

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BYTEWEAVER, LLC,
Plaintiff,

v.

DATABRICKS, INC.,
Defendant.

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CASE NO. 2:24-cv-00162-JRG-RSP
JURY TRIAL DEMANDED

EXHIBIT A

PLAINTIFF'S CLAIM CONSTRUCTION CHART UNDER P.R. 4-3

U.S. Patent No. 6,839,733

Claim Term	Plaintiff's Construction	Plaintiff's Supporting Evidence	Defendant's Construction
Claims 37 and 40: "agent"	"a software application, program, or process responsible for performing a task on behalf of a user"	'733 patent at Abstract; 1:1-2; 1:31-35; 1:46-2:28; 2:29-3:40; 4:30-5:21 5:22-6:5; 6:44-49; 7:38-49; 7:50-8:19; 8:20-10:24; 10:25-67; 11:15-12:21; 12:22-53; 13:39-14:60; 15:13-16:33; 16:43-17:8; 17:9-19:12; 19:23-20:33; 20:44-21:47; 21:48-22:32; 22:33-24:14; 24:15-49; 24:50-25:60; 25:61-26:12; Claims 1-4, 9, 10, 17, 25, 32, 34, 35, 36, 37-43, 44-48, 50, 57, 58. Figures 1-17; Any additional evidence relied on by Defendant.	"a process that occupies a place and that is mobile, i.e., can move from a first place to a second place"

U.S. Patent No. 7,949,752

Claim Term	Plaintiff's Construction	Plaintiff's Supporting Evidence	Defendant's Construction
Claims 24 and 25: "agent"	"a software application, program, or process responsible for performing a task on behalf of a user"	'752 patent at Abstract; 1:1-2; 1:13-18; 1:19-2:34; 2:35-3:45; 4:32-5:21; 5:23-31; 5:43-6:3 6:42-48; 7:40-45; 7:46-8:13; 8:14-10:58; 11:6-12:12 12:13-43; 13:29-56; 14:10-24; 14:25-57; 15:1-11 15:12-16:20; 16:30-61; 16:64-18:60; 18:61-20:13; 21:24-22:51; 22:52-25:34; 25:35-53; Figures 1 - 17; Claims 1-34. Any additional evidence relied on by Defendant.	"a process that occupies a place and that is mobile, i.e., can move from a first place to a second place"
Claim 24: "exhausted"	Plain and ordinary meaning.	'752 patent at Abstract; 1:1-2; 1:13-18; 1:19-2:34;	"used up to the allotted or predetermined amount"

		2:38-3:44; 4:32-5:21; 8:15-23; 9:31-59; 11:6-16; 11:56-12:12; 12:13-43; 14:17-24; 16:50-62; 18:1-21; 22:13-50; 24:32-39; 24:54-67; 25:14-34; 25:48-52; Claims 1-5, 7, 9, 13-17, 19-22, 24, 28-31, 34; Figures 1, 2, 3, 4, 5, 6, 7, 13, 16, 17. Any additional evidence relied on by Defendant.	
Claim 24: “type of event”	Plain and ordinary meaning.	’752 patent at Abstract; 1:1-2; 1:13-18; 1:19-2:34; 2:38-3:44; 4:32-5:21; 10:3-11; 15:20-16:20; 17:56-18:60; 23:10-24:24; 25:48-52; Claims 1-5, 7, 9, 13-17, 19-22, 24 25-27, 28-31, 32, 34; Figures 1, 2, 3, 4, 5, 6, 7, 13, 16, 17.	“a predetermined condition that triggers execution of the network-based agent”

		Any additional evidence relied on by Defendant.	
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U.S. Patent No. 6,862,488

Claim Term	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Defendant's Construction
Claim 11: "In a computing environment a method to automate the validation of equipment and/or processes for use in a pharmaceutical and/or bio-technology manufacturing facility comprising the steps of:"	Preamble is not limiting.	'488 patent at Abstract; 1:1-1:11; 1:14-2:42; 2:45-3:10; 3:42-4:40; 4:41-4:62; 4:63-6:24; 6:25-7:56; 8:33-55; 11:9-12:21; 12:65-13:50; Claims 1, 2, 5, 6, 11-14, 15-17, 20, 21, 22-23; Figures 1-9. Any additional evidence relied on by Defendant.	The preamble is limiting.
Claim 11: "validation protocol"	"a protocol describing the equipment, facility, and/or process that is being validated along with one or more tests that is being applied in a validation process"	'488 patent at Abstract; 1:1-1:11; 1:14-2:42; 3:42-4:62; 5:32-6:24; 8:34-10:19; 10:20-11:9; 11:37-12:21;	"the equipment, facility and/or process that is being validated along with one or more tests that will be applied to the equipment, facility, and/or process that will ensure that the equipment, facility, and/or process

		Claims 1-4, 10, 11-13, 15, 20, 21, 22-23; Figures 1-9. Any additional evidence relied on by Defendant.	satisfy the predetermined quality and safety standards”
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U.S. Patent No. 6,965,897

Claim Term	Plaintiff's Construction	Plaintiff's Supporting Evidence	Defendant's Construction
Claim 1: “compressing the data of the variable-sized fields and the fixed-sized fields”	Plain and ordinary meaning.	’897 patent at Abstract; 1:5-30; 1:34-51; 2:31-3:1; 3:24-5:2; Claims 1-29; Figures 1-7. Any additional evidence relied on by Defendant.	“using the offset slots to compress the data of the variable sized fields and the fixed-sized fields”
Claim 1: “offset slots”	“slots in a mixed format physical layout used to achieve efficient compression of other data fields”.	’897 patent at Abstract; 1:1-2:2; 1:5-30; 2:18-39; 2:40-3:23; 3:24-41; 3:42-62; 3:63-4:33; 4:34-47; Claims 1, 4, 6-8, 10,13,15-16, 17, 18,19, 20, 21, 24-28; Figures 1-7.	“a pointer into a dictionary identifying either a redundant or non-redundant field (or group of fields) for data compression”

		Any additional evidence relied on by Defendant.	
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U.S. Patent No. 8,275,827¹

Claim Term	Plaintiff's Construction	Plaintiff's Supporting Evidence	Defendant's Construction
Claims 2 and 14: "client agent"	"a program that manages the workloads and processes of a distributed processing system"	'827 patent at Abstract; 1:1-4; 2:1-6; 5:54-6:34; 8:55-9:9 9:40-10:23; 10:58-11:22; 11:54-12:8; 13:36-14:2; 14:32-50; 16:21-34; 17:31-34; 20:23-42; 24:47-53; 26:34-47; 27:41-28:2; 31:43-32:9; 33:3-55; 34:8-42; 35:8-21; 36:34-37:13; 37:25-43; 40:61-43:5; 43:6-44:46; 44:66-46:10; 46:11-26; Claims 1, 2, 13, 14 Figures 1A, 1B, 2B, 2C, 2D, 3A, 3B, 3C, 5B,	"a software program configured to run on each distributed device to provide what appears to client devices as dedicated NAS functionality"

¹ ByteWeavr asserts that Databricks infringes Claim 2, which depends from and incorporates the limitations of Claim 1, and infringes Claim 14, which depends from and incorporates the limitations of Claim 13.

		6B, 9, 10, 11A, 11B, 12A, 12B, 13A, 13B, 14A, 14B, 15, 16, 17B, 19, 20, 21 Any additional evidence relied on by Defendant.	
Claims 2 and 14: “stand-alone dedicated NAS device”	“a dedicated NAS device that contains its own storage, processing, connectivity, and management resources”	’827 patent at Abstract; 1:1-4; 2:1-6; 2:10-55; 2:59-4:3; 5:54-6:34; 7:18-33; 40:61-41:24; 42:11-45:30; 46:11-26; Claims 1, 2, 13, 14 Figure 1A, 19, 20, 21 Any additional evidence relied on by Defendant.	“a distributed device that separately appears to network connected user devices as a dedicated NAS device”

U.S. Patent No. RE42153

Claim Term	Plaintiff’s Construction	Plaintiff’s Supporting Evidence	Defendant’s Construction
Claim 1: “initial project and poll parameters”	“initial parameters relating to the project and poll communications”	’153 patent at Abstract; 1:60-67; 2:1-22; 2:24-52; 3:30-4:37; 13:57-14:18; 16:30-17:23; 17:52-18:42; 18:43-19:7; 19:22-20:20; 22:1-28:24;	“initial parameters for the project and initial parameters that identify when client systems communicate with or poll the server system”

		28:25-41; Claims 1, 2, 12, 18, 19, 26, 28, 34, 35, 45, 51, 52, 58, 60, 66; Figs. 5A-B. Any additional evidence relied on by Defendant.	
Claim 1: “poll communications”	“communications that are used to control, manage or coordinate project activities of distributed devices”	’153 patent at Abstract; 1:60-67; 2:1-22; 2:24-52; 3:30-4:37; 15:1-63; 18:9-19:7; 22:1-28:24; 28:25-41; Claims 1, 9, 18, 21, 34, 42, 51, 66; Figs. 5A-B. Any additional evidence relied on by Defendant.	“communications between the distributed client systems and server system during processing of project workloads to control, manage, and coordinate the activities of the distributed client systems in accomplishing the project goal”