

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

PROXENSE, LLC,

Plaintiff,

v.

INTEL CORP.,

Defendant.

Civil Action No. 6:24-cv-00283-ADA

PROXENSE’S LIST OF CLAIM CONSTRUCTION’S

Pursuant to the Court’s Scheduling Order, Plaintiff Proxense, LLC (hereafter “Proxense” or “Plaintiff”) provides these Proposed Claim Constructions related to the asserted claims identified in Plaintiff’s infringement contentions. Proxense maintains the right to supplement or modify this list of proposed terms, including in response to Intel Corp.’s invalidity contentions and non-infringement theories or in view of information learned during discovery.

Term	Patent(s)/Claim(s)	Proxense’s Proposed Construction
“synchronization information”	8,457,672, claim 1; 9,265,043, claim 1; 8,219,129, claims 1 and 18	information assigning a time slot
“network traffic” / “network traffic load”	9,265,043, claim 1	plain and ordinary meaning
“class”	8,457,672, claim 1; 9,265,043, claim 1; 8,219,129, claims 1 and 18	plain and ordinary meaning
“fixed proximity-based reader device” / “fixed location proximity reader” / “fixed location proximity-based reader device”	8,457,672, claim 1 9,265,043, claim 1 8,219,129, claim 1	a fixed access point that can wirelessly interact with a client device to link the user with various applications, assets, and/or services

“time slot”	8,457,672, claim 1; 9,265,043, claim 1; 8,219,129, claims 1 and 18; 8,036,152, claim 1	a set period of time for communicating – i.e., sending and/or receiving data
“a timer [] to indicate when to switch from sleep mode to [] active mode based on [] time slot assignment information”	8,036,152, claims 1 and 7	a timer set to go off when it is time for the next time slot during which the device is to listen and/or talk or receive and/or send data

Dated: December 16, 2024

/s/ David L. Hecht

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