

**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 RULE 4-2
DISCLOSURES**

Pursuant to the Court's Scheduling Order (Dkt. 81), Defendant hereby provides the following Preliminary Claim Constructions and Extrinsic Evidence for the set of terms identified by the Parties for the asserted claims of United States Patent Nos. 7,822,841 ("841 patent"); 8,352,584 ("584 patent"); 7,721,282 ("282 patent"); 7,712,080 ("080 patent"); 10,103,845 ("845 patent"); and 11,032,000 ("000 patent").

Defendant's proposed constructions are based on information that is currently available to date. Defendant reserves the right to modify their proposed constructions should additional information become available through discovery, after they have reviewed Plaintiff's proposed constructions, and in light of arguments made by Plaintiff as this case proceeds. Defendant's disclosure of extrinsic evidence is preliminary and based on Defendant's analysis and investigation to date.

Defendant will make itself available to meet and confer for the purposes of attempting to limit the terms/constructions in dispute by narrowing and resolving differences and to facilitate the ultimate preparation of a Joint Claim Construction and Prehearing Statement.

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

Claim Term/Phrase	Proposed Construction	Extrinsic Evidence
“operational and connectivity problems” (claim 1)	Indefinite	Expert testimony of Dr. Michael Goodrich regarding the indefiniteness of this term.
“hardware and software problems” (claim 1)	Indefinite	Expert testimony of Dr. Michael Goodrich regarding the indefiniteness of this term.
“wherein the first configuration differs from the second configuration” (claim 1)	Indefinite	Expert testimony of Dr. Michael Goodrich regarding the indefiniteness of this term.
“communications within the first and second clusters are isolated” (claim 8)	Network traffic within each cluster is maintained separate from other clusters by a gateway positioned between the private cluster network and the private company network that manages traffic destined for its corresponding cluster	Expert testimony of Dr. Michael Goodrich regarding the proper construction of this term.
“high performance computing cluster” (claim 9)	Indefinite	Expert testimony of Dr. Michael Goodrich regarding the indefiniteness of this term.

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

Claim Term/Phrase	Proposed Construction	Extrinsic Evidence
“high performance cluster” / “high performance computing cluster” (claims 1 and 10)	Indefinite	Expert testimony of Dr. Michael Goodrich regarding the indefiniteness of this term.
“a first cluster ... including at least one hardware processor” and “a second cluster ... including at least one hardware processor” (claims 1 and 10)	A first cluster of computing resources that includes at least one hardware processor and establishes communications through a distinct first gateway	Expert testimony of Dr. Michael Goodrich.

Claim Term/Phrase	Proposed Construction	Extrinsic Evidence
	<p>positioned between that cluster and the private communications network</p> <p>A second cluster of computing resources that includes at least one hardware processor and establishes communications through a distinct second gateway positioned between that cluster and the private communications network</p>	
<p>“communications between the first [HPC] cluster and the second [HPC] cluster are isolated”</p> <p>(claims 1 and 10)</p>	<p>Network traffic within each cluster is maintained separate from other clusters by a gateway positioned between the private cluster network and the private company network that manages traffic destined for its corresponding cluster</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the proper construction of this term.</p>
<p>“wherein the first configuration differs from the second configuration”</p> <p>(claims 1 and 10)</p>	<p>Indefinite</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the indefiniteness of this term.</p>
<p>“operational or connectivity problems”</p> <p>(claims 5 and 6)</p>	<p>Indefinite</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the indefiniteness of this term.</p>
<p>“hardware or software problems”</p> <p>(claim 6)</p>	<p>Indefinite</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the indefiniteness of this term.</p>
<p>“means ... to limit access ...”</p> <p>(claim 8)</p>	<p>Means-plus-function under § 112(f)</p> <p><u>Function</u>: Limit access to the first cluster to communication access from a first client associated with the first client task and limit access</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the proper construction of this term.</p>

Claim Term/Phrase	Proposed Construction	Extrinsic Evidence
	<p>to the second cluster to communication access from a second client associated with the second client task</p> <p><u>Structure:</u> Firewall and authentication mechanism 210</p>	

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

Claim Term/Phrase	Proposed Construction	Extrinsic Evidence
<p>“root image”</p> <p>(claims 1, 4, 5, 15, 17, 20, and 21)</p>	<p>“a read-only base set of data blocks, operating beneath the file system, that provide the common portion of the application environment”</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the proper construction of this term.</p>
<p>“new data blocks”</p> <p>(claims 1 and 15)</p>	<p>“data blocks that are not present in the root image”</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the proper construction of this term.</p>
<p>“appropriate persistent mapping”</p> <p>(claims 1 and 15)</p>	<p>Indefinite</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the indefiniteness of this term.</p>
<p>“sector”</p> <p>(claims 1, 10, and 15)</p>	<p>“contiguous portion of the data storage area on a disk”</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the proper construction of this term.</p> <p>Microsoft Computer Dictionary, Fifth Ed., 2002 definition of “sector.”</p> <p>Barrons Dictionary of Computer and Internet Terms, 10th Ed., 2009 definition of “sector.”</p>
<p>“low-level driver”</p> <p>(claim 1)</p>	<p>“driver that operates below the file system.”</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the proper construction of this term.</p>
<p>“the modifying”</p> <p>(claim 15)</p>	<p>Indefinite</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the indefiniteness of this term.</p>
<p>“at an operational level”</p>	<p>Indefinite</p>	<p>Expert testimony of Dr. Michael Goodrich regarding the</p>

Claim Term/Phrase	Proposed Construction	Extrinsic Evidence
(claim 26)		indefiniteness of this term.

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

Claim Term/Phrase	Proposed Construction	Extrinsic Evidence
“distributed parallel computing program” (claims 1, 4-6, 9, 17, and 18)	“program using multiple concurrent distributed sequential computing programs configured to operate across multiple processors/nodes and multiple memories.”	Expert testimony of Dr. Michael Shamos regarding the proper construction of this term.
“distributed sequential computing program” (claims 1 and 9)	“program using a single locus of computation over distributed data.”	Expert testimony of Dr. Michael Shamos regarding the proper construction of this term.
“parallel processing and/or operations” (claims 1 and 9)	“handling multiple threads concurrently without terminating and resuming thread processes.”	Expert testimony of Dr. Michael Shamos regarding the proper construction of this term.
“multiple nodes” (claim 6)	“multiple memory areas associated with separate processors”	Expert testimony of Dr. Michael Shamos regarding the proper construction of this term.
“distributed shared memory system” (claim 17 and 18)	“system that uses a globally accessible memory space built on distributed memories.”	Expert testimony of Dr. Michael Shamos regarding the proper construction of this term.

V. U.S. Patent No. 11,032,000

Claim Term/Phrase	Proposed Construction	Extrinsic Evidence
“time interval” and “time intervals” (claims 1, 6, 13, and 18)	“time slot” / “time slots”	<i>Toyota Motor Corp. et al. v. Intellectual Ventures II LLC</i> , IPR2022-01130, Papers 10, 13, 26, 41 (P.T.A.B. December 4, 2023). U.S. Patent No. 8,811,356 Expert Testimony of Dr. Daniel van der Weide regarding the proper construction of this term.
“a processor” and “the processor” (claims 1, 2, and 4)	one or more processors, at least one of which is configured to receive resource allocation	Expert Testimony of Dr. Daniel van der Weide regarding the proper construction of this term.

Claim Term/Phrase	Proposed Construction	Extrinsic Evidence
	information ..., send, over the physical uplink shared channel, data ..., send the uplink physical signal ..., and receive, on a physical control channel, control information ...	
“a receiver” and “the receiver” (claims 1, 2, and 4)	one or more receivers, at least one of which is configured to receive resource allocation information..., and receive, on a physical control channel, control information...	Expert Testimony of Dr. Daniel van der Weide regarding the proper construction of this term.
“a transmitter” and “the transmitter” (claim 1)	one or more transmitters, at least one of which is configured to send, over the physical uplink shared channel, data ..., and send the uplink physical signal ...	Expert Testimony of Dr. Daniel van der Weide regarding the proper construction of this term.
“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” (claim 1)	indefinite under <i>IPXL Holdings, LLC v. Amazon.com, Inc.</i> , 430 F.3d 1377, 1384 (Fed. Cir. 2005)	Expert Testimony of Dr. Daniel van der Weide regarding the indefiniteness of this term.
“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” (claim 13)	indefinite under <i>IPXL Holdings, LLC v. Amazon.com, Inc.</i> , 430 F.3d 1377, 1384 (Fed. Cir. 2005)	Expert Testimony of Dr. Daniel van der Weide regarding the indefiniteness of this term.

Dated: January 13, 2026

/s/ John B. Campbell

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ATTORNEYS FOR DEFENDANT
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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 January 13, 2026.

/s/ John B. Campbell
John B. Campbell