IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Kove IO, Inc., Plaintiff, v. Amazon Web Services, Inc., Defendant.	Civil Action No. 1:18-cv-08175 Hon. Rebecca R. Pallmeyer Jury Trial Demanded

JOINT CLAIM CONSTRUCTION CHART (UPDATED)

Pursuant to Local Patent Rule 4.2(f), Plaintiffs Kove IO, Inc. ("Kove") and Amazon WebServices, Inc. ("AWS"), respectfully submit this updated Joint Claim Construction Chart reflecting the parties' agreement on the construction of the term "hash table" that was discussed during the July 23, 2021 Claim Construction Hearing.

Attached as Exhibit A is a revised table identifying the parties' respective proposed claim constructions for the remaining disputed terms in connection with the asserted claims of U.S. Patent Nos. 7,103,640 ("the '640 Patent"), 7,233,978 ("the '978 Patent"), and 7,814,170 ("the '170 Patent"), which removes the term "hash table." Attached as Exhibit B is a revised table identifying the parties' agreed upon constructions, which now includes the term "hash table."

Dated: August 11, 2021

Respectfully Submitted,

KOVE IO, INC.

By: _/s/ Khue V. Hoang_____

Renato Mariotti (State Bar No. 6323198)
rmariotti@thompsoncoburn.com
Holly H. Campbell (State Bar No. 6320395)
hcampbell@thompsoncoburn.com
THOMPSON COBURN LLP
55 E. Monroe St., 37th Floor
Chicago, IL 60603
Telephone: (312) 346-7500
Telecopier: (312) 580-2201

Courtland L. Reichman (*pro hac vice*)
creichman@reichmanjorgensen.com
Shawna Ballard (*pro hac vice*)
sballard@reichmanjorgsensen.com
Michael Marvin (*pro hac vice*)
mmarvin@reichmanjorgensen.com
Karlanna M. Lewis
klewis@reichmanjorgensen.com
REICHMAN JORGENSEN LEHMAN & FELDBERG LLP
100 Marine Parkway, Suite 300
Redwood Shores, CA 94065
Telephone: (650) 623-1401
Telecopier: (650) 623-1449

Khue V. Hoang (*pro hac vice*)
khoang@reichmanjorgensen.com
Jaime F. Cardenas-Navia (*pro hac vice*)
jcardenas-navia@reichmanjorgensen.com
REICHMAN JORGENSEN LEHMAN &FELDBERG LLP
750 Third Avenue, Suite 2400
New York, NY 10017
Telephone: (646) 921-1474
Telecopier: (650) 623-1449

Christine E. Lehman (*pro hac vice*)
clehman@reichmanjorgensen.com
Adam Adler (*pro hac vice*)
aadler@reichmanjorgensen.com

AMAZON WEB SERVICES, INC.

By: _/s/ R. William Sigler_____

Alan M. Fisch
alan.fisch@fischllp.com
R. William Sigler
bill.sigler@fischllp.com
Jeffrey M. Saltman (*pro hac vice*)
jeffrey.saltman@fischllp.com
Adam A. Allgood (*pro hac vice*)
adam.allgood@fischllp.com
Elizabeth Bernard (*pro hac vice*)
elizabeth.bernard@fischllp.com
FISCH SIGLER LLP
5301 Wisconsin Ave NW Fourth Floor
Washington, D.C. 20015
202.362.3500

Attorneys for Defendant Amazon Web Services, Inc.

Phil Eklem (*pro hac vice*)
peklem@reichmanjorgensen.com
REICHMAN JORGENSEN LEHMAN &
FELDBERG LLP
1710 Rhode Island Ave., NW, 12th Floor
Washington, DC 20036
Telephone: (202) 894-7310
Telecopier: (650) 623-1449

Attorneys for Plaintiff Kove IO, Inc.

EXHIBIT A
Proposed Constructions for U.S. Patent Nos. 7,103,640 ("the '640 Patent"), 7,233,978 ("the '978 patent"), and 7,814,170 ("the '170 patent")

Claim Term/Phrase	Kove's Proposed Construction	AWS' Proposed Construction
location information '978 patent: claims 1, 3, 6, 10, 14, 17, 31 '170 patent: claims 1-2, 6, 8, 15 '640 patent: claims 17-18, 24	'978: one or more identifiers and their associated locations '170/'640: information pertaining to one or more locations of data and/or the identities of one or more location servers	'978/'170/'640: one or more identifiers and their associated locations
location server '978 patent: claims 1, 3, 6, 10, 14, 17, 23, 30-31 '170 patent: claims 1, 6, 8, 12, 15 '640 patent: claims 17-18, 24	a network-attached component that maintains a set of identifier/location mappings that are modified or returned in response to ***location*** request messages from clients	a network-attached component that maintains a set of identifier/location mappings that are modified or returned in response to ***NDTP*** request messages from clients
client '978 patent: claim 14 '170 patent: claim 15 '640 patent: claims 17-18, 24	a network-attached component that initiates update or lookup of identifier/location mappings from a ***location*** server with ***location*** request messages	Plain and ordinary meaning or, in the alternative: a network-attached component that initiates update or lookup of identifier/location mappings from a ***NDTP*** server with ***NDTP*** request messages

Claim Term/Phrase	Kove's Proposed Construction	AWS' Proposed Construction
based on a hash function used to organize the data location information across the plurality of data location servers … based on the hash function applied to the identifier string '170 patent: claim 1	the portion of the data location information included in a corresponding one of the data location servers is based on a hash function ***that maps identifier strings to one or more of the data location servers***, and each one of the data location servers is configured to determine the at least one of the plurality of data location servers ***based on the hash function applied to the identifier string***	the portion of the data location information included in a corresponding one of the data location servers is based on a hash function ***applied to an identifier string in which the function result organizes the data location information by giving an index into a data structure that provides the location of an indicated location server***, and each one of the data location servers is configured to determine at least one of the plurality of data location servers ***by applying the hash function to the identifier string in which the function result is an index into a data structure on the location server containing the location of an indicated location server for the identifier string***
data pertaining to the entity '978 patent: claims 1, 31 '170 patent: claim 6	data pertaining to a person or thing ***(real, digital, or abstract)***	data pertaining to a person or thing ***distinct from that data***

EXHIBIT B
The Parties' Agreed Upon Constructions for U.S. Patent Nos. 7,103,640 ("the '640 Patent"), 7,233,978 ("the '978 patent"), and 7,814,170 ("the '170 patent")

Claim Term/Phrase	The Parties' Agreed Upon Construction
location '978 patent: claims 1, 3, 6, 10, 14, 17, 23-24, 30-31 '170 patent: claims 1-2, 6, 8, 12, 15 '640 patent: claims 17-18, 24	an encoding that is a member of a set of associations with an identifier in a location server, and that specifies where data pertaining to the entity identified by the identifier is stored
identifier/identifier string/identification string '978 patent: claims 1, 10, 14, 17, 30, 31 '170 patent: claims 1, 6, 15 '640 patent: claims 17-18	a unique encoding that identifies an individual entity, and with which zero or more location strings are associated in a location server
hash table '978 patent: claim 6 '170 patent: claims 2, 12 '640 patent: claim 24	a data structure that stores values in a table, where values are stored and retrieved by applying a hash function to an input and using the function result as an index into the table
data location sewer network '640 patent: claim 17	data location server network
Preamble '978 patent: claim 14	Preamble after "comprising" limits the claim
Preamble '978 patent: claim 17	Preamble after "having" limits the claim

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing was filed electronically on August 11, 2021, with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all registered counsel of record.

/s/ R. William Sigler