

Appendix A
to
JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT UNDER P.L.R. 4-3
January 15, 2026

A. Motive's Asserted Patents**U.S. Patent No. 11,875,580 ("’580 Patent") and U.S. Patent No. 12,136,276 ("’276 Patent")**

Claim Language	Motive's Proposed Construction and Supporting Evidence	Samsara's Proposed Construction and Supporting Evidence¹
"camera parameter" (claims 1, 3-7 of the ’580 Patent) (claims 1, 2, 7, 8, 9, 14, 15, 20 of the ’276 Patent)	<u>PROPOSED CONSTRUCTION:</u> "value(s) associated with one or more operating characteristics of a camera" <u>INTRINSIC EVIDENCE:</u> ’580 Patent, Abstract; Figs. 3B, 4B, 5A, 5B, 7; 1:29-32, 1:36-2:8, 2:21-23, 2:36-39, 4:12-38, 5:38-47, 5:57-6:14, 6:42-7:10, 8:20-27, 8:52-9:59, 11:8-36, 12:22-61, 13:29-47, 13:61-14:2, 15:28-42, Claims 1-8, 10, 13, 17-20; ’276 Patent, Abstract; Figs. 3B, 4B, 5A, 5B, 7, 1:43-2:15, 2:28-30, 2:43-46, 4:20-46, 5:46-55, 5:65-6:22, 6:50-7:18, 8:29-38, 8:62-10:3, 11:19-59, 12:34-42, 12:58-13:6, 13:39-58, 14:5-13, 15:38-52; Claims 1, 2, 7-9, 14, 15, 20; MOTIVE_NDCA_0013522-0013525, 0013595-0013597, 0013606-0013611, 0013634-0013642, 0013649-0013651,	<u>PROPOSED CONSTRUCTION:</u> "property of the camera itself" <u>INTRINSIC EVIDENCE:</u> ’580 Patent at Abstract; 1:21-2:8; 4:13-38; 5:21-47; 5:57-64; 6:1-24; 6:42-7:10; 7:54-8:28; 8:61-9:59; 11:8-36; 12:16-30; 12:46-61; 13:28-47; 13:50-14:2; 15:28-42; Figs. 2, 3A, 3B, 4B, 5A, 5B, 6, 7. ’580 Patent Prosecution history at 9/21/2023 Non-Final Rejection; 10/17/2023 Applicant Arguments/Remarks Made in Amendment; 12/1/2023 Notice of Allowance and Fees Due. IPR2025-00574 at Paper 20; Exhibit 2003. <u>EXTRINSIC EVIDENCE:</u> Samsara does not intend to affirmatively offer expert testimony on this term, as

¹ The ’276 Patent is a continuation of the ’580 Patent, and both patents share a common specification. For simplicity, Samsara has generally cited the ’580 Patent’s specification, but Samsara may rely on the same disclosure from either specification.

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	0015139-0015141, 0015171-0015174, 0015226-0015229, 0015249-0015253, 0015262-0015270, 0015292-0015300, 0015323-0015325. <u>EXTRINSIC EVIDENCE:</u> Appendix B (expert declaration provided by Mr. David Znidarsic, including without limitation any cited materials therein) and additional testimony to be provided by Mr. David Znidarsic during claim construction discovery (if any) to explain why a POSITA would have understood the term to mean Motive's proposed construction and why Samsara's competing construction (if any and if different) is incorrect.	such extrinsic evidence is unnecessary. Samsara reserves the right to offer rebuttal expert testimony if Motive elects to offer expert testimony on this term.
“predictive model” (claims 1, 3, 4 of the '580 Patent)	<u>PROPOSED CONSTRUCTION:</u> “model that predicts values using non-geometric calculation” <u>INTRINSIC EVIDENCE:</u> '580 Patent, Figs. 4A, 4B; 1:36-2:8, 2:18-23, 2:33-39, 4:12-57, 5:21-37, 6:42-55, 7:11-53, 8:7-19, 8:29-10:32, 11:8-13:17, 14:15-36, 15:20-27; Claims 1, 3, 4, 6, 8, 11, 14-19; MOTIVE_NDCA_0013522-525, 0013595-597, 0013605-610, 0013634-650.	<u>PROPOSED CONSTRUCTION:</u> “a deep learning or other AI model trained to directly identify the one or more lines” <u>INTRINSIC EVIDENCE:</u> '580 Patent at Abstract; 1:36-2:8; 4:12-57; 5:21-37; 6:42-55; 7:11-8:60; 9:49-59; 9:60-10:58; 10:59-11:62; 11:63-12:25; 12:26-61; 12:62-13:27; 13:50-60; 13:64-66; 14:10-14; 15:8-19; 15:43-46; 16:24-27; Figs. 2, 3A, 3B, 3C, 4A, 4B, 5A, 5B, 6, 7.

Claim Language	Motive's Proposed Construction and Supporting Evidence	Samsara's Proposed Construction and Supporting Evidence ¹
	<u>EXTRINSIC EVIDENCE:</u> Appendix B (expert declaration provided by Mr. David Znidarsic, including without limitation any cited materials therein) and additional testimony to be provided by Mr. David Znidarsic during claim construction discovery (if any) to explain why a POSITA would have understood the term to mean Motive's proposed construction and why Samsara's competing construction (if any and if different) is incorrect.	'580 Patent Prosecution history at 9/21/2023 Non-Final Rejection; 10/17/2023 Applicant Arguments/Remarks Made in Amendment; 12/1/2023 Notice of Allowance and Fees Due. IPR2025-00574 at Paper 9; Paper 12; Paper 20; Exhibit 2003. <u>EXTRINSIC EVIDENCE:</u> Samsara does not intend to affirmatively offer expert testimony on this term, as such extrinsic evidence is unnecessary. Samsara reserves the right to offer rebuttal expert testimony if Motive elects to offer expert testimony on this term.
“[a] receiving, over a network from a camera device, a video comprising a set of image frames / [b] identifying one or more lines in the video using a predictive model, the one or more lines including a horizon line;	<u>PROPOSED CONSTRUCTION:</u> Plain and ordinary meaning <u>INTRINSIC EVIDENCE:</u> '580 Patent, Claims 1-7; MOTIVE_NDCA_0013522-0013523, 0013605-0013607, 0013634-0013635, 0013638-0013641, 0013648-0013650. <u>EXTRINSIC EVIDENCE:</u>	<u>PROPOSED CONSTRUCTION:</u> The steps of the claim must be performed in the following order: 1) Step [b] must be performed after step [a] 2) Step [c] must be performed after step [b] 3) Step [d] must be performed after step [b]

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[c] computing at least one camera parameter based on the one or more lines / [d] overlaying the one or more lines on the video to generate an overlaid video / [e] transmitting the overlaid video to an annotator device for manual review / [f] receiving a confirmation from the annotator device, the confirmation indicating that the one or more lines are accurate / [g] and transmitting data representing the at least one camera parameter to the camera device" (claim 1 of the '580 Patent)	Appendix B (expert declaration provided by Mr. David Znidarsic, including without limitation any cited materials therein) and additional testimony to be provided by Mr. David Znidarsic during claim construction discovery (if any) to explain what the plain and ordinary meaning of this term is to a POSITA and why, including without limitation what a POSITA would have understood the sequence/order of the recited method steps to be and why, as well as why Samsara's competing construction (if any and if different) is incorrect.	4) Step [e] must be performed after step [d] 5) Step [f] must be performed after step [e] 6) Step [g] must be performed after steps [c] and [f] <u>INTRINSIC EVIDENCE:</u> '580 Patent at Abstract; 1:36-2:8; 5:21-7:10; 7:11-8:60; 11:63-12:25; 12:26-12:61; 12:62-13:27; 13:61-14:2; 14:2-15:42; Figs. 2, 3A, 3B, 3C, 5A, 5B, 6, 7. <u>EXTRINSIC EVIDENCE:</u> Samsara does not intend to affirmatively offer expert testimony on this term, as such extrinsic evidence is unnecessary. Samsara reserves the right to offer rebuttal expert testimony if Motive elects to offer expert testimony on this term.
"[a] receiving an image of a roadway recorded by a camera device installed within a vehicle /	<u>PROPOSED CONSTRUCTION:</u> Plain and ordinary meaning <u>INTRINSIC EVIDENCE:</u> '580 Patent, Claims 1-7; MOTIVE NDCA_0013522-0013523, 0013605-	<u>PROPOSED CONSTRUCTION:</u> The steps of the claim must be performed in the following order:

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[b] detecting a horizon line in the image / [c] overlaying a line on the image to generate an overlaid image; [d] transmitting the overlaid image to a computing device over a network / [e] receiving a modification of the line from the computing device, the modification comprising a new line at a second position / [f] computing a camera parameter based on the new line / [g] and transmitting data representing the camera parameter to the camera device” (claims 1, 8, 15 of the '276 Patent)	0013607, 0013634-0013635, 0013638-0013641, 0013648-0013650. <u>EXTRINSIC EVIDENCE:</u> Appendix B (expert declaration provided by Mr. David Znidarsic, including without limitation any cited materials therein) and additional testimony to be provided by Mr. David Znidarsic during claim construction discovery (if any) to explain what the plain and ordinary meaning of this term is to a POSITA and why, including without limitation what a POSITA would have understood the sequence/order of the recited method steps to be and why, as well as why Samsara's competing construction (if any and if different) is incorrect.	1) Step [b] must be performed after step [a] 2) Step [c] must be performed after step [b] 3) Step [d] must be performed after step [c] 4) Step [e] must be performed after step [d] 5) Step [f] must be performed after step [e] 6) Step [g] must be performed after step [f] <u>INTRINSIC EVIDENCE:</u> '580 Patent at Abstract; 1:36-2:8; 5:21-7:10; 7:11-8:60; 11:63-12:25; 12:26-12:61; 12:62-13:27; 13:61-14:2; 14:2-15:42; Figs. 2, 3A, 3B, 3C, 5A, 5B, 6, 7. '276 Patent Prosecution history at 6/12/2024. <u>EXTRINSIC EVIDENCE:</u> Samsara does not intend to affirmatively offer expert testimony on this term, as such extrinsic evidence is unnecessary. Samsara reserves the right to offer rebuttal expert testimony if

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		Motive elects to offer expert testimony on this term.
“an image of a roadway recorded by a camera device” (claims 1, 8, and 15 of the '276 Patent)	<u>PROPOSED CONSTRUCTION:</u> “a video, or video frames [of a roadway recorded by a camera device]” <u>INTRINSIC EVIDENCE:</u> '276 Patent, Abstract; Figs. 4A, 4B, 5A, 5B; 1:60-2:15, 5:1-28, 5:46-55, 10:7-15, 11:6-15, 12:13-21, 12:43-51, 13:59-14:4; Claims 1, 3, 4, 8, 10, 11, 15-17; MOTIVE_NDCA_0015139-0015141, 0015171-0015174, 0015226-0015229, 0015262-0015263. <u>EXTRINSIC EVIDENCE:</u> Appendix B (expert declaration provided by Mr. David Znidarsic, including without limitation any cited materials therein) and additional testimony to be provided by Mr. David Znidarsic during claim construction discovery (if any) to explain why a POSITA would have understood the term to mean Motive's proposed construction and why Samsara's competing construction (if any and if different) is incorrect.	<u>PROPOSED CONSTRUCTION:</u> Plain and ordinary meaning <u>INTRINSIC EVIDENCE:</u> '276 Patent at Abstract; 1:42-63; 2:5-15; 4:6-19; 5:1-6:41; 7:22-31; 10:7-15; 11:6-12; 12:12-21; 12:43-51; Figs. 3C, 4A, 4B, 5A, 5B. <u>EXTRINSIC EVIDENCE:</u> Samsara does not intend to affirmatively offer expert testimony on this term, as such extrinsic evidence is unnecessary. Samsara reserves the right to offer rebuttal expert testimony if Motive elects to offer expert testimony on this term.

B. Samsara's Asserted Patents**U.S. Patent No. 12,069,041 ("041 Patent")**

Claim Language	Samsara's Proposed Construction and Supporting Evidence	Motive's Proposed Construction and Supporting Evidence
"certificate" (claims 16 and 18 of the '041 patent)	<u>PROPOSED CONSTRUCTION:</u> Plain and ordinary meaning <u>INTRINSIC EVIDENCE:</u> '041 Patent at Abstract, 2:32–67, 3:4–16, 7:18–22, 21:54–22:15, 22:60–23:23, 23:48–62. <u>EXTRINSIC EVIDENCE:</u> Samsara does not intend to affirmatively offer expert testimony on this term, as such extrinsic evidence is unnecessary. Samsara reserves the right to offer rebuttal expert testimony if Motive elects to offer expert testimony on this term.	<u>PROPOSED CONSTRUCTION:</u> "a digital document including data plus a digital signature generated by the management server based on the data and a private key of the management server" <u>INTRINSIC EVIDENCE:</u> '041 Patent, Abstract, 1:45–53, 2:1–24, 2:32–67, 3:1–34, 21:54–58, 23:52–56, 7:15–22, 22:14–15, 24:7–10; Figs. 8, 9; Claims 1–8, 10–18, 21–23, 26–28; SAM-NDCA-24CV902_000001417-000001422, 000001530--000001561, 000001576-000001582, 000001584-000001586, 000001640-000001646, 000001670-000001671. <u>EXTRINSIC EVIDENCE:</u> Appendix B (expert declaration provided by Mr. David Znidarsic, including without limitation any cited materials therein) and additional testimony to be provided by Mr. David Znidarsic during claim construction discovery (if any) to explain why a person of

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		ordinary skill in the art ("POSITA") would have understood the term to mean Motive's proposed construction and why Samsara's competing construction (if any and if different) is incorrect; Digital Identity, by Philip Windly, ©2005 O'Reilly Media, Chapter 6, ISBN 0-596-00878-3 (MOTIVE_NDCA_0017249-0017269).

U.S. Patent No. 10,033,706 (“’706 Patent”)

Claim Language	Samsara’s Proposed Construction and Supporting Evidence	Motive’s Proposed Construction and Supporting Evidence
“[first/second/third/fourth] secure communication channel” (claims 1, 2, 4–6 of the ’706 patent)	<u>PROPOSED CONSTRUCTION:</u> Plain and ordinary meaning <u>INTRINSIC EVIDENCE:</u> ’706 Patent at abstract, Figs. 1, 2, 3, 4, 5, 6A, 6B, 25C; 1:33–3:60, 5:56–64, 6:10–39, 7:41–56, 8:31–9:14, 9:15–32, 9:41–12:58, 15:4–43, 18:27–43, 19:37–54, 22:4–23:5, 24:58–25:25, 27:43–28:2, 31:1–13, 32:13–24, claims 2, 4-6, 8, 10-12. <u>EXTRINSIC EVIDENCE:</u> Samsara does not intend to affirmatively offer expert testimony on this term, as such extrinsic evidence is unnecessary. Samsara reserves the right to offer rebuttal expert testimony if Motive elects to offer expert testimony on this term.	<u>PROPOSED CONSTRUCTION:</u> Each of the first, second, third, and fourth secure communication channels is a separate and unique channel <u>INTRINSIC EVIDENCE:</u> ’706 Patent, Claims 1, 2, 4-8, and 10-12, Abstract, Background and Summary of the Invention; SAM-NDCA-24CV902_000000947-0000000952. <u>EXTRINSIC EVIDENCE:</u> Appendix B (expert declaration provided by Mr. David Znidarsic, including without limitation any cited materials therein) and additional testimony to be provided by Mr. David Znidarsic during claim construction discovery (if any) to explain why a POSITA would have understood the term to plainly and ordinarily mean that each of the first, second, third, and fourth secure communication channels is a separate and unique channel, and why Samsara’s competing construction (if any and if different) is incorrect.

Claim Language	Samsara's Proposed Construction and Supporting Evidence	Motive's Proposed Construction and Supporting Evidence
“a sequence number for each [sensor measurement]” (claim 1 of the '706 patent)	<u>PROPOSED CONSTRUCTION:</u> Plain and ordinary meaning <u>INTRINSIC EVIDENCE:</u> '706 Patent at Abstract, 2:45–3:17, 7:57–8:12, 9:41–10:17, 12:59–13:61, 14:27–15:43, Figs. 1, 2, 3, 4, 5. <u>EXTRINSIC EVIDENCE:</u> Samsara does not intend to affirmatively offer expert testimony on this term, as such extrinsic evidence is unnecessary. Samsara reserves the right to offer rebuttal expert testimony if Motive elects to offer expert testimony on this term.	<u>PROPOSED CONSTRUCTION:</u> “a sequential number assigned to each sensor measurement” <u>INTRINSIC EVIDENCE:</u> '706 Patent, Summary, Claims 1 and 7, 7:41–43, 7:57–59, 9:1–6, 9:15–32, 9:41–67, 10:1–17, 12:43–67, 13:1–18, 13:23–67, 14:4–16, 14:20–32, 23:26–61; Figs 1, 2, 3, 4 and 5; SAM-NDCA-24CV902_000000947-000000952, 000001018. <u>EXTRINSIC EVIDENCE:</u> Appendix B (expert declaration provided by Mr. David Znidarsic, including without limitation any cited materials therein) and additional testimony to be provided by Mr. David Znidarsic during claim construction discovery (if any) to explain why a POSITA would have understood the term to mean Motive's proposed construction and why Samsara's competing construction (if any and if different) is incorrect.
“reconciling the data indicative of the first plurality of sensor measurements and the data indicative of the second plurality	<u>PROPOSED CONSTRUCTION:</u> Plain and ordinary meaning <u>INTRINSIC EVIDENCE:</u>	<u>PROPOSED CONSTRUCTION:</u> This step occurs in the management server device and after the two previously recited “receiving” steps

Claim Language	Samsara's Proposed Construction and Supporting Evidence	Motive's Proposed Construction and Supporting Evidence
of sensor measurements based on the sequence numbers and the time stamps” (claim 1 of the '706 patent)	'706 Patent at Abstract, 2:45–3:17, 7:57–8:12, 9:41–10:17, 12:59–13:61, 14:27–15:43, Figs. 1, 2, 3, 4, 5. <u>EXTRINSIC EVIDENCE:</u> Samsara does not intend to affirmatively offer expert testimony on this term, as such extrinsic evidence is unnecessary. Samsara reserves the right to offer rebuttal expert testimony if Motive elects to offer expert testimony on this term.	<u>INTRINSIC EVIDENCE:</u> '706 Patent, Claims 1 and 7, Abstract, 3:8–16, 3:17–60, 9:15–23, 10:43–58, 12:64–66, 14:20–56, 15:32–41, 23:44–49, 25:38–44, 26:47–27:7; Figs. 1, 3, 4, 5, 10, 11, 21–24; SAM-NDCA-24CV902_000000949-000000952, 000001018. <u>EXTRINSIC EVIDENCE:</u> Appendix B (expert declaration provided by Mr. David Znidarsic, including without limitation any cited materials therein) and additional testimony to be provided by Mr. David Znidarsic during claim construction discovery (if any) to explain that the term's plain and ordinary meaning requires this step to occur in the management server device and after the two previously recited “receiving” steps and why Samsara's competing construction (if any and if different) is incorrect.

U.S. Patent No. 11,975,685 (“’685 Patent”)

Claim Language	Samsara’s Proposed Construction and Supporting Evidence	Motive’s Proposed Construction and Supporting Evidence
“a conducting path between a starter motor of the vehicle and a battery of the vehicle” (claim 1 of the ’685 patent)	<u>PROPOSED CONSTRUCTION:</u> Plain and ordinary meaning <u>INTRINSIC EVIDENCE:</u> ’685 Patent at 2:32–3:16, 5:31–53, 7:19–51, 11:48-67, 13:20-32, Figs. 4, 5. <u>EXTRINSIC EVIDENCE:</u> Samsara does not intend to affirmatively offer expert testimony on this term, as such extrinsic evidence is unnecessary. Samsara reserves the right to offer rebuttal expert testimony if Motive elects to offer expert testimony on this term.	<u>PROPOSED CONSTRUCTION:</u> “a path over which electrical current is conducted from the battery to the motor that turns the engine when starting the vehicle” <u>INTRINSIC EVIDENCE:</u> ’685 Patent, Abstract, 2:33-49, 3:6-10, 3:33-39, 5:35-42, 5:46-53, 7:19-29, 7:35-51, 8:25-28, 8:30-34, 11:48-67, 13:24-32, 23:65-68, 24:1-7, 24:45-54, 25:22-24, 26:1-7; Claims 1, 9, and 17; Figs. 4 and 5; SAM-NDCA-24CV902_000001140-00000141, 000001177-000001179, 000001244-000001246, 000001313-000001314. <u>EXTRINSIC EVIDENCE:</u> Appendix B (expert declaration provided by Mr. David Znidarsic, including without limitation any cited materials therein) and additional testimony to be provided by Mr. David Znidarsic during claim construction discovery (if any) to explain why a POSITA would have understood the term to mean Motive’s proposed construction, as well as why Samsara’s competing construction (if any and if different) is incorrect; Bosch Automotive Handbook (5th Edition) at pp.

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		572-574; Bosch Automotive Handbook (11th Edition) at pp. 1506-1517 (MOTIVE_NDCA_0017242- 0017248); https://www.sciencedirect.com/topics/engineering/starter-motor (MOTIVE_NDCA_0017270-0017273).