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

Clement Naples (admitted *Pro Hac Vice*)
Jennifer Rabbino (admitted *Pro Hac Vice*)
CLEARY GOTTLIEB STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
cnaples@cgsh.com
jrabbino@cgsh.com
Telephone: (212) 225-2000
Facsimile: (212) 225-3999

Gregory Sobolski (admitted *Pro Hac Vice*)
Thomas W. Yeh (admitted *Pro Hac Vice*)
Lucas Lonergan (admitted *Pro Hac Vice*)
CLEARY GOTTLIEB STEEN & HAMILTON LLP
650 California Street, Suite 2400
San Francisco, CA 94108
gsobolski@cgsh.com
tyeh@cgsh.com
llonergan@cgsh.com
Telephone: (415) 796-4400
Facsimile: (415) 796-4499

Sami Al-Marzoog (admitted *Pro Hac Vice*)
Steven Peters (admitted *Pro Hac Vice*)
Jasmine Zhu (admitted *Pro Hac Vice*)
CLEARY GOTTLIEB STEEN & HAMILTON LLP
2112 Pennsylvania Avenue, N.W.
Washington, DC 20037
salmarzoog@cgsh.com
speters@cgsh.com
jazhu@cgsh.com
Telephone: (202) 974-1500
Facsimile: (202) 974-1999

Nathaniel St. Clair, II
Texas State Bar No. 24071564
nstclair@jw.com
2323 Ross Avenue, Suite 600
Dallas, Texas 75201
Telephone: (214) 953-6000
Facsimile (214) 953-5822

Respectfully submitted,

/s/ Marc Fenster

Marc Fenster
CA State Bar No. 181067
Email: mfenster@raklaw.com
Reza Mirzaie
CA State Bar No. 246953
Email: rmirzaie@raklaw.com
Brian Ledahl
CA State Bar No. 186579
Email: bledahl@raklaw.com
Dale Chang
CA State Bar No. 248657
Email: dchang@raklaw.com
Kristopher Davis
CA State Bar No. 329627
Email: kdavis@raklaw.com
James Pickens
CA State Bar No. 307474
Email: jpickens@raklaw.com
James S. Tsuei
CA State Bar No. 285530
Email: jtsuei@raklaw.com
Jason M. Wietholter
CA State Bar No. 337139
Email: jwietholter@raklaw.com
Minna Jay
CA State Bar No. 305941
Email: mjay@raklaw.com
Ryan Lundquist
CO State Bar No. 56449
Email: rlundquist@raklaw.com
RUSS AUGUST & KABAT
12424 Wilshire Blvd. 12th Floor
Los Angeles, CA 90025
Telephone: 310-826-7474

Qi (Peter) Tong
TX State Bar No. 24119042
Email: ptong@raklaw.com
RUSS AUGUST & KABAT
8080 N. Central Expy., Suite 1503
Dallas, TX 75206
Telephone: 310-826-7474

Attorneys for Defendant
Google LLC

Attorneys for Plaintiff
Headwater Research LLC

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
Marc Fenster