

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

**INTELLECTUAL VENTURES I, LLC and
INTELLECTUAL VENTURES II LLC,**

Plaintiffs,

v.

SOUTHWEST AIRLINES CO.,

Defendant.

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Civil Action No. 7:24-cv-00277-ADA

JURY TRIAL DEMANDED

**SOUTHWEST AIRLINES CO.'S PRELIMINARY
IDENTIFICATION OF CLAIM TERMS FOR CONSTRUCTION**

Pursuant to the Court's Standing Order Governing Proceedings (OGP) and Scheduling Order (Dkt. 53), Defendant Southwest Airlines Co. ("Defendant" or "Southwest") identifies the following terms from the asserted claims of United States Patent Nos. 8,332,844 (the '844 Patent), 8,407,722 (the '722 Patent), 7,949,785 (the '785 Patent), 8,027,326 (the '326 Patent), 7,324,469 (the '469 Patent), 7,257,582 (the '582 Patent), 7,712,080 ("the '080 Patent"), 7,721,282 ("the '282 Patent"), 8,352,584 ("the '584 Patent"), and 11,032,000 ("the '000 Patent") (collectively, the "Asserted Patents") for construction. Southwest reserves the right to amend, modify, or supplement its list of preliminary terms as additional information becomes available, including: (1) the claim terms Plaintiffs Intellectual Ventures I, LLC and Intellectual Ventures II, LLC ("Plaintiffs" or "IV") contend require construction; (2) IV's construction of those claim terms; (3) the evidence in support of IV's proposed claim constructions; and (4) after meet and confer discussions with IV. Southwest further reserves the right to amend, modify, or supplement its

identification of claim terms based on any modifications or supplementations to Southwest's invalidity contentions or IV's infringement contentions, or as otherwise may be appropriate.

A. The '844 Patent

No.	Term(s) for Construction	Claim(s)
1	"root image" / "blocks of a root image"	7
2	"leaf images" / "said leaf images including only additional data blocks not previously contained in said root image and changes made by respective compute nodes to the blocks of the root image"	7
3	"merging the blocks of said root image with the blocks of respective leaf images to create cohesive respective application environments"	11

B. The '722 Patent

No.	Term(s) for Construction	Claim(s)
1	"respond to the live object of the data representation by determining an object identifier (ID) of the live object"	14
2	"register for updates of the live object with the routing network"	14
3	"input source"	14
4	"identify a category of the update message based on the input source"	14

C. The '785 Patent

No.	Term(s) for Construction	Claim(s)
1	"distribute a virtual network address to the device"	30
2	"network route director"	30
3	"join module"	35, 37
4	"network address"	30, 37

D. The '326 Patent

No.	Term(s) for Construction	Claim(s)
N/A	N/A	N/A

E. The '469 Patent

No.	Term(s) for Construction	Claim(s)
1	“the data connection is one of a wired data connection and a wireless data connection”	25
2	“a remote location a experiencing a relatively high volume of transient traffic”	24
3	“a relatively high volume of transient traffic”	24

F. The '582 Patent

No.	Term(s) for Construction	Claim(s)
1	“distributing descriptions of all of said partitions to each of a plurality of subtask processors”	1
2	“first-come/first-served basis”	1
3	“partition”	1
4	“description of all said partitions”	1
5	“simultaneously executing at least a respective one of the subtasks of the computer-executable process in each of at least some of said processors on a respective one of the partitions”	1

G. The '584 Patent

No.	Term(s) for Construction	Claim(s)
1	“high performance cluster” / “high performance computing cluster”	1, 10
2	“means ... to limit access ...”	8
3	“a first cluster ... including at least one hardware processor” and “a second cluster ... including at least one hardware processor”	1, 10
4	“a first cluster ... with a first gateway” and “a second cluster ... with a second gateway”	1, 10
5	“first configuration” / “second configuration”	1, 10
6	“communications between the first [HPC] cluster and the second [HPC] cluster are isolated”	1, 10

H. The '080 Patent

No.	Term(s) for Construction	Claim(s)
1	“distributed sequential computing program”	1, 7
2	“wherein the at least one distributed shared variable is a single variable that includes several variables that may be physically distributed across multiple memories”	1
3	“when at least one intermediate condition occurs”	1

I. The '282 Patent

No.	Term(s) for Construction	Claim(s)
1	“union block device”	1
2	“root image” / “blocks of a root image”	1, 15
3	“leaf images” / “the leaf image comprising new data blocks and changes to the blocks of the root image”	1, 15
4	“merging the blocks”	1, 15
5	“and the union block device, upon receiving a write request from the compute node for a sector X, creates an appropriate persistent mapping for sector X”	1
6	“wherein the modifying comprises: upon receiving a write request from the compute node for a sector X, creating an appropriate persistent mapping for sector X”	15

J. The '000 Patent

No.	Term(s) for Construction	Claim(s)
1	“time interval”	1, 13
2	“uplink physical signal”	1, 13
3	“different resources”	1, 13
4	“configured, in a time interval that it is not sending information over the physical uplink shared channel, to send the uplink physical signal based on the received resource allocation information”	1

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Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 16, 2025 the foregoing document has been served on counsel of record via electronic mail.

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