UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION

VIRTAMOVE, CORP, Plaintiff, v. GOOGLE LLC Defendant.	Case No. 7:24-CV-00033-ADA-DTG

PLAINTIFF'S DISCLOSURE OF
PROPOSED CLAIM CONSTRUCTIONS

Plaintiff VirtaMove, Corp. ("Plaintiff" or "VirtaMove") hereby provides the following disclosure of proposed constructions for the claim terms identified for construction by Defendant Google LLC ("Defendant" or "Google"), as set forth below in Exhibit A. Plaintiff's disclosure is based on currently available information, and Plaintiff reserves the right to also identify and propose constructions for any terms Defendants identify for construction, even if Defendants later determine to withdraw those terms for construction by the Court. Plaintiff reserves the right to amend, revise, and/or supplement this disclosure as additional documents and information become available, and as discovery, investigation, and meet-and-confer with Defendants' counsel proceed.

Google Exhibit 1101
Google v. VirtaMove

Oracle Ex. 1101
Oracle v. VirtaMove, IPR2025-00965

EXHIBIT A

No.	Term	Claim(s)	Proposed Construction
1	processor	’814 patent, claim 1; ’058 patent, claim 1	No construction necessary; plain and ordinary meaning.
2	operating system	’814 patent, claims 1, 10; ’058 patent, claim 1	No construction necessary; plain and ordinary meaning.
3	kernel / operating system kernel	’814 patent, claim 1; ’058 patent, claim 1	No construction necessary; plain and ordinary meaning.
4	a kernel module	’058 patent, claim 5	No construction necessary; plain and ordinary meaning.
5	kernel mode	’058 patent, claim 1	No construction necessary; plain and ordinary meaning, *i.e.* the context in which the kernel portion of an operating system executes.
6	user mode	’058 patent, claim 1	No construction necessary; plain and ordinary meaning, *i.e.* the context in which applications execute.
7	servers	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.
8	disparate computing environments	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.

No.	Term	Claim(s)	Proposed Construction
9	system files	’814 patent, claims 1, 4, 10, 14	No construction necessary; plain and ordinary meaning, *i.e.* files provided within an operating system that are available to applications as shared libraries and/or configuration files.
10	service	’814 patent, claims 1, 14	No construction necessary; plain and ordinary meaning.
11	shared library	’058 patent, claim 1	No construction necessary; plain and ordinary meaning.
12	critical system elements	’058 patent, claim 1	Any service or part of a service, “normally” supplied by an operating system, that is critical to the operation of a software application.
13	container	’814 patent, claims 1, 2, 4, 6, 9, 10, 13, 14	No construction necessary; plain and ordinary meaning.
14	within a container	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.
15	secure containers of application software	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.
16	at least some of the different operating systems / at least some of the plurality of different operating systems	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.
17	memory accessible to at least some of the servers	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.

No.	Term	Claim(s)	Proposed Construction
18	wherein some of the SLCSEs stored in the shared library….are accessible to some of the plurality of software applications / accessed by one or more of the plurality of software applications it	’058 patent, claim 1	No construction necessary; plain and ordinary meaning.
19	it forms a part of the one or more of the plurality of software applications	’058 patent, claim 1	No construction necessary; plain and ordinary meaning.
20	local kernel residing permanently on one of the servers	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.
21	copies or modified copies	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.
22	wherein SLCSEs are not copies of OSCSEs	’058 patent, claim 18	No construction necessary; plain and ordinary meaning.
23	functional replicas of OSCSEs	’058 patent, claim 1	No construction necessary; plain and ordinary meaning.
24	a kernel a set of associated local system files [*sic*]	’814 patent, claim 1	A kernel and a set of associated local system files
25	an operating system’s root file system	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.
26	whether the preamble is limiting	’814 patent, claim 1; ’058 patent, claim 1	The preamble of ’814 Patent Claim 1 is limiting. The preamble of ’058 Patent claim 1 is limiting.
27	a processor / the processor	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.

No.	Term	Claim(s)	Proposed Construction
28	a plurality of servers / the servers	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.
29	one of the servers / the server	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.
30	operating systems / the operating systems	’814 patent, claim 1, 10	No construction necessary; plain and ordinary meaning.
31	a plurality of different operating systems / the plurality of different operating systems	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.
32	one or more of the executable applications / the one or more of the executable applications	’814 patent, claim 1	No construction necessary; plain and ordinary meaning.
33	a plurality of secure containers of application software / the containers of application software / the plurality of secure containers of application software / the containers	’814 patent, claims 1, 6, 9	No construction necessary; plain and ordinary meaning.
34	a plurality of software applications / the plurality of software applications	’058 patent, claims 1, 4, 10	No construction necessary; plain and ordinary meaning.
35	a processor / said processor	’058 patent, claim 1	No construction necessary; plain and ordinary meaning.
36	an operating system / the operating system	’058 patent, claims 1, 2	No construction necessary; plain and ordinary meaning.

No.	Term	Claim(s)	Proposed Construction
37	a shared library / the shared library	’058 patent, claims 1, 2, 10	No construction necessary; plain and ordinary meaning.
38	OS critical system elements (OSCSEs) / OSCSEs	’058 patent, claim 1, 3, 18	No construction necessary; plain and ordinary meaning.
39	shared library critical system elements (SLCSEs) / the SLCSEs	’058 patent, claims 1, 3, 4, 10, 18	No construction necessary; plain and ordinary meaning.
40	one or more of the plurality of software applications / the one or more of the plurality of software applications	’058 patent, claims 1, 4, 10	No construction necessary; plain and ordinary meaning.
41	a first of the plurality of software applications / the first of the plurality of software applications / at least first of the plurality of software applications	’058 patent, claim 1	No construction necessary; plain and ordinary meaning.
42	a second of the plurality of software applications / the second of the plurality of software applications	’058 patent, claim 1	No construction necessary; plain and ordinary meaning.
43	a SLCSE related to a predetermined function / a first instance of the SLCSE	’058 patent, claim 1	No construction necessary; plain and ordinary meaning.
44	a SLCSE for performing a same function / a second instance of the SLCSE	’058 patent, claim 1	No construction necessary; plain and ordinary meaning.

Dated: October 1, 2024

Respectfully submitted,

/s/ Reza Mirzaie

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendants on October 1, 2024 via electronic service.

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