

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IMPROVED SEARCH LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 15-262 (SLR) (SRF)
	)	
AOL INC.,	)	
	)	
Defendant.	)	

**AMENDED JOINT CLAIM CONSTRUCTION STATEMENT**

Plaintiff Improved Search LLC (“Improved Search”) and Defendant AOL Inc. (“AOL”) submit the following Amended Joint Claim Construction Statement, updating the Joint Claim Construction Statement submitted on October 4, 2016 [D.I. 51] to reflect the terms on which the parties have reached agreement, and the terms over which there remains a dispute.

**a. The Construction of Terms on Which the Parties Agree**

The parties have agreed upon the constructions of the following terms of the asserted claims:

Claim Term/Phrase	Agreed Construction
1. receiving through an input device, a query /receiving from the user through an input device a query (’101 Patent, Claim 1; ’154 Patent Claim 1)	receiving on a user’s computer a query from an input device connected to that computer
2. first language (’101 Patent Claims 1, 2, 4, 25, 27, 28; ’154 Patent, Claims 1, 7)	language in which the query is entered by a user
3. content word (’101 Patent, Claim 1; ’154 Patent, Claims 1, 7)	a word other than a preposition, article, or pronoun

Claim Term/Phrase	Agreed Construction
4. search in the second language/searching in the second language (’101 Patent, Claim 1; ’154 Patent, Claims 1, 7)	searching using only words in the second language including words from other languages that are used in the second language
5. advertising cues (’154 Patent, Claims 1, 7)	advertisements, as well as signals or references that direct a user to an advertisement
6. “means to send the search results and the matching advertising cues to the user’s computer screen” (’154 Patent, Claim 7)	<i>Means Plus Function</i> Function: to send the search results and the matching advertising cues to the user’s computer screen Structure: server and/or browser or equivalents

**b. Proposed Constructions of Disputed Terms**

The Parties’ proposed constructions of disputed terms are provided in the chart below.

Claim Term, Phrase or Clause	Improved Search’s Proposed Construction	AOL’s Proposed Construction
1. Translating (’101 Patent, Claims 1, 25; ’154 Patent, Claims 1, 7)	changing text from one language into an equivalent text in a different language	changing text from one language into an equivalent text in a different language pre-selected by the user
2. second language (’101 Patent, Claims 1, 5, 24, 27, 28; ’154 Patent, Claims 1, 7)	language different from the first language, including different dialects of the first language	language different from the first language
3. contextual search / contextually searching (’101 Patent, Claims 1, 24, 25; ’154 Patent Claims 1, 7)	identification of/identifying relevant documents from the domain-unlimited set of documents available on the World Wide Web, based on words contained in the documents.	identification of relevant documents based on words contained in those documents

Claim Term, Phrase or Clause	Improved Search's Proposed Construction	AOL's Proposed Construction
<p>4. dialectal standardization / dialectally standardizing / dialectally standardized</p> <p>('101 Patent, Claim 1; '154 Patent, Claims 1, 7)</p>	<p>to map keywords from different styles and dialects into standard and less ambiguous keywords</p>	<p>changing a word to a more standard and less ambiguous word in a different dialect of the same language, if such a word is identified</p>
<p>5. means for receiving from the user through an input device a query in the first language</p> <p>('154 Patent, Claim 7)</p>	<p><i>Means Plus Function:</i></p> <p>Function: receiving from the user through an input device a query in a first language</p> <p>Structure: Keyboard or equivalent</p>	<p><i>Means Plus Function:</i></p> <p>Indefinite (no disclosed structure)</p>
<p>6. dialectal controller for dialectally standardizing a content word extracted from the query</p> <p>('154 Patent, Claim 7)</p>	<p>This term is not governed by 35 U.S.C. § 112(6). If it is ruled to be so governed, Improved Search submits that the following structures provide the function of "dialectally standardizing a content word extracted from the query":</p> <p>Server or equivalent</p>	<p><i>Means Plus Function:</i></p> <p>Indefinite (no disclosed structure)</p>
<p>7. means to search the database of the advertising cues based on the relevancy to the translated content word</p> <p>('154 Patent, Claim 7)</p>	<p><i>Means Plus Function:</i></p> <p>Function: to search the database of the advertising cues based on the relevancy to the translated content word</p> <p>Structure: Server or equivalent</p>	<p><i>Means Plus Function:</i></p> <p>Indefinite (no disclosed structure)</p>

FARNAN LLP

*/s/ Michael J. Farnan*

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