

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

NOBOTS LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 1:22-cv-585-ABD

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

Plaintiff Nobots LLC (“Nobots” or “Plaintiff”) and Defendant Google LLC (“Google” or “Defendant”) hereby submit the following Joint Claim Construction Statement.

Disputed Constructions

#	Term	Proposed By	Plaintiff’s Proposed Construction	Defendant’s Proposed Construction
1	<u>“repeating a)-c) and comparing the first instance of the value of d) to the second instance of the value of d)”</u> ’008 Patent, Claim 18	Joint	“repeating b)-d) and comparing the first instance of the value of e) to the second instance of the value of e)”	Indefinite
2	<u>Preambles of Independent Claims 1, 16, and 22</u> ’014 Patent, Claims 1, 16, and 22	Defendant	Plain and ordinary meaning	The preambles of the independent claims of the ’014 patent are limiting as to requiring “a value indicative of a likelihood that a human or autonomic computer application is operating the client computer” (claim 1) and “a value indicating a judgment of whether a human or an autonomic computer application operating a client computer” (claims 16 and 22)
3	<u>“active data”</u> ’014 Patent, Claims 1, 4, 6, 9–12, 15, 16, 18, 19, 22, and 24	Defendant	Plain and ordinary meaning with the explanation that “active data includes, without limitation, pointing device vector movements and/or cadence, key stroke combinations and/or cadence, time differentials between stimulus (e.g., display of dialog box, radio button, form field, etc., and/or generation of sound) and user response (e.g.,	“data acquired from a computing device user’s interactions therewith and within the computing environment where such data is not normally stored (logged) or transmitted to a remote location, including, without limitation, pointing device vector movements and/or cadence, key stroke combinations and/or cadence, time differentials

#	Term	Proposed By	Plaintiff's Proposed Construction	Defendant's Proposed Construction
			input into dialog box, selection of radio button, completion of form field, new page display request rates, etc., and/or input response to sound), and similar metrics.”	between stimulus (e.g., display of dialog box, radio button, form field, etc., and/or generation of sound) and user response (e.g., input into dialog box, selection of radio button, completion of form field, new page display request rates, etc., and/or input response to sound), and similar metrics”
4	“<u>passive data</u>” ’014 Patent, Claims 1, 4, 9, 11, 12, 15, 16, 18, 19, 22, and 24	Defendant	Plain and ordinary meaning with the explanation that “passive data includes, without limitation, browser cookies, destination IP histories, originating IP address, originating IP address traffic data, originating IP address physical location, third party data regarding abusers (including originating IP addresses and physical locations), etc.”	“data available from a computing device user’s interactions therewith and within the computing environment where such data is normally stored (logged) or transmitted to a remote location, including, without limitation, browser cookies, destination IP histories, originating IP address, originating IP address traffic data, originating IP address physical location, third party data regarding abusers (including originating IP addresses and physical locations), etc.”

Dated: July 27, 2026

Respectfully submitted,

/s/ Andres Healy

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of **JOINT CLAIM CONSTRUCTION STATEMENT** on July 27, 2026, via the Court's CM/ECF system.

/s/ Rebecca M. Ho

Rebecca M. Ho