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

Defendants Advanced Micro Devices, Inc.'s and Pensando Systems, Inc.'s
Identification of Claim Terms for Construction

Pursuant to the Scheduling Order (Dkt. 52), Defendants Advanced Micro Devices, Inc. and Pensando Systems, Inc. hereby serve their Identification of Claim Terms for Construction with respect to the asserted claims of United States Patent Nos. 8,924,596 ("the '596 Patent") 9,529,767 ("the '767 Patent"), 10,873,753 ("the '753 Patent"), 10,985,943 ("the '943 Patent"), and 10,944,634 ("the '634 Patent"), (collectively, the "Asserted Patents") identified by Plaintiffs Concurrent Ventures, LLC and XtreamEdge, Inc. in their Infringement Contentions served October 11, 2024.

Defendants reserve the right, consistent with the Federal Rules of Civil Procedure and the Local Rules of this Court, as well as any other applicable rule, to revise its list of claim terms for construction should Plaintiffs provide any information it failed to provide in their Infringement Contentions or should Plaintiffs amend their Infringement Contentions in any way. Defendants further reserve the right to amend this list of terms as a result of the parties' meet-and-confer process to attempt to reduce and narrow the number of claim construction issues. The inclusion of terms in this list or a supplement to it does not necessarily mean that Defendants contend that

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any of these terms are capable of being construed, and Defendants reserve the right to contend that one or more of the identified terms are invalid as indefinite pursuant to 35 U.S.C. § 112.

A. '596 Patent

- "input queue implemented in hardware" (claims 1, 7, 13)
- "output queue implemented in hardware" (claims 1, 7, 13)
- "register" (claims 1, 7, 13)

B. '767 Patent

- "abstraction protocol" (claims 1, 2, 4, 6, 16) (subject to 112(f))
- "abstract protocol messages" (claim 1) (subject to 112(f))
- "abstract protocol packets" (claim 17) (subject to 112(f))
- "storage media device interface" (claims 1 and 16)
- "the master controller" and "the edge controller" (claims 8, 9, 11, 13-15, and 19)

C. '753 Patent

- "One or more swappable pods or cards"/"the plurality of swappable pods or cards" (claims 1-4)
- "memory superposition" (claims 4, 7, and 15)
- "interleaved memory" (claims 4, 7, and 15)
- "swapped memory over a specified address range" (claims 4, 7, and 15)
- "memory allocated to specified address ranges according to parameterized task needs" (claims 4, 7, and 15)
- "sandbox" (claims 3, 10, and 14)

D. ’943 Patent

- “programmable logic device” (claims 1 and 10)
- “sandbox” (claims 1, 3-5, 7-10, and 12-18)

E. ’634 Patent

- “geographical area” (claims 1, 8, 15)
- “tuner server” (claims 1, 2, 6, 7, 8, 9, 13, 15, 16)
- “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.” (claim 16)
- “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.” (claim 20)

Dated: 1/09/2025

/s/Jeffrey Liang

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendants' Identification of Claim Terms for Construction were served on Plaintiffs' counsel by email sent to the following recipients on January 9, 2025:

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