

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

IARNACH TECHNOLOGIES LTD.,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.,
CHARTER COMMUNICATIONS HOLDING
COMPANY, LLC, CHARTER
COMMUNICATIONS OPERATING, LLC,
SPECTRUM MANAGEMENT HOLDING
COMPANY, LLC, and SPECTRUM GULF
COAST, LLC,

Defendants.

Civil Action No. 2:24-cv-00230-JRG

JURY TRIAL DEMANDED

DISCLOSURE OF PROPOSED CLAIM TERMS FOR CONSTRUCTION

Pursuant to the Court’s Docket Control Order (Dkt. 55) and Local Patent Rule 4-1, defendants Charter Communications, Inc.; Charter Communications Holding Company, LLC; Charter Communications Operating, LLC; Spectrum Management Holding Company, LLC; and Spectrum Gulf Coast, LLC (collectively “Defendants”) provide the following list of proposed claim terms for construction to plaintiff Iarnach Technologies Ltd. (“Iarnach”). Defendants’ identification of proposed terms for claim construction is based on its analysis and investigation to date. Because Defendants do not know yet what terms Iarnach may propose for construction, and the parties must meet and confer after the exchange of the terms and proposed constructions in accordance with Local Patent Rule 4-1, Defendants expressly reserve their right to add, remove, modify, and supplement the terms identified herein during that meet and confer process, including in response to terms Iarnach may propose, positions Iarnach takes regarding the construction of

claim terms, additional information learned during discovery, court orders in this matter, and any applicable rules.

Defendants have selected the proposed claim terms from the currently asserted claims of U.S. Patent No. 8,942,378 (the “378 patent”); U.S. Patent No. 9,287,982 (the “982 patent”); and U.S. Patent No. 9,674,035 (the “035 patent”). Should Iarnach be allowed to assert additional claims, or should other claims become relevant, Defendants reserve the right to propose construction of additional terms.

Subject to the foregoing, Defendants hereby identify the following terms that may need to be construed by the Court if parties are unable to reach agreement on the meaning of each term during the meet and confer process. The chart below identifies the terms that should be construed with reference to the asserted claims where each term occurs; for the sake of clarity, any unlisted occurrence of a term or similar term in an asserted claim is also proposed for construction. Terms that are similar, or that present the same claim construction issues, are grouped accordingly in the charts.

I. TERMS FOR CONSTRUCTION

Terms	Claims
1. “configuring the OLT locally according to the configuration information of the OLT and meanwhile configuring the ONU according to the configuration information of the ONU”	982 patent, claims 1, 5, 6
2. “back-office management system”	982 patent, claims 1, 5, 6
3. “service auto-configuration method for a DOCSIS Provisioning of EPON (DPoE) System”	982 patent, claims 1, 6
4. “acquisition unit,” “analyzing unit,” “configuration unit”	982 patent, claims 5, 6

Subject to 35 U.S.C. § 112 ¶ 6.	
5. “notifying...providing” / “notifies...provides” / “receiving a notification...obtaining the updated configuration file” / “receives a notification...obtains the updated configuration file”/“receiving a notification...obtaining the updated configuration file”/“means for receiving...means for obtaining the updated configuration file”	035 patent, claims 1, 5, 9, 13, 14, 20, 26, 32
6. “generator,” “notifier,” “file provider,” “monitor” Subject to 35 U.S.C. § 112 ¶ 6.	035 patent, claim 5
7. “means for generating,” “means for notifying,” “means for providing,” “means for monitoring” Subject to 35 U.S.C. § 112 ¶ 6.	035 patent, claim 13
8. “receiver,” “obtainer,” “first validator,” “determiner,” “second validator,” and “an applier” Subject to 35 U.S.C. § 112 ¶ 6.	035 patent, claim 20
9. “means for receiving,” “means for obtaining,” “means for performing,” “means for determining,” “means for performing,” “means for applying” Subject to 35 U.S.C. § 112 ¶ 6.	035 patent, claim 32
10. “multicast service”	378 patent, claims 1, 9
11. “key generation unit,” “encryption unit,” “sending unit” Subject to 35 U.S.C. § 112 ¶ 6.	378 patent, claim 9

Dated: April 7, 2025

Respectfully submitted,

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Inc., Charter Communications Holding Company,
LLC, Charter Communications Operating, LLC,
Spectrum Management Holding Company, LLC, and
Spectrum Gulf Coast, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on **April 7, 2025**, a true and correct copy of the above and foregoing document has been served on all counsel of record via electronic mail per Local Rule CV-5.

/s/ Saina S. Shamilov
Saina S. Shamilov