

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**INTELLECTUAL VENTURES I LLC AND
INTELLECTUAL VENUTRES II, LLC,**

Plaintiff,

vs.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No. 4:24-cv-00980

JURY TRIAL

**DEFENDANT AMERICAN AIRLINES, INC.'S SUPPLEMENTAL DISCLOSURE OF
PROPOSED TERMS AND CLAIM ELEMENTS FOR CONSTRUCTION**

Pursuant to the Court's Scheduling Order (Dkt. 81), Defendant identifies the following claim terms and phrases for construction by the Court for United States Patent Nos. 7,822,841 (the "'841 patent"); 8,352,584 (the "'584 patent"); 7,721,282 (the "'282 patent"); 7,712,080 (the "'080 patent"); 10,103,845 (the "'845 patent"); and 11,032,000 (the "'000 patent").

The fact that Defendant contends that any claim term or element should be construed by the Court is not an admission that the term is unambiguous, subject to prosecution history estoppel, or that the patentee has acted as his own lexicographer. As provided by Patent L.R. 2-4, "the statement and disclosures provided for in Patent L.R. 4-1 and 4-2 are not admissible for any purpose other than in connection with motions seeking an extension or modification of the time periods within which actions contemplated by these Patent Local Rules must be taken."

Defendant's identification of claim terms is based, at least in part, on IV's Disclosure of Asserted Claims and Infringement Contentions Pursuant to Local Patent Rules 3-1 and 3-2, dated November 20, 2025 ("Supplemental Infringement Contentions"), including IV's apparent interpretation of the claims in its Supplemental Infringement Contentions. Defendant has not

completed its discovery in this action, nor has it completed its preparation for trial. Accordingly, the following proposed claim terms and phrases are preliminary in nature and based only upon Defendant's knowledge at this time. Defendant expressly reserves the right to supplement or amend this list on any basis, subject to and in accordance with this Court's Local Rules and any Orders issued by this Court.

I. U.S. Patent No. 7,822,841

Claim Term/Phrase	Claim(s)
"operational and connectivity problems"	1
"hardware and software problems"	1
"wherein the first configuration differs from the second configuration"	1
"first configuration" / "second configuration"	1, 3, 4, 5, 9
"communications within the first and second clusters are isolated"	8
"high performance computing cluster"	9

II. U.S. Patent No. 8,352,584

Claim Term/Phrase	Claim(s)
"high performance cluster" / "high performance computing cluster"	1, 10
"a first cluster ... including at least one hardware processor" and "a second cluster ... including at least one hardware processor"	1, 10
"communications between the first [HPC] cluster and the second [HPC] cluster are isolated"	1, 10
"wherein the first configuration differs from the second configuration"	1, 10
"first configuration" / "second configuration"	1, 2, 3, 4, 10, 11, 12, 13
"operational or connectivity problems"	5, 6
"hardware or software problems"	6
"means ... to limit access ..."	8

III. U.S. Patent No. 7,721,282

Claim Term/Phrase	Claim(s)
"application environment"	1, 15, 16
"compute node"	1, 5, 8, 15, 16, 21, 24, 26
"blocks"	1, 15

Claim Term/Phrase	Claim(s)
“sections of data”	1, 15
“root image”	1, 4, 5, 15, 17, 20, 21,
“blocks of a root image of a compute node”	1, 15
“computer program”	1, 15
“file of the root image”	1, 15
“leaf image”	1, 15, 16, 17
“new data blocks”	1, 15
“changes to the blocks of the root image”	1, 15
“union block device”	1, 10
“driver”	1
“merging the blocks of the root image stored on the first storage unit with the blocks of the leaf image stored on the second storage unit”	1, 15
“appropriate persistent mapping”	1, 15
“sector”	1, 10, 15
“a write request from the compute node for a sector X”	1, 15
“creates an appropriate persistent mapping for sector X”	1, 15
“block modification log”	8, 24
“partition”	9, 25
“low-level driver”	1
“the modifying”	15
“at an operational level”	26

IV. U.S. Patent No. 7,712,080

Claim Term/Phrase	Claim(s)
“distributed parallel computing program”	1, 4-6, 9, 17, and 18
“distributed shared variable”	1, 3, 9
“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
“distributed sequential computing program”	1, 9
“physically distributed across multiple memories”	1
“memories”	1, 3
“spawning”	1, 9
“spawning at least one child distributed sequential computing program from the at least one distributed sequential computing program”	1, 9
“intermediate condition”	1, 9
“at least one intermediate condition occurs”	1, 9

Claim Term/Phrase	Claim(s)
within the at least one distributed sequential computing program”	
“concurrently uses”	1, 9
“parallel processing and/or operations”	1, 9
“wherein the at least one distributed parallel computing program concurrently uses the at least one distributed sequential computing program and the at least one spawned child distributed sequential computing program to perform parallel processing and/or operations”	1, 9
“intermediate result”	1, 9
“will be required by the at least one spawned child distributed sequential computing program to continue computation”	1, 9
“the distributed parallel computing program is configured to operate across multiple processors”	4
“threads”	5
“the distributed parallel computing program is configured to operate using multiple threads”	5
“nodes”	6
“the distributed parallel computing program is configured to operate across multiple nodes”	6
“distributed parallel computing system”	9
“memory area”	9
“physically loaded”	9
“configured to access the at least one distributed shared variable”	9
“distributed shared memory system”	17, 18
“the distributed parallel computing program is configured to operate across a distributed shared memory system	17, 18

V. U.S. Patent No. 10,103,845

Claim Term/Phrase	Claim(s)
“separate first mode transmit symbols”	1
“a first set of antennas and a second set of antennas”	1
“a spectrum of frequencies that is same”	1
“bandwidth expansion”	1
“separate second mode transmit symbols”	1
“operating conditions”	2
“an interference”	3
“non-adjacent”	5

“performing a gap filling”	6
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VI. U.S. Patent No. 11,032,000

Claim Term/Phrase	Claim(s)
“time interval” and “time intervals”	1, 13
“different resources”	1, 13
“other physical channels”	1, 13
“a processor” and “the processor”	1, 2, 4
“a receiver” and “the receiver”	1, 2, 4
“a transmitter” and “the transmitter”	1
“in the same time interval that the uplink physical signal is sent, a plurality of UEs transmit uplink physical signals in the same time interval” (indefinite under <i>IPXL Holdings, LLC v. Amazon.com, Inc.</i> , 430 F.3d 1377, 1384 (Fed. Cir. 2005).)	1
“a plurality of predetermined time slots in a downlink frame, wherein other time slots of the downlink frame do not include a physical control channel” (indefinite under <i>IPXL Holdings, LLC v. Amazon.com, Inc.</i> , 430 F.3d 1377, 1384 (Fed. Cir. 2005).)	13

Dated: December 22, 2025

/s/ John B. Campbell

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via email on December 22, 2025.

/s/ John B. Campbell
John B. Campbell