

Patent(s), Claim(s)	Term/Phrase	Touchstream's Proposed Construction	Cross-reference to Related Paragraphs of Touchstream's Infringement Contentions	Vizbee's Proposed Construction	C Re V
'251 patent, claims 1, 8, 9, 11, 19, 20, 22 '528 patent, claims 1, 12, 16, 25, 27	"synchronization code"	No construction necessary. This term should be given its plain and ordinary meaning, which is "an identifier that can be used to facilitate a connection between two or more devices."	Pages 2, 3, 10, 16, and 17 of Exhibit A to Touchstream's Infringement Contentions (Exhibit 4 at pp. 4-2, 4-3, 4-10, 4-16, and 4-17). Pages 3, 6, 13 and 19 of Exhibit B to Touchstream's Infringement Contentions (Exhibit 4 at pp. 4-25, 4-28, 4-35, and 4-41).	"a unique identifier associated with a particular display device [or content presentation device]"	Exl Viz Cor 10, Exl Viz Cor 13, Exl Viz Cor 12, Exl Viz Cor 10, Exl Viz Cor 8-1 Exl Viz

Exhibit 1 to Joint Disputed Claim Terms Charts for
U.S. Pat. Nos. 8,356,251 (“the ’251 patent”), 8,782,528 (“the ’528 patent”) and 8,904,289 (“the ’289 patent”)
Touchstream Technologies, Inc. v. Vizbee, Inc. Case No. 1:17-cv-06247-PGG

Patent(s), Claim(s)	Term/Phrase	Touchstream’s Proposed Construction	Cross-reference to Related Paragraphs of Touchstream’s Infringement Contentions	Vizbee’s Proposed Construction	Comments
					Cor 9, 1
’251 patent, claims 1, 4, 11-15, 22 ’528 patent, claims 1-7, 10, 16-24, 27, 28, 30 ’289 patent, claims 1, 5, 6, 10, 15, 16 ¹	“storing”/“store”	No construction necessary. This term should be given its plain and ordinary meaning, which is “placing in a location for subsequent use.”	Pages 3, 6, 10, and 14-16 of Exhibit A to Touchstream’s Infringement Contentions (Exhibit 4 at pp. 4-3, 4-6, 4-10, and 4-13 to 4-16). Pages 6, 16, 19, and 22 of Exhibit B to Touchstream’s Infringement Contentions (Exhibit 4 at pp. 4-28, 4-38, 4-41, and 4-44). Pages 5, 9, 11, 13, and 15-17 of Exhibit C to Touchstream’s	Plain and ordinary meaning, which is: “persistently retaining data or instructions to enable subsequent retrieval” / “to persistently retain data or instructions to enable subsequent retrieval”	Exh 9, 1 Vizbee’s Cor 20, Exh 19-35- Vizbee’s Cor 19, 62, Vizbee’s

¹ Touchstream reserves its right to object to Vizbee’s identification of claims 4, 14, and 15 of the ’251 patent, claim 30 of the ’528 patent, and claims 5 and 15 of the ’289 patent on the grounds that these claims were not identified in the claim constructions pursuant to Section 8(b) of the Court’s Case Management Plan and Scheduling Order.

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			Infringement Contentions (Exhibit 4 at pp. 4-51, 4-55, 4-57, 4-59, and 4-61 to 4-63).		Cor 11, 26. Exl Viz Cor 8, 1 30, Exl Viz Cor 11, 30, Exl Viz Cor 7, 1 Exl Viz Cor 9, 1 Exl

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Patent(s), Claim(s)	Term/Phrase	Touchstream’s Proposed Construction	Cross-reference to Related Paragraphs of Touchstream’s Infringement Contentions	Vizbee’s Proposed Construction	Comments
					Vizbee’s Construction 9-1
’251 patent, claims 1, 3, 11-13, 22 ’528 patent, claims 1, 9, 14, 16, 24, 27, 28, 29 ’289 patent, claims 1, 2, 4, 6, 8, 10, 12, 14, 16	“programming code”	No construction necessary. This term should be given its plain and ordinary meaning, which is “instructions for a computer.”	Pages 5, 6, 8, 14-15, 17 and 18 of Exhibit A to Touchstream’s Infringement Contentions (Exhibit 4 at pp. 4-5, 4-6, 4-8, 4-13 to 4-15, 4-17, and 4-18). Pages 6-8, 10, 12, 13, 15-18, 20, 21, and 23 of Exhibit B to Touchstream’s Infringement Contentions (Exhibit 4 at pp. 4-28 to 4-30, 4-32, 4-34, 4-35, 4-37 to 4-40, 4-42, 4-43, and 4-45). Pages 6, 7, 10, 11, 13, 14, 17, and 18 of	“display-device- or media-player-specific executable code”	Exhibit 20, Vizbee’s Construction 20, Exhibit 18, Vizbee’s Construction 18, 37. Exhibit 18, Vizbee’s Construction 18, 54, Exhibit 10, Vizbee’s Construction 10, 31.

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Patent(s), Claim(s)	Term/Phrase	Touchstream's Proposed Construction	Cross-reference to Related Paragraphs of Touchstream's Infringement Contentions	Vizbee's Proposed Construction	Comments Re Vizbee's
			Exhibit C to Touchstream's Infringement Contentions (Exhibit 4 at pp. 4-52, 4-53, 4-56, 4-57, 4-59, 4-60, 4-63, and 4-64).		Exhibit C to Vizbee's Contentions 9, 10, 11, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760,<



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