

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                               |   |                     |
|-------------------------------|---|---------------------|
| CISCO SYSTEMS, INC. and CISCO | ) |                     |
| TECHNOLOGY, INC.,             | ) |                     |
|                               | ) |                     |
| Plaintiffs,                   | ) |                     |
|                               | ) | C.A. No.: 25-271-MN |
| v.                            | ) |                     |
|                               | ) |                     |
| INTELLIGENT PROTECTION        | ) |                     |
| MANAGEMENT CORP.              | ) |                     |
|                               | ) |                     |
| Defendant.                    | ) |                     |

**DEFENDANT’S CLAIM TERMS FOR CONSTRUCTION**

Pursuant to the Scheduling Order, Defendant Intelligent Protection Management Corp. (“IPM”) identifies the below claim term constructions. Considering that the Joint Claim Construction Chart is not due until August 21, 2026 and discovery is ongoing, IPM reserves the right to adjust this list and the constructions therein in response to the list provided by Plaintiff or in light of any additional information that becomes apparent during the course of discovery.

**U.S. Patent No. 8,830,293**

| Claim # | Term  | Proposed Construction   |
|---------|---|---|
| All     | Video frames / frame  | One of a series of discrete images forming a real-time video stream   |
| 1       | the order of the scaling, removing, and superimposing steps in “wherein the combining comprises:” | <p>(1) scaling the video frames of the first video stream and repositioning in a first direction the resulting pictures in the video frames of the first video stream to produce a first sequence of scaled video frames; then</p> <p>(2) removing the background image in the first sequence of scaled video frames to produce first background separated video frames to be displayed in the anterior portion of the combined frames of the combined video stream; and then</p> |

|    |  |   |
|----|--|---|
|    |  | (3) superimposing the first background separated video frames onto corresponding ones of the video frames of the second video stream to produce combined video frames of the combined video stream  |
| 3  | the order of the second scaling, removing, and superimposing steps in “wherein combining comprises:”   | <p>(1) scaling the video frames of the second video stream and repositioning in a second direction the resulting pictures in the video frames of the second video stream to produce a second sequence of scaled video frames; then</p> <p>(2) extending the background image in the second sequence of scaled video frames to produce background extended video frames to be displayed in the posterior portion of the combined frames of the combined video stream; and then</p> <p>(3) superimposing the first background separated video frames onto corresponding ones of background extended video frames to produce combined video frames of the combined video stream.</p> |
| 5  | the order of the second scaling, removing, and superimposing steps in “wherein combining further comprises:”   | <p>(1) removing the background image in the video frames of the first and second video streams to produce first and second background separated video frames; then</p> <p>(2) generating supplemental background image video frames that comprise a supplemental background image; and then</p> <p>(3) superimposing corresponding ones of the first background separated video frames and the second background separated video frames onto corresponding ones of the supplemental background video frames to produce the combined video frames of the combined video stream.</p>  |
| 10 | the order of the scaling, removing, and superimposing steps in “wherein the at least one data processor is configured to combine the subject images of video frames by:” | <p>(1) scaling the video frames of the first video stream and repositioning in a first direction the resulting pictures in the video frames of the first video stream to produce a first sequence of scaled video frames; then</p> <p>(2) removing the background image in the first sequence of scaled video frames to produce first background separated video frames to be displayed</p>   |

|    |  |  |
|----|--|--|
|    |  | <p>in the anterior portion of the combined frames of the combined video stream; and then</p> <p>(3) superimposing the first background separated video frames onto corresponding ones of the video frames of the second video stream to produce combined video frames of the combined video stream.</p>  |
| 11 | <p>the order of the second scaling, removing, and superimposing steps in “wherein the at least one data processor is configured to combine the subject images of video frames by:”</p> | <p>(1) scaling the video frames of the second video stream and reposition in a second direction the resulting pictures in the video frames of the second video stream to produce a second sequence of scaled video frames; then</p> <p>(2) extending the background image in the second sequence of scaled video frames to produce background extended video frames to be displayed in the posterior portion of the combined frames of the combined video stream; and then</p> <p>(3) superimposing the first background separated video frames onto corresponding ones of background extended video frames to produce combined video frames of the combined video stream.</p>               |
| 13 | <p>the order of the scaling, removing, and superimposing steps in “wherein the subject images are combined by:”</p>  | <p>(1) scaling the video frames of the first video stream and repositioning in a first direction the resulting pictures in the video frames of the first video stream to produce a first sequence of scaled video frames; then</p> <p>(2) removing the background image in the first sequence of scaled video frames to produce first background separated video frames to be displayed in the anterior portion of the combined frames of the combined video stream; and then</p> <p>(3) superimposing the first background separated video frames onto corresponding ones of the video frames of the second video stream to produce combined video frames of the combined video stream;</p> |
| 15 | <p>the order of the second scaling, removing, and superimposing steps in</p>   | <p>(1) scale the video frames of the second video stream and reposition in a second direction the resulting pictures in the video frames of the second video</p>   |

|    |   |   |
|----|---|---|
|    | “wherein the logic that combines is configured to:”   | <p>stream to produce a second sequence of scaled video frames;</p> <p>(2) extend the background image in the second sequence of scaled video frames to produce background extended video frames to be displayed in the posterior portion of the combined frames of the combined video stream; and</p> <p>(3) superimpose the first background separated video frames onto corresponding ones of background extended video frames to produce combined video frames of the combined video stream.</p>   |
| 17 | the order of the second scaling, removing, and superimposing steps in “wherein the logic that combines is configured to:” | <p>(1) remove the background image in the video frames of the first and second video streams to produce first and second background separated video frames; then</p> <p>(2) generate supplemental background image video frames that comprise a supplemental background image; and then</p> <p>(3) superimpose corresponding ones of the first background separated video frames, and the second background separated video frames onto corresponding ones of the supplemental background video frames to produce the combined video frames of the combined video stream.</p> |

**U.S. Patent No. 8,941,708**

| <b>Claim #</b> | <b>Term</b>              | <b>Proposed Construction</b>  |
|----------------|--------------------------|---|
| All            | axis                     | a continuous or discontinuous line, having a start value, an end value, and a number of intermediate values   |
| All            | Composite video signal   | a video signal being a spatial mix of one or more video conference streams  |
| All            | Video conference streams | multimedia streams originating from an endpoint   |
| All            | Video composing unit     | a device or software running on a processing device configured to receive a number, P, of video conference streams and mix the streams together into one or more composite video streams, and output the one or more composite video streams to one or more endpoints |

|               |  |   |
|---------------|--|---|
| All           | Layout   | a template or pattern for defining the composition of a composite video signal  |
| 1, 10, 16, 17 | “an object configured to be moved by a user along an axis”                                   | A moveable user-interface object whose position is limited to a single axis and whose position on that axis affects composition of the composite video signal |
| 1             | “associating a plurality of predefined layouts ... with respective intervals along the axis” | Assigning each member of the plurality of predefined layouts to a specific position or specific range of positions on an interval                             |
| 1 and 17      | “a layout, ... associated with an interval”  | A layout assigned to a specific interval on the axis  |
| 10 and 16     | “associating a plurality of predefined layouts with respective intervals along the axis”     | Assigning each member of the plurality of predefined layouts to a specific position or specific range of positions on the axis                                |
| 10 and 16     | “the layout, ... associated with the interval”   | A layout assigned to a specific position or range of positions on the axis  |
| 17            | “associate a plurality of predefined layouts with respective intervals along the axis”       | Assigning each member of the plurality of predefined layouts to a specific position or specific range of positions on the axis                                |

Dated: December 16, 2025

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 16, 2025, a copy of the foregoing was served via email on the following counsel of record:

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