

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

CYANDIA, INC.,

Plaintiff,

v.

SAP AMERICA, INC. and SAP SE,

Defendants.

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Case No. 2:24-cv-00096-JRG

**PLAINTIFF CYANDIA, INC.'S
REPLY CLAIM CONSTRUCTION BRIEF**

specification provides: “[t]he computer-readable storage media may further include computer-readable instructions configured to cause one or more computer processors to also execute the operations including deploying the [secure user-centric] channel from the channel grid framework on the first platform to a second platform” Parent Spec. at 2:19-27.

In light of SAP’s failure to carry its burden that this is a means-plus-function term lacking definite structure and its omission of evidence about a POSITA’s perspective, Terms 26 and 28 should be given their plain and ordinary meaning. In the alternative, the structure in the specification for performing the functions of Terms 26 and 28 is a server or web services gateway as described in the ’285 Patent at 5:3-16, 7:27-42, and 8:4-25.

G. Term 30 (*’948 Patent*)

There are no inconsistencies between the claims of the ’948 Patent and its specification that would result in a POSITA not understanding their scope with reasonable certainty. As SAP acknowledges, the claims provide an alert on “the” “at least one external device” where the antecedent basis for “the” is Element D, which recites “receiving *session data* indicating a current state of at least one external device of the user.” *See, e.g.*, ’948 Patent, Claim 1 (emphasis added). In SAP’s hypothetical in which a user has three devices—one off, one on but locked and one in active use—the claims will provide an alert to the devices that are on (both locked and in active use). This is because a device that is off will not send any *session data* to indicate its current state for the processor to receive and thus will not be among the “at least one external devices” in (D). Instead, at (D), the processor will receive session data from the two devices that are on and, if the “event” is determined at (E), then at (F), the processor determines a notification method for them.

Further, the ’948 Patent specification does not limit sending alerts to active devices or suggest that it is “more logical” to do so, as SAP suggests. Resp. 23-24. Providing an alert to an active session on a user’s laptop is described as an example. ’948 Patent at 20:60-21:15. This

example is provided in the context of the specification's description of the notification manager querying the configuration server for the user's notification preferences and correlating those with the session manager to determine the best notification method. *Id.* In other words, the system utilizes session information and a user's notification preferences to determine how to notify the user. This is entirely consistent with the claims. As Dr. Goodrich explained, a POSITA would understand that (D) is met so long as the system receives session data indicating a current state of the external device, whatever it may be. Ex. 11 (Goodrich Dep.) at 46:7-15; *see also id.* at 49:20-50:3; 46:16-47:1, 48:25-49:8.

H. Term 32 ('948 Patent, claims 1, 2, 4)

Term 32 is definite, and SAP does not cite any case law or expert testimony to argue otherwise. Claim 1 of the '948 sets forth an "if" condition that triggers an action. Specifically, Claim 1 requires that if an "event" occurs, then a "notification method" is determined to provide an alert. Dependent Claim 2 further restricts Claim 1 to require the notification to be transmitted to an external device if the "event" in Claim 1 has been detected. Rather than grapple with the claim language, SAP concludes without explanation that Term 32 is indefinite because there is a purported "inter-claim conflict." Resp. 24-25. However, as Dr. Goodrich explained, there is no conflict because Claim 1 requires a notification method to be determined based on the event (Step F) and Claim 2 requires the notification to be transmitted based on the event (Step H). Ex. 11 at 42:10-20; 45:23-46:15. Because the claims as written are readily understood by a POSITA, Term 32 is definite. The prosecution history further supports this. In the claims as filed, the applicant identified several steps in dependent claims that are conditioned on the "events" being detected, including transmitting the alerts (Claim 2) and storing the alerts (Claim 3). Ex. 13 at 46-47 (claims 1, 2, 3). The original claims further confirm that the dependent claims identify additional actions that occur in response to the detection of an event at Step E. *Id.*

Respectfully submitted,

Dated: March 12, 2025

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CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically on March 12, 2025 pursuant to Local Rule CV-5(a) and has been served on all counsel who have consented to electronic service.

/s/ Paul J. Andre
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