UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

HEADWATER RESEARCH LLC, *Plaintiff,* v. GOOGLE LLC, *Defendant*.	Case No. 7:25-cv-369-DC-DTG **JURY TRIAL DEMANDED**

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Scheduling Order as modified (Dkt. 88), Plaintiff Headwater Research LLC ("Plaintiff" or "Headwater") and Defendant Google LLC ("Defendant" or "Google") respectfully submit this Joint Claim Construction Statement in anticipation of the claim construction hearing scheduled for August 26, 2026 (Dkt. 91). The asserted patents are U.S. Patent Nos. 8,639,935 (the "'935 patent"), 9,609,510 (the "'510 patent"), 9,973,930 (the "'930 patent"), 11,096,055 (the "'055 patent"), 11,405,429 (the "'429 patent"), 11,966,464 (the "'464 patent"), and 11,985,155 (the "'155 patent").

I. AGREED-UPON CONSTRUCTIONS

Claim Language	Agreed Construction
"device agent[s]" '930 patent, claim 1; '935 patent, claims 1, 3, 4, 9, 16, 18, 20, 21, 23, 25, 27-29	a piece of software on the end-user device that performs certain functions for other software
"A non-transitory computer-readable storage medium storing one or more machine-executable instructions that, when executed by one or more processors of a network system, cause the one or more processors to:"	Preamble limits the claim

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’935 patent, claim 1	
“service control link” ’935 patent, claims 1, 5, 11, 21, 22, 24, 26, 27, 29	a communication link with the service controller for service control messages
“A method of operating a wireless end-user device having a secure modem, a secure execution environment and a secure memory partition, the method comprising:” ’464 patent, claim 1	Preamble limits the claim

II. DISPUTED CLAIM TERMS

Defendant proposed each of the following terms. Plaintiff did not propose any terms.

Claim Language	Plaintiff’s Construction	Defendant’s Construction
“subscriber [information/identity][1] module (SIM)” ’510 patent, claims 22, 24; ’935 patent, claim 10; ’055 patent, claim 11; ’155 patent, claims 3, 12	No construction is necessary; the term should be given its plain and ordinary meaning	Subscriber Identity Module as described in the ETSI/3GPP standards in existence at the time of the claimed invention

[1] The Parties agree that “subscriber information module” and “subscriber identity module” should be construed the same way, but disagree on what that construction should be.

Claim Language	Plaintiff's Construction	Defendant's Construction
"A method for use by a communications device including a wide area network port configured to connect the communications device to a wide area network, and further including a secure memory, a secure execution environment configured to be inaccessible to a user application software, and a secure data path processing agent, the method comprising" '155 patent, claim 10	Limiting except for "configured to be inaccessible to a user application software"	Limits the claim

Dated: July 10, 2026

/s/ Clement Naples

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served on July 10, 2026 with a copy of this document via the Court's CM/ECF system.

/s/ Marc Fenster
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