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*.	§	Case No. 2:24-cv-00096-JRG

PRELIMINARY CONSTRUCTIONS

Term	Disputed Term	Preliminary Construction
1	"secure user-centric" ('250 Patent, Claims 1, 25; '285 Patent, Claims 1, 13, 37, 42; '641 Patent, Claims 1, 2, 13, 18, 31, 32; '948 Patent, Claims 1, 13, 35, 36)	"secure" means "requiring authorization for access" "user-centric" means "based on the identity of, and relevant to, a user"
2	"channel" ('250 Patent: Claims 1, 2, 4, 6, 9, 13, 14, 25, 26, 30; '285 Patent, Claims 1, 6, 13, 18, 36, 37, 42; '641 Patent, Claims 1, 2, 13, 16, 18, 31, 32, 34; '948 Patent, Claims 1, 7, 11, 13, 35, 36)	"a conduit for accessing and interacting with information, comprising a visual component to be presented on the at least one user [platform/device] and an information delivery component on an application server"
6	"a user profile identifying . . . platform identities" ('250 Patent, Claims 1, 13, 25; '285 Patent, Claims 1, 37, 42; '641 Patent, Claims 1, 31, 32) "a user profile to identify . . . platform identities" ('948 Patent, Claims 1, 35, 36)	"a user profile [identifying / to identify] . . . specific devices"

7	"authenticating a user and a first [computing device] platform associated with the user" ('250 Patent, Claims 1, 13) "authenticating the user and the at least one user platform" ('285 Patent, Claims 1, 6, 37, 42; '948 Patent, Claim 23)	"verifying the user's identity and the identity of the platform"
8	"C) authenticating the second [computing device] platform to receive the . . . channel based at least in part on a second [computing device] platform identity for the second [computing device] platform" ('250 Patent, Claims 1, 13) "authenticate the second computing device platform to receive the . . . channel based at least in part on a second computing device platform identity for the second computing device platform" ('250 Patent, Claim 25)	Plain and ordinary meaning.
9	"copy operation of the channel" ('250 Patent, Claims 1, 2, 13, 14, 25, 26)	Plain and ordinary meaning.
10	"deploy[ing] the . . . channel" ('250 Patent, Claims 1, 6, 13, 25) "deploying the . . . information" ('285 Patent: Claims 1, 37, 42; '641 Patent: Claims 1, 31, 32)	Plain and ordinary meaning.
11	"the second [computing device] platform" ('250 Patent, Claims 1, 2, 6, 13, 14, 25, 26, 30)	Plain and ordinary meaning.

12	"synchronize functions and features . . . of channels across two or more of the . . . user platforms by deploying the . . . information to two or more of the plurality of user platforms" ('285 Patent, Claims 1; '641 Patent, Claim 1) "synchronizing functions and features of one or more . . . of channels across two or more of the … user platforms deploying the . . . information to two or more of the . . . user platforms to two or more of the plurality of user platforms" ('285 Patent, Claim 37) "synchronize functions and features . . . of channels across . . . user platforms by deploying . . . information to the plurality of user platforms" ('285 Patent, Claim 42; '641 Patent, Claims 1, 31, 32)	Plain and ordinary meaning.
13	"bi-directional interrogation" ('285 Patent, Claims 1, 37, 42; '641 Patent, Claims 1, 31, 32)	"querying of content in two directions"
14	"external device of the user" ('948 Patent, Claims 1, 7, 11, 13, 35, 36)	Plain and ordinary meaning.
16	"provide [an] alert" ('948 Patent, Claims 1, 35, 36)	Plain and ordinary meaning.
15	"intelligent alert object" ('250 Patent, Claim 9)	"intelligent alert" means "alert with a threshold condition controlled by computer instructions"

17	"service support instructions that determine how the secure user-centric channel behaves on at least the second platform" ('250 Patent, Claims 1, 13, 25; '285 Patent, Claim 1, 37, 42; '641 Patent, Claim 1, 19, 31–33; '948 Patent, Claim 1, 35, 36)	Plain and ordinary meaning.
18	"D) if the user, the first [computing device] platform, and the second [computing device] platform are authenticated . . ." ('250 Patent, Claims 1, 13)	Plain and ordinary meaning.
19	"application host and transfer tool" ('250 Patent, Claims 25, 26, 30)	Plain and ordinary meaning.
24	"C) comprises authenticating the user and the user platform based at least in part on the user profile; and D) comprises transmitting the first authenticated channel information to the at least one user platform based at least in part on the user profile" ('285 Patent, Claims 5–10, 13)	Plain and ordinary meaning.
25	"C) comprises authenticating the user and the at least one user platform based at least in part on the plurality of user accounts and the plurality of device accounts included in the authentication directory" ('285 Patent, Claim 38)	Plain and ordinary meaning.
26	"the at least one processor is configured to synchronize functions and features of one or more of the plurality of channels across two or more of the plurality of user platforms by deploying the secure user-centric information to two or more of the plurality of user platforms" ('285 Patent, Claim 1)	Plain and ordinary meaning. [Not § 112(f)]

28	"the at least one external computing device is configured to synchronize functions and features of one or more of the plurality of channels across a plurality of user platforms by deploying secure user-centric information to the plurality of user platforms" ('641 Patent, Claims 1, 31–33)	Plain and ordinary meaning. [Not § 112(f)]
30	"D) receiving session data indicating a current state of at least one external device of the user . . . F) determining a notification method by which to provide at least one alert on the at least one external device based on the current state of the at least one external device indicated by the session data; G) . . . the notification data is configured to cause the at least one external device to provide the at least one alert on the at least one external device; and H) controlling the at least one communication interface to transmit the notification data to the at least one external device" ('948 Patent, Claim 1, 35, 36)	Plain and ordinary meaning.
31	"if the one or more events, conditions, logical workflows, discrete information values or signal data is/are determined in E)" ('948 Patent, Claims 1, 7, 35, 36)	Plain and ordinary meaning.
32	"if the one or more events, conditions, logical workflows, discrete information values or signal data is/are determined in E), the at least one processor performs H)" ('948 Patent, Claims 2, 4)	