

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

BLUESTONE VENTURES INC.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

No. 7:25-cv-00569-DC-DTG

Jury Trial Demanded

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Court’s Standing Order Governing Patent Proceedings, Plaintiff Bluestone Ventures Inc. (“Bluestone”) and Defendant Google LLC (“Google”) hereby submit the following Joint Claim Construction Statement.

Agreed Constructions

There are no agreed constructions.

Disputed Constructions

#	Term	Proposed By	Bluestone’s Proposed Construction	Google’s Proposed Construction
1	Preamble (i.e., “A method of controlling a mobile computing apparatus to dynamically predict and display a route of travel of the mobile computing apparatus, wherein the mobile computing apparatus includes a GPS receiver, a memory to store map data, a display, and at least one processor, the method comprising”)	Google	Plain and ordinary meaning	The preamble is limiting.

#	Term	Proposed By	Bluestone's Proposed Construction	Google's Proposed Construction
	'341 Patent, Claim 11			
2	Preamble (i.e., “A method for dynamically calculating and displaying multiple travel routes for a mobile device and for tracking the mobile device along the multiple travel routes, the method performed by a navigation system including the mobile device and one or more servers, the computer program product comprising a non-transitory computer readable medium including computer instructions that when executed by at least one processor of the navigation system cause the navigation system to:”) '925 Patent, claim 9	Google	Plain and ordinary meaning	The preamble is limiting.
3	“the map data” '208 Patent, claim 1	Google	Not indefinite. Plain and ordinary meaning; no construction necessary. Alternatively, to the extent the Court finds a construction would be helpful: “the map data previously referenced in the claim, i.e., the same collection of map information to which the starting location, destination location, and possible routes are referenced”	Indefinite
4	“display on the map a partial route of travel of the mobile	Google	Not indefinite	Indefinite

#	Term	Proposed By	Bluestone's Proposed Construction	Google's Proposed Construction
	computing apparatus from the first position to the second position predicted by the at least one processor based on the first one of the plurality of position updates and the one or more metrics associated with the mobile computing apparatus” '341 Patent, claim 11		Plain and ordinary meaning	
5	“display on the map a partial route of travel of the mobile computing apparatus from the first position to the second position based on the first position data and the one or more metrics associated with the mobile computing apparatus” '337 Patent, claim 1	Google	Not indefinite Plain and ordinary meaning	Indefinite

DATED: September 21, 2026

Respectfully submitted,

/s/ Raymond W. Mort, III (signed with permission)

Raymond W. Mort, III (TX Bar No. 00791308)
 DAIGNAULT IYER LLP
 111 Congress Ave, Suite 500
 Austin, TX 78701
 (512) 865-7950
 rmort@daignaultiyer.com

Oded Burger
 DAIGNAULT IYER LLP
 8229 Boone Boulevard, Suite 450
 Vienna, VA 22182
 (917) 698-2508
 oburger@daignaultiyer.com

/s/ Andrew T. Radsch

Brian C. Banner (TX Bar No. 24059416)
 SLAYDEN GRUBERT BEARD PLLC
 401 Congress Avenue, Suite 1650
 Austin, TX 78701
 (512) 402-3550
 bbanner@sbgfirm.com

Andrew T. Radsch (*admitted to WDTX*)
 Susannah M. L. Gagnon (*pro hac vice*)
 Kevin Han Yang (*admitted to WDTX*)
 MUNGER, TOLLES & OLSON LLP
 560 Mission Street, 27th Floor
 San Francisco, CA 94105

(415) 512-4000
Attorney for Plaintiff Bluestone Ventures Inc. andrew.radsch@mto.com
susannah.gagnon@mto.com
kevin.yang@mto.com

Heather E. Takahashi (*admitted to WDTX*)
Adam R. Lawton (*pro hac vice*)
Adam W. Kwon (*admitted to WDTX*)
Kaitlyn M. Rubcich (*pro hac vice*)
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, California 90071
(213) 683-9100
heather.takahashi@mto.com
adam.lawton@mto.com
adam.kwon@mto.com
katie.rubcich@mto.com

Andrew J. Slottje (*pro hac vice*)
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Avenue NW, Suite 500E
Washington, DC 20001
(202) 220-1100
andrew.slottje@mto.com

Attorneys for Defendant Google LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on counsel of record who are deemed to have consented to electronic service via electronic filing using the Court's CM/ECF system.

Dated: September 21, 2026

/s/ Andrew T. Radsch
Andrew T. Radsch