IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VB ASSETS, LLC, Plaintiff, v. AMAZON.COM SERVICES LLC, Defendant.	C.A. No. 1:24-cv-00839-MN

AMAZON'S IDENTIFICATION OF PROPOSED CONSTRUCTIONS

Pursuant to the Court's Scheduling Order (D.I. 19), Defendant Amazon.com Services LLC ("Amazon") provides the following preliminary constructions for identified terms found in the asserted claims of U.S. Patent Nos. 10,297,249 (the "249 patent"); 10,755,699 (the "699 patent"); 11,087,385 (the "385 patent"); 11,080,758 (the "758 patent"); and 9,502,025 (the "025 patent") (collectively, the "Asserted Patents").

Amazon's preliminary constructions are based on its analysis and investigation to date. Amazon reserves the right to amend its proposed constructions, including in response to: the claim terms Plaintiff VB Assets, LLC identifies, the parties' meet and confer discussions regarding the identified claims, positions Plaintiff takes regarding the construction of claim terms, additional information learned through discovery, Court orders in this matter, and any applicable rules.

The chart below identifies Amazon's proposed constructions with reference to the asserted claims where each term occurs; for the sake of clarity, the constructions also apply to any unlisted occurrence of a term or similar term in an asserted claim. Terms that are similar, or that present the same claim construction issues, are grouped accordingly in the chart below.

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Claim Terms	Asserted Patents, Asserted Claims	Amazon's Proposed Constructions
1. Preambles	249 patent, claim 1; 699 patent, claims 1, 12; 385 patent, claims 1, 31; 758 patent, claim 1; 025 patent, claims 1, 8	The preambles are limiting.
2. "context"	249 patent, claims 1, 2; 699 patent, claims 1, 12; 385 patent, claim 2; 758 patent, claim 1	the subject matter area to which a particular user input is directed and which is used to determine the meaning of the user input
3. "voice input"	249 patent, claim 1	a speech signal received by an input device
4. "comparing, by the computer system, the first voice input with the second voice input; filtering, by the computer system, sound from the first voice input and the second voice input based on the comparison"	249 patent, claim 1	Indefinite
5. "a user's manner of speaking" / "a manner in which the natural language utterance was spoken" / "a manner in which the first natural language utterance is spoken"	249 patent, claim 10; 699 patent, claims 1, 12	the way a user spoke the [first] natural language utterance

Claim Terms	Asserted Patents, Asserted Claims	Amazon's Proposed Constructions
6. "speech recognition engine"	699 patent, claims 7, 18; 385 patent, claims 1, 32; 785 patent, claim 1; 025 patent, claims 1, 8	software and/or hardware that recognizes the words or phrases in the natural language utterance
7. "contextual signifiers"	699 patent, claims 4, 15	Indefinite
8. "conversational language processor"	758 patent, claim 5; 025 patent, claims 1, 8	software and/or hardware that determines an interpretation of the recognized words or phrases of a natural language utterance
9. "domain agent"	758 patent, claim 6	software with domain-specific behavior and information
10. "the natural language processing"	025 patent, claims 15, 16	the interpretation of the first utterance by the conversational language processor

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Respectfully submitted,

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