

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

1	completion queue corresponding to a	
2	completion queue state mapped to the interrupt	
3	vector state contains an unprocessed completion	
4	status based on the interrupt vector state, and to	
5	generate an interrupt message packet based on	
6	the interrupt vector state for triggering an	
7	interrupt in the host processing unit to alert the	
8	host processing unit of the unprocessed	
9	completion status in the completion queue.”	
10	“error correction coding (ECC)”/“ECC”	U.S. Patent No. 9,183,085 Claims 1, 14, 15, 16
11	“primary and secondary ECC parity symbols”	U.S. Patent No. 9,183,085 Claims 1, 15
12	“a set of predefined gears comprising at least a	U.S. Patent No. 9,183,085 Claims 1, 15
13	first gear and a second gear, wherein the	
14	predefined gears correspond to different	
15	[predefined] [error correction coding] ECC	
16	schemes”	
17	“the gear”	U.S. Patent No. 9,183,085 Claim 14
18	“ECC schemes”/“error correction coding (ECC)	U.S. Patent No. 9,183,085 Claims 1, 15
19	scheme(s)”	
20	“a fixed number of two or more flash memory	U.S. Patent No. 9,183,085 Claims 1, 15
21	pages or integer fractions thereof”/“the two or	
22	more flash memory pages of a region”	
23	“the ECC encoder”	U.S. Patent No. 9,183,085 Claim 16
24	“the processor”	U.S. Patent No. 9,183,085 Claims 16
25	“without storing each data block in a data	U.S. Patent No. 8,601,346 Claims 1, 14
26	buffer”	
27		
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2	“parity write command”	U.S. Patent No. 8,601,346 Claims 1, 5, 7, 11, 14
3		
4	“exclusive-or operation”	U.S. Patent No. 8,601,346 Claims 3, 11, 16
5	“each command processing unit of the plurality	U.S. Patent No. 8,601,346
6	of command processing units configured to	Claim 1
7	receive a command of a plurality of commands	
8	for performing the data stripe operation”	
9	“context memory”	U.S. Patent No. 8,601,346 Claims 1, 11, 14
10		
11	“data block(s)”	U.S. Patent No. 8,601,346 Claims 1, 2, 6, 11, 14, 15
12	“the parity calculator further comprising a	U.S. Patent No. 8,601,346
13	context memory including a page frame”	Claim 1
14	“parity calculator”	U.S. Patent No. 8,601,346 Claims 1, 2, 6, 11, 14
15	“a plurality of command processing units, each	U.S. Patent No. 8,601,346
16	command processing unit of the plurality of	Claim 1
17	command processing units configured to receive	
18	a command of a plurality of commands for	
19	performing the data stripe operation”	
20	“a command distribution unit configured to	U.S. Patent No. 8,601,346 Claim 5
21	distribute the plurality of data update commands	
22	to command processing units of the plurality of	
23	command processing units”	
24	“A command distribution unit configured to	U.S. Patent No. 8,601,346
25	receive a plurality of commands for performing	Claim 11
26	a data stripe operation on a plurality of data	
27	blocks . . . Further configured to distribute the	
28	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 unit	
	of the plurality of command processing units in	

1 response to determining the arity block is
2 complete”

3
4
5 Date: January 24, 2025

HAYNES AND BOONE, LLP

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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:

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☐ **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