

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

HEADWATER RESEARCH LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

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Case No. 7:25-cv-00376-DC-DTG

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Scheduling Order (Dkt. 41), Plaintiff Headwater Research LLC and Defendant Google LLC submit this Joint Claim Construction Statement regarding U.S. Patent Nos. 8,023,425 (the “’425 Patent”), 8,631,102 (the “’102 Patent”), and 8,799,451 (the “’451 Patent”).

I. AGREED-UPON CLAIM TERMS

Claim Term	Agreed Construction
N/A	N/A

II. DISPUTED CLAIM TERMS

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

Claim Term	Plaintiff’s Construction	Defendant’s Construction
“user response” ’425 Patent, claims 1, 2, 3	No construction is necessary; each term’s plain and ordinary meaning should apply.	“response from the user of the first end point device [to the notification message including an offer to activate the access network forwarding service]”

“[the] one or more processors” ’102 Patent, claims 1, 5, 7, 10, 13, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28	No construction is necessary; each term’s plain and ordinary meaning should apply.	These terms must have the same meaning in each instance that they appear in the claims.
“[the] one or more other devices” ’102 Patent, claims 1, 15, 16, 20	The Court should give the general antecedent basis instruction: “Subsequent use of the definite articles ‘the’ or ‘said’ in a claim refers back to the same term recited earlier in the claim”	
“[the] at least one processor” ’451 Patent, claims 1, 5, 6, 7, 8, 11, 12, 13, 17, 24, 25, 26, 27, 28, 33, 43, 44, 52, 57, 62		

DATED: June 5, 2026

Respectfully Submitted,

/s/ Marc Fenster

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, the undersigned certifies that on June 5, 2026, all counsel of record who have appeared in this case and have consented to electronic service, were served with the foregoing document via the Court's CM/ECF system.

/s/ Robert W. Unikel
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