

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

LIONRA TECHNOLOGIES LIMITED

v.

CISCO SYSTEMS, INC.

CASE NO. 2:24-cv-00097-JRG

**JURY TRIAL DEMANDED**

**DEFENDANT'S P.R. 4-2 DISCLOSURE**

Pursuant to the Court's Docket Control Order (Dkt. 22) and P.R. 4-2, Defendant Cisco Systems, Inc. ("Cisco" or "Defendant") hereby sets forth the following list of preliminary proposed claim constructions and extrinsic evidence for U.S. Patent No. 7,738,471.

Defendant reserves the right to add or remove claim terms from those proposed for construction, and to amend or supplement these proposed constructions and/or the identification of extrinsic evidence including in response to Lionra's proposed constructions, as a result of the meet and confer process with Lionra, and/or as discovery continues. By proposing a construction for a claim term or failing to propose a construction for a claim term, phrase, or clause, Defendant in no way admits that construction is required, not required, or possible. Defendant also reserves the right to cite additional extrinsic evidence, including dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses, including to rebut the proposed constructions of Lionra. Defendant also reserves the right to put forth expert testimony in support of its constructions and/or in response to any expert testimony Lionra may offer in support of its proposed constructions.

Pursuant to P.R. 4-2(b), Defendant hereby identifies Dr. Tajana Rosing as an expert that may provide testimony in support of Defendant's proposed constructions. This may include how

(or if) one of ordinary skill in the art at the time of the claimed inventions of the asserted claims would have understood certain claim terms proposed for construction, depending upon whether such terms are, in fact, disputed following review of the parties' P.R. 4-2 Disclosures. Dr. Rosing may also be asked to provide background and context regarding the technology at issue, including, but not limited to, the level of ordinary skill in the art, in an effort to assist the Court in understanding the technology in dispute from the perspective of one of ordinary skill at the relevant time. In providing any such background, Dr. Rosing may rely on the extrinsic evidence identified in this document, as well as any other background material to explain the knowledge of a person of ordinary skill in the art at the time. In opining about the meaning of disputed terms of the asserted claims, Dr. Rosing may be asked to explain how Defendant's proposed constructions are supported by intrinsic evidence, extrinsic evidence, and/or the education and experience of a person of ordinary skill in the art relevant to the asserted patent. Dr. Rosing may also be asked to respond to Lionra's proposed constructions and supporting evidence. Defendant reserves the right to ask Dr. Rosing to opine on any claim construction issue for which Lionra may provide expert testimony.

In view of the foregoing, Defendant proposes that the following terms, phrases, and clauses should be construed as indicated in the following table. The claim numbers identified herein are representative. Unless otherwise indicated, identification of a proposed construction applies equally to other instances of that term, phrase, or clause in any of the asserted claims, including in the claims that are dependent on the claims identified. Defendant reserves the right to seek construction of a smaller component of the term, phrase, or clause proposed for claim construction, and the right to seek construction of terms, phrases, or clauses that includes the term, phrase, or clause proposed for claim construction including for context. The following chart provides exemplary supporting evidence. Identification of a reference as supporting evidence is not an

admission that the reference is “extrinsic,” as opposed to “intrinsic,” evidence. Defendant reserves the right to amend or otherwise supplement its above identification of supporting evidence that may be used to support, describe, or explain Defendant’s preliminary proposed claim constructions. Defendant further reserves the right to identify additional supporting evidence to offer in rebuttal to Lionra’s proposed constructions. Defendant further reserves the right to identify additional extrinsic evidence that is obtained through further discovery in this matter, including deposition testimony obtained from any third parties (such as named inventors and/or any expert witnesses).

The following preliminary proposed constructions do not waive any argument, such as, for example, that an asserted claim is indefinite or is otherwise invalid under one or more of 35 U.S.C. §§ 101, 102, 103, and/or 112, as detailed in Defendant’s Invalidity Contentions and Ineligibility Contentions, and any supplements thereto. For example, Defendant reserves the right to argue that a particular claim term is indefinite and/or fails to satisfy the written description and enablement requirements, regardless of whether the term has been proposed for construction, has not been proposed for construction, and/or was initially proposed for construction but has since been dropped from the terms proposed for construction.

Defendant reserves the right to amend or otherwise supplement the preliminary proposed constructions and/or extrinsic evidence that are provided herein, including after receiving additional discovery in this matter and infringement contentions that comply with the local patent rules (assuming Lionra seeks and is granted leave to amend), and also in response to the preliminary proposed constructions and extrinsic evidence that are being concurrently provided in the P.R. 4-2 Disclosure of Lionra in this case.

| <b>Claim Term or Phrase</b>                                                                                                                                                                 | <b>Claim Nos.</b>          | <b>Defendants' Preliminary Proposed Construction</b>                                                                                                                                                                                                                                        | <b>Extrinsic Evidence</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| “concurrently writing (1) each of said plurality of headers to a packet buffer memory and (2) each individual one of said plurality of headers to a respective protocol stack layer memory” | 1, 13                      | Plain meaning, <i>i.e.</i> , “concurrently writing (1) each of said plurality of headers to a CPU main memory space used for the packet transfer and (2) each individual one of said plurality of headers (each concurrently with each other) to a respective protocol stack layer memory.” |                           |
| “packet buffer memory”                                                                                                                                                                      | 1, 13                      | “CPU main memory space used for the packet transfer”                                                                                                                                                                                                                                        |                           |
| “writing”                                                                                                                                                                                   | 1, 9, 13                   | Withdrawn.                                                                                                                                                                                                                                                                                  |                           |
| “respective protocol stack layer memory”                                                                                                                                                    | 1, 2, 3, 5, 13, 14, 15, 17 | Withdrawn.                                                                                                                                                                                                                                                                                  |                           |
| “direct memory access (DMA) device” / “DMA device”                                                                                                                                          | 9, 13, 20                  | Withdrawn.                                                                                                                                                                                                                                                                                  |                           |
| “[a decoder configured for] decoding a packet having a plurality of headers”                                                                                                                | 1, 13                      | Withdrawn.                                                                                                                                                                                                                                                                                  |                           |
| “a direct memory access (DMA) device coupled to said decoder”                                                                                                                               | 13                         | Withdrawn.                                                                                                                                                                                                                                                                                  |                           |
| “said respective protocol stack layer memory”                                                                                                                                               | 2, 3, 5, 14, 15, 17        | Withdrawn.                                                                                                                                                                                                                                                                                  |                           |

DATE: January 2, 2025

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Brian A. Rosenthal

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*Attorneys for Defendant Cisco Systems, Inc*

**CERTIFICATE OF SERVICE**

I certify that the foregoing document was served electronically on January 2, 2025, on all counsel who have consented to electronic service.

/s/ Brian A. Rosenthal  
Brian A. Rosenthal