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

NETWORK SYSTEM TECHNOLOGIES, LLC Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG AUSTIN SEMICONDUCTOR, LLC, SAMSUNG SEMICONDUCTOR, INC., LENOVO GROUP LTD., ONEPLUS TECHNOLOGY (SHENZHEN) CO., LTD., Defendants.	CASE NO. 2:22-CV-481-JRG **JURY TRIAL DEMANDED**

SAMSUNG'S PRELIMINARY CLAIM CONSTRUCTIONS AND
EXTRINSIC EVIDENCE PURSUANT TO LOCAL PATENT RULE 4-2

Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Austin Semiconductor, LLC, and Samsung Semiconductor, Inc. (collectively, "Samsung") hereby provide the following Preliminary Claim Constructions and identification of Extrinsic Evidence for the asserted claims of United States Patent Nos. 7,366,818, 7,373,449, 7,594,052, 7,769,893, 8,072,893, and 8,086,800 (collectively, the "Patents-in-Suit").

Samsung reserves the right to supplement this disclosure, including the right to add to or remove from or otherwise modify or amend its proposed claim constructions and extrinsic evidence to the extent allowed by applicable law, rule, order, or other practice or agreement. Samsung may also supplement this disclosure in light of the positions that Network System Technologies, LLC ("NST" or "Plaintiff") takes in this litigation. NST's positions may require the Court to construe other claim terms in addition to the ones provided herein.

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A. Preliminary Proposed Claim Constructions and Identification of Extrinsic Evidence

Subject to the above, Samsung attaches its preliminary proposed claim constructions as to its identified terms in **Exhibit A**, and as to NST's identified terms in **Exhibit B**. Samsung's preliminary proposed claim constructions apply to each element of the asserted claims using the same or similar language as the terms and phrases proposed for construction. Samsung also makes the preliminary identification of extrinsic evidence in **Exhibits A** and **B**, which Samsung may rely on in connection with each of its preliminary claim constructions. In addition, Samsung incorporates by reference all extrinsic claim construction evidence disclosed and/or relied upon in *Network System Technologies, LLC v. Texas Instruments Inc., et al.*, CA No. 2:22-cv-482 (E.D. Tex.) and *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331 (W.D. Tex.), and may also rely on any extrinsic evidence cited by NST.

B. Expert Testimony

Samsung may also offer the testimony of one or more experts, including Dr. Vijay Madisetti. For example, Dr. Madisetti and/or another expert may provide testimony on the technology that underlies the alleged inventions; the level of ordinary skill in the art; how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of ordinary skill in the art; the alleged inventions claimed in the patents-in-suit; and the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art, or any other opinions or testimony useful to the Court in conducting the requisite claim construction. Dr. Madisetti and/or another expert may also rebut any extrinsic evidence offered by NST, including any expert opinions.

Dated: December 19, 2023

Respectfully Submitted

/s/ *Alan M. Rabinowitz*

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served on all counsel of record who have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3) on December 19, 2023.

/s/ Alan M. Rabinowitz
Alan M. Rabinowitz

Exhibit A

Preliminary Claim Constructions and Identification of Extrinsic Evidence – Exhibit A (Defendants' Terms)

I. '818 Patent

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
'818 patent: claims 1, 3, 5	"dropping means (DM) for dropping data exchanged by said first and second module (M, S)"	Subject to Section 112, ¶ 6. **Function**: - Claim 1, "dropping data exchanged by first and second module (M, S)" - Claim 3, "create an error message if data is dropped" - Claim 5, "send said error message to said first module" **Structure**: portion of the circuit configured to implement the scheme disclosed in the '818 Patent at 7:45-56, 8:38-39, and 8:64-9:10. Otherwise, indefinite.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. *drop, drop and insert*, Hargrave's Communications Dictionary (2001) Declaration of Dr. Mitchell Thornton, *Network System Technologies, LLC v. Texas Instruments Inc., et al.*, CA No. 2:22-cv-482, Dkt. No. 107-1 (E.D. Tex. Oct. 11, 2023) (and any exhibits cited therein) Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits cited therein)

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’818 patent: claims 1, 6, 7	“interface means (ANIP, PNIP) for managing the interface between a module (M, S) and the network (N, RN), wherein said interface means (ANIP, PNIP) comprises a first dropping means (DM) for dropping data, and wherein the dropping of data and therefore the transaction completion can be controlled by the interface means”	Subject to Section 112, ¶ 6 **<u>Function</u>**: - Claim 1, “managing the interface between a module (M, S) and a network (N, RN) and controlling dropping of data and transaction completion.” - Claim 6, “store received error messages” - Claim 7, “not drop error messages” **<u>Structure</u>**: portion of the circuit configured to implement the scheme disclosed in the ’818 Patent at 7:57-8:63 and 9:11-49 and the structure of the claimed dropping means. Otherwise, indefinite.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. *Interface*, New Oxford American Dictionary 884 (2001) *Interface*, Microsoft Computer Dictionary 279 (5th ed. 2002). *Network Interface*, The Authoritative Dictionary of IEEE Standards Terms 726 (7th ed. 2000). *Network Interface*, Cisco Systems’ Dictionary of Internetworking Terms and Acronyms 244 (2001). *Interface*, American Heritage Dictionary of the English Language 912 (4th ed. 2000). Declaration of Dr. Mitchell Thornton, *Network System Technologies, LLC v. Texas Instruments Inc., et al.*, CA No. 2:22-cv-482, Dkt. No. 107-1 (E.D. Tex. Oct. 11, 2023) (and any exhibits cited therein) Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits cited therein)

II. ’449 Patent

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’449 patent: claim 10	Preamble	Preamble is limiting.	
’449 patent: claims 2, 6, 10	“communication manager [(CM) for managing the communication between different modules]”	Subject to Section 112, ¶ 6. **Function**: “forwarding a request to a resource manager.” **Structure**: portion of the circuit configured to implement the scheme disclosed in the ’449 Patent at 10:19-24, 10:41-54. Otherwise, indefinite.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits cited therein) Reply Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 83-1 (W.D. Tex. Nov. 30, 2023) (and any exhibits cited therein)
’449 patent: claims 1, 10	“at least one connection with said communication channels is available” / “a target connection with the desired connection properties is available”	“at least one connection is available to be created/established” / “a target connection with the desired connection properties is available to be created/established”	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits cited therein)

III. ’052 Patent

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’052 patent: claim 6	Preamble	Preamble is limiting.	
’052 patent: claims 1, 2, 7	“mapping means (A) for mapping the requested at least one communication service based on said specific communication properties to a connection based on a set of connection properties according to said at least one communication service identification”	Subject to Section 112, ¶ 6. **Function**: “mapping the requested at least one communication service based on said specific communication properties to a connection based on a set of connection properties according to said at least one communication service identification.” **Structure**: adapter unit/shell comprising a sequentializing unit and a desequentializing unit as disclosed in the ’052 patent at 5:58–6:3, 6:30–7:14, Figs. 1, 2A and 2B. Otherwise, indefinite.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term.

IV. ’9893 Patent

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’9893 patent: claim 4	Preamble	Preamble is limiting.	
’9893 patent: claim 4	“arranging … the first and second information comprising said issued message as a single address”	Indefinite.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits cited therein) Reply Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 83-1 (W.D. Tex. Nov. 30, 2023) (and any exhibits cited therein)

V. ’2893 Patent

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’2893 patent: claim 10	Preamble	Preamble is limiting.	
’2893 patent: claims 1, 10	“each data package comprising N data elements”	“every data package communicated by the network stations has a fixed size of N data elements.”	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. Rijpkema et al., “Trade-offs in the design of a router with both guaranteed and best-effort services for networks on chip,” IEEE Proceedings-Computers and Digital Techniques, 150(5), 294-302. Carloni et al., “Coping with latency in SoC design”, IEEE Micro 5, Vol. 22, p. 24-35, IEEE 2002 Radulescu et al., “An efficient On-Chip Network Interface Offering Guaranteed Services, Shared Memory Abstraction and Flexible Network Configuration” Proceedings of Design, Automation and Test Conference in Europe, February 2004 *Each*, Black’s Law Dictionary Fifth Edition (1979) at 455 *Each*, The American Heritage College Dictionary, Third Edition (2000) at 430 Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
			cited therein) Reply Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 83-1 (W.D. Tex. Nov. 30, 2023) (and any exhibits cited therein)

VI. ’800 Patent

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’800 patent: claim 12	“optimal amount of data to be buffered”	Indefinite.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. *Optimal*, *optimum*, New Oxford American Dictionary 1202 (2001). *Optimal*, *optimum*, The American Heritage College Dictionary 958 (3rd ed. 2000) *Optimal*, *optimum*, American Heritage Dictionary of the English Language 1235 (4th ed. 2000). *Optimal, Optimal Decision*, Dictionary of Computer Science Engineering and Technology (2001) Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits cited therein)

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
			Reply Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 83-1 (W.D. Tex. Nov. 30, 2023) (and any exhibits cited therein) Declaration of Dr. Mitchell Thornton, *Network System Technologies, LLC v. Texas Instruments Inc., et al.*, CA No. 2:22-cv-482, Dkt. No. 107-1 (E.D. Tex. Oct. 11, 2023) (and any exhibits cited therein)
’800 patent: claim 12	“optimal moment for sending the data”	Indefinite.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. *Optimal*, *optimum*, New Oxford American Dictionary 1202 (2001). *Optimal*, *optimum*, The American Heritage College Dictionary 958 (3rd ed. 2000) *Optimal*, *optimum*, American Heritage Dictionary of the English Language 1235 (4th ed. 2000). *Optimal, Optimal Decision*, Dictionary of Computer Science Engineering and Technology (2001) Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits cited therein)

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
			Reply Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 83-1 (W.D. Tex. Nov. 30, 2023) (and any exhibits cited therein) Declaration of Dr. Mitchell Thornton, *Network System Technologies, LLC v. Texas Instruments Inc., et al.*, CA No. 2:22-cv-482, Dkt. No. 107-1 (E.D. Tex. Oct. 11, 2023) (and any exhibits cited therein)
’800 patent: claim 12	“determination unit”	Subject to Section 112, ¶ 6. **Function**: “determine a first/second optimal amount of data to be buffered by the first/second memory” and for at least one of the first determination unit and the second determination unit “determine an optimal moment for sending data.” **Structure**: Indefinite.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. *Unit*, The Authoritative Dictionary of IEEE Standards Terms 1234–1235 (7th ed. 2000) Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits cited therein)

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’800 patent: claim 12	“said first wrapper” / “said second wrapper”	Indefinite.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits cited therein)

Exhibit B

Preliminary Claim Constructions and Identification of Extrinsic Evidence – Exhibit B (NST's Terms)

I. '818 Patent

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
'818 patent: claim 1	Whether the preamble is a limitation	Preamble is limiting.	
'818 patent: claims 1, 6, 7	"interface means"	Subject to Section 112, ¶ 6 **Function**: - Claim 1, "managing the interface between a module (M, S) and a network (N, RN) and controlling dropping of data and transaction completion." - Claim 6, "store received error messages" - Claim 7, "not drop error messages" **Structure**: portion of the circuit configured to implement the scheme disclosed in the '818 Patent at 7:57-8:63 and 9:11-49 and the structure of the claimed dropping means. Otherwise, indefinite.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. *Interface*, New Oxford American Dictionary 884 (2001) *Interface*, Microsoft Computer Dictionary 279 (5th ed. 2002). *Network Interface*, The Authoritative Dictionary of IEEE Standards Terms 726 (7th ed. 2000). *Network Interface*, Cisco Systems' Dictionary of Internetworking Terms and Acronyms 244 (2001). *Interface*, American Heritage Dictionary of the English Language 912 (4th ed. 2000). Declaration of Dr. Mitchell Thornton, *Network System Technologies, LLC v. Texas Instruments Inc., et al.*, CA No. 2:22-cv-482, Dkt. No. 107-1 (E.D. Tex. Oct. 11, 2023) (and any exhibits cited therein)

II. ’449 Patent

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’449 patent: claim 10	Whether the preamble is a limitation	Preamble is limiting.	
’449 patent: claims 10, 14, 15	“resource manager”	Plain and ordinary meaning.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits cited therein) U.S. Patent Pub. No. 2004/0103230

III. ’052 Patent

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’052 patent: claim 6	Whether the preamble is a limitation	Preamble is limiting.	

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’052 patent: claim 6	“interconnect means”	Plain and ordinary meaning.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. *Interconnect*, Newton’s Telecom Dictionary 380 (18th ed. 2002). *Interconnect*, Microsoft Computer Dictionary 279 (5th ed. 2002). *Interconnect*, New Oxford American Dictionary 884 (2001). *Interconnect*, The Authoritative Dictionary of IEEE Standards Terms 573 (7th ed. 2000). *Interconnect*, American Heritage Dictionary of the English Language 912 (4th ed. 2000). Declaration of Dr. Mitchell Thornton, *Network System Technologies, LLC v. Texas Instruments Inc., et al.*, CA No. 2:22-cv-482, Dkt. No. 107-1 (E.D. Tex. Oct. 11, 2023) (and any exhibits cited therein) Declaration of Dr. Marwan Hassoun, *Network System Technologies, LLC v. Qualcomm Inc., et al.*, CA No. 1:22-cv-1331, Dkt. No. 77-1 (W.D. Tex. Oct. 12, 2023) (and any exhibits cited therein)

IV. ’9893 Patent

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’9893 patent: claim 4	Whether the preamble is a limitation	Preamble is limiting.	

V. ’2893 Patent

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’2893 patent: claim 10	Whether the preamble is a limitation	Preamble is limiting	

VI. Common Terms

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
’818 patent: claims 1, 2 ’449 patent: claims 10, 11, 12, 14 ’9893 patent: claims 4, 11 ’2893 patent: claims 1, 10 ’800 patent: claim 12	“network”	Plain and ordinary meaning.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. *Network*, Newton’s Telecom Dictionary 503 (18th ed. 2002) *Network*, New Oxford American Dictionary 1150 (2001) *Network*, Microsoft Computer Dictionary 362 (5th ed. 2002) *Network*, The Authoritative Dictionary of IEEE Standards Terms 725-26 (7th ed.

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
			2000) *Network*, Cisco Systems' Dictionary of Internetworking Terms and Acronyms 243 (2001) *LAN*, Newton's Telecom Dictionary 420 (18th ed. 2002) *MAN*, Newton's Telecom Dictionary 454 (18th ed. 2002) Declaration of Dr. Mitchell Thornton, *Network System Technologies, LLC v. Texas Instruments Inc., et al.*, CA No. 2:22-cv-482, Dkt. No. 107-1 (E.D. Tex. Oct. 11, 2023) (and any exhibits cited therein)
'449 patent: claims 10, 13, 14, 15, 16 '052 patent: claim 6 '9893 patent: claims 4, 6, 8	"connection properties"	"properties of a connection, including ordering (data transport in order), flow control (a remote buffer is reserved for a connection, and a data producer will be allowed to send data only when it is guaranteed that space is available for the produced data), throughput (a lower bound on throughput is guaranteed), latency (upper bound for latency is guaranteed), the lossiness (dropping of data), transmission termination, transaction completion, data correctness, priority, or data delivery"	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. Radulescu et al., *Communication Services for Networks on Chip*, at Abstract, Key Words, 277, 287-297 Tanenbaum, *Computer Networks* at 23, 26, 341, 481 *Connection*, The Authoritative Dictionary of IEEE Standards Terms (7th Ed. 2000) Dielissen et al., "*Concepts and implementation of the Philips Network-on-Chip*" IP-Based SOC Design, Nov. 2003

Asserted Claim(s)	Terms	Preliminary Construction	Extrinsic Evidence
			Rijpkema et al., "A *Router Architecture for Networks on Silicon*" In Proc. of Progress 2001, 2nd Workshop on Embedded Systems, October 2001
'449 patent: claim 13 '9893 patent: claim 8 '800 patent: claim 12	"flow control"	"controlling flow whereby a remote buffer is reserved for a connection, and a data producer will be allowed to send data only when it is guaranteed that space is available for the produced data"	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term.
'818 patent: claims 1, 2, 3, 5, 6, 7 '449 patent: claim 10 '052 patent: claim 6 '9893 patent: claim 4 '2893 patent: claims 1, 10 '800 patent: claim 12	"integrated circuit"	Plain and ordinary meaning.	Dr. Vijay Madisetti may provide a declaration discussing the state of the technology relating to the alleged inventions, providing a definition of one of ordinary skill in the art, and explaining how a person of ordinary skill in the art would interpret this term. Declaration of Dr. Mitchell Thornton, *Network System Technologies, LLC v. Texas Instruments Inc., et al.*, CA No. 2:22-cv-482, Dkt. No. 107-1 (E.D. Tex. Oct. 11, 2023) (and any exhibits cited therein)