From: acaridis
To: Ogi Zivojnovic; QE-Google-CDCal169
Cc: Sonos-CDCA0169-service; LS3_team@ls3ip.com
Subject: RE: Sonos v. Google, No. 2:20-cv-00169-JAK-DFM (C.D. Cal.) -- Schedule
Date: Friday, June 13, 2025 5:18:08 PM
Attachments: image003.png

[EXTERNAL EMAIL from acaridis@orrick.com]

Ogi,

Thanks for getting back to us.

Agreed Terms

We confirm our agreement with the exception of "the at least one an individual future time" term. For that term, Sonos will be pursuing its originally-proposed construction: "an individual future time."

Also, minor, but the "synchrony group" term should be "a synchrony group" to properly align with the agreed construction.

Disputed Terms

For the disputed "user input indicating that a user wishes to set up a playback device to operate on the secure WLAN" term, Sonos will be pursuing the construction it proposed to Google on June 9th: "an objectively verifiable indication that a user wishes to set up a playback device to operate on the secure WLAN, which does not require that the user select the secure WLAN."

Minor again, but the "an application for controlling [one or more / the] playback devices" term should be "an application for controlling [one or more playback devices / the playback device]" to track the claim language of '896 claim 12 and '883 patent claim 13, respectively.

Thanks,

Alyssa

From: Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>
Sent: Wednesday, June 11, 2025 10:25 AM
To: Caridis, Alyssa <acaridis@orrick.com>; QE-Google-CDCal169 <qe-google-cdcal169@quinnemanuel.com>
Cc: Sonos-CDCA0169-service <Sonos-CDCA0169-service@orrick.com>; LS3_team@ls3ip.com
Subject: RE: Sonos v. Google, No. 2:20-cv-00169-JAK-DFM (C.D. Cal.) -- Schedule

[EXTERNAL]

Alyssa,

Thank you for continuing to meet and confer on proposed constructions over the last few weeks. Below are the terms where the parties have reached an agreement. I've highlighted the additions / changes relative to our May 28, 2025 list of proposed agreed terms. **Please confirm that these are indeed agreed terms**.

Patent(s) & Claim(s)	Term(s)	Agreed Construction
'959 patent, claims 1, 10 '025 patent, claims 1, 13, 18	"pair" / "pairing" / "paired"	"configuration involving two or more playback devices that have different playback roles"
'959 patent, claims 5, 10	"equalization of the data" / "equalization [of the audio data']"	"alteration of the relative strength of certain frequency ranges in the audio data by performing one or more of the following: adjusting one or more parameters related to speaker drivers, such as gain, frequency response, channel output, phase, or time delay; adjusting amplifier gain of the playback device; or using one or more filters"
'896 patent, claims 1, 13 '883 patent,	"at least a second message containing network	"at least one second message containing network

claims 1, 14	configuration parameters [for the secure WLAN], wherein the network configuration parameters comprise an identifier of the secure WLAN and a security key for the secure WLAN”	configuration parameters, wherein the network configuration parameters comprise an identifier of the secure WLAN and a security key for the secure WLAN”
’896 patent, claim 12 ’883 patent, claim 13	“the [given] playback device is configured to play back audio content in synchrony with at least the first playback device”	Plain and ordinary meaning. No construction necessary.
’258 patent, claims 17, 26 ’953 patent, claims 7, 18, 25, 28	“clock time information” / “clock timing information”	“information representing a time value indicated by a device’s clock”
’001 patent, claim 20	“based a”	“based on a”
’014 patent, claims 25, 32, 35, 38, 42, 43 ’949 patent, claims 1, 2, 4, 5, 8, 9, 11, 12 ’258 patent, claims 17, 21, 22, 23,	“zone player” / “playback device” / “player”	“data network device configured to process and output audio”

24, 26 ’959 patent, claims 5, 10, 29 ’715 patent, claims 7, 9, 11, 13, 15, 17 ’953 patent, claims 7, 8, 12, 13, 14, 18, 22, 23, 24, 25, 28, 29, 30 ’896 patent, claims 1, 5, 6, 8, 9, 12, 13, 15, 17, 18 ’883 patent, claims 1, 2, 4, 5, 9, 10, 11, 13, 14, 15, 16, 17, 19 ’025 patent, claims 1, 10, 12, 13, 18 ’001 patent, claims 12, 13, 14, 17, 18, 19, 20, 21, 22, 23, 24, 25, 28, 29, 30, 31, 32, 33		
’014 patent, claims 25, 38 ’258 patent,	“network interface”	“physical component of a device that provides an interconnection with a data

claims 17, 24 ’959 patent, claim 1 ’715 patent, claims 7, 8, 13, 15 ’953 patent, claim 7 ’896 patent, claim 1 ’883 patent, claim 1 ’025 patent, claim 1 ’001 patent, claim 12, 23		network”
’258 patent, claims 17, 26 ’715 patent, claims 11, 17 ’953 patent, claims 7, 14, 25 ’001 patent, claims 12, 22, 23, 33	“playback timing information”	“information indicating when the audio [information / content] is to be played back” [proposed by Sonos on June 2, 2025]
’258 patent, claims 17, 21, 22, 23, 24, 26 ’715 patent, claims 7, 9, 11, 13, 15,	“synchrony group”	“a set of two or more zone players that are to play the same audio program synchronously”

17 ’953 patent, claims 7, 8, 12, 13, 18, 22, 23, 24, 25, 28, 29, 30 ’001 patent, claims 12, 13, 17, 18, 23, 24, 28, 29		
’258 patent, claim 17	“independently clocked”	“operating in accordance with their own respective clocks during synchronous playback”
’949 patent, claims 1, 2, 4, 5, 8	“multimedia”	“any type of media that comprises audio (including audio alone)”
’949 patent, claims 1, 8 ’014 patent, claim 25	“synchronized playback of a multimedia output” / “synchronizing all players”	“playback of the same multimedia at the same time” / “causing all players to playback the same multimedia at the same time” [proposed by Sonos on June 2, 2025]
’896 patent, claims 1, 13 ’883 patent, claims 1, 5, 14, 17	“initial communication path”	“wired or wireless communication path established before transitioning to communicating via the secure

		WLAN” [proposed by Sonos on June 9, 2025]
’896 patent, claim 9	“the current network configuration parameters of the computing device”	“current network configuration parameters of the computing device” [proposed by Google and Sonos on June 2, 2025]
’001 patent, claims 14, 25	“the playback timing”	“the playback timing information” [proposed by Google on June 2, 2025]
’001 patent, claim 31	“the at least one an individual future time”	“the at least one individual future time” [proposed by Google on June 2, 2025]

In addition, based on Sonos’ June 2, 2025 representation regarding intrinsic evidence informative of the plain meaning of “generat[ing] playback timing information associated with the obtained audio information …” (’001 patent, claims 12, 23), Google is dropping that term from its list of claim construction disputes. Google reserves the right, however, to re-raise its indefiniteness challenge should Sonos interpret this term in a manner that deviates from the description in the intrinsic evidence identified by Sonos.

That leaves the following disputed claim terms. Google is continuing to evaluate these terms and reserves the right to agree to modify its proposed constructions or agree that no construction is necessary for any of them.

Patent(s) & Claim(s)	**Term(s)**	**Google’s Proposed Construction**	**Sonos’ Proposed Construction**
’014 patent, claim 42	“relative volume loudness difference”	Indefinite	No construction necessary
’896 patent,	“an application	Plain and	No

claims 1, 13 ’883 patent, claims 1, 14	for controlling [one or more / the] playback devices”	ordinary meaning Sonos is incorrectly limiting this term to “an application for controlling operation of [one or more / the] playback devices after setup”	construction necessary
’896 patent, claims 1, 13	“user input indicating that a user wishes to set up a playback device to operate on the secure WLAN”	an objectively verifiable indication that a user wishes to set up a playback device to operate on the same secure WLAN used by the computing device Otherwise: Indefinite	No construction necessary
’896 patent, claims 1, 13	“while operating on a secure wireless local area network (WLAN) that is defined by an access point, (a) receiving, via a graphical user interface (GUI) associated with an application for controlling one or more playback devices, user	Plain and ordinary meaning, which includes a sequence of steps	No construction necessary

	input indicating that a user wishes to set up a playback device to operate on the secure WLAN and (b) receiving a first message indicating that a given playback device is available for setup; after receiving the user input and receiving the first message, transmitting a response to the first message that facilitates establishing an initial communication path with the given playback device, wherein the initial communication path with the given playback device does not traverse the access point "		
'883 patent, claim 13	"The computing device of claim 1, further comprising program instructions stored on the	Plain and ordinary meaning	"The playback device of claim 1, further comprising program instructions

	non-transitory computer-readable medium that, when executed by the at least one processor, cause the computing device to perform functions comprising:”		stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the playback device to perform functions comprising:”
’001 patent, claims 12, 18, 23, 29	“audio information that is representative of the audio content” / “audio information that is representative of the particular audio content”	Indefinite	No construction necessary
’001 patent, claims 18, 29	“wherein the first control information identifies particular audio content to be played back by the synchrony group that is available at an audio source outside of the at least one data network”	Indefinite	No construction necessary
’001 patent, claim 30	“an individual future time”	Indefinite	No construction necessary

Best,
Ogi

From: Caridis, Alyssa <acaridis@orrick.com>
Sent: Monday, June 9, 2025 12:04 PM
To: Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>; QE-Google-CDCal169 <qe-google-cdcal169@quinnemanuel.com>
Cc: Sonos-CDCA0169-service <Sonos-CDCA0169-service@orrick.com>; LS3_team@ls3ip.com
Subject: RE: Sonos v. Google, No. 2:20-cv-00169-JAK-DFM (C.D. Cal.) -- Schedule

[EXTERNAL EMAIL from acaridis@orrick.com]

Ogi –

I believe we are still waiting for Google's position on some claim construction issues (pursuant to my June 2 e-mail).

In addition, Sonos offers the following proposed compromise positions, please let us know Google's positions.

1. "initial communication path" – "wired or wireless communication path established before transitioning to communicating via the secure WLAN"
2. "user input indicating that a user wishes to set up a playback device to operate on the secure WLAN" – "an objectively verifiable indication that a user wishes to set up a playback device to operate on the secure WLAN, which does not require that the user select the secure WLAN"

Finally, I am not available this afternoon for a meeting, but can find time to discuss tomorrow. In the meantime, attached is a draft status report that sets forth Sonos's position. After you have a chance to review we can discuss in the morning whether you think there is any common ground. (Obviously Sonos reserves the right to modify its position based on Google's position.)

Alyssa

From: Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>
Sent: Monday, June 9, 2025 9:09 AM
To: Caridis, Alyssa <acaridis@orrick.com>; QE-Google-CDCal169 <qe-google-cdcal169@quinnemanuel.com>
Cc: Sonos-CDCA0169-service <Sonos-CDCA0169-service@orrick.com>; LS3_team@ls3ip.com
Subject: RE: Sonos v. Google, No. 2:20-cv-00169-JAK-DFM (C.D. Cal.) -- Schedule

[EXTERNAL]

Alyssa,

Per the Court's comments at last week's hearing, we need to meet and confer in anticipation of submitting a joint status report tomorrow. Is your team available sometime between 2 and 4 pm PT?

Thanks,
Ogi

From: Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>
Sent: Wednesday, June 4, 2025 8:51 PM
To: acaridis <acaridis@orrick.com>; QE-Google-CDCal169 <qe-google-cdcal169@quinnemanuel.com>
Cc: Sonos-CDCA0169-service <Sonos-CDCA0169-service@orrick.com>; LS3_team@ls3ip.com
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Alyssa,

We agree to move the June 6, 2025, opening declaration and exchange of evidence deadline to June 16, 2025, and the subsequent June 13, 2025, rebuttal declaration deadline to June 30, 2025. Since these are dates only agreed to between the parties in the first instance, there is no need to file anything with the Court.

As for deadlines further out, starting with the close of claim construction discovery on June 19, 2025, we believe it is premature to file anything given the Court's order that the parties meet-and-confer and submit a joint report on June 10, 2025. We can discuss the rest of your proposal as part of the court-ordered meet-and-confer.

Best,
Ogi

From: Caridis, Alyssa <acaridis@orrick.com>
Sent: Wednesday, June 4, 2025 8:02 AM
To: QE-Google-CDCal169 <qe-google-cdcal169@quinnemanuel.com>
Cc: Sonos-CDCA0169-service <Sonos-CDCA0169-service@orrick.com>; LS3_team@ls3ip.com
Subject: Sonos v. Google, No. 2:20-cv-00169-JAK-DFM (C.D. Cal.) -- Schedule

[EXTERNAL EMAIL from acaridis@orrick.com]

Counsel –

At the hearing Monday, the Court explained that it would not be able to hold a Markman hearing on July 28, and that the next available date is August 25.

As such, we think it makes sense to adjust the court deadlines now (both pre- and post-Markman) to align with an August 25 hearing. We suggest submitting a stipulation to modify the schedule, consistent with the proposal below. We can address the Court's questions about Markman related to Google's Setup Patents separately in the June 10 submission (and will note as much in this submission).

Please let us know if you agree with the below dates, or have any proposed edits.

	Current Deadline	Proposed New Deadline

Both parties exchange intrinsic and non-expert extrinsic evidence for constructions that remain in dispute. Any party who intends to support their proposed construction(s) with expert testimony in their opening Markman brief serves said declaration(s).	June 6, 2025	June 16, 2025
Any party wishing to rebut opening expert reports serves said declaration(s). (Such rebuttal declaration(s) may only be submitted with the party's responsive Markman brief and must be strictly limited to opinions rebutting the other side's opening expert.)	June 13, 2025	June 30, 2025
Claim Construction Discovery Cut-Off	June 19, 2025	July 9, 2025
Joint Prehearing Statement Due	June 26, 2025	July 16, 2025
Simultaneous Opening Markman Briefs Due	July 3, 2025	July 28, 2025
Simultaneous Responsive Markman Briefs, Tutorials, and Presentation Materials Due	July 17, 2025	August 18, 2025
Markman Hearing	July 28, 2025	August 25, 2025
Anticipated Ruling to be Issued on Markman Hearing	September 15, 2025	October 13, 2025
Patentee's Deadline to Serve Final Infringement Contentions, Expert Reports on Issues Where Patentee has Burden of Proof, all parties serve advice of counsel disclosures	October 14, 2025	November 19, 2025
Last day to participate in settlement conference/mediation	October 22, 2025	November 26, 2025
Last day to file a notice of settlement or joint report re: status of settlement	October 24, 2025	December 1, 2025
Post Mediation Status Conference	November 3, 2025 at 11:30 am	December 8, 2025
Accused Infringer's Deadline to Serve Final Invalidity	November 10, 2025	December 17, 2025

Contentions, Rebuttal Expert Reports on Issues Where Patentee has Burden of Proof, and Opening Expert Reports Where Accused Infringer has Burden of Proof		
Patentee's Deadline to Serve Rebuttal Expert Reports on Issues Where Accused Infringer has Burden of Proof	December 8, 2025	January 21, 2026
Discovery Cut-Off	January 12, 2026	February 18, 2026
Last day to file motions (including discovery motions)	February 9, 2026	March 4, 2026

Alyssa Caridis
Intellectual Property
Partner

Pronouns: she/her/hers

Orrick
Los Angeles
T 2136122372
acaridis@orrick.com

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