

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

AFL TELECOMMUNICATIONS LLC,

Plaintiff,

v.

STERLITE TECH HOLDING, INC.,

Defendant.

C.A. No. 1:23-cv-01202-RGA

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Paragraph 6 of the Scheduling Order of March 20, 2024 (D.I. 27), Plaintiff AFL Telecommunications LLC (“AFL”) and Defendant Sterlite Tech Holding, Inc. (“STHI”) met and conferred in preparation for the deadline to file a Joint Claim Construction Chart for the claim terms of U.S. Patent No. 11,287,591 (“the ‘591 Patent”). During the meet and confer process, the parties were able to resolve all claim construction disputes. Therefore, the parties submit this Joint Claim Construction Chart solely for the purpose of identified agreed-upon claim constructions as set forth below.

I. Agreed-Upon Claim Terms and Constructions

Term	Claim	Agreed-Upon Construction
“Radial inner ends”	1	Portions of a protrusion that are closest to the central, longitudinal axis of the fiber optic cable along its radial direction (i.e., perpendicular to the central, longitudinal axis).
“Radial outer ends”	1	Portions of a protrusion that are furthest from the central, longitudinal axis of the fiber optic cable along its radial direction (i.e., perpendicular to the central, longitudinal axis).
“Convex surface shape that is radially inward”	2	A surface curving inwardly towards the fiber optic cable’s core.

Respectfully submitted,

/s/ Arthur G. Connolly, III

CONNOLLY GALLAGHER LLP
Arthur G. Connolly, III (#2667)
Alan R. Silverstein (#5066)
1201 North Market Street, 20th Floor
Wilmington, DE 19801
(302) 757-7300
aconnolly@connollygallagher.com
asilverstein@connollygallagher.com

Tim F. Williams (*admitted pro hac vice*)
Scott A. Cole (*admitted pro hac vice*)
Mark H. Johnson (*admitted pro hac vice*)
DORITY & MANNING, P.A.
Two Liberty Square
75 Beattie Place, Suite 1100
Greenville, SC 29601
(864) 271-1592
timw@dority-manning.com
scole@dority-manning.com
mjohnson@dority-manning.com

Attorneys for Plaintiff
AFL Telecommunications LLC

/s/ Kelly E. Farnan

Kelly E. Farnan (#4395)
Kevin M. Gallagher (#5337)
Richards, Layton & Finger, P.A.
One Rodney Square
920 N. King Street
Wilmington, DE 19801
(302) 651-7700
farnan@rlf.com
gallagher@rlf.com

Raymond. R. Ferrera,
TX SBN 00796541
(*admitted pro hac vice*)
LyondellBasell Tower
1221 McKinney Street, Suite 4400
Houston, Texas 77010
Tel: (713) 308-0127
Email: ray.ferrera@arlaw.com

Lyndey R.Z. Bryant
Adams and Reese LLP
1221 Main Street, Suite 1200
Columbia, SC 29201
(803) 254-4190
lyndey.bryant@arlaw.com

Attorneys for Defendant
Sterlite Tech Holding, Inc.