

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

AUDIO POD IP, LLC,

Plaintiff,

v.

AMAZON.COM, INC., AMAZON.COM LLC,  
and AMAZON WEB SERVICES, INC.,

Defendants.

Lead Case No. 3:24-cv-00406-RCY

**JURY TRIAL DEMANDED**

**JOINT CLAIM CONSTRUCTION CHART**

Pursuant to the Court's January 30, 2025 Order at Dkt. 56, the parties submit their Joint Claim Construction Chart.

Attached as **Exhibit 1** is a chart that includes the parties' respective proposed constructions of the disputed claim terms and supporting evidence.

Dated: April 30, 2025

/s/ Chandran B. Iyer

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**CERTIFICATE OF SERVICE**

I certify that on April 30, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

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**EXHIBIT 1****PROPOSED CONSTRUCTIONS OF DISPUTED CLAIM TERMS AND SUPPORTING EVIDENCE**

The evidence below is non-exhaustive and the parties may rely on additional evidence as needed to support their respective proposals.

| <b><u>Terms</u></b>                 | <b><u>Patent Claims</u></b>                                                                                                                     | <b><u>Audio Pod's Proposal</u></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b><u>Amazon's Proposal</u></b>                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| "media stream" /<br>"media streams" | '720 patent: 1, 2, 6, 9, 15, 17, 20, 25, 26<br>'922 patent: 1, 8, 10, 17, 19, 20<br>'488 patent: 1, 10<br>'907 patent: 1, 3-7, 9, 11, 15, 17-21 | <p>Plain and ordinary meaning</p> <p><b>Intrinsic Evidence:</b><br/>'720 patent: Abstract; 1:16-4:30, 7:23-10:22, 12:45-18:29, 20:10-27:24, Figs. 4, 5, 8, 15, 18, 19, 24, 25, 26, and related text; claims.</p> <p>'922 patent: Abstract; 1:23-3:27, 5:35-8:61, 14:7-16:7, Figs. 4, 5, 8, 15, 18, 19, and related text; claims.</p> <p>'488 patent: Abstract; 1:25-3:41, 5:49-9:8, 11:16-16:21, Fig 4, 5, 8, 15, 18, 19, and related text; claims.</p> <p>'907 patent: Abstract; 1:21-4:40, 7:22-10-49, 12:65-19:24, 21:7-28-32, Figs. 4, 5, 8, 15, 18, 19, 24, 25, 26, and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon.</p> | <p><b>Construction:</b><br/>a single media file or a collection of segments from the same media content / media files or collections of segments from the same media content</p> <p><b>Intrinsic Evidence:</b><br/>'720 patent: 1:26-43, 7:47-8:3, 18:60-19:25, Fig. 1, Fig. 2, Fig. 5c, Fig. 7, claims.<br/>'922 patent: 1:30-47, 6:12-36, Fig. 1, Fig. 2, Fig. 5c, Fig. 7, claims.</p> |

| <u><b>Terms</b></u> | <u><b>Patent Claims</b></u>                                                            | <u><b>Audio Pod's Proposal</b></u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <u><b>Amazon's Proposal</b></u>                                                                                                                                                                                                                                                                                                    |
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| "descriptor file"   | '720 patent: 1, 5, 11, 19, 20, 23, 24-27<br>'907 patent: 1-4, 9, 11, 13-15, 18, 20, 21 | <p>Plain and ordinary meaning</p> <p><b>Intrinsic Evidence:</b><br/>'720 patent: Abstract; 1:16-4:30, 6:20-9:28, 12:47-15:23, 39:56-40:20; Figs. 5-6, 9, 10, 12, 20-22, and 26 and related text; claims.</p> <p>'907 patent: Abstract; 1:21-4:40, 6:37-9:52, 12:65-15:52, 41:14-44, Figs. 5-6, 9, 10, 12, 20-22, and 26 and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon, including expert testimony by Dr. Gareth Loy.</p> | <p><b>Construction:</b><br/>a file containing descriptive information about a media stream</p> <p><b>Intrinsic Evidence:</b><br/>'720 patent: 6:36-52, Fig. 5c, claims.</p> <p><b>Extrinsic Evidence:</b><br/>Expert testimony of Dan Schonfeld, Ph.D. Microsoft Computer Dictionary (2002); A Dictionary of Computing (2004).</p> |

| <u><b>Terms</b></u> | <u><b>Patent Claims</b></u> | <u><b>Audio Pod's Proposal</b></u>                                                                                                                                                                                                                                                                                                                        | <u><b>Amazon's Proposal</b></u>                                                                                                                                                                                                                                                                                  |
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| "descriptor"        | '266 patent: 1, 2, 4, 5, 13 | <p>Plain and ordinary meaning</p> <p><b>Intrinsic Evidence:</b><br/>'266 patent: Abstract; 1:21-4:17, 6:37-9:52, 11:11-16:18, Figs. 5-6, 9, 10, 12 and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon, including expert testimony by Dr. Gareth Loy.</p> | <p><b>Construction:</b><br/>descriptive information about digital content</p> <p><b>Intrinsic Evidence:</b><br/>'266 patent: 5:1-17, Fig. 5c, claims.</p> <p><b>Extrinsic Evidence:</b><br/>Expert testimony of Dan Schonfeld, Ph.D. Microsoft Computer Dictionary (2002); A Dictionary of Computing (2004).</p> |

| <u><b>Terms</b></u>                                   | <u><b>Patent Claims</b></u> | <u><b>Audio Pod's Proposal</b></u>                                                                                                                                                                                                                                                                                                                                                                                                                             | <u><b>Amazon's Proposal</b></u>                                                                                                                                                                                                                                                  |
|-------------------------------------------------------|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| “literary experience of the originating written work” | '720 patent: 1, 24-26       | <p>Plain and ordinary meaning</p> <p><b>Intrinsic Evidence:</b><br/>           '720 patent: Abstract; 1:16-4:30, 5:55-8:22, 18:42-40:20; Figs. 21, 27-32; claims.</p> <p>'266 patent: Abstract; 1:21-4:17, 6:37-9:52, 11:11-16:18, Figs. 5-6, 9, 10, 12 and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon, including expert testimony by Dr. Gareth Loy.</p> | <p>Indefinite</p> <p><b>Intrinsic Evidence:</b><br/>           '720 patent: 23:41-46, 28:9-38; 31:53-56, claims.<br/>           '720 prosecution history, Sept. 29, 2015 response.</p> <p><b>Extrinsic Evidence:</b><br/>           Expert testimony of Dan Schonfeld, Ph.D.</p> |

| <u><b>Terms</b></u>                                                                | <u><b>Patent Claims</b></u> | <u><b>Audio Pod's Proposal</b></u>                                                                                                                                                                                                                                                                                                                                     | <u><b>Amazon's Proposal</b></u>                                                                                                                                                                    |
|------------------------------------------------------------------------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| “content in the secondary digital content that is related to the range of content” | ’266 patent: 1, 13          | <p>Plain and ordinary meaning</p> <p><b>Intrinsic Evidence:</b><br/>           ’266 patent: Abstract; 1:21-3:27, 5:18-8:41, 11:11-16:18, Figs. 4, 5, 6, 10, 12, and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon, including expert testimony by Dr. Gareth Loy.</p> | <p>Indefinite</p> <p><b>Intrinsic Evidence:</b><br/>           ’266 patent: 5:1-17, 5:37-55, claims.</p> <p><b>Extrinsic Evidence:</b><br/>           Expert testimony of Dan Schonfeld, Ph.D.</p> |

| <u><b>Terms</b></u> | <u><b>Patent Claims</b></u>                      | <u><b>Audio Pod's Proposal</b></u>                                                                                                                                                                                                                                                                                                                                             | <u><b>Amazon's Proposal</b></u>                                                                                                |
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| “surrounding”       | '922 patent: 1, 14, 18, 20<br>'266 patent: 1, 13 | <p>Plain and ordinary meaning</p> <p><b>Intrinsic Evidence:</b><br/>'922 patent: Abstract; 1:23-3:27, 9:45-16:7, Fig 13-18, and related text; claims.</p> <p>'266 patent: Abstract; 1:21-3:27, 9:50-16:18, Fig 13-18, and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon.</p> | <p><b>Construction:</b><br/>before and after</p> <p><b>Intrinsic Evidence:</b><br/>'922 patent: 13:11-37, Fig. 13, claims.</p> |

| <u><b>Terms</b></u> | <u><b>Patent Claims</b></u>                                                       | <u><b>Audio Pod's Proposal</b></u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <u><b>Amazon's Proposal</b></u>                                                                                                                                                                                                                                                                                                                      |
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| "bookmark"          | '922 patent: 1, 11-13, 15, 20<br>'720 patent: 18, 19, 22, 23<br>'907 patent: 4, 6 | <p>Plain and ordinary meaning</p> <p><b>Intrinsic Evidence:</b><br/>'720 patent: Abstract; 1:16-4:30, 12:45-18:17, 26:1-29:57, Figs. 12, 13, 17, 18, 19, 27, 28, 30, and related text; claims.</p> <p>'922 patent: Abstract; 1:21-4:16, 7:1-9:44, 10:64-13:58, Figs. 12, 13, 17, 18, 19, and related text; claims.</p> <p>'907 patent: Abstract; 1:21-4:40, 12:65-19:11, 27:8-31:3, Figs. 12, 13, 17, 18, 19, 27, 28, 30, and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon.</p> | <p><b>Construction:</b><br/>information identifying a user's position in a media work</p> <p><b>Intrinsic Evidence:</b><br/>'922 patent: Abstract, 7:48-8:35, Table 1, Figs. 9-10, Fig. 13, claims.</p> <p>'907 patent: 9:35-10:23, 23:57-64, 31:18-27, 31:59-32:5, 32:53-62, 39:56-67, 41:14-44, Table 1, Figs. 9-10, Fig. 13, Fig. 32, claims.</p> |

| <u><b>Terms</b></u>                   | <u><b>Patent Claims</b></u> | <u><b>Audio Pod's Proposal</b></u>                                                                                                                                                                                                                                                                                                                        | <u><b>Amazon's Proposal</b></u>                                                                                                                                                                                                             |
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| “track[ing] service level statistics” | '488 patent: 1, 8, 10, 17   | <p>Plain and ordinary meaning</p> <p><b>Intrinsic:</b><br/>'488 patent: Abstract; 1:25-3:41, 4:35-6:50, 9:58-15:67, Figs. 3, 5, 7, 11, 12, 15, 16, and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon, including expert testimony by Dr. Gareth Loy.</p> | <p><b>Construction:</b><br/>track[ing] service level statistics at the client device</p> <p><b>Intrinsic Evidence:</b><br/>'488 patent: 10:3-56, claims.</p> <p><b>Extrinsic Evidence:</b><br/>Expert testimony of Dan Schonfeld, Ph.D.</p> |

| <u><b>Terms</b></u>                                                                           | <u><b>Patent Claims</b></u> | <u><b>Audio Pod's Proposal</b></u>                                                                                                                                                                                                                                                                                                                                 | <u><b>Amazon's Proposal</b></u>                                                                                                                                                                                                                                                              |
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| <p>“select[ing] a ... content server ... in dependence upon the service level statistics”</p> | <p>'488 patent: 1, 10</p>   | <p>Plain and ordinary meaning</p> <p><b>Intrinsic Evidence:</b><br/>'488 patent: Abstract; 1:25-3:41, 4:35-6:50, 9:58-15:67, Figs. 3, 5, 7, 11, 12, 15, 16, and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon, including expert testimony by Dr. Gareth Loy.</p> | <p><b>Construction:</b><br/>select[ing] at the client device a ... content server ... in dependence upon the service level statistics</p> <p><b>Intrinsic Evidence:</b><br/>'488 patent: 10:3-56, claims.</p> <p><b>Extrinsic Evidence:</b><br/>Expert testimony of Dan Schonfeld, Ph.D.</p> |

| <u>Terms</u>              | <u>Patent Claims</u>                                                                                            | <u>Audio Pod's Proposal</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <u>Amazon's Proposal</u>                                                                                                                                                                                                                                                                                                                                          |
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| "segment" /<br>"segments" | '488 patent: 1, 5, 6, 10, 14, 15<br>'720 patent: 1, 5, 11, 24-26<br>'922 patent: 8, 9, 10<br>'907 patent: 9, 10 | <p>Plain and ordinary meaning</p> <p><b>Intrinsic Evidence:</b><br/>'720 patent: Abstract; 1:16-4:30, 7:23-10:22, 12:45-18:29, 20:10-27:24, Figs. 4, 5, 8, 15, 18, 19, 24, 25, 26, and related text; claims.</p> <p>'922 patent: Abstract; 1:23-3:27, 5:35-8:61, 14:7-16:7, Figs. 4, 5, 8, 15, 18, 19, and related text; claims.</p> <p>'488 patent: Abstract; 1:25-3:41, 5:49-9:8, 11:16-16:21, Fig 4, 5, 8, 15, 18, 19, and related text; claims.</p> <p>'907 patent: Abstract; 1:21-4:40, 7:22-10:49, 12:65-19:24, 21:7-28-32, Figs. 4, 5, 8, 15, 18, 19, 24, 25, 26, and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon, including expert testimony by Dr. Gareth Loy.</p> | <p><b>Construction:</b><br/>distinct portion of a media stream that contains content<br/>/ distinct portions of a media stream that contain content</p> <p><b>Intrinsic Evidence:</b><br/>'720 patent: 19:9-25, claims.<br/>'720 prosecution history, Sept. 29, 2015 response.</p> <p><b>Extrinsic Evidence:</b><br/>Expert testimony of Dan Schonfeld, Ph.D.</p> |

| <u><b>Terms</b></u>       | <u><b>Patent Claims</b></u> | <u><b>Audio Pod's Proposal</b></u>                                                                                                                                                                                                                                                                                                                                 | <u><b>Amazon's Proposal</b></u>                                                                                                                                               |
|---------------------------|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| "imperceptible to a user" | '488 patent: 1, 10          | <p>Plain and ordinary meaning</p> <p><b>Intrinsic Evidence:</b><br/>'488 patent: Abstract; 1:25-3:41, 4:35-6:50, 9:58-15:67, Figs. 3, 5, 7, 11, 12, 15, 16, and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon, including expert testimony by Dr. Gareth Loy.</p> | <p>Indefinite</p> <p><b>Intrinsic Evidence:</b><br/>'488 patent: 3:3-41, 10:17-56, claims.</p> <p><b>Extrinsic Evidence:</b><br/>Expert testimony of Dan Schonfeld, Ph.D.</p> |

| <u><b>Terms</b></u>       | <u><b>Patent Claims</b></u> | <u><b>Audio Pod's Proposal</b></u>                                                                                                                                                                                                                                                                                                                                            | <u><b>Amazon's Proposal</b></u>                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------------|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| “digital audio narration” | ’907 patent: 1, 21          | <p>Plain and ordinary meaning</p> <p><b>Intrinsic Evidence:</b><br/>           ’907 patent: Abstract; 1:21-4:40, 12:65-19:11, 19:37-23:56, Figs. 4, 5, 19, 21, 22, 24, and related text; claims.</p> <p><b>Extrinsic Evidence:</b> Audio Pod reserves the right to supplement its extrinsic evidence in response to Amazon, including expert testimony by Dr. Gareth Loy.</p> | <p><b>Construction:</b><br/>           digital audio recording of a narrator reading aloud the text of the originating work</p> <p><b>Intrinsic Evidence:</b><br/>           ’907 patent: 3:12-17, 19:52-55, 20:67-21:6, 21:36-52, 25:23-33, 27:42-44, 29:24-25, 32:56-33:1, Fig. 5c, Fig. 32, claims.</p> <p><b>Extrinsic Evidence:</b><br/>           Expert testimony of Dan Schonfeld, Ph.D.</p> |