

Subject: RE: Intellectual Ventures v. Tesla - 1:24-cv-00884-ADA - preliminary constructions
Date: Wednesday, April 9, 2025 at 5:21:20 PM Eastern Daylight Time
From: Ryan Hering
To: msiegmund@cjsjlaw.com
CC: Intellectual Ventures, Matt Colvin, Aamir Kazi, jdowning@kasowitz.com, Michael Ellis, Kate Quisenberry (Left as of 8/29/2025), Daniel Gopenko, David Hoffman, Bernard Cryan, Rodeen Talebi, Jennifer Clark, Kristie Davis
Attachments: image001.png, image002.png

[This email originated outside of F&R.]

Counsel,

The Court provides the following preliminary constructions in advance of tomorrow’s Markman hearing. The purpose of preliminary constructions is to streamline the hearing by providing the parties an indication of the Court’s current position for each term. Although the parties are, of course, free to argue for their originally proposed construction, it is generally unlikely that the Court will select a party’s originally proposed construction over the preliminary construction. As such, the Court believes that making arguments to fine-tune the preliminary construction may be more helpful. The preliminary constructions are not final as the Court may change some of those constructions based on the arguments at the hearing.

Of the below terms, please let me know what terms each side would like to argue at least two hours before the hearing. Each side may email their list separately (but please CC the other side) or jointly (please indicate which side, or both, wants to argue each term).

Also, at least 30 minutes before the hearing, please submit any slides the parties (and CC the other side) wish to use at the Markman hearing.

U.S. Patent 6,894,639				
Claim(s)	Claim Term	IV’s Proposed Construction	Tesla’s Proposed Construction	Court's Preliminary Construction
1	“said target feature information”	Plain and ordinary meaning. Not indefinite.	Indefinite	Plain and ordinary meaning. Not indefinite.
7	“said feature	Plain and	Indefinite	Plain and

	information”	ordinary meaning. Not indefinite.		ordinary meaning. Not indefinite.
U.S. Patent 7,336,805				
Claim(s)	Claim Term	IV’s Proposed Construction	Tesla’s Proposed Construction	Court's Preliminary Construction
1	“may at least partially describe a potential destination”	Plain and ordinary meaning. Not indefinite.	Indefinite	Plain and ordinary meaning. Not indefinite.
1	“potential geometric objects for plausibility using a matching algorithm so as to identify one or more plausible objects”	Plain and ordinary meaning. Not indefinite.	Indefinite	Plain and ordinary meaning. Not indefinite.
U.S. Patent 8,898,395				
Claim(s)	Claim Term	IV’s Proposed Construction	Tesla’s Proposed Construction	Court's Preliminary Construction
1	“said processing”	Plain and ordinary meaning. Not indefinite.	Indefinite	Plain and ordinary meaning. Not indefinite.
U.S. Patent 10,136,416				
Claim(s)	Claim Term	IV’s Proposed Construction	Tesla’s Proposed Construction	Court's Preliminary Construction
1	“broadcast information”	Original: Plain and ordinary	Original: Plain and ordinary meaning,	Plain and ordinary

		meaning. Revised: Plain and ordinary meaning, which is “information that is transmitted via a broadcast.”	which is “information that is received via a broadcast transmission to all UEs within a base station’s coverage area.” Revised: Plain and ordinary meaning, which is “information that is transmitted via a broadcast transmission to all UEs within a base station’s coverage area.”	meaning, which is “information that is transmitted via a broadcast.”
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Ryan Hering
Law Clerk to the
Hon. Alan D Albright
 U.S. District Court
 Western District of Texas
 Office: **254-750-1522**

From: Ryan Hering
Sent: Monday, March 31, 2025 9:38 AM
To: Mark Siegmund <MSiegmund@CJSJLAW.com>
Cc: Intellectual Ventures <IntellectualVentures@kasowitz.com>; Matt Colvin <colvin@fr.com>; Aamir Kazi <kazi@fr.com>; John Downing <JDowning@kasowitz.com>; Michael Ellis <ellis@fr.com>; Kate Quisenberry <quisenberry@fr.com>; Daniel Gopenko <gopenko@fr.com>; David Hoffman <Hoffman@fr.com>; Bernard Cryan <cryan@fr.com>; Rodeen Talebi <talebi@fr.com>
Subject: RE: Intellectual Ventures v. Tesla - 1:24-cv-00884-ADA - JCCS

Counsel,

Thank you for submitting the joint claim construction. The Court can confirm that the *Markman* hearing in this case is still set for April 10, at 9:00am.

Thanks,

Ryan



Ryan Hering
Law Clerk to the
Hon. Alan D Albright
U.S. District Court
Western District of Texas
Office: **254-750-1522**

From: Mark Siegmund <MSiegmund@CJSJLAW.com>

Sent: Monday, March 31, 2025 9:35 AM

To: TXWDml_LawClerks_WA_JudgeAlbright
<TXWDml_LawClerks_WA_JudgeAlbright@txwd.uscourts.gov>

Cc: Intellectual Ventures <IntellectualVentures@kasowitz.com>; Matt Colvin <colvin@fr.com>; Aamir Kazi <kazi@fr.com>; John Downing <JDowning@kasowitz.com>; Michael Ellis <ellis@fr.com>; Kate Quisenberry <quisenberry@fr.com>; Daniel Gopenko <gopenko@fr.com>; David Hoffman <Hoffman@fr.com>; Bernard Cryan <cryan@fr.com>; Rodeen Talebi <talebi@fr.com>

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CAUTION - EXTERNAL:

Dear Law Clerks,

Pursuant to the Court's OGP and the Scheduling Order, attached is the joint claim construction statement submitted by the parties. We also wanted to confirm the Markman hearing date, which is currently set for April 10, 2025 at 9:00 am. Please let us know if the Court needs anything else from us.

Sincerely,
Mark

MARK SIEGMUND

PARTNER

msiegmund@cjsjlaw.com

O 254.732.2242

C 254.644.2122

F 866.627.3509

CHERRY JOHNSON SIEGMUND JAMES

Bridgeview Center
7901 Fish Pond Rd, Second Floor
Waco, Texas 76710



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