

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ADEIA TECHNOLOGIES, INC., ADEIA
GUIDES INC., AND ADEIA MEDIA
HOLDINGS LLC,

PLAINTIFFS,

v.

THE WALT DISNEY COMPANY, DISNEY
MEDIA AND ENTERTAINMENT
DISTRIBUTION LLC, DISNEY DTC LLC,
DISNEY STREAMING SERVICES LLC,
DISNEY ENTERTAINMENT & SPORTS
LLC, DISNEY PLATFORM
DISTRIBUTION, INC., BAMTECH, LLC,
HULU, LLC, AND ESPN, INC.,

DEFENDANTS.

C.A. NO.: 1:24-CV-01231

**DEFENDANTS' SUPPLEMENTAL DISCLOSURE OF PROPOSED CLAIM
CONSTRUCTIONS**

Pursuant to the Scheduling Order (D.I. 25), Defendants The Walt Disney Company, Disney Media and Entertainment Distribution LLC, Disney DTC LLC, Disney Streaming Services LLC, Disney Entertainment & Sports LLC, Disney Platform Distribution, Inc., Bamtech, LLC, Hulu, LLC, and ESPN, Inc. ("Defendants" or "Disney") disclose the following proposed constructions of claim terms and phrases identified by the parties in U.S. Patent Nos. 9,762,639 ("the '639 patent"); 8,280,987 ("the '987 patent"); 9,860,595 ("the '595 patent"); 10,165,324 ("the '324 patent"); 8,542,705 ("the '705 patent"); and 9,235,428 ("the '428 patent").

Defendants' disclosure of proposed constructions is preliminary, and Defendants reserve the right to amend or supplement their disclosure based on further discovery, Court rulings, or additional disclosure provided by Plaintiffs Adeia Technologies, Inc., Adeia Guides Inc., and Adeia Media Holdings LLC ("Plaintiffs" or "Adeia"). To the extent that Plaintiffs amend or

supplement their Infringement Contentions, Defendants reserve the right to amend or supplement their preliminary disclosure of claim terms.

Subject to the foregoing, Defendants identify the following claim terms and phrases:

Claim Term/Phrase (Patent, Claim)	Proposed Construction
“chunking protocol” (’639 Patent, Claim 8)	“protocol that dynamically creates segments of media based on a request”
Order of steps 8[b] to 8[e] (’639 Patent, Claim 8)	Steps [b] to [e] must be performed in order.
Order of steps 8[g] to 8[j] (’639 Patent, Claim 8)	Steps [g] to [j] must be performed in order.
“at least one beaconing URL which, when used, is indicative of [playback of at least one advertisement / a certain point has been reached in playback of the requested media source]” (’639 Patent, Claims 14 and 15)	Indefinite
“data object” (’987 Patent, Claims 1, 3-13)	“metadata about a particular media asset, distinct from the asset itself”
“data persistence cache servers” (’987 Patent, Claim 7)	Invalid under 35 U.S.C. § 112 ¶4
“[first/second] progress point” (’595 Patent, Claim 1) (’324 Patent, Claim 1)	“user’s time position within an episode”
“serial program” (’595 Patent, Claims 1, 4, 5, 6) (’324 Patent, Claims 1, 4, 5, 6)	“related programming containing a temporal component connecting episodes”
“the summary region” (’595 Patent, Claim 6); (’324 Patent, Claim 6)	Indefinite for lacking antecedent basis
“media aggregation server” (’705 Patent, Claim 1)	“any mechanism for obtaining media content from a large number of sources in order to provide the media content to mobile devices in live broadcast streams is referred to herein as a media content aggregation server”
“key frame” (’705 Patent, Claims 1, 5-7)	“a frame that can be displayed substantially on its own”
“group of pictures (GOP)” (’705 Patent, Claims 1, 5)	“a sequence of different frames types, beginning with a key frame and ending just before a subsequence key frame”
“predictive frame” (’705 Patent, Claim 1)	“a frame that relies on information from a reference key frame”
“wherein a plurality of buffers at the streaming server are allocated on a per group of pictures (GOP) basis” (’705 Patent, Claim 1)	“wherein the streaming server allocates one or more different buffers for each group of pictures (GOP)”
“wherein the next available key frame is provided as the second key frame in response	Indefinite

to the channel change request, wherein no predictive frames are transmitted at the beginning of the channel change request” ('705 Patent, Claim 1)	
“identifying a next available key frame associated with the second media stream” ('705 Patent, Claim 1)	“identifying, by the streaming server, by decoding or partially decoding the frame, a next available key frame associated with the second media stream”
Order of steps among elements recited in Claim 1 ('705 Patent, Claim 1)	1[a] and 1[b] must precede 1[c], and 1[c], 1[d], and 1[e] must be performed in order.
“wherein the first media stream is a first video stream and the second media stream is a second video stream” ('705 Patent, Claim 2)	Invalid under 35 U.S.C. § 112, ¶4
“single monolithic application program” ('428 Patent, Claim 9)	“single self-contained application program”
“a workflow manager to communicate one or more document viewers and associated user interface components to the proxy” ('428 Patent, Claim 9)	Governed by 35 U.S.C. § 112, ¶6. Function: to communicate one or more document viewers and associated user interface components to the proxy Structure: Insufficient structure; indefinite
“a renderer to render a graphical user interface (GUI) for an application program” ('428 Patent, Claim 9)	Governed by 35 U.S.C. § 112, ¶6. Function: to render a graphical user interface (GUI) for an application program Structure: Insufficient structure; indefinite
“the ox” ('428 Patent, Claim 9)	Not amenable for construction
“wherein the proxy functions to hide details of each component which makes up the application program from the renderer” ('428 Patent, Claim 10)	Indefinite
“wherein the proxy functions to enable each component which makes up the application program to be modified in a manner that is transparent to the renderer” ('428 Patent, Claim 11)	Indefinite

Dated: September 16, 2025

By: /s/ Jason J. Rawnsley

OF COUNSEL:

Ryan K. Yagura
Xin-Yi Zhou
Laura M. Burson
O'MELVENY & MYERS LLP
400 South Hope Street, 19th Floor
Los Angeles, CA 90071
Tel: (213) 430-6000
ryagura@omm.com
vzhou@omm.com
lburson@omm.com

Bradley M. Berg
O'MELVENY & MYERS LLP
610 Newport Center Drive, 17th Floor
Newport Beach, CA 92660-6429
Tel: (949) 823-6900

Khanh Leon
O'MELVENY & MYERS LLP
1625 Eye Street, NW
Washington, DC 20006
Tel: (202) 383-5300
kleon@omm.com

Robert W. Whetzel (#2288)
Jason J. Rawnsley (#5379)
Gabriela Z. Monasterio (#7240)
RICHARDS, LAYTON & FINGER, P.A.
920 North King Street
Wilmington, DE 19801
Tel: (302) 651-7700
whetzel@rlf.com
rawnsley@rlf.com
monasterio@rlf.com

Attorneys for Defendants The Walt Disney Company, Disney Media and Entertainment Distribution LLC, Disney DTC LLC, Disney Streaming Services LLC, Disney Entertainment & Sports LLC, Disney Platform Distribution, Inc., BAMTech, LLC, Hulu, LLC, and ESPN, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2025, I caused true and correct copies of the foregoing document to be served on the following counsel in the manner indicated:

VIA EMAIL

Bradley W. Caldwell
Jason D. Cassady
John Austin Curry
Brian D. Johnston
Caldwell Cassady & Curry PC
2121 N Pearl St., Suite 1200
Dallas, TX 75201
Telephone: (214) 888-4848
bcaldwell@caldwellcc.com
jcassady@caldwellcc.com
acurry@caldwellcc.com
bjohnston@caldwellcc.com

Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
919 N. Market St., 12 Floor
Wilmington, DE 19801
Tel: (302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

*Attorneys for Plaintiffs Adeia Technologies
Inc., Adeia Guides Inc., and Adeia Media
Holdings LLC*

/s/ Jason J. Rawnsley
Jason J. Rawnsley (#5379)