

EXHIBIT B: Disputed Claims Terms and Evidence

P.R. 4-3 Joint Claim Construction and Prehearing Statement

No.	Term	Patent(s), Claim(s)	Databricks' Construction	Intrinsic Evidence	Extrinsic Evidence
1	"agent"	'733 patent, claims 37, 40; '752 patent, claims 24, 25	"a process that occupies a place and that is mobile, i.e., can move from a first place to a second place"	'733 patent claims, specification, and figures including at 1:7–39, 2:64–67, 5:27–31, 8:35–40, 13:62–63, 14:22–28, 32–37, 15:48–52, 18:6–9, 17:3–5, 18:9–11. '752 patent claims, specification, and figures including at 1:30–52, 3:3–6, 5:27–31, 8:29–34, 14:6–7, 10–16, 20–24, 15:34–40, 17:3–5, 17:58–61, 17:61–62. U.S. Patent No. 5,603,031 at Abstract, 7:26–34, 16:60, 65–67, 360:43. U.S. Patent No. 6,016,393 (allowed from U.S. application Ser. No. 08/798,675 which was incorporated into the specification of both the '752 and '733 patents), at 16:65–68. <i>VMware, Inc. v. Intell. Ventures I LLC</i>, IPR2020-00470, Paper 7 at 17–19; Paper 13 at 12–13.¹	All extrinsic evidence identified by any other party including, but not limited to, other defendants in prior Byteweavr and Intellectual Venture matters.

¹ While these IPRs are part of the prosecution history and intrinsic evidence for the '827 patent, out of an abundance of caution, Databricks disclosed support from these IPRs as extrinsic evidence in its P.R. 4-2 disclosures. Likewise, each IPR Databricks identifies as intrinsic evidence in this chart for a claim term is hereby identified, out of an abundance of caution, as extrinsic evidence for the same claim term.

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				<i>Intell. Ventures I LLC v. HCC Ins. Holdings, Inc.</i>, No. 15-cv-00660, Dkt. 102 (E.D. Tex.) at pp. 24-26. <i>Intell. Ventures I LLC v. VMware, Inc.</i>, No. 19-cv-01075, Dkt. 92 (E.D. Tex.) at p. 1.	
2	“exhausted”	'752 patent, claim 24	“used up to the allotted or predetermined amount”	'752 patent claims, specification, and figures, including at 8:21:23, 9:40–43, 52–55, 11:59–12:12, 14:17–24, 16:55–61, 22:34–37, 47–50, 24:54–67, 25:1–13, 25:14–18, 25:31–34; 25:44–47, 52:31–34. '752 patent File History, Amendment and Reply Under 37 C.F.R. § 1.111 dated August 20, 2010 at 13. <i>Intell. Ventures I LLC v. HCC Ins. Holdings, Inc.</i>, No. 15-cv-00660, Dkt. 102 (E.D. Tex.) at pp. 31–34.	All extrinsic evidence identified by any other party including, but not limited to, other defendants in prior Byteweavr and Intellectual Venture matters.
3	“type of event”	'752 patent, claim 24	“a predetermined condition that triggers execution of the network-based agent”	'752 patent claims, specification, and figures, including at 15:20–21,	All extrinsic evidence identified by any other party including, but not limited to, other defendants in prior

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				15:23-31, 15:51-53, 16:5-8, 16:9-20, 18:40-42. '752 patent file history, Supplemental Amendment and Reply Under 37 C.F.R. 1.116 dated December 9, 2009 at 14-15.	Byteweavr and Intellectual Venture matters.
4	"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:"	'488 patent, claim 11	The preamble is limiting.	'488 patent claims, specification, and figures, including at 1:6-10, 8:32-55, 11:9-27, 12:49-51.	All extrinsic evidence identified by any other party including, but not limited to other defendants in prior Byteweavr matters.
5	"validation protocol"	'488 patent, claim 11	"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	'488 patent claims, specification, and figures, including at 1:31-36.	All extrinsic evidence identified by any other party including, but not limited to other defendants in prior Byteweavr matters.

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			equipment, facility, and/or process satisfy the predetermined quality and safety standards”		
6	“compressing the data of the variable-sized fields and the fixed-sized fields”	’897 patent, claim 1	“using the offset slots to compress the data of the variable sized fields and the fixed-sized fields”	’897 patent claims, specification, and figures, including at 2:40-44, 2:49-56, 3:25-28, 3:42-53.	All extrinsic evidence identified by any other party including, but not limited to other defendants in prior Byteweavr matters.
7	“offset slots”	’897 patent, claim 1	“a pointer into a dictionary identifying either a redundant or non-redundant field (or group of fields) for data compression”	’897 patent claims, specification, and figures, including at 1:61-63, 2:40-65, 3:11-21, 3:25-28, 3:42-51, Fig. 5.	All extrinsic evidence identified by any other party including, but not limited to other defendants in prior Byteweavr matters.
8	“stand-alone dedicated NAS device”	’827 patent, claims 2, 14	“a distributed device that separately appears to network connected user devices as a dedicated NAS device”	’827 patent claims, specification, and figures including at 2:10-14, 3:17-21, 3:52-56, 42:45-44:37. <i>EMC Corp. v. Intell. Ventures I LLC</i>, IPR2017-000374, Paper 5 at pp. 11-12, Paper 9 at p. 6, Paper 24 at p. 10, Paper 32 at p. 3-8, and Paper 53 at pp. 9-14. <i>EMC Corp. v. Intell. Ventures I LLC</i>, IPR2017-000439, Paper 5 at pp. 10-11, Paper 9 at p. 6, Paper 21	All extrinsic evidence identified by any other party including, but not limited to other defendants in prior Byteweavr matters.

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				at p. 11, Paper 29 at p. 8-13, Paper 50 at pp. 9-14.	
9	"client agent"	'827 patent, claims 1, 2, 13 and 14	"a software program configured to run on each distributed device to provide what appears to client devices as dedicated NAS functionality"	'827 patent claims, specification, and figures including at 2:61-65, 3:43-48, 31:43-53, 42:36-41, 42:54-65, 43:47-58, 44:29-37. '827 patent File History, Amendment Under 37 C.F.R. Section 1.116 in response to Office Action dated December 16, 2005, at 10 (p. 367).	All extrinsic evidence identified by any other party including, but not limited to other defendants in prior Byteweavr matters.
10	"initial project and poll parameters"	'153 patent, claim 1	"initial parameters for the project and initial parameters that identify when client systems communicate with or poll the server system"	'153 patent claims, specification, and figures including at 16:33-47, 17:52-58, 22:10-32.	All extrinsic evidence identified by any other party including, but not limited to other defendants in prior Byteweavr matters.
11	"poll communications"	'153 patent, claim 1	"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	'153 patent claims, specification, and figures including at Abstract, 2:25-52, 3:36-39, 14:43-47, 14:50-53, 15:8-17, Figs. 5A, 5B. WO 2001014961 A2 at 29:19-22, 33:8-16.	All extrinsic evidence identified by any other party including, but not limited to other defendants in prior Byteweavr matters.

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			accomplishing the project goal”		