

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

STELLAR, LLC,

Plaintiff,

v.

MOTOROLA SOLUTIONS, INC. and
WATCHGUARD VIDEO, INC.

Defendants.

Civil Action No. 4:23-cv-750

JURY TRIAL DEMANDED

**JOINT CLAIM CONSTRUCTION CHART
PURSUANT TO P.R. 4-5(d)**

Pursuant to P.R. 4-5(d) and the Scheduling Order (Dkt. 21 at 1), Plaintiff Stellar, LLC and Defendants Motorola Solutions, Inc. and WatchGuard Video, Inc. jointly submit this Claim Construction Chart setting forth the Parties' agreed constructions for certain terms and phrases, the Parties' disputed claim terms and phrases, the Parties' proposed constructions, and a column for the Court's construction for the identified terms phrases, or clauses of U.S. Patent Nos., 7,593,034 (the "'034 patent"), 8,310,540 (the "'540 patent"), 8,928,752 (the "'752 patent"), 9,485,471 (the "'471 patent"), 10,523,901 (the "'901 patent"), and 10,965,910 (the "'910 patent").¹

Also asserted are U.S. Patent Nos. 7,593,034, 8,692,882, and 9,912,914 but the Parties did not identify any disputes regarding the terms and phrases of those patents.

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Disputed Term	Plaintiff's Construction	Defendants' construction	Court's Construction
“A surveillance apparatus, comprising: a camera having an image capturing component that captures images, and a converting component that converts the images into at least one data stream; a local memory functionally coupled to the camera; a wireless transmitter functionally coupled to the local memory; a recording facility that continuously records the data stream into available portions of a circular buffer in the local memory as a first file using a digital video file format; a protecting facility that responds to a signal to record by designating a segment of the circular buffer as a write-protected portion and by indexing the write-protected portion as a second distinct file in the circular buffer, wherein the segment includes a pre-recorded subset recorded before the signal is received and a post-recorded subset to be recorded after the signal is received; and a sending facility that uses the transmitter to wirelessly transmit the second file to a remote memory.” '034 patent, claim 1	[AGREED]	[AGREED]	“a memory that is distanced less than 20 cm from the camera and is coupled to the camera using entirely physical connectors”

Disputed Term	Plaintiff's Construction	Defendants' construction	Court's Construction
“An apparatus, comprising: a sensor having a data capturing component that captures sensor data; a local memory functionally coupled to the sensor, a recording facility that records the sensor data into available portions of a buffer in the local memory; and a protecting facility that responds to a signal to record the sensor data by designating a segment of the buffer as a write-protected segment and by indexing the write protected segment as a file in the buffer, wherein the write-protected segment includes a pre-recorded subset recorded before the signal is received and a post recorded subset to be recorded after the signal is received.” '471 patent, claim 1	[AGREED]	[AGREED]	“a memory that is distanced less than 20 cm from the sensor and is coupled to the sensor using entirely physical connectors”
“A method of storing discrete segments of imaged data in a camera, comprising: using a sensor in the camera to capture image data; providing a recorder coupled to the camera and having a memory; using multiple portions of the memory as a memory loop in which to record segments of the image data in approximately real time;	Preamble is not limiting and therefore no construction is necessary.	Preamble is limiting.	

Disputed Term	Plaintiff's Construction	Defendants' construction	Court's Construction
treating the memory loop as a single file; protecting the multiple portions, within the single file, from being overwritten by subsequent recording in the memory loop; and allowing the editing of the imaged data in protected multiple portions stored in the memory loop within the single file via a recorder control while recording additional segments of the image data in the memory loop within the single file.” '540 patent, claim 1			
“A method of storing discrete segments of imaged data in a camera, comprising: using a sensor in the camera to capture image data; providing a recorder coupled to the camera and having a memory; using multiple portions of the memory as a memory loop in which to record segments of the image data in approximately real time; treating the memory loop as a single file; protecting the multiple portions, within the single file, from being overwritten by subsequent recording in the memory loop; and	Not indefinite. No construction necessary.	Indefinite.	

Disputed Term	Plaintiff's Construction	Defendants' construction	Court's Construction
allowing the editing of the imaged data in protected multiple portions stored in the memory loop within the single file via a recorder control while recording additional segments of the image data in the memory loop within the single file.” '540 patent, claim 1			
“A surveillance system comprising: a camera that converts images into first and second data streams; a memory; and hardware that executes an instruction set that utilizes an area of the memory as a circular buffer , records the first data stream in the buffer; responds to a first signal by protecting a recently used segment of the buffer storing at least a portion of the first data stream corresponding to a duration of time prior to the first signal, while at the same time continuously recording the first data stream as the second data stream in an unprotected segment of the buffer, without overwriting the protected segment; and responds to a second signal received after the first signal by increasing the duration of the protected segment of the buffer prior to the first signal.”	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6: Function: utilizing an area of the memory as a circular buffer Structure: FIGS 3A-H, 4 and 5 including corresponding descriptions in the specification and equivalents thereof; 2:25-44, 4:64-5:4, 5:35-61, Abstract; Any recording device including a processor that runs software to accomplish the described function.	Function: utilizes an area of the memory as a circular buffer Structure: hardware and software programmed to perform the circular buffer algorithm disclosed at 2:36-39, 4:67-5:1, Figs. 3A-3H, 3:13-4:45, Fig. 5 (Step 51), 5:35-40.	

Disputed Term	Plaintiff's Construction	Defendants' construction	Court's Construction
'752 patent, claim 1			
"A surveillance system comprising: a camera that converts images into first and second data streams; a memory; and hardware that executes an instruction set that utilizes an area of the memory as a circular buffer, records the first data stream in the buffer; responds to a first signal by protecting a recently used segment of the buffer storing at least a portion of the first data stream corresponding to a duration of time prior to the first signal, while at the same time continuously recording the first data stream as the second data stream in an unprotected segment of the buffer, without overwriting the protected segment; and responds to a second signal received after the first signal by increasing the duration of the protected segment of the buffer prior to the first signal."	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6: Function: recording the first data stream in the circular buffer Structure: FIGS 3A-H, 4 and 5 including corresponding descriptions in the specification and equivalents thereof; 2:25-44, 4:64-5:4, 5:35-61, Abstract; Any recording device including a processor that runs software to accomplish the described function	Function: records the first data stream in the [circular] buffer Structure: hardware and software programmed to perform the circular buffer algorithm disclosed at 2:36-39, 4:67-5:1, 5:12-14, Fig. 3A, 3:13-16, Fig. 5 (Step 52), 5:48.	
'752 patent, claim 1			
"A Surveillance system comprising: a camera that converts images into first and second data streams; a memory; and hardware that executes an instruction set that utilizes an area of	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6:	Indefinite because no corresponding structure for performing the claimed function disclosed in the specification.	

Disputed Term	Plaintiff's Construction	Defendants' construction	Court's Construction
the memory as a circular buffer, records the first data stream in the buffer; responds to a first signal by protecting a recently used segment of the buffer storing at least a portion of the first data stream corresponding to a duration of time prior to the first signal, while at the same time continuously recording the first data stream as the second data stream in an unprotected segment of the buffer, without overwriting the protected segment; and responds to a second signal received after the first signal by increasing the duration of the protected segment of the buffer prior to the first signal.” ’752 patent, claim 1	Function: responding to a first signal by protecting a segment of the buffer corresponding to a duration of time prior to the first signal, while at the same time continuously recording the first data stream as the second data stream in an unprotected segment Structure: FIGS 3A-H, 4 and 5 including corresponding descriptions in the specification and equivalents thereof; 2:25-44, 4:64-5:4, 5:35-61, Abstract; Any recording device including a processor that runs software to accomplish the described function	Function: responding to a first signal by protecting a segment of the buffer corresponding to a duration of time prior to the first signal, while at the same time continuously recording the first data stream as the second data stream in an unprotected segment Structure: None. No corresponding structure renders claim 1 indefinite.	
“A Surveillance system comprising: a camera that converts images into first and second data streams; a memory; and hardware that executes an instruction set that utilizes an area of the memory as a circular buffer, records the first data stream in the buffer; responds to a first signal by protecting a recently used segment of	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6: Function: responding to a second signal received after the first signal by increasing the duration of the protected	Indefinite because no corresponding structure for performing the claimed function disclosed in the specification. Function: responding to a second signal received after the first signal by increasing the duration of the protected	

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the buffer storing at least a portion of the first data stream corresponding to a duration of time prior to the first signal, while at the same time continuously recording the first data stream as the second data stream in an unprotected segment of the buffer, without overwriting the protected segment; and responds to a second signal received after the first signal by increasing the duration of the protected segment of the buffer prior to the first signal. '752 patent, claim 1	segment of the buffer prior to the first signal Structure: FIGS 3A-H, 4 and 5 including corresponding descriptions in the specification and equivalents thereof; 2:25-44, 4:64-5:4, 5:35-61, Abstract; Any recording device including a processor that runs software to accomplish the described function	segment of the buffer prior to the first signal Structure: None. No corresponding structure renders claim 1 indefinite.	
"A recording system for saving a sequence of clips comprising: a pair of eyeglasses having a sensor that captures sensor data; a first memory communicatively coupled with the sensor; and a computer processor configured to: record the sensor data in the first memory; in response to a first trigger signal, designate for saving a first portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the portion of the sensor data occupies a portion of the first memory that is less than the entirety of the first memory and corresponds to a length of time prior to the first trigger signal;	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6: Function: recording the sensor data in the first memory Structure: FIGS 1, 3, and 4A-H including corresponding descriptions in the specification and equivalents thereof; 2:18-3:19, 4:67-5:3, 6:5-21; A component of a recording device including software or	Function: record the sensor data in the first memory Structure: hardware and/or software programmed to perform the circular buffer algorithm disclosed at 2:33-39, 4:67-5:2, 5:38-50, Fig. 3, 7:48-59, Fig. 4A, 7:60-65.	

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contiguously continuing to record the sensor data in the first memory while the first portion of the sensor data is designated for saving; in response to a subsequent second trigger signal, designate for saving a second portion wherein the second portion occupies less than the remaining entirety of the first memory not designated for saving and corresponds to a length of time prior to the second trigger signal; and automatically overwrite portions of the sensor data that were recorded in the first memory that were not designated for saving.” '901 patent, claim 1	hardware that accomplishes the functions described		
“A recording system for saving a sequence of clips comprising: a pair of eyeglasses having a sensor that captures sensor data; a first memory communicatively coupled with the sensor; and a computer processor configured to: record the sensor data in the first memory; in response to a first trigger signal, designate for saving a first portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the portion of	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6: Function: designating for saving in response to a first trigger signal a first portion of sensor data captured prior to occurrence of the first trigger signal, wherein the saved sensor data includes data captured prior to the first trigger signal and	Function: in response to a first trigger signal, designate for saving a first portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the portion of the sensor data occupies a portion of the first memory that is less than the entirety of the first memory and corresponds to a length of time prior to the first trigger signal	

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the sensor data occupies a portion of the first memory that is less than the entirety of the first memory and corresponds to a length of time prior to the first trigger signal; contiguously continuing to record the sensor data in the first memory while the first portion of the sensor data is designated for saving; in response to a subsequent second trigger signal, designate for saving a second portion wherein the second portion occupies less than the remaining entirety of the first memory not designated for saving and corresponds to a length of time prior to the second trigger signal; and automatically overwrite portions of the sensor data that were recorded in the first memory that were not designated for saving.” ’901 patent, claim 1	occupies less than the entirety of the first memory Structure: FIGS 1, 3, and 4A-H including corresponding descriptions in the specification and equivalents thereof; 2:18-3:19, 4:67-5:3, 6:5-21; A component of a recording device including software or hardware that accomplishes the functions described	Structure: hardware and/or software programmed to perform the circular buffer algorithm disclosed at 2:33-39, 2:46-64, 4:67-5:2, 5:38-50, Fig. 4B, 8:9-37, Fig. 4C, 8:52-67, 9:62-10:5.	
“A recording system for saving a sequence of clips comprising: a pair of eyeglasses having a sensor that captures sensor data; a first memory communicatively coupled with the sensor; and a computer processor configured to: record the sensor data in the first memory;	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6: Function: contiguously continuing to record the sensor data in the first memory while the first	Function: contiguously continuing to record the sensor data in the first memory while the first portion of the sensor data is designated for saving Structure: hardware and/or software programmed to	

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in response to a first trigger signal, designate for saving a first portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the portion of the sensor data occupies a portion of the first memory that is less than the entirety of the first memory and corresponds to a length of time prior to the first trigger signal; contiguously continuing to record the sensor data in the first memory while the first portion of the sensor data is designated for saving; in response to a subsequent second trigger signal, designate for saving a second portion wherein the second portion occupies less than the remaining entirety of the first memory not designated for saving and corresponds to a length of time prior to the second trigger signal; and automatically overwrite portions of the sensor data that were recorded in the first memory that were not designated for saving.” '901 patent, claim 1	portion of the sensor data is designated for saving Structure: FIGS 1, 3, and 4A-H including corresponding descriptions in the specification and equivalents thereof; 2:18-3:19, 4:67-5:3, 6:5-21; A component of a recording device including software or hardware that accomplishes the functions described	perform the circular buffer algorithm disclosed at 2:33-39, 2:46-64, 4:67-5:2, 5:38-50, Fig. 3, 7:48-59, Fig. 4D, 9:21-26, Fig. 4B, 8:9-37, Fig. 4C, 8:52-67, 9:62-10:5.	
“A recording system for saving a sequence of clips comprising: a pair of eyeglasses having a sensor that captures sensor data;	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6:	Function: in response to a subsequent second trigger signal, designate for saving a second portion where in the second portion occupies	

Disputed Term	Plaintiff's Construction	Defendants' construction	Court's Construction
a first memory communicatively coupled with the sensor; and a computer processor configured to: record the sensor data in the first memory; in response to a first trigger signal, designate for saving a first portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the portion of the sensor data occupies a portion of the first memory that is less than the entirety of the first memory and corresponds to a length of time prior to the first trigger signal; contiguously continuing to record the sensor data in the first memory while the first portion of the sensor data is designated for saving; in response to a subsequent second trigger signal, designate for saving a second portion wherein the second portion occupies less than the remaining entirety of the first memory not designated for saving and corresponds to a length of time prior to the second trigger signal; and automatically overwrite portions of the sensor data that were recorded in the first memory that were not designated for saving.” ’901 patent, claim 1	Function: designating for saving in response to a second trigger signal a second portion of sensor data captured prior to occurrence of the second trigger signal, wherein the saved sensor data includes data captured prior to the second trigger signal and occupies less than the remaining entirety of the first memory not previously designated for saving Structure: FIGS 1, 3, and 4A-H including corresponding descriptions in the specification and equivalents thereof; 2:18-3:19, 4:67-5:3, 6:5-21; A component of a recording device including software or hardware that accomplishes the functions described	less than the remaining entirety of the first memory not designated for saving and corresponds to a length of time prior to the second trigger signal Structure: hardware and/or software programmed to perform the circular buffer algorithm disclosed at 2:33-39, 2:46-64, 4:67-5:2, 5:38-50, Fig. 4E, 9:48-50, 9:62-10:5.	

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“A recording system for saving a sequence of clips comprising: a pair of eyeglasses having a sensor that captures sensor data; a first memory communicatively coupled with the sensor; and a computer processor configured to: record the sensor data in the first memory; in response to a first trigger signal, designate for saving a first portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the portion of the sensor data occupies a portion of the first memory that is less than the entirety of the first memory and corresponds to a length of time prior to the first trigger signal; contiguously continuing to record the sensor data in the first memory while the first portion of the sensor data is designated for saving; in response to a subsequent second trigger signal, designate for saving a second portion wherein the second portion occupies less than the remaining entirety of the first memory not designated for saving and corresponds to a length of time prior to the second trigger signal; and automatically overwrite portions of the sensor data that were recorded in	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6: Function: automatically overwriting portions of the recorded sensor data not previously designated for saving Structure: FIGS 1, 3, and 4A-H including corresponding descriptions in the specification and equivalents thereof; 2:18-3:19, 4:67-5:3, 6:5-21; A component of a recording device including software or hardware that accomplishes the functions described	Function: automatically overwrite portions of the sensor data that were recorded in the first memory that were not designated for saving Structure: hardware and/or software programmed to perform the circular buffer algorithm disclosed at 2:33-39, 4:67-5:2, 5:38-50, Fig. 3, 7:48-59, Fig. 4A, 7:60-65.	

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the first memory that were not designated for saving.” '901 patent, claim 1			
“A recording system for saving a sequence of clips comprising: at least one memory communicatively coupled with a sensor; and a computer processor configured to: record sensor data obtained by the sensor in the at least one memory; in response to a first trigger signal, designate for write-protecting a first portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the first portion of the sensor data occupies a portion of the at least one memory that is less than the entirety of the at least one memory and corresponds to a length of time prior to the first trigger signal; continuing to record the sensor data in the at least one memory while the first portion of the sensor data is designated for write-protecting; in response to a subsequent second trigger signal, designate for write-protecting a second portion wherein the second portion occupies less than the remaining entirety of the at least one memory not designated for write-protecting and corresponds to a length	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6: Function: recording sensor data in the at least one memory Structure: FIGS 1, 3, and 4A-H including corresponding descriptions in the specification and equivalents thereof; 2:21-3:21, 5:1-6, 6:6-22; A component of a recording device including software or hardware that accomplishes the functions described	Function: record sensor data obtained by the sensor in the at least one memory Structure: hardware and/or software programmed to perform the circular buffer algorithm disclosed at 2:36-42, 5:3-5, 5:40-52, Fig. 3, 7:48-59, Fig. 4A, 7:60-65.	

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of time prior to the second trigger signal; and upon reaching at least one of the first portion and the second portion while continuing to record the sensor data in the at least one memory, excluding from overwriting the at least one of the first portion and second portion.” '910 patent, claim 1			
“A recording system for saving a sequence of clips comprising: at least one memory communicatively coupled with a sensor; and a computer processor configured to: record sensor data obtained by the sensor in the at least one memory; in response to a first trigger signal, designate for write-protecting a first portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the first portion of the sensor data occupies a portion of the at least one memory that is less than the entirety of the at least one memory and corresponds to a length of time prior to the first trigger signal; continuing to record the sensor data in the at least one memory while the first portion of the sensor data is designated for write-protecting;	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6: Function: designating a portion of the memory for write-protecting including at least a portion captured prior to the trigger signal and a portion and which is less than the entirety of the at least one memory Structure: FIGS 1, 3, and 4A-H including corresponding descriptions in the specification and equivalents thereof; 2:21-3:21, 5:1-6, 6:6-22; A component of a recording device including software or	Function: in response to a first trigger signal, designate for write-protecting a first portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the first portion of the sensor data occupies a portion of the at least one memory that is less than the entirety of the at least one memory and corresponds to a length of time prior to the first trigger signal Structure: hardware and/or software programmed to perform the circular buffer algorithm disclosed at 2:36-42, 2:49-67, 5:3-5, 5:40-52,	

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in response to a subsequent second trigger signal, designate for write-protecting a second portion wherein the second portion occupies less than the remaining entirety of the at least one memory not designated for write-protecting and corresponds to a length of time prior to the second trigger signal; and upon reaching at least one of the first portion and the second portion while continuing to record the sensor data in the at least one memory, excluding from overwriting the at least one of the first portion and second portion.” '910 patent, claim 1	hardware that accomplishes the functions described	Fig. 4B, 8:10-40, Fig. 4C, 8:55-9:3, 9:65-10:8.	
“A recording system for saving a sequence of clips comprising: at least one memory communicatively coupled with a sensor; and a computer processor configured to: record sensor data obtained by the sensor in the at least one memory; in response to a first trigger signal, designate for write-protecting a first portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the first portion of the sensor data occupies a portion of the at least one memory that is less than the entirety of the at least one memory	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6: Function: continuing to record additional data while designating a portion of the memory for write-protecting Structure: FIGS 1, 3, and 4A-H including corresponding descriptions in the specification and equivalents thereof; 2:21-	Function: continuing to record the sensor data in the at least one memory while the first portion of the sensor data is designated for write-protecting Structure: hardware and/or software programmed to perform the circular buffer algorithm disclosed at 2:36-42, 2:49-67, 5:3-5, 5:40-52, Fig. 3, 7:48-59, Fig. 4D, 9:24-29, Fig. 4B, 8:10-40, Fig. 4C, 8:55-9:3, 9:65-10:8.	

Disputed Term	Plaintiff's Construction	Defendants' construction	Court's Construction
and corresponds to a length of time prior to the first trigger signal; continuing to record the sensor data in the at least one memory while the first portion of the sensor data is designated for write-protecting; in response to a subsequent second trigger signal, designate for write-protecting a second portion wherein the second portion occupies less than the remaining entirety of the at least one memory not designated for write-protecting and corresponds to a length of time prior to the second trigger signal; and upon reaching at least one of the first portion and the second portion while continuing to record the sensor data in the at least one memory, excluding from overwriting the at least one of the first portion and second portion.” '910 patent, claim 1	3:21, 5:1-6, 6:6-22; A component of a recording device including software or hardware that accomplishes the functions described		
“A recording system for saving a sequence of clips comprising: at least one memory communicatively coupled with a sensor; and a computer processor configured to: record sensor data obtained by the sensor in the at least one memory; in response to a first trigger signal, designate for write-protecting a first	Not governed by § 112 ¶ 6; should the Court conclude that the term is governed by § 112 ¶ 6: Function: designating for write protection an additional portion of the remaining memory not previously	Function: in response to a subsequent second trigger signal, designate for write-protecting a second portion wherein the second portion occupies less than the remaining entirety of the at least one memory not designated for write-	

Disputed Term	Plaintiff's Construction	Defendants' construction	Court's Construction
portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the first portion of the sensor data occupies a portion of the at least one memory that is less than the entirety of the at least one memory and corresponds to a length of time prior to the first trigger signal; continuing to record the sensor data in the at least one memory while the first portion of the sensor data is designated for write-protecting; in response to a subsequent second trigger signal, designate for write-protecting a second portion wherein the second portion occupies less than the remaining entirety of the at least one memory not designated for write-protecting and corresponds to a length of time prior to the second trigger signal; and upon reaching at least one of the first portion and the second portion while continuing to record the sensor data in the at least one memory, excluding from overwriting the at least one of the first portion and second portion.” ’910 patent, claim 1	designated for write-protecting Structure: FIGS 1, 3, and 4A-H including corresponding descriptions in the specification and equivalents thereof; 2:21-3:21, 5:1-6, 6:6-22; A component of a recording device including software or hardware that accomplishes the functions described	protecting and corresponds to a length of time prior to the second trigger signal Structure: hardware and/or software programmed to perform the circular buffer algorithm disclosed at 2:36-42, 2:49-67, 5:3-5, 5:40-52, Fig. 4E, 9:51-53, 9:65-10:8.	
“A recording system for saving a sequence of clips comprising:	Not governed by § 112 ¶ 6; should the Court conclude	Function: upon reaching at least one of the first portion and the second portion while	

Disputed Term	Plaintiff's Construction	Defendants' construction	Court's Construction
at least one memory communicatively coupled with a sensor; and a computer processor configured to: record sensor data obtained by the sensor in the at least one memory; in response to a first trigger signal, designate for write-protecting a first portion of the sensor data that was captured prior to occurrence of the first trigger signal, wherein the first portion of the sensor data occupies a portion of the at least one memory that is less than the entirety of the at least one memory and corresponds to a length of time prior to the first trigger signal; continuing to record the sensor data in the at least one memory while the first portion of the sensor data is designated for write-protecting; in response to a subsequent second trigger signal, designate for write-protecting a second portion wherein the second portion occupies less than the remaining entirety of the at least one memory not designated for write-protecting and corresponds to a length of time prior to the second trigger signal; and upon reaching at least one of the first portion and the second portion while continuing to record the sensor data in the at least one memory, excluding	that the term is subject to § 112 ¶ 6: Function: excluding from overwriting the at least one of the first portion and second portion, upon reaching a protected portion in the at least one memory Structure: FIGS 1, 3, and 4A-H including corresponding descriptions in the specification and equivalents thereof; 2:21-3:21, 5:1-6, 6:6-22; A component of a recording device including software or hardware that accomplishes the functions described	continuing to record the sensor data in the at least one memory, excluding from overwriting the at least one of the first portion and second portion Structure: hardware and/or software programmed to perform the circular buffer algorithm disclosed at 2:36-42, 5:3-5, 5:40-52, Fig. 3, 7:48-59, Fig. 4A, 7:62-65, Fig. 4G, 9:56-60.	

Disputed Term	Plaintiff's Construction	Defendants' construction	Court's Construction
from overwriting the at least one of the first portion and second portion.” '910 patent, claim 1			

Dated: June 10, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document, via electronic mail on June 10, 2024.

/s/ Robert Kiddie

Robert Kiddie

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The following transaction was entered by Kiddie, Robert on 6/10/2024 at 6:29 PM CDT and filed on 6/10/2024

Case Name: STELLAR, LLC v. Motorola Solutions, Inc. et al
Case Number: [4:23-cv-00750-SDJ](#)
Filer: STELLAR, LLC
Document Number: [39](#)

Docket Text:

[Joint Claim Construction Chart by STELLAR, LLC. \(Kiddie, Robert\)](#)

4:23-cv-00750-SDJ Notice has been electronically mailed to:

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