

**IN THE 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

**PLAINTIFF IARNACH TECHNOLOGIES LTD.'S  
PROPOSED CLAIM TERMS FOR CONSTRUCTION (P.R. 4-1)**

Pursuant to Local Patent Rule 4-1 and the Court's Docket Control Order (Dkt. 55), Plaintiff Iarnach Technologies Ltd. ("Plaintiff" or "Iarnach") identifies the following claim terms which it contends may require construction by the Court in this case against 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" or "Charter").

Plaintiff's proposed terms are based on information that is currently available to Plaintiff. Plaintiff reserves the right to modify this disclosure should additional information become available through discovery. Further, Plaintiff reserves the right to supplement, amend, and/or modify this disclosure for any other reason including, consistent with P.R. 4-1(b), to facilitate the preparation of the Joint Claim Construction and Prehearing Statement, and in light of arguments made or positions taken by Defendants as this case proceeds.

**I. U.S. PATENT NO. 8,942,378**

- “optical line terminal (OLT)”: ‘378 claims 1, 3-6, 8
- “optical network unit (ONU)”: ‘378 claims 1-6, 8-9, 11-13
- “service”: ‘378 claims 1-9, 11-13

**II. U.S. PATENT NO. 9,287,982**

- “DPOE system”: ‘982 claims 1, 4, 6-7
- “optical line terminal (OLT)”: ‘982 claims 1-6, 8-11
- “optical network unit (ONU)”: ‘982 claims 1-6, 8-11
- “back-office management system”: ‘982 claims 1, 4, 6-7

**III. U.S. PATENT NO. 9,674,035**

- “DPOE system”: ‘035 claims 19, 25, 31
- “optical line terminal (OLT)”: ‘035 claims 19, 25, 31
- “optical network unit (ONU)”: ‘035 claims 1-2, 5-6, 9-10, 13-14, 20, 26, 32
- “virtual cable modem (vCM)”: ‘035 claims 1, 3-5, 7-9, 11-13
- “means for generating an updated configuration file for the ONU”: ‘035 claim 13. This term should be governed by 35 U.S.C. §112(f).
- “means for notifying a virtual cable modem (vCM), prior to successful update of the ONU, that the updated configuration file is available for the ONU”: ‘035 claim 13. This term should be governed by 35 U.S.C. §112(f).
- “means for providing, when requested by the vCM, to the vCM, the updated configuration file”: ‘035 claim 13. This term should be governed by 35 U.S.C. §112(f).
- “means for monitoring the vCM for an indication of successful update of the ONU by the vCM using the updated configuration file”: ‘035 claim 13. This term should be governed by 35 U.S.C. §112(f).
- “means for receiving a notification that an updated configuration file is available for the ONU”: ‘035 claim 32. This term should be governed by 35 U.S.C. §112(f).

- “means for obtaining the updated configuration file”: ‘035 claim 32. This term should be governed by 35 U.S.C. §112(f).
- “means for performing a first validation of the updated configuration file for structural errors”: ‘035 claim 32. This term should be governed by 35 U.S.C. §112(f).
- “means for determining changes between the current configuration file of the ONU and the updated configuration file to identify ONU resources to implement to the changes”: ‘035 claim 32. This term should be governed by 35 U.S.C. §112(f).
- “means for performing a second validation about whether the ONU resources to implement the changes are available or not at the ONU”: ‘035 claim 32. This term should be governed by 35 U.S.C. §112(f).
- “means for applying the changes to the ONU when it is determined that the ONU resources to implement the changes are available at the ONU”: ‘035 claim 32. This term should be governed by 35 U.S.C. §112(f).

Dated: April 7, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on all counsel of record  
via email.

/s/ Eric J. Enger  
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