

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

CardWare Inc.,	§	
	§	
Plaintiff,	§	
	§	Civil Action No. 7:24-cv-00278-DC-DTG
v.	§	
	§	JURY TRIAL DEMANDED
Google LLC,	§	
	§	
Defendant.	§	
	§	
	§	

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Court’s Scheduling Order (ECF No. 48) and the Court’s Standing Order Governing Proceedings (OGP) filed on August 2, 2022 at 4, Plaintiff CardWare Inc. (“CardWare”) and Defendant Google LLC (“Google”) submit this Joint Claim Construction Statement for claim terms asserted in U.S. Patent Nos. 10,339,520 (“the ’520 Patent”), 11,176,538 (“the ’538 Patent”), 10,810,579 (“the ’579 Patent”), and 11,620,634 (“the ’634 Patent”).

I. DISPUTED CLAIM CONSTRUCTIONS

#	Proposed By	Claim Term	Google’s Proposed Construction	CardWare’s Proposed Construction
1	Google	“payment information”; “issued payment information”; “an issuer provided payment information”; “the issuer provided payment information”; “a static device account number payment information”; “the payment information”; “a issuer provided payment information”; “issuer provided payment information” ’520 Patent Claim 10	Indefinite	Not indefinite. Plain and ordinary meaning

#	Proposed By	Claim Term	Google's Proposed Construction	CardWare's Proposed Construction
2	Google	"said device account information" '538 Patent, Claim 4	Indefinite	Not indefinite. Plain and ordinary meaning
3	Google	"[device-transmitted] limited-use payment information" '538 Patent, Claim 7	Indefinite	Not indefinite. Plain and Ordinary Meaning
4	Google	"said information" '538 Patent, Claim 9	Indefinite	Not indefinite. Plain and Ordinary Meaning
5	Google	"said information" '538 Patent, Claim 27	Indefinite	Not indefinite. Plain and Ordinary Meaning
6	Google	"said secrets" '538 Patent, Claim 27	Indefinite	Not indefinite. Plain and Ordinary Meaning

II. AGREED CLAIM CONSTRUCTIONS

#	Proposed By	Claim Term	Agreed Construction
1	CardWare	"rendered the display" '520 Patent Claim 15	"rendered on the display"
2	CardWare	"rejecting a limited-use number, by the payment processing authority, on at least one" '579 Patent: Claim 6	"rejecting a limited-use number, by the payment processing authority, based on at least one"
3	CardWare	"a device biometric sensing the electronic device is continuously remaining in the proximity contact of a valid user" '579 Patent, Claim 9	"a device biometric sensing that the electronic device is continuously remaining in the proximity contact of a valid user"
4	CardWare	"reduce" '634 Patent, Claim 4	"produce"
5	CardWare	"via said NFC for receipt by an NFC recipient" '634 Patent, Claim 4	"via said NFC interface for receipt by an NFC recipient"

#	Proposed By	Claim Term	Agreed Construction
6	CardWare	"Lather" '634 Patent, Claim 5	"further"
7	CardWare	"in place of the issued payment account information said NFC interface" '634 Patent, Claim 18	"in place of the issued payment account information via said NFC interface"
8	CardWare	"performing" '634 Patent, Claim 28	"performing"
9	CardWare	"received the user input device coupled to the processor" '634 Patent, Claim 55	"received via the user input device coupled to the processor"

Dated: July 15, 2025

Respectfully submitted,

/s/ Eric H. Findlay

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of July, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Eric H. Findlay

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