary for this term. If construed, Video Solutions proposes that this term be construed according to its plain and ordinary meaning which is “network configuration where the [endpoints]	<u>Specification of '099 patent</u> Figs. 1-10; 1:13-2:47, 3:9-22, 3:56-4:46, 4:52-6:9, 7:1-17, 7:38-67, 8:8-21, 15:4-17:67; Claims 1-5, 7, 9-10. <u>File History of '099 patent</u> January 31, 2013 Original Claims at 29-31 August 7, 2013 Information	See above Extrinsic Evidence relating to “endpoint(s).” Exhibits 22-36 from Video Solutions' disclosures pursuant to LPR 4-2, served on Cisco on May 2, 2024: Exhibit 22 - Ford, M. (1997). <i>Internetworking Technologies Handbook</i>. (p. 626). New Riders Publishing.

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
	connect directly or indirectly to one another and can send data to and from one another without the data passing through the same central server”	Disclosure Statement August 29, 2014 Office Action at 7-8 January 29, 2015 Amendment and Remarks at 2-6, 11 March 24, 2015 Office Action at 7-8 June 16, 2015 Amendment and Remarks at 2-6 July 28, 2015 Notice of Allowability U.S. Patent Publication Nos. US 2008/0170550 (“Liu”) and US 2011/0187813 (“Musgrave”) cited during prosecution and on the face of the ’099 patent	Exhibit 23 - Ford, M. (1997). <i>Internetworking Technologies Handbook</i>. (p. 611). New Riders Publishing. Exhibit 24 - Ford, M. (1997). <i>Internetworking Technologies Handbook</i>. (p. 635). New Riders Publishing. Exhibit 25 – Clayton, J. (2001). <i>McGraw-Hill Illustrated Telecom Dictionary</i>. (3rd ed., pp. 437-438). The McGraw-Hill Companies, Inc. Exhibit 26 – Microsoft Corporation. (2003). <i>Microsoft Internet & Networking Dictionary</i>. (p. 158). Microsoft Press. Exhibit 27 – Microsoft Corporation. (2002). <i>Microsoft Computer Dictionary</i>. (5th ed., p. 335). Microsoft Press. Exhibit 28 – <i>Mesh networking</i>. (2024, April 10). Wikipedia. https://en.wikipedia.org/w/index.php?title=Mesh_networkin

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
			g&oldid=1218203620 Exhibit 29 – De Schutter, L. (2018, July 10). <i>9 Things You Need To Know About Mesh Networks</i>. HackerNoon. https://hackernoon.com/9-things-you-need-to-know-about-mesh-networks-f61a77e5751a Exhibit 30 – “Cisco Wireless Mesh Networking,” Cisco Systems, Inc. Exhibit 31 – <i>Wireless Mesh Networking Topology</i>. (2024, May 2). Mouser Electronics, Inc. https://www.mouser.com/applications/wireless_mesh_networking_topologies/ Exhibit 32 – Higgins, M. (2023, March 15). <i>What is a mesh network, and how does it work?</i> Nord Security. Exhibit 33 – Mastin, R. (2001). <i>Telecom & Networking Glossary</i>:

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
			<i>Understanding Communications Technology</i>. (2nd ed., pp. 158-160). Aegis Publishing Group, Ltd. Exhibit 34 – Johnson, D. (2007). <i>Building a Rural Wireless Mesh Network, A do-it-yourself guide to planning and building a Freifunk based mesh network</i>. (2nd ed., version 0.8). Wireless Africa Team of the Meraka Institute. Exhibit 35 – Hildenbrand, J. (2018, November 1). <i>How Wi-Fi mesh networks work</i>. Android Central. https://www.androidcentral.com/how-wifi-mesh-networks-work Exhibit 36 – <i>Wireless mesh network</i>. (2024, April 25). Wikipedia. https://en.wikipedia.org/w/index.php?title=Wireless_mesh_network&oldid=1220782338 Cole Declaration

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
			Video Solutions reserves the right to provide rebuttal expert testimony to any expert testimony provided by Cisco.
“mesh-connected [endpoint]”/“mesh [endpoint(s)]” (Claims 3 and 10) (Proposed by Cisco) (Term recites other disputed terms, including “endpoint(s),” shown above in bold)	Video Solutions' position is that no construction is necessary for this term. If construed, Video Solutions proposes that this term be construed according to its plain and ordinary meaning which is “[endpoint(s)] connected in a network configuration where the [endpoints] connect directly or indirectly to one another and can send data to and from one another without the data passing through the same central server”	<u>Specification of '099 patent</u> Figs. 1-10; 1:13-2:47, 3:9-22, 3:56-4:46, 4:52-6:9, 7:1-17, 7:38-67, 8:8-21, 15:37-17:67; Claims 1-5, 7, 9-10. <u>File History of '099 patent</u> January 31, 2013 Original Claims at 29-31 August 7, 2013 Information Disclosure Statement August 29, 2014 Office Action at 7-8 January 29, 2015 Amendment and Remarks at 2-6, 11 March 24, 2015 Office Action at 7-8 June 16, 2015 Amendment and Remarks at 2-6	See above Extrinsic Evidence relating to “endpoint(s)” and “mesh configuration.”

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
		July 28, 2015 Notice of Allowability U.S. Patent Publication Nos. US 2008/0170550 ("Liu") and US 2011/0187813 ("Musgrave") cited during prosecution and on the face of the '099 patent	
"[the] conference participants" (Claims 3 and 10) (Proposed by Video Solutions and Cisco)	Video Solutions proposes that this term be construed as "videoconference participants at the at least some [mesh-connected endpoints] and the at least one non-mesh connected [endpoint]"	<u>Specification of '099 patent</u> Abstract; Figs. 1, 4, 8-10; 1:24-25; 1:51-64, 2:15-24, 3:9-21, 4:11-40, 4:43-46, 4:52-6:9, 7:1-17, 14:16-25, 15:37-17:23, 17:34-40, 17:47-67; Claims 1-5, 7, 9-10.	See above Extrinsic Evidence relating to "endpoint(s)" and "mesh-connected endpoint(s)"
"a plurality of [endpoints] ... which are configured such that a film strip with ... video feeds from [the conference participants] is displayed" (Claim 3)	Video Solutions' position is that no construction is necessary for this term. If construed, Video Solutions proposes that this term be construed according to its plain and ordinary meaning which is	<u>Specification of '099 patent</u> Figs. 1-10; 1:19-2:47, 3:9-4:46, 4:52-6:12, 6:34-7:17, 7:38-67, 8:1-21, 8:58-9:2, 15:4-17:67; Claims 1-5, 7, 9-10. <u>File History of '099 patent</u> January 31, 2013 Original	See above Extrinsic Evidence relating to "endpoint(s)" and "the conference participants"

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
(Proposed by Cisco)	"a plurality of [endpoints] ...which are configured such that a film strip with...video feeds from [the conference participants] is displayed"	Claims at 29-31 August 29, 2014 Office Action at 3-8 January 29, 2015 Amendment and Remarks at 2-9 March 24, 2015 Office Action at 3-5, 8 June 16, 2015 Amendment and Remarks at 2-6 July 28, 2015 Notice of Allowability	
"wherein a film strip with frames containing reduced-size video feeds from [the conference participants] is displayed at the [mesh endpoints]" (Claim 10) (Proposed by Cisco)	Video Solutions' position is that no construction is necessary for this term. If construed, Video Solutions proposes that this term be construed according to its plain and ordinary meaning which is "wherein a film strip with frames containing reduced-	<u>Specification of '099 patent</u> Figs. 1-10; 1:19-2:47, 3:9-4:46, 4:52-6:12, 6:34-7:17, 7:38-67, 8:1-21, 8:58-9:2, 15:4-17:67; Claims 1-5, 7, 9-10. <u>File History of '099 patent</u> January 31, 2013 Original Claims at 29-31	See above Extrinsic Evidence relating to "endpoint(s)," "mesh configuration," and "the conference participants"

Disputed Claim Term(s)	Video Solutions' Proposed Construction	Video Solutions' Supporting or Potential Rebuttal Intrinsic Evidence	Video Solutions' Supporting or Potential Rebuttal Extrinsic Evidence
	size video feeds from [the conference participants] is displayed at the [mesh endpoints]"	August 29, 2014 Office Action at 3-8 January 29, 2015 Amendment and Remarks at 2, 8-9 March 24, 2015 Office Action at 3-5, 8 June 16, 2015 Amendment and Remarks at 2-6 July 28, 2015 Notice of Allowability	

EXHIBIT B – CISCO’S PROPOSED CONSTRUCTIONS AND EVIDENCE**A. U.S. PATENT NO. 8,446,452**

Disputed Claim Term(s)	Cisco’s Proposed Construction	Cisco’s Supporting or Potential Rebuttal Intrinsic Evidence	Cisco’s Supporting or Potential Rebuttal Extrinsic Evidence
“endpoint” (Claims 1, 2, 15, 21) (Proposed by Cisco)	A device or collection of devices that an end user views and accesses to send or receive communications over a network	<u>Specification</u>: ’452 patent, 1:14-24, 2:1-35, 2:60-3:61, 4:1-3, 4:30-40, 4:41-62, 9:29-10:9, Fig. 1, claims 1, 15. <i>See also</i> citations for “endpoint” in other patents.	Cisco will offer expert testimony regarding this term from Dr. Kevin Almeroth, including testimony regarding: (1) Technical background of the patent and claims; (2) Qualifications and knowledge of a person of ordinary skill in the art at the time of the alleged inventions; and (3) What one of ordinary skill in the art at the time of the alleged inventions would understand this term to mean. Cisco may also rely on testimony from the named inventors, Mojtaba Hosseini and Patrick White, regarding the meaning of this term. Cisco may also rely on definitions of this term (or related terms) in dictionaries and technical literature, including, without limitation the following: CISCO_00100453-00100455, Steven M. Kaplan, WILEY ELECTRICAL AND ELECTRONICS ENGINEERING DICTIONARY at CISCO_00100455 (John Wiley & Sons, Inc., 1st ed. 2004)

Disputed Claim Term(s)	Cisco's Proposed Construction	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
			Video Solutions' P.R. 4-2 Disclosure, Ex. 7, IEEE 100, THE AUTHORITATIVE DICTIONARY OF IEEE STANDARDS TERMS (7th ed. 2000) Cisco may also rely on other extrinsic evidence, including, without limitation the following: Video Solutions' P.R. 4-2 Disclosure, Ex. 3, Perimeter 81, What is an Endpoint?, available at https://www.perimeter81.com/glossary/endpoint.

B. U.S. PATENT NO. 8,446,823

Disputed Claim Term(s)	Cisco's Proposed Construction	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
"endpoint(s)" (Claims 1, 7) (Proposed by Cisco)	A device or collection of devices that an end user views and accesses to send or receive communications over a network	<u>Specification</u>: '823 patent, 1:17-22, 1:37-52, 2:8-14, 2:46-56, 2:61-3:6, 3:58-4:20, 4:32-41, Figs. 1-2, claim 1.	Cisco will offer expert testimony regarding this term from Dr. Kevin Almeroth, including testimony regarding: (1) Technical background of the patent and claims; (2) Qualifications and knowledge of a person of ordinary skill in the art at the time of the alleged inventions; and (3) What one of ordinary skill in the art at the time of the alleged inventions would understand this term to mean. Cisco may also rely on testimony from the named inventors, Mojtaba Hosseini and Patrick White, regarding the meaning of this term.

Disputed Claim Term(s)	Cisco's Proposed Construction	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
			Cisco may also rely on definitions of this term (or related terms) in dictionaries and technical literature, including, without limitation the following: CISCO_00100453-00100455, Steven M. Kaplan, WILEY ELECTRICAL AND ELECTRONICS ENGINEERING DICTIONARY at CISCO_00100455 (John Wiley & Sons, Inc., 1st ed. 2004) Video Solutions' P.R. 4-2 Disclosure, Ex. 7, IEEE 100, THE AUTHORITATIVE DICTIONARY OF IEEE STANDARDS TERMS (7th ed. 2000) Cisco may also rely on other extrinsic evidence, including, without limitation the following: Video Solutions' P.R. 4-2 Disclosure, Ex. 3, Perimeter 81, What is an Endpoint?, available at https://www.perimeter81.com/glossary/endpoint.
"establishing logical two-way connections through the common communications resource between one or more near endpoints and one	Establishing logical two-way connections from one or more near endpoints through the common communications resource to one or more far endpoints, and vice versa	<u>Specification</u>: '823 patent, Abstract, 1:56-65, 2:15-27, 2:61-3:6, Figs. 1-2, claim 1.	Cisco may rely on testimony from the named inventors, Mojtaba Hosseini and Patrick White, regarding the meaning of this term.

Disputed Claim Term(s)	Cisco's Proposed Construction	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
or more far endpoints" (Claim 1) (Proposed by Cisco) (Term recites other disputed terms, including "endpoints," shown above in bold)			
"round trip delay" (Claim 1) (Proposed by Cisco)	In the video conferencing context, the time taken from the moment an individual at the source moves or makes a gesture until that movement occurs at the distant display plus the time taken for a similar movement at the distant location to occur on the local display	<u>Specification</u>: '823 patent, 3:46-62, 4:42-48, 4:59-62, 5:47-62, claim 1.	Cisco may rely on testimony from the named inventors, Mojtaba Hosseini and Patrick White, regarding the meaning of this term.
"determining the location of said data peaks in said data streams" (Claim 1)	Determining the location of data peaks in each data stream to be transmitted	<u>Specification</u>: '823 patent, 1:37-52, 1:56-2:14, 3:7-14, 3:21-39, 3:46-57, 4:42-5:16, 5:40-6:45, Figs. 2-6, claim 1.	Cisco will offer expert testimony regarding this term from Dr. Kevin Almeroth, including testimony regarding: (1) Technical background of the patent and claims;

Disputed Claim Term(s)	Cisco's Proposed Construction	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
(Proposed by Cisco)			(2) Qualifications and knowledge of a person of ordinary skill in the art at the time of the alleged inventions; and (3) What one of ordinary skill in the art at the time of the alleged inventions would understand this term to mean. Cisco may also rely on testimony from the named inventors, Mojtaba Hosseini and Patrick White, regarding the meaning of this term.
“dependent on the location of said data peaks” (Claim 1) (Proposed by Cisco)	According to the location of the data peaks in the data streams that have not been transmitted	<u>Specification</u>: '823 patent, 1:37-52, 1:56-2:14, 3:7-14, 3:21-39, 3:46-57, 4:42-5:16, 5:40-6:45, Figs. 2-6, claim 1.	Cisco will offer expert testimony regarding this term from Dr. Kevin Almeroth, including testimony regarding: (1) Technical background of the patent and claims; (2) Qualifications and knowledge of a person of ordinary skill in the art at the time of the alleged inventions; and (3) What one of ordinary skill in the art at the time of the alleged inventions would understand this term to mean. Cisco may also rely on testimony from the named inventors, Mojtaba Hosseini and Patrick White, regarding the meaning of this term.
“without increasing the maximum round-trip delay for the logical two-way connections” (Claim 1)	Without increasing round trip delay for the endpoint with the greatest undelayed round trip delay	<u>Specification</u>: '823 patent, 1:56-2:7, 4:66-5:4, 5:27-33, 5:66-6:9, 6:22-24, Fig. 6, claim 1.	Cisco may rely on testimony from the named inventors, Mojtaba Hosseini and Patrick White, regarding the meaning of this term.

Disputed Claim Term(s)	Cisco's Proposed Construction	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
(Term recites another disputed term, "round trip delay," shown above in bold) (Proposed by Cisco)			

C. U.S. PATENT NO. 8,649,426

No terms disputed by either party at this time.

D. U.S. PATENT NO. 9,204,099

Disputed Claim Term(s)	Cisco's Positions	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
"endpoint(s)" (Claims 3, 4, 5, and 10) (Proposed by Cisco)	A device or collection of devices that an end user views and accesses to send or receive communications over a network	<u>Specification</u>: '099 patent, 1:34-39, 1:60-2:3, 2:21-47, 4:39-56, 4:61-5:38, 5:54-60, 7:4-9, 7:46-49, 7:57-60, 8:8-12, 15:4-5, 15:16-23, 15:55-16:21, 17:3-12, 17:41-67, Figs. 1, 4a-b, 6a-b, 9. See endpoint(s) above.	Cisco will offer expert testimony regarding this term from Dr. Kevin Almeroth, including testimony regarding: (1) Technical background of the patent and claims; (2) Qualifications and knowledge of a person of ordinary skill in the art at the time of the alleged inventions; and (3) What one of ordinary skill in the art at the time of the alleged inventions would understand this term to mean. Cisco may also rely on testimony from the named inventor, David Brown, regarding the meaning of this term. Cisco may also rely on definitions of this term (or related terms) in dictionaries and technical literature, including, without limitation the following: CISCO_00100453-00100455, Steven M. Kaplan, WILEY ELECTRICAL AND ELECTRONICS ENGINEERING DICTIONARY at CISCO_00100455 (John Wiley & Sons, Inc., 1st ed. 2004) Video Solutions' P.R. 4-2 Disclosure, Ex. 7, IEEE 100, THE AUTHORITATIVE DICTIONARY OF IEEE STANDARDS TERMS (7th ed. 2000)

Disputed Claim Term(s)	Cisco's Positions	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
			Cisco may also rely on other extrinsic evidence, including, without limitation the following: Video Solutions' P.R. 4-2 Disclosure, Ex. 3, Perimeter 81, What is an Endpoint?, available at https://www.perimeter81.com/glossary/endpoint.
"mesh configuration" (Claims 3, 10) (Proposed by Cisco)	A configuration of endpoints in which each endpoint is connected directly to each other endpoint and streams its data independently to and from each other endpoint.	<u>Specification</u>: '099 patent, 1:34-50, 1:65-67, 2:33-47, 4:1-56, 5:21-35, 15:37-64, 16:6-18, 16:24-67, 17:3-12, 17:16-64, Figs. 8-10, claims 3, 10.	Cisco will offer expert testimony regarding this term from Dr. Kevin Almeroth, including testimony regarding: (1) Technical background of the patent and claims; (2) Qualifications and knowledge of a person of ordinary skill in the art at the time of the alleged inventions; and (3) What one of ordinary skill in the art at the time of the alleged inventions would understand this term to mean. Cisco may also rely on testimony from the named inventor, David Brown, regarding the meaning of this term. Cisco may also rely on definitions of this term (and related terms) in dictionaries and technical literature, including, without limitation the following: CISCO_00100470-00100473, Phillip A. Laplante, COMPREHENSIVE DICTIONARY OF ELECTRICAL ENGINEERING at CISCO_00100473 (CRC Press, 2d ed. 2005)

Disputed Claim Term(s)	Cisco's Positions	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
			CISCO_00100449-00100452, Phillip A. Laplante, COMPREHENSIVE DICTIONARY OF ELECTRICAL ENGINEERING at CISCO_00100452 (CRC Press, 2d ed. 2005) CISCO_00100474-00100476, Harry Newton, NEWTON'S TELECOM DICTIONARY at CISCO_00100476 (Flatiron Publishing, 24th ed. 2008) Video Solutions' P.R. 4-2 Disclosure, Exs. 22-24, Merilee Ford et al., INTERWORKING TECHNOLOGIES HANDBOOK (1997) Video Solutions' P.R. 4-2 Disclosure, Ex. 25, Jade Clayton, MCGRAW-HILL ILLUSTRATED TELECOM DICTIONARY (3d ed. 2001) Video Solutions' P.R. 4-2 Disclosure, Ex. 26, MICROSOFT INTERNET & NETWORKING DICTIONARY (2003) Video Solutions' P.R. 4-2 Disclosure, Ex. 27, MICROSOFT COMPUTER DICTIONARY (5th ed. 2002) Video Solutions' P.R. 4-2 Disclosure, Ex. 33, Robert Mastin, TELECOM & NETWORKING GLOSSARY (2d ed. 2001)

Disputed Claim Term(s)	Cisco's Positions	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
“mesh-connected endpoint”/“mesh endpoint(s)” (Claims 3 and 10) (Proposed by Cisco) (Term recites other disputed terms, including “endpoint(s),” shown above in bold)	An endpoint that is connected directly to each other mesh-connected endpoint and streams its data independently to and from each other mesh-connected endpoint	<u>Specification</u>: '099 patent, 1:34-50, 1:65-67, 2:33-47, 4:1-56, 5:21-35, 15:37-64, 16:6-18, 16:24-67, 17:3-12, 17:16-64, Figs. 8-10, claims 3, 10.	Cisco will offer expert testimony regarding this term from Dr. Kevin Almeroth, including testimony regarding: (1) Technical background of the patent and claims; (2) Qualifications and knowledge of a person of ordinary skill in the art at the time of the alleged inventions; and (3) What one of ordinary skill in the art at the time of the alleged inventions would understand this term to mean. Cisco may also rely on testimony from the named inventor, David Brown, regarding the meaning of this term. Cisco may also rely on definitions of this term in dictionaries and technical literature, including, without limitation the following: CISCO_00100470-00100473, Phillip A. Laplante, COMPREHENSIVE DICTIONARY OF ELECTRICAL ENGINEERING at CISCO_00100473 (CRC Press, 2d ed. 2005) CISCO_00100449-00100452, Phillip A. Laplante, COMPREHENSIVE DICTIONARY OF ELECTRICAL ENGINEERING at CISCO_00100452 (CRC Press, 2d ed. 2005) CISCO_00100474-00100476, Harry Newton, NEWTON'S TELECOM DICTIONARY at

Disputed Claim Term(s)	Cisco's Positions	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
			CISCO_00100476 (Flatiron Publishing, 24th ed. 2008) Video Solutions' P.R. 4-2 Disclosure, Exs. 22-24, Merilee Ford et al., INTERWORKING TECHNOLOGIES HANDBOOK (1997) Video Solutions' P.R. 4-2 Disclosure, Ex. 25, Jade Clayton, MCGRAW-HILL ILLUSTRATED TELECOM DICTIONARY (3d ed. 2001) Video Solutions' P.R. 4-2 Disclosure, Ex. 26, MICROSOFT INTERNET & NETWORKING DICTIONARY (2003) Video Solutions' P.R. 4-2 Disclosure, Ex. 27, MICROSOFT COMPUTER DICTIONARY (5th ed. 2002) Video Solutions' P.R. 4-2 Disclosure, Ex. 33, Robert Mastin, TELECOM & NETWORKING GLOSSARY (2d ed. 2001)
"[the] conference participants" (Claims 3 and 10) (Proposed by Video Solutions and Cisco)	Individuals participating in a videoconference from an endpoint	<u>Specification</u>: '099 patent, Abstract, 1:51-64, 2:15-24, 3:11-22, 5:4-20, 7:4-6, 17:1-2, 17:34-40, Fig. 1, claims 3, 10.	Cisco may rely on testimony from the named inventor, David Brown, regarding the meaning of this term.

Disputed Claim Term(s)	Cisco's Positions	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
“a plurality of endpoints ... which are configured such that a film strip with ... video feeds from the conference participants is displayed” (Claim 3) (Proposed by Cisco) (Term recites other disputed terms, including but not limited to, e.g., “endpoints” and “the conference participants,” shown above in bold)	A plurality of endpoints that always display a film strip with the video feeds from all of the conference participants when video feeds from at least two conference participants are available	<u>Specification</u>: '099 patent, 3:11-33, 3:44-60, 4:61-5:3, 5:39-6:19, 6:34-45, 6:50-61, 7:4-16, 7:50-67, 8:66-9:7, 9:27-30, 12:13-19, 15:4-27, 17:47-67, Figs. 4a-b, 5a-b, 6a-c, 7a-b, claims 3, 10.	Cisco may rely on testimony from the named inventor, David Brown, regarding the meaning of this term.
“wherein a film strip with frames containing reduced-size video feeds from the conference participants is displayed at the mesh endpoints” (Claim 10)	Wherein a film strip with the video feeds from all of the conference participants is always displayed at the mesh endpoints when video feeds from at least two conference participants are available	<u>Specification</u>: '099 patent, 3:11-33, 3:44-60, 4:61-5:3, 5:39-6:19, 6:34-45, 6:50-61, 7:4-16, 7:50-67, 8:66-9:7, 9:27-30, 12:13-19, 15:4-27, 17:47-67, Figs. 4a-b, 5a-b, 6a-c, 7a-b, claims 3, 10.	Cisco may rely on testimony from the named inventor, David Brown, regarding the meaning of this term.

Disputed Claim Term(s)	Cisco's Positions	Cisco's Supporting or Potential Rebuttal Intrinsic Evidence	Cisco's Supporting or Potential Rebuttal Extrinsic Evidence
(Proposed by Cisco) (Term recites other disputed terms, including but not limited to, e.g., "endpoints" and "the conference participants," shown above in bold)			