

Eugene Y. Mar (State Bar No. 227071)
emar@fbm.com
Daniel C. Callaway (State Bar No. 262675)
dcallaway@fbm.com
Winston Liaw (State Bar No. 273899)
wliaw@fbm.com
MaryJo Lopez-Oneal (State Bar No. 337163)
mlopezoneal@fbm.com
Farella Braun + Martel LLP
One Bush Street, Suite 900
San Francisco, California 94104
Telephone: (415) 954-4400
Facsimile: (415) 954-4480

Attorneys for Defendant
GOOGLE LLC

JOSEPH W. COTCHETT
(SBN 36324; jcotchett@cpmlegal.com)
BLAIR V. KITTLE
(SBN 336367; bkittle@cpmlegal.com)
VASTI S. MONTIEL
(SBN 346409; vmontiel@cpmlegal.com)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577

PAUL W. REIDL
(SBN 155221; paul@reidllaw.com)
LAW OFFICE OF PAUL W. REIDL
25 Pinehurst Lane
Half Moon Bay, CA 94019
Telephone: (650) 560-8530

Attorneys for Plaintiff
TJTM TECHNOLOGIES, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TJTM TECHNOLOGIES, LLC,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:24-cv-01232-TLT

**JOINT CLAIM CONSTRUCTION AND
PREHEARING STATEMENT**

The Hon. Trina L. Thompson

Trial Date: August 3, 2026

TO THE HONORABLE COURT:

Pursuant to the Court's Case Management and Scheduling Order (Dkt. 31) and Patent L.R.
4-3, Plaintiff TJTM Technologies, LLC ("TJTM") and Defendant Google LLC ("Google") jointly

submit this joint claim construction and prehearing statement.

Patent L.R. 4-3(a) Disclosure

The parties have not stipulated to the construction of any terms.

Patent L.R. 4-3(b)-(c) Disclosures

The parties dispute the meaning of one term:

¹ Plaintiff's position has always been that the term should be interpreted as construed by the PTAB. When Plaintiff reviewed its prior claim construction, Plaintiff realized that it had not followed the PTAB's construction of the term to the letter. At this time, Plaintiff wants to follow the PTAB's construction of the term.

1
23

“inactive mode”	Proposed construction: At the very least: “a mode in which user notifications relating to incoming communications are suppressed.” No other construction is required per the PTAB Evidence: 2019-07-30 PTAB decision, p. 9, 13, 17.¹	Proposed construction: “a mode in which user notifications relating to incoming communications are suppressed.” Evidence: ’853 Patent: 1:59-65; 1:66-2:1; 2:28-45; 2:46-54; 5:7-24; 6:48-50; 6:57-60; 7:37-46; 7:47-8:3; 8:4-23; 8:24-43; 12:62-13:3; Figs. 1, 2, 3, 4a, 4b, 4c, 6, 7. File History: 2014-12-29 Notice of Allowance and fees due.

2
3
4
23
5
24
6
25
26

27 ² Without adopting the arguments in the cited briefing, Google notes that TJTM has previously
 28 argued the construction Google now proposes.

Related Applications: Parent
Application 14/176,107 (Jan.
7, 2015 – Claims)

TJTM Technologies, LLC v.
Cellco Partnership D/B/A
Verizon Wireless, No. 22-cv-
02081-TLT, Dkts. 32-34²
(N.D. Cal. Feb. 7, 2023).

The parties have not identified any other disputed terms in this case.

Patent L.R. 4-3(d) Disclosure

The parties believe that no more than 30 minutes is necessary for any Claim Construction Hearing.

Patent L.R. 4-3(e) Disclosure

The parties do not anticipate calling any witnesses at the claim Construction Hearing.

Patent L.R. 4-3(f) Disclosure

The parties do not request any factual findings relating to the term “inactive mode” at this time.

//

//

//

1 //

//

Dated: September 20, 2024

COTCHETT, PITRE & McCARTHY, LLP

2

By: /s/ Joseph W. Cotchett

3

4

JOSEPH W. COTCHETT
(SBN 36324; jcotchett@cpmlegal.com)

5

BLAIR V. KITTLE
(SBN 336367; bkittle@cpmlegal.com)

6

VASTI S. MONTIEL
(SBN 346409; vmontiel@cpmlegal.com)

7

COTCHETT, PITRE & McCARTHY, LLP

8

San Francisco Airport Office Center

840 Malcolm Road, Suite 200

9

Burlingame, CA 94010

Telephone: (650) 697-6000

10

Facsimile: (650) 697-0577

11

By: /s/ Paul W. Reidl

12

PAUL W. REIDL
(SBN 155221; paul@reidllaw.com)

13

LAW OFFICE OF PAUL W. REIDL

14

25 Pinehurst Lane

Half Moon Bay, CA 94019

Telephone: (650) 560-8530

15

Attorneys for Plaintiff TJTM TECHNOLOGIES, LLC

16

Dated: September 20, 2024

FARELLA BRAUN + MARTEL LLP

17

18

By: /s/ Winston Liaw

19

Winston Liaw

20

Attorneys for Defendant GOOGLE LLC

23

24

25

26

27

28

21

22

FILER'S ATTESTATION

2 In compliance with Civil L.R. Rule 5-1, I hereby attest that all parties have concurred in
3 the filing of this Statement.

4

5 Dated: September 20, 2024

FARELLA BRAUN + MARTEL LLP

6

7

By: /s/ Winston Liaw

Winston Liaw

8

Attorneys for Defendant GOOGLE LLC

9

10

11

12

13

14

15

16

17

18

19

20

23

24

25

26

27

28

21

22

23

24

25

26

27

28