EXHIBIT C

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Attorneys for Defendants
WESTERN DIGITAL CORPORATION
WESTERN DIGITAL TECHNOLOGIES, INC.,

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

POLARIS POWERLED TECHNOLOGIES, LLC, Plaintiff, v. WESTERN DIGITAL CORPORATION AND WESTERN DIGITAL TECHNOLOGIES, INC., Defendants,	CASE NO. 2:24-cv-02864-ODW-MAR **DEFENDANTS' IDENTIFICATION OF CLAIM TERMS FOR CONSTRUCTION** Hon. Otis D. Wright

Pursuant to the Patent Local Rule 4-1, Defendants Western Digital Corporation and Western Digital Technologies, Inc., (collectively referred to as "Defendants") identifies the following claim terms, phrases, or clauses which Defendants contend should be construed by the Court.

Claim Term, Phrase, or Clause	Patent Claim
"A nonvolatile memory controller for alerting a host processing unit to an unprocessed completion status contained in a completion queue of the host processing unit, the nonvolatile memory controller comprising:"	U.S. Patent No. 8,554,968 Claim 1
"interrupt manager"/ "interrupt manager controller"	U.S. Patent No. 8,554,968 Claims 1, 6, 7, 8, 9, 10, 14, 15
"interrupt vector state"	U.S. Patent No. 8,554,968 Claims 1, 6, 8, 14, 16
"completion queue state"	U.S. Patent No. 8,554,968 Claims 1, 7, 8, 9, 11, 15, 16
"generate a completion queue state for indicating the occurrence of a completion queue event associated with the completion queue, generate an interrupt vector state based on the completion queue state determine the completion queue of the host processing unit contains an unprocessed completion status based on the interrupt vector state, and generate an interrupt message packet for triggering an interrupt in the host processing unit to alert the host processing unit of the unprocessed completion status in the completion queue,"	U.S. Patent No. 8,554,968 Claim 1
"map at least one completion queue state of the plurality of completion queue states to an interrupt vector state of the plurality of interrupt vector states, generate the interrupt vector state based on each completion queue state mapped to the interrupt vector state, determine a	U.S. Patent No. 8,554,968 Claim 8

completion queue corresponding to a completion queue state mapped to the interrupt vector state contains an unprocessed completion status based on the interrupt vector state, and to generate an interrupt message packet based on the interrupt vector state for triggering an interrupt in the host processing unit to alert the host processing unit of the unprocessed completion status in the completion queue."	
"error correction coding (ECC)"/"ECC"	U.S. Patent No. 9,183,085 Claims 1, 14, 15, 16
"primary and secondary ECC parity symbols"	U.S. Patent No. 9,183,085 Claims 1, 15
"a set of predefined gears comprising at least a first gear and a second gear, wherein the predefined gears correspond to different [predefined] [error correction coding] ECC schemes"	U.S. Patent No. 9,183,085 Claims 1, 15
"the gear"	U.S. Patent No. 9,183,085 Claim 14
"ECC schemes"/"error correction coding (ECC) scheme(s)"	U.S. Patent No. 9,183,085 Claims 1, 15
"a fixed number of two or more flash memory pages or integer fractions thereof"/"the two or more flash memory pages of a region"	U.S. Patent No. 9,183,085 Claims 1, 15
"the ECC encoder"	U.S. Patent No. 9,183,085 Claim 16
"the processor"	U.S. Patent No. 9,183,085 Claims 16
"without storing each data block in a data buffer"	U.S. Patent No. 8,601,346 Claims 1, 14

"parity write command"	U.S. Patent No. 8,601,346 Claims 1, 5, 7, 11, 14
"exclusive-or operation"	U.S. Patent No. 8,601,346 Claims 3, 11, 16
"each command processing unit of the plurality of command processing units configured to receive a command of a plurality of commands for performing the data stripe operation"	U.S. Patent No. 8,601,346 Claim 1
"context memory"	U.S. Patent No. 8,601,346 Claims 1, 11, 14
"data block(s)"	U.S. Patent No. 8,601,346 Claims 1, 2, 6, 11, 14, 15
"the parity calculator further comprising a context memory including a page frame"	U.S. Patent No. 8,601,346 Claim 1
"parity calculator"	U.S. Patent No. 8,601,346 Claims 1, 2, 6, 11, 14
"a plurality of command processing units, each command processing unit of the plurality of command processing units configured to receive a command of a plurality of commands for performing the data stripe operation"	U.S. Patent No. 8,601,346 Claim 1
"a command distribution unit configured to distribute the plurality of data update commands to command processing units of the plurality of command processing units"	U.S. Patent No. 8,601,346 Claim 5
"A command distribution unit configured to receive a plurality of commands for performing a data stripe operation on a plurality of data blocks . . . Further configured to distribute the plurality of data update commands among command processing units of the plurality of command processing units . . . Further configured to determine generation of the parity block is complete and to distribute the parity write command to a command processing unity of the plurality of command processing units in	U.S. Patent No. 8,601,346 Claim 11

response to determining the arity block is complete"	

Date: January 24, 2025

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CERTIFICATE OF SERVICE

I, the undersigned, declare that I am over the age of 18 years and not a party to the within action. I am employed in the County of Orange, State of California, within which county the subject service occurred. My business address is 600 Anton Boulevard, Suite 700, Costa Mesa, California 92626.

On ***January 24, 2025***, I served the following document described as***: DEFENDANTS' IDENTIFICATION OF CLAIM TERMS FOR CONSTRUCTION*** on the interested party in this action, addressed as follows, and in the manner so indicated:

Robert F. Kramer rkramer@krameralberti.com David Alberti dalberti@krameralberti.com Sal Lim slim@krameralberti.com Russell S. Tonkovich rtonkovich@krameralberti.com Jeremiah Armstrong jarmstrong@krameralberti.com Hong S. Lin hlin@krameralberti.com Aidan Brewster abrewster@krameralberti.com 577 Airport Blvd., Suite 250 Burlingame, AL 94010 *[Attorneys for Plaintiff Polaris PowerLED Technologies, LLC]*	Lawrence McDonough lmcdonough@krameralberti.com 950 Tower Lane, Suite 1725 Foster City, CA 94404

☐ **BY ELECTRONIC FILING.** I caused such document(s) to be electronically filed and served through the United States District Court's CM/ECF System for the within action. This service complies with the Federal Rules of Civil Procedure. The file transmission was reported as complete and a copy of the Court's Notice of Electronic Filing will be maintained with the original document(s) in our office.

☒ **BY ELECTRONIC DELIVERY.** I caused a true and correct copy of such document to be served via electronic delivery to the interested parties in this action as indicated above.

I declare that I am employed in the offices of a member of the bar of this Court at whose direction this service was made. Executed on ***January 24, 2025***, at San Clemente, California.

/s/Tara Hamilton
Tara Hamilton