Francisco A. Villegas (SBN 206997)
Damir Cefo (*pro hac vice*)
Mark W. Halderman (*pro hac vice*)
Evan M. Rosenbaum (SBN 310414)
fvillegas@villegascefo.com
dcefo@villegascefo.com
mhalderman@villegascefo.com
erosenbaum@villegascefo.com
VILLEGAS & CEFO, LLP
1350 Avenue of the Americas, Floor 2
New York, NY 10019
Telephone: (646) 844-0679

Mark McDougall (pro hac vice)
mmcdougall@calfee.com
CALFEE HALTER & GRISWOLD LLP
The Calfee Building
1405 East Sixth Street
Cleveland, OH 44114
Telephone: (216) 622-8200

John V. Picone III (SBN 187226)
jpicone@spencerfane.com
SPENCER FANE LLP
225 West Santa Clara Street, Suite 1500
San Jose, CA 95113
Telephone: (408) 286-5100

Attorneys for Plaintiff
WITHROW NETWORKS, INC.

Asim M. Bhansali (SBN 194925)
abhansali@kblfirm.com
Kate E. Lazarus (SBN 268242)
klazarus@kblfirm.com
Elizabeth H. Dinh (SBN 329295)
edinh@kblfirm.com
Amy Le (SBN 341925)
ale@kblfirm.com
KWUN BHANSALI LAZARUS LLP
555 Montgomery Street, Suite 750
San Francisco, CA 94111
Tel: (415) 630-2350

Attorneys for Defendants
GOOGLE LLC and YOUTUBE, LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

WITHROW NETWORKS, INC., Plaintiff, v. GOOGLE LLC and YOUTUBE, LLC, Defendants.	Case No. 5:24-CV-03203-PCP (VKD) **THE PARTIES' JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT** Hearing: October 28, 2025 Time: 10:00 a.m.

Google Exhibit No. 1070
IPR2025-00775 - Page 001

Pursuant to Patent Local Rule ("P.L.R.") 4-1 of the United States District Court for the Northern District of California and the Case Management Order in this case (ECF No. 78), Plaintiff Withrow Networks, Inc. ("Plaintiff" or "Withrow") and Defendants Google LLC and YouTube, LLC (collectively, "Defendants") provide the following Joint Claim Construction and Prehearing Statement concerning U.S. Patent No. 10,771,849 (the "'849 Patent"). The Parties have met and conferred as required.

A. The Construction of Terms on Which the Parties Agree (P.L.R. 4-3(a))

The parties have not agreed on the construction of any of the exchanged terms, but will meet and confer again prior to the submission of the opening claim construction brief in an attempt to narrow the issues by agreement.

B. Proposed Construction of Disputed Terms (P.L.R. 4-3(b))

The parties' proposed constructions for the disputed terms are set forth in the accompanying **Exhibit 1** along with the supporting evidence upon which the parties intend to rely. The parties reserve the right to rely on any evidence cited by the opposing party to support its proposed construction.

C. Identification of Most Significant and Dispositive Terms (P.L.R. 4-3(c))

Of the terms for which the parties were not able to reach agreement, the Defendants believe that the constructions of the following disputed terms may be case dispositive if the Court holds one or more of terms is indefinite:

- "fluidity, video quality and audio quality are maintained" / "fluidity" (claims 1, 6, 7)
- "maintain quality playback" (claims 1, 6, 7)
- "optimized decoding processes" (claims 1, 6, 7)
- "optimal" / "optimal digital format" / "optimal encoding rate" (claims 3, 8)[1].

Plaintiff identifies "intervals" and "segment" as most significant though not likely

[1] To the extent that the Court disagrees with Defendants on the indefiniteness of the term "optimized decoding processes", but agrees as to the indefiniteness of the terms "optimal" / "optimal digital format" / "optimal encoding rate", the latter terms would be significant, but not dispositive because it would dispose of asserted dependent claims 3 and 8.

dispositive.

D. Length of Time for Claim Construction Hearing (P.L.R. 4-3(d))

The Claim Construction Hearing is presently scheduled for October 28, 2025 at 10:00 a.m. Plaintiff anticipates needing no more than three (3) hours for the Claim Construction Hearing; Defendants do not object to a three-hour hearing but believe two hours will suffice. The parties agree that, unless the Court prescribes a format for the presentation at the Claim Construction Hearing, the claim construction hearing proceed claim term by claim term, with Withrow presenting its construction of each term first, except that, as to any term Defendants contend is indefinite, Defendants shall proceed first. The parties will meet and confer regarding any of the logistics associated with the claim construction hearing as the case progresses.

E. Witnesses to be Called at the Claim Construction Hearing (P.L.R. (4-3(e))

The parties agree that there will be no witnesses called at the Claim Construction Hearing. The parties intend to have persons present a summary and explanation of the technology at issue during the tutorial scheduled for October 21, 2025.

F. Identification of Factual Findings Requested from the Court (P.L. R. 4-3(f))

The parties do not request any factual findings related to claim construction from the Court.

Google Exhibit No. 1070
IPR2025-00775 - Page 003

Dated: June 20, 2025

VILLEGAS & CEFO LLP

By: Francisco Villegas

Francisco A. Villegas
Damir Cefo (*pro hac vice*)
Mark W. Halderman (*pro hac vice*)
Evan M. Rosenbaum

Mark McDougall
CALFEE HALTER & GRISWOLD LLP

John V. Picone III
SPENCER FANE LLP
Attorneys for Plaintiff
WITHROW NETWORKS, INC.

Dated: June 20, 2025

KWUN BHANSALI LAZARUS LLP

By: Elizabeth Dinh

Asim M. Bhansali
Kate E. Lazarus
Elizabeth H. Dinh
Amy Le

Attorneys for Defendants
GOOGLE LLC and YOUTUBE, LLC

ATTESTATION CLAUSE

I, Francisco A. Villegas, am the ECF user whose credentials were used in this filing. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have consented to the filing of this document.

Dated: June 20, 2025

By:/*s/ Francisco Villegas*
Francisco A. Villegas

EXHIBIT 1

THE PARTIES' JOINT PRELIMINARY CLAIM CONSTRUCTIONS

CLAIM TERM(S) AND ASSERTED CLAIMS	PLAINTIFF'S PROPOSED CONSTRUCTION AND EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION AND EVIDENCE
segment *Claims 1, 3, 4, 5, 7, 8*	Proposed Construction: "File" Intrinsic Evidence 3:7-16; 3:30-34; 6:18-31; 6:32-7:12; 7:45-50; 7:57-8:7; 9:10-20; 9:22-24; Patent Figs. 1-4. Claims 2, 4. WITHROW_00000168-175; WITHROW_00000131-32; WITHROW_00000095-96; WITHROW_00000521-29; WITHROW_00000456-65 at 63. Petition at 13-18.[1] Polish Decl. at 30-32; 71-81; 178-183.	Proposed Construction: Plain & ordinary meaning Intrinsic Evidence: '849 Patent at 3:7-16; 7:66-8:1; claims 1, 3, 4, 6, 7, and 8. Extrinsic Evidence: IEEE 100 The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) at 1016: definition of "segment"; GOOG-WITHROW-CC-00000920. Webster's Universal English Dictionary (2005) at 255: definition of "segment"; GOOG-WITHROW-CC-00000953.
optimal (plaintiff) / optimal (defendants), optimal digital format (defendants), optimal encoding rate (defendants) *Claims 3, 8*	Proposed Construction: "most satisfactory" Intrinsic Evidence 7:57-61; Patent Fig. 3a. Claim 3, 8 IPR Petition 56-60; 67-68; 70-71; 74; 75-77. Polish Decl. 183-196; Polish Decl. 219-221. Extrinsic Evidence:	Proposed Construction: Indefinite Intrinsic Evidence '849 Patent at Abstract; 2:55-63; 4:7-34; 4:49-57; 5:33-35; 5:44-47; 5:62-67; 7:57-61; 12:25-29; 12:42-53; 12:63-13:14; 13:29-59; 13:60-65; Figs. 3a, 7, 9, 10, 11, 12, 13, 15; claims 1, 3, 6, 7, 8, and 9. Extrinsic Evidence Expert Report of Dr. Mark Crovella (opining that a POSA, in light of the intrinsic and extrinsic evidence and the understanding of a POSA, would conclude the patent's claims fail to inform, with reasonable certainty, those

[1] The parties disagree whether Defendant Google LLC's filings in the concurrent IPR of the '849 patent (e.g., the Petition and Polish Declaration) are properly considered intrinsic evidence for the purposes of claim construction

EXHIBIT 1

THE PARTIES' JOINT PRELIMINARY CLAIM CONSTRUCTIONS

CLAIM TERM(S) AND ASSERTED CLAIMS	PLAINTIFF'S PROPOSED CONSTRUCTION AND EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION AND EVIDENCE
	Optimal, Websters Collegiate Dictionary 11th Ed. (2003). U.S. Pub. Appl. No. 2003/0217362 at para. 73. Cross-layer Optimization of Video Streaming in Single-Hop Wireless (Jan. 2009), at 3, 8; *passim*. Expert Report of Matthew Goldman rebutting Defendants' position that this term is indefinite.	skilled in the art about the scope of the terms "optimal", "optimal digital format" and "optimal encoding rate") IEEE 100 The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) at 772: definition of "optimization"; GOOG-WITHROW-CC-00000917. Random House Webster's Computer & Internet Dictionary (3rd ed. 1999) at 400: definition of "optimize"; GOOG-WITHROW-CC-00000960. Webster's Universal English Dictionary (2005) at 201: definition of "optimal"; GOOG-WITHROW-CC-00000949.
"optimized decoding processes" *Claims 1, 6, 7*	Proposed Construction: "complexity reducing decoding processes" Intrinsic Evidence 2:55-60; 4:7-23; 4:24-34; 4:44-57; 12:19-29; 12:42-13:14; 13:15-59; 13:60-14:15; 14:16-60; 15:62-17:50; 17:47-49; 18:64-19:9; 9:63-11:27; 11:28-19:10. Patent Figs. 7, 10, 13, 15, 16. WITHROW_00000818-26, at 24. IPR Petition 45-50;72-73; 78-80. Polish Decl. 153-162, 165, 167-170, 172, 174-175. **Extrinsic Evidence:** Low-Complexity H.264 Decoder: Motion Estimation and Mode Decision (2003), at 2-4.	**Proposed Construction**: Indefinite **Intrinsic Evidence:** '849 Patent at Abstract; 2:55-63; 4:7-34; 4:49-57; 5:33-35; 5:44-47; 5:62-67; 7:57-61; 12:25-29; 12:42-53; 12:63-13:14; 13:29-59; 13:60-65; Figs. 3a, 7, 9, 10, 11, 12, 13, 15; claims 1, 3, 6, 7, 8, and 9. **Extrinsic Evidence:** Expert Report of Dr. Mark Crovella (opining that a POSA, in light of the intrinsic and extrinsic evidence and the understanding of a POSA, would conclude the patent's claims fail to inform, with reasonable certainty, those skilled in the art about the scope of the term "optimized decoding processes")

EXHIBIT 1

THE PARTIES' JOINT PRELIMINARY CLAIM CONSTRUCTIONS

CLAIM TERM(S) AND ASSERTED CLAIMS	PLAINTIFF'S PROPOSED CONSTRUCTION AND EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION AND EVIDENCE
	Improving MPEG-4 coding performance by jointly optimising compression and blocking effect elimination, at 2, 8 (2001). Expert Report of Matthew Goldman rebutting Defendants' position that this term is indefinite.	IEEE 100 The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) at 772: definition of "optimization"; GOOG-WITHROW-CC-00000917. Random House Webster's Computer & Internet Dictionary (3rd ed. 1999) at 400: definition of "optimize"; GOOG-WITHROW-CC-00000960. Webster's Universal English Dictionary (2005) at 201: definition of "optimal"; GOOG-WITHROW-CC-00000949.
intervals *Claims 3, 5, 8*	Proposed Construction: "segment size" Intrinsic Evidence 7:57-8:7; 14:16-24. Patent Figs. 3, 3a. Claims 3, 5, 8. IPR Petition 64-65. Polish Decl. 183-196; 205-210. Extrinsic Evidence: The Pollution Attack in P2P Live Video Streaming: Measurement Results and Defenses, at 1, 2 (Aug. 2007).	Proposed Construction: Plain & ordinary meaning Intrinsic Evidence: '849 Patent at 7:57-8:7; 9:52-58; 14:16-24; Fig. 3a; claims 3, 5, and 8. Extrinsic Evidence: IEEE 100 The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) at 585: definition of "interval"; GOOG-WITHROW-CC-00000915. Webster's Universal English Dictionary (2005) at 155: definition of "interval"; GOOG-WITHROW-CC-00000947.
fluidity (plaintiff) / fluidity, video quality and audio quality are maintained (defendant)	Proposed Construction: "smoothness (which is distinct from sequential playback)" Intrinsic Evidence	Proposed Construction: Indefinite Intrinsic Evidence:

EXHIBIT 1

THE PARTIES' JOINT PRELIMINARY CLAIM CONSTRUCTIONS

CLAIM TERM(S) AND ASSERTED CLAIMS	PLAINTIFF'S PROPOSED CONSTRUCTION AND EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION AND EVIDENCE
Claims 1, 6, 7	3:36-45; 6:18-3; 6:32-7:12; 8:22-44; 9:10-20; 9:22-24. Patent Figs. 1, 2, 4, 5. WITHROW_00000221-30, at 26; WITHROW_00000818-25, at 24. IPR Petition 34-40, 45-67, 70-86. Polish Decl. 123-162, 183-196, 205-210, 210-219, 225-261 <u>Extrinsic Evidence:</u> *Fluid*, Websters Collegiate Dictionary 11th Ed. (2003). Performance Issues in Video Streaming Environments, at 1-2, 3 (Sep. 2005). Sporadic Frame Dropping Impact on Quality Perception, at 1, 4 (Jun. 2004). ISO/IEC 13818-1 (May 2006), at 146-149. Expert Report of Matthew Goldman rebutting Defendants' position that this term is indefinite.	'849 Patent at 1:49-60; 4:7-23; 5:39-43; 12:19-29; 12:60-13:14; 13:15-28; 13:51-14:5; 14:25-60; claims 1, 6, 7, and 9. <u>Extrinsic Evidence</u>: Expert Report of Dr. Mark Crovella (opining that a POSA, in light of the intrinsic and extrinsic evidence and the understanding of a POSA, would conclude the patent's claims fail to inform, with reasonable certainty, those skilled in the art about the scope of the terms "fluidity, video quality and audio quality are maintained" and "maintain quality playback") IEEE 100 The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) at 901: definition of "quality"; GOOG-WITHROW-CC-00000918. Webster's Universal English Dictionary (2005) at 233: definition of "quality"; GOOG-WITHROW-CC-00000951. Webster's Universal English Dictionary (2005) at 115: definition of "fluid"; GOOG-WITHROW-CC-00000946. Webster's Universal English Dictionary (2005) at 176: definition of "maintain"; GOOG-WITHROW-CC-00000948. ITU-T P.910, Subjective video quality assessment methods for multimedia applications (1999) at 11-12, 14-15, 17; GOOG-WITHROW-CC-00000028-64.

EXHIBIT 1

THE PARTIES' JOINT PRELIMINARY CLAIM CONSTRUCTIONS

CLAIM TERM(S) AND ASSERTED CLAIMS	PLAINTIFF'S PROPOSED CONSTRUCTION AND EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION AND EVIDENCE
		Stefan Winkler, Praaveen Mohandas, *The Evolution of Video Quality Measurement: From PSNR to Hybrid Metrics,* 54 IEEE Trans. Broadcast 660 (2008) at 660-61; GOOG-WITHROW-CC-00000065-73. Iain E. G. Richardson, H.264 and MPEG-4 Video Compression (2003) at 20-21; GOOG-WITHROW-CC-00000826-907. Gabriel-Miro Muntean, Philip Perry, Liam Murphy, Subjective Assessment of the Quality-Oriented Adaptive Scheme, 51 IEEE Trans. Broadcast 276 (2005) at 278-79; GOOG-WITHROW-CC-00000074-84. Ze-Nian Li, Mark S. Drew, Jiangchuan Liu, Fundamentals of Multimedia (2nd ed. 2014) at 431, 457; GOOG-WITHROW-CC-00000085-825. Thiede et al., PEAQ - The ITU Standard for Objective Measurement of Perceived Audio Quality, 48 J Audio Eng. Soc., No. ½ (2000) at 3-5; GOOG-WITHROW-CC-00000001-27.
maintain quality playback *Claims 1, 6, 7*	Proposed Construction: Plain and ordinary meaning. Intrinsic Evidence 4:7-23; 4:24-34; 12:25-29; 13:4-9; 13:51-59; 13:60-14:15; 14:25-60. Patent Figs. 9, 11, 13. Patent Claims 1, 6, 7, and 9. WITHROW_00000818-25, at 24.	Proposed Construction: Indefinite Intrinsic Evidence: '849 Patent at 1:49-60; 4:7-23; 5:39-43; 12:19-29; 12:60-13:14; 13:15-28; 13:51-14:5; 14:25-60; claims 1, 6, 7, and 9. Extrinsic Evidence:

EXHIBIT 1

THE PARTIES' JOINT PRELIMINARY CLAIM CONSTRUCTIONS

CLAIM TERM(S) AND ASSERTED CLAIMS	PLAINTIFF'S PROPOSED CONSTRUCTION AND EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION AND EVIDENCE
	IPR Petition 35-40, 45-67, 70-86. Polish Decl. 123-162, 183-196, 205-210, 210-219, 225-261 Extrinsic Evidence Expert Report of Matthew Goldman rebutting Defendants' position that this term is indefinite.	Expert Report of Dr. Mark Crovella (opining that a POSA, in light of the intrinsic and extrinsic evidence and the understanding of a POSA, would conclude the patent's claims fail to inform, with reasonable certainty, those skilled in the art about the scope of the terms "fluidity, video quality and audio quality are maintained" and "maintain quality playback") IEEE 100 The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) at 901: definition of "quality"; GOOG-WITHROW-CC-00000918. Webster's Universal English Dictionary (2005) at 233: definition of "quality"; GOOG-WITHROW-CC-00000951. Webster's Universal English Dictionary (2005) at 176: definition of "maintain"; GOOG-WITHROW-CC-00000948. ITU-T P.910, Subjective video quality assessment methods for multimedia applications (1999) at 11-12, 14-15, 17; GOOG-WITHROW-CC-00000028-64. Stefan Winkler, Praaveen Mohandas, *The Evolution of Video Quality Measurement: From PSNR to Hybrid Metrics,* 54 IEEE Trans. Broadcast 660 (2008) at 660-61; GOOG-WITHROW-CC-00000065-73. Iain E. G. Richardson, H.264 and MPEG-4 Video Compression (2003) at 20-21; GOOG-WITHROW-CC-00000826-907.

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THE PARTIES' JOINT PRELIMINARY CLAIM CONSTRUCTIONS

CLAIM TERM(S) AND ASSERTED CLAIMS	PLAINTIFF'S PROPOSED CONSTRUCTION AND EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION AND EVIDENCE
		Gabriel-Miro Muntean, Philip Perry, Liam Murphy, Subjective Assessment of the Quality-Oriented Adaptive Scheme, 51 IEEE Trans. Broadcast 276 (2005) at 278-79; GOOG-WITHROW-CC-00000074-84. Ze-Nian Li, Mark S. Drew, Jiangchuan Liu, Fundamentals of Multimedia (2nd ed. 2014) at 431, 457; GOOG-WITHROW-CC-00000085-825. Thiede et al., PEAQ - The ITU Standard for Objective Measurement of Perceived Audio Quality, 48 J Audio Eng. Soc., No. ½ (2000) at 3-5; GOOG-WITHROW-CC-00000001-27.
"(a) requesting by a multimedia player, transmission of said multimedia objects; (b) request(s) transmission of multimedia objects" *Claims 1 (a), 6 (b), 7(b)*	Proposed Construction: "(a) requesting by a multimedia player, each transmission of said multimedia objects; (b) request(s) each transmission of multimedia objects" Intrinsic Evidence 7:25-44; 7:45-56; 8:48-57; 9:17-62; Patent Figs. 4, 5. IPR Petition 26-27. Polish Decl. 100-107.	Proposed Construction: Plain & ordinary meaning Intrinsic Evidence: '849 Patent at 7:35-56; 8:48-57; 9:37-58; claims 1, 6, and 7. Extrinsic Evidence: IEEE 100 The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) at 966: definition of "request"; GOOG-WITHROW-CC-00000919. Microsoft Computer Dictionary (5th ed. 2002) at 408: definition of "player"; GOOG-WITHROW-CC-00000930. Webster's Universal English Dictionary (2005) at 218: definition of "player"; GOOG-WITHROW-CC-00000950. Webster's Universal English Dictionary (2005) at 242: definition of "request"; GOOG-WITHROW-CC-00000952.

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THE PARTIES' JOINT PRELIMINARY CLAIM CONSTRUCTIONS

CLAIM TERM(S) AND ASSERTED CLAIMS	PLAINTIFF'S PROPOSED CONSTRUCTION AND EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION AND EVIDENCE
		IEEE 100 The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) at 1207: definition of "transmission"; GOOG-WITHROW-CC-00000922. Microsoft Computer Dictionary (5th ed. 2002) at 528: definition of "transmit"; GOOG-WITHROW-CC-00000932. Webster's Universal English Dictionary (2005) at 297: definition of "transmission"; GOOG-WITHROW-CC-00000955.
"object parameters" *Claims 1, 6, 7*	Proposed Construction: "The characteristics of the audio and video segments" Intrinsic Evidence 3:11-14; 3:38-43; 6:32-7:12; 8:9-9:3; 9:4-10. Patent Figs. 2, 4. Claim 9. IPR Petition 18-26; 68-70. Polish Decl. 82-99; 138-153; 221-225. Extrinsic Evidence MPEG-7 Description for Scalable Video Reconstruction (2004), at 7, 9, 16. *Parameter*, Merrian-Webster's Collegiate Dictionary 11th Ed. (2006).	Proposed Construction: Plain & ordinary meaning Intrinsic Evidence: '849 Patent at 3:7-27; 3:36-45; 3:56-62; 5:8-11; 5:20-22; 6:32-7:12; 8:9-9:3; 9:4-10; 9:37-62; claims 1, 6, 7, 9. Extrinsic Evidence: IEEE 100 The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) at 793: definition of "parameter"; GOOG-WITHROW-CC-00000965 Microsoft Computer Dictionary (5th ed. 2002) at 391: definition of parameter"; GOOG-WITHROW-CC-00000969 Webster's New World Computer Dictionary (9th ed. 2001) at 274: definition of "parameter"; GOOG-WITHROW-CC-00000977

EXHIBIT 1

THE PARTIES' JOINT PRELIMINARY CLAIM CONSTRUCTIONS

CLAIM TERM(S) AND ASSERTED CLAIMS	PLAINTIFF'S PROPOSED CONSTRUCTION AND EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION AND EVIDENCE
		Webster's Universal English Dictionary (2005) at 207: definition of "parameter"; GOOG-WITHROW-CC-00000981 Random House Webster's Computer & Internet Dictionary (3rd ed. 1999) at 414: definition of "parameter"; GOOG-WITHROW-CC-00000973
"multimedia object" / "multimedia objects" Asserted claims 1, 2, 3, 6, 7, 8	Proposed Construction: Plain and ordinary meaning Intrinsic Evidence 2:64-3:6; 3:7-16; 3:17-27; 3:28-55; 6:18-25; 6:32-7:3; 7:4-44; 7:45-56; 7:57-8:21; 8:22-44; 8:45-47; 8:48-57; 8:58-9:10; 9:11-62. Patent Figs. 2-5. Claims 1, 2, 3, 5, 6, 7, 8, and 9. IPR Petition 18-26, 65-67, 70-86. Polish Decl. 82-10, 210-219, 225-261.	**Proposed Construction**: "a discrete object/discrete objects comprising at least one audio segment and/or at least one video segment" **Intrinsic Evidence:** '849 Patent at Abstract; 2:64-3:6; 3:7-20; 3:30-35; 3:63-67; 6:32-7:3; 7:45-8:7; 8:8-9:9; Figs. 2, 3, 3a, 4; claims 1, 2, 5, 6, 7, 8, and 9. WITHROW_00000242-45 (App. 11/107,952 File History, 06-29-2011 Applicant Arguments/Remarks Made in an Amendment); WITHROW_00000225-30 (App. 11/107,952 File History, 08-29-2011 Applicant Arguments/Remarks Made in an Amendment) **Extrinsic Evidence**: IEEE 100 The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) at 713: definition of "multimedia"; GOOG-WITHROW-CC-00000916.

EXHIBIT 1

THE PARTIES' JOINT PRELIMINARY CLAIM CONSTRUCTIONS

CLAIM TERM(S) AND ASSERTED CLAIMS	PLAINTIFF'S PROPOSED CONSTRUCTION AND EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION AND EVIDENCE
		Microsoft Computer Dictionary (5th ed. 2002) at 352: definition of "multimedia"; GOOG-WITHROW-CC-00000928. Webster's New World Computer Dictionary (9th ed. 2001) at 248: definition of "multimedia"; GOOG-WITHROW-CC-00000938. Microsoft Computer Dictionary (5th ed. 2002) at 372: definition of "object"; GOOG-WITHROW-CC-00000929. Webster's New World Computer Dictionary (9th ed. 2001) at 260: definition of "object"; GOOG-WITHROW-CC-00000939.