

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

CONCURRENT VENTURES, LLC and
XTREAMEDGE, INC.,

Plaintiffs,

v.

ADVANCED MICRO DEVICES, INC. and
PENSANDO SYSTEMS, INC.,

Defendants.

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Civil Action No. 1:24-cv-335-DII

JURY TRIAL DEMANDED

**PLAINTIFFS' PROPOSED PRELIMINARY
CLAIM CONSTRUCTIONS**

Pursuant to the Scheduling Order (Dkt. No. 52), Plaintiffs Concurrent Ventures, LLC and XstreamEdge, Inc. ("Plaintiffs") hereby identify proposed preliminary claim constructions from the claims of U.S. Patent Nos. 8,924,596 ("596 patent"), 9,529,767 ("767 patent"), 10,873,753 ("753 patent"), 10,944,634 ("634 patent") and 10,985,943 ("943 patent") (collectively, the "Asserted Patents"). Plaintiffs are prepared to meet and confer with Defendants Advanced Micro Devices, Inc. and Pensando Systems, Inc. ("Defendants") to discuss any terms in dispute to finalize the parties' lists of claim terms for construction. Plaintiffs reserve the right to supplement, amend, and/or modify the preliminary proposed claim terms to facilitate the preparation of the Claim Construction briefing based on the terms identified by Defendants and any intervening orders from the Court.

Plaintiffs also identify Badal Sharma and Paul Min as expert witnesses who may provide support for the claim constructions as a person having ordinary skill in the art regarding the Asserted Patents. In addition to the terms specifically identified below, one or more of the identified expert witnesses may provide support for any terms for which Defendants intend to rely

on expert support.

Plaintiffs' proposed constructions are identified in the table below.

Claim Term(s)	Plaintiffs' Proposed Construction	Identification of Potential Extrinsic Evidence
"input queue implemented in hardware" '596 Patent, claims 1, 7, 13	Plain and ordinary meaning	McGraw-Hill Dictionary of Electrical & Computer Engineering definition of "Input" and "Queue;" Modern Dictionary of Electronics definition of "Input," "Queue," and "Hardware."
"output queue implemented in hardware" '596 Patent, claims 1, 7, 13	Plain and ordinary meaning	McGraw-Hill Dictionary of Electrical & Computer Engineering definition of "Output" and "Queue;" Modern Dictionary of Electronics definition of "Output," "Queue," and "Hardware."
"register" '596 Patent, claims 1, 7, 13	Plain and ordinary meaning, that is "a memory location within a microprocessor used to store values and external memory addresses"	Modern Dictionary of Electronics definition of "Register;" Microsoft Computer Dictionary definition of "Register;" Webster's New World Computer Dictionary definition of "Register."
"abstraction protocol" '767 Patent, claims 1, 2, 4, 6, 16	Plain and ordinary meaning Not subject to § 112(f)	Modern Dictionary of Electronics definition of "Abstraction;" Microsoft Computer Dictionary definition of "Abstraction." Expert Testimony from Mssrs. Badal Sharma and/or Paul Min regarding the meaning of the claim term to one of skill in the art.
"abstract protocol messages"	Plain and ordinary meaning, that is "abstraction protocol"	Microsoft Computer Dictionary definition of

'767 Patent, claim 1	messages" Not subject to § 112(f)	"Abstract." Expert Testimony from Mssrs. Badal Sharma and/or Paul Min regarding the meaning of the claim term to one of skill in the art.
"abstract protocol packets" '767 Patent, claim 17	Plain and ordinary meaning, that is "abstraction protocol packets" Not subject to § 112(f)	Microsoft Computer Dictionary definition of "Abstract." Expert Testimony from Mssrs. Badal Sharma and/or Paul Min regarding the meaning of the claim term to one of skill in the art.
"storage media device interface" '767 Patent, claims 1, 16	Plain and ordinary meaning, that is "interface that allows communication with at least one storage media device"	
"the master controller" and "the edge controller" '767 Patent, claims 8, 9, 11, 13, 14, 15, 19	Plain and ordinary meaning	Modern Dictionary of Electronics definition of "Controller;" Electrical Engineering Dictionary definition of "Master," and "Controller."
"one or more swappable pods or cards" / "the plurality of swappable pods or cards" '753 Patent, claims 1, 2, 3, 4	[one or more / plurality of] pods or cards that are removable, insertable, or replaceable	
"memory superposition" '753 Patent, claims 4, 7, and 15)	Two or more types of memory that can be made available for a data flow or other data processing operation	
"interleaved memory" '753 Patent, claims 4, 7, and 15)	Blended different types of memory	Electrical Engineering Dictionary definition of "Interleaved Memory."
"swapped memory over a specified address range" '753 Patent, claims 4, 7, and 15)	Plain and ordinary meaning	
"memory allocated to specified address ranges	Plain and ordinary meaning	

according to parameterized task needs” '753 Patent, claims 4, 7, and 15		
“sandbox” '753 Patent, claims 3, 10, 14 '943 Patent, claims 1, 3-5, 7-10, and 12-18	Plain and ordinary meaning, that is “portion designated for programmable electronic circuits”	Expert Testimony from Mssrs. Badal Sharma and/or Paul Min regarding the meaning of the claim term to one of skill in the art.
“geographical area” '634 Patent, claims 1, 8, 15	Plain and ordinary meaning	
“tuner server” '634 Patent, claims 1, 2, 6, 7, 8, 9, 13, 15, 16)	network connected or connectable device that can optimize network performance	
“The network connected device of claim 15, wherein the one or more processors are configurable to: send the parameter values for determination of bandwidth, from the first endpoint device, to the tuner server that is configured to receive further parameter values for determination of bandwidth of network connections from a plurality of endpoint devices; send, from the first endpoint device to the tuner server, connection information for the next network connection, wherein the tuner server performs the determining and derives one or more parameter values for the transmission bandwidth; and receive, at the first endpoint device, from the tuner server, the one or more parameter values for the transmission bandwidth.” '634 Patent, claim 16	Plain and ordinary meaning	

“The network connected device of claim 15, further comprising the network connected device configurable to: monitor network traffic between the first endpoint device and the second endpoint device; transmit data associated with the network traffic from the first endpoint to the network connected device; determine, at the network connected device, an adjustment to the transmission bandwidth is desired; receive data for adjusting the transmission bandwidth from the network connected device; and adjust the transmission bandwidth responsive to the receiving.” ’634 Patent, claim 20	Plain and ordinary meaning	
“programmable logic device” ’943 Patent, claims 1, 10	Plain and ordinary meaning, that is “a device with electronic circuitry capable of being configured or reconfigured”	Expert Testimony from Mssrs. Badal Sharma and/or Paul Min regarding the meaning of the claim term to one of skill in the art. The Penguin Dictionary of Electronics definition of “PLD;” Electrical Engineering Dictionary definition of “Programmable Logic Device (PLD);” EDACAFE “Programmable ASICs;” Adsantec “All About Application-Specific Integrated Circuits (ASIC).”

Dated: January 23, 2025

Respectfully submitted,

/s/ Michael Matulewicz-Crowley

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***Attorneys for Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served by electronic mail on January 23, 2025 to all counsel of record.

/s/ Michael Matulewicz-Crowley
Michael Matulewicz-Crowley