

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

FRIENDLIAI INC.,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 23-816-MN
v.	)	
	)	JURY TRIAL DEMANDED
HUGGING FACE, INC.,	)	
	)	
Defendant.	)	

PLAINTIFF’S DISCLOSURE OF PROPOSED CONSTRUCTIONS OF CLAIM TERMS

Pursuant to Section 10 of the Court’s Scheduling Order (D.I. 17; *See* D.I. 41), Plaintiff FriendliAI Inc. (“FriendliAI”) states that it is not proposing that the Court construe any claims terms from U.S. Patent Nos. 11,442,775 and 11,836,520. All claim terms identified by Defendant should be construed according to their plain and ordinary meaning.

This disclosure is made solely for the purpose of this action. Discovery and investigations in connection with this lawsuit are ongoing. FriendliAI’s disclosure is based on information that is currently available to it. FriendliAI’s positions concerning the meaning, scope, construction, and application of the asserted claims are to the extent those positions can be deduced from the Initial Contentions served by both parties in this case so far. Given that discovery is currently ongoing, FriendliAI’s proposed constructions are subject to change.

Further, FriendliAI does not know yet what constructions Defendant may propose, and the parties must meet and confer after the exchange of the terms and proposed constructions in accordance with the Court’s Scheduling Order. FriendliAI expressly reserves it right to add, remove, and supplement the terms and constructions identified herein during that meet and confer process. FriendliAI intends to respond to any constructions Hugging Face may identify

and reserves the right to revisit its position if necessary after receiving Hugging Face's claim construction disclosures.

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Dated: May 28, 2024
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CERTIFICATE OF SERVICE

I, Andrew L. Brown, hereby certify that on May 28, 2024, true and correct copies of the within document were served on the following counsel of record at the addresses and in the manner indicated:

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