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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

Polaris EX2017
Sandisk v. Polaris
IPR2025-00515

Pursuant to the Patent Local Rule 4-1, Defendants Western Digital Corporation and Western Digital Technologies, Inc. identify 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 completion queue corresponding to a completion queue state mapped to the interrupt	U.S. Patent No. 8,554,968 Claim 8

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."	
"generating a completion queue state by a nonvolatile memory controller for indicating the occurrence of a completion queue event associated with a completion queue in a host processing unit, . . . generating an interrupt vector state by the nonvolatile memory controller based on the completion queue state, the interrupt vector state associated with an interrupt vector in the host processing unit; determining by the nonvolatile memory controller based on the interrupt vector state that the completion queue contains an unprocessed completion status; and generating an interrupt message packet by a nonvolatile memory interface 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 16
"determining a bit error rate"/ "determine a bit error rate"	U.S. Patent No. 9,183,085 Claims 1, 15
"primary and secondary ECC parity symbols corresponding to the data payload of the region"	U.S. Patent No. 9,183,085 Claims 1, 15
"a set of predefined gears"	U.S. Patent No. 9,183,085 Claims 1, 15
"ECC schemes"/ "error correction coding (ECC) scheme(s)"	U.S. Patent No. 9,183,085 Claims 1, 15
"data update commands"	U.S. Patent No. 8,601,346 Claims 1, 5, 11, 14

"parity write command"	U.S. Patent No. 8,601,346 Claims 1, 5, 7, 11, 14
"data block(s)"	U.S. Patent No. 8,601,346 Claims 1, 2, 6, 11, 14, 15
"parity calculator"	U.S. Patent No. 8,601,346 Claims 1, 2, 6, 11, 14

Date: April 18, 2025

HAYNES AND BOONE, LLP

/s/Marron E. Frith
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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 ***April 18, 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 ***April 18, 2025***, at San Clemente, California.

/s/Tara Hamilton
Tara Hamilton