

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

COGMEDIA LLC,

Plaintiff

vs.

META PLATFORMS, INC.,

Defendant.

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CASE NO. 1:25-cv-12127

JOINT CLAIM CONSTRUCTION STATEMENT

In accordance with the Scheduling Order (Dkt. No. 62) and Local Rule 16.6(e)(1)(D), Cogmedia LLC (“Plaintiff”) and Meta Platforms, Inc. (“Defendant”) (collectively the “Parties”) submit the following Joint Claim Construction Statement.

Plaintiff alleges infringement of the following three United States Patents: Nos. 11,036,371 (“the ‘371 Patent”), 9,817,562 (“the ‘562 Patent”), and 10,664,141 (“the ‘141 Patent”) (collectively, “the Asserted Patents” or “the Patents-in-Suit”). Plaintiff has identified the following Asserted Claims:

- ‘371 Patent: Claims 1-29;
- ‘562 Patent: Claims 1-3, 5, 7-8, 11-15, 17-18;
- ‘141 Patent: Claims 1-13, 15, 17-22.

At this time, the Parties have not agreed on the construction of any term. For the Court’s benefit, and pursuant to Local Rule 16.6(e)(1)(D), the Parties include the below claim construction chart identifying the terms and/or phrases of the Asserted Patents that are in dispute. An identification of where each disputed term and/or phrase may be found in the Asserted Patents is also included. There are a total of eight disputed claims terms and/or phrases found within the Asserted Claims.

TERM	PATENT OWNER'S CONSTRUCTION (Plaintiff)	ACCUSED INFRINGER'S CONSTRUCTION (Defendant)	COURT'S CONSTRUCTION
“at least one computer initiates execution of software instructions to perform computer processes” (all Asserted Claims)	plain and ordinary meaning; no construction necessary	plain and ordinary meaning, which is “at least one computer initiates execution of software instructions [residing on the at least one computer] to perform computer processes”	
“vote function” (all Asserted Claims)	plain and ordinary meaning; no construction necessary	plain and ordinary meaning, which is “function that expresses a decision”	
“replicate function” (‘562: all claims) / “copy function” (‘141: all claims; ‘371: all claims)	plain and ordinary meaning; no construction necessary	plain and ordinary meaning, which is “function that duplicates”	
“send command” (‘562: claim 13; ‘141: claim 7; ‘371: claims 7, 22)	plain and ordinary meaning; no construction necessary	plain and ordinary meaning, which is “transmit command”	
“instant messaging function” (‘562: all claims; ‘141: claim 9; ‘371: claims 9, 24)	plain and ordinary meaning; no construction necessary	plain and ordinary meaning, which is “realtime communication function”	
“comment function” (‘141: all claims; ‘371: all claims)	plain and ordinary meaning; no construction necessary	plain and ordinary meaning, which is “function that allows a user to remark or annotate”	

“user-entered command” (‘562: claims 15, 17, 19)	plain and ordinary meaning; no construction necessary	plain and ordinary meaning, which is “textual command entered by a user”	
“displaying ... a first view ... and also displaying ... a second view” (‘141: claim 5; ‘371: claims 5, 20)	plain and ordinary meaning; no construction necessary	plain and ordinary meaning, which is “displaying a first view and second view at the same time”	

DATE: April 22, 2026

Respectfully submitted,

/s/ Dave R. Gunter

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF on April 22, 2026.

/s/ Dave R. Gunter