IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ACCUSEARCH TECHNOLOGIES LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 25-cv-514 (GBW)
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Paragraph 8 of the Amended Scheduling Order (D.I. 34), the parties hereby submit their Joint Claim Chart (Ex. A) for claim construction proceedings for U.S. Patent Nos. 10,585,959 (the "'959 Patent"); 10,867,001 (the "'001 Patent"); 11,100,184 (the "'184 Patent"); and 11, 971,937 (the "'937 Patent") (collectively, "Asserted Patents"). The Joint Claim Chart identifies the disputed claim terms and the parties' proposed constructions of those terms and supporting intrinsic evidence. Each citation to a figure incorporates by reference, as if fully set out herein, any associated description or discussion of the figure. Similarly, each citation to a description or discussion of any figure incorporates by reference each figure described or discussed as if fully set out herein.

Each party reserves the right to rely on other portions of the intrinsic record to refute positions taken by the other party during the Markman proceedings.

The parties will exchange extrinsic evidence on which they intend to rely on or before Monday, June 1, 2026.

The citation to any portion of the intrinsic record is not to be construed as an admission by that party that the cited portion defines the term. Moreover, the parties further agree that any party may argue that the cited portions are exemplary, and thus indicate that no special definition governs, and that the ordinary meaning should thus govern.

Additionally, each party reserves the right to assert that its proposed construction is supported by the ordinary meaning of the term, and to introduce extrinsic evidence to the extent the Court permits such evidence.

The following exhibits are attached:

Exhibit	Description
Exhibit A	Joint Claim Construction Chart
Exhibit B	U.S. Patent No. 10,585,959
Exhibit C	U.S. Patent No. 10,867,001
Exhibit D	U.S. Patent No. 11,100,184
Exhibit E	U.S. Patent No. 11,971,937
Exhibit F	Excerpts of Certified File History of U.S. Patent No. 10,585,959
Exhibit G	Excerpts of Certified File History of U.S. Patent No. 11,971,937
Exhibit H	Excerpts of Certified File History of U.S. Patent No. 11,100,184

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EXHIBIT A

AccuSearch Exhibit 2002
Google v. AccuSearch - IPR2026-00286

Exhibit A – Joint Claim Construction Chart

Disputed Terms for Construction

Claim Term / Claims[1]	AccuSearch's Proposed Construction	AccuSearch's Intrinsic Evidence Citations	Google's Proposed Construction	Google's Intrinsic Evidence Citations
"selectable filtering function that, when selected by the user, causes one or more Internet search results referencing webpages that are missing one or more search term elements to be removed from being displayed on the search results webpage on the computing device"[2]	Plain and ordinary meaning. No construction required.	**'959 patent (Ex. B)**[3] ▪ Title ▪ Abstract ▪ Figs. 3, 5, 6, 7, 10, and 11 ▪ 1:40–2:34 ▪ 2:52–3:3 ▪ 3:5–4:7 ▪ 4:61–5:2 ▪ 5:4–6:30 ▪ 9:25—13:59	"An [option/function] that, when selected by the user, causes the system to display a narrowed set of search results by removing, from the original search results, references to webpages that are missing one or more terms from the user's query"	'937 patent[4] (Ex. E) at Abstract; Fig. 10; 3:26-31; 4:23-27; 5:12-16; 6:43-47; 11:36-38; 12:57-13:2; 13:5-59 '184 patent, preliminary amendment (Jan. 8, 2021) (Ex. H) '184 patent claims 4, 9,

[1] Dependent claims not expressly including the Claim Term are not separately listed.

[2] During the parties' exchanges of Claim Terms, AccuSearch objected to combining Claim Terms in the manner Google did. AccuSearch believes that it fails to properly account for the differences among the various claims and leads to grammatical inconsistencies. Nonetheless, AccuSearch includes intrinsic evidence to address what it believes to be the common issue raised by Google's proposed constructions. AccuSearch reserves the right to address the problems with forcing a single construction across differing patents and claims in its briefs.

[3] Because the '959, '001, '184, and '937 patents are members of a common patent family sharing a common specification, citations to the specification herein are made only to the '959 patent. Corresponding disclosures appear in each of the other Asserted Patents. Citations to the "Abstract," however, will refer to the abstract of the applicable patent.

[4] Google provides cites to the '937 patent for convenience and incorporates by reference citations the corresponding text and figures of other asserted patents, which share a specification with the '937 patent.

Claim Term / Claims[1]	AccuSearch's Proposed Construction	AccuSearch's Intrinsic Evidence Citations	Google's Proposed Construction	Google's Intrinsic Evidence Citations
('959, '001, '184 patents) '959 claims: 3, 6, 13, 16, and 22 '001 claims: 9 and 22 '184 claims: 3, 8, 13 "a filtering option, wherein the search engine user's selection of the filtering option causes an updated Internet search user interface to be generated and provided for display on the personal computing device," ('937 patent) '937 claims: 1, 15		**File Histories** ▪ **'937 patent (Ex. G)** AS_00000077–AS_000000101 ▪ **'184 patent (Ex. H)** AS_00000499–AS_00000514, AS_00000562–AS_00000569 **Claims** ▪ **'959 patent (Ex. B)** claims 3, 6, 13, 16, and 22 ▪ **'001 patent (Ex. C)** claims 9 and 22 ▪ **'184 patent (Ex. D)** claims 3, 8, and 13 ▪ **'937 patent (Ex. E)** claims 1, 15, and 29		14, 21, 22 '937 patent claims 6, 8, 10, 20, 22, 24, 34, 36
"descendant webpage[s]" '959 claims: 2, 12, 21 '001 claims: 5, 18 '184 claims: 6, 11, 16,	Plain and Ordinary Meaning. No Construction Required. Alternatively: "Plain and ordinary meaning; not limited to webpages in the same	**'959 patent (Ex. A)** ▪ Abstract ▪ Figs. 3, 5–7, 9–11 ▪ 1:34—3:58 ▪ 4:26–48, 55-60 ▪ 6:31–46 ▪ 7:8–8:22	"A webpage in the same domain as the referenced webpage and that is reachable by clicking an outbound link on the referenced webpage"	'937 patent (Ex. E) at Abstract; Fig. 9; Fig. 10; 2:43-48; 4:52-67; 10:39-67; 11:1-23; 11:27-38; 12:29-56; 13:10-15 '959 patent, second

Claim Term / Claims[1]	AccuSearch's Proposed Construction	AccuSearch's Intrinsic Evidence Citations	Google's Proposed Construction	Google's Intrinsic Evidence Citations
17, 20	domain." Alternatively: "Plain and ordinary meaning, where the plain and ordinary meaning means 'webpages linked from the referenced webpage.'"	▪ 9:25–11:30 ▪ 12:5–13:59 **File History** ▪ **'959 patent (Ex. F)** AS_00000766–AS_00000777 **Claims** ▪ **'001 patent (Ex. C)** claims 5 and 18 ▪ **'184 patent (Ex. D)** claims 6, 11, 16, 17, and 20 ▪ **'959 patent (Ex. B)** claims 2, 12, and 21 ▪ **'937 patent (Ex. E)** claims 5, 9, 19, 23, and 33		preliminary amendment (Oct 4, 2019) (Ex. F)
"Internet search" '959 claims: 1, 3–4, 6–7, 10–11, 13–14, 16–17, 19–20, 22–23, and 25 '001 claims: 1, 3, 5, 7, 9–11, 13–14, 16, 18,	plain and ordinary meaning, where the plain and ordinary meaning refers to a general-purpose Internet search, such as one offered by an Internet search engine, rather than a search constrained to a particular vendor and product offering (e.g., search	**'959 patent (Ex. B)** ▪ Title ▪ Abstract ▪ Figs. 1–11 ▪ 1:32–4:7 ▪ 5:5–5:50 ▪ 6:31—8:22 ▪ 9:10–10:24 ▪ 11:4–13:18	Plain and ordinary meaning	'937 patent (Ex. E) at Fig. 8a; Fig. 8b; Fig. 9; Fig. 10; 2:19-23; 3:42-51; 4:4-11; 6:33-43; 6:48-52; 11:39-67; 12:1-8; 12:18-23; 12:41-51; 13:9-15

Claim Term / Claims[1]	AccuSearch's Proposed Construction	AccuSearch's Intrinsic Evidence Citations	Google's Proposed Construction	Google's Intrinsic Evidence Citations
20, 22–24, and 26 '184 claims: 1, 7, 12, 17, and19 '937 claims: 1, 2, 4, 6, 8, 10, 13, 15–16, 18, 20, 22, 24, 27, 29–30, 32, 34, 36–37, 39	offered on amazon.com constrained to products and services offered by Amazon).	▪ 14:13–51 **File History** ▪ **'937 patent (Ex. G)** AS_00000077–AS_00000101 **Claims** ▪ **'959 patent (Ex. B)** claims 1, 3–4, 6–7, 10–11, 13–14, 16–17, 19–20, 22–23, and 25 ▪ **'001 patent (Ex. C)** claims 1, 3, 5, 7, 9–11, 13–14, 16, 18, 20, 22–24, and 26 ▪ **'184 patent (Ex. D)** claims 1, 7, 12, 17, and19 ▪ **'937 patent (Ex. E)** claims 1, 2, 4, 6, 8, 10, 13, 15–16, 18, 20, 22, 24, 27, 29–30, 32, 34, 36–37, and 39		