

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

SONOS, INC.,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 24-131-JNR
v.	)	
	)	
LINKPLAY TECHNOLOGY INC.,	)	JURY TRIAL DEMANDED
LINKPLAY TECHNOLOGY, INC.,	)	
NANJING,	)	
	)	
Defendants.	)	

**JOINT CLAIM CONSTRUCTION CHART**

Pursuant to the Court’s Scheduling Order, Sonos, Inc. (“Sonos”) and Linkplay Technology Inc. and Linkplay Technology, Inc., Nanjing (collectively, “Linkplay”) hereby submit this Joint Claim Construction Chart, which addresses the claim construction positions of the parties regarding U.S. Patent Nos. 7,571,014 (“’014 Patent”), 9,164,532 (“’532 Patent”), 9,213,357 (“’357 Patent”), 10,146,498 (“’498 Patent”), 10,541,883 (“’883 Patent”), and 10,853,023 (“’023 Patent”) (collectively, the “Asserted Patents”).

The parties have agreed to the following constructions:

Patent Nos.	Term/Phrase	Construction
9,164,532 9,213,357 10,146,498	device clock information/ clock time information/ clock timing information	“information representing a time value indicated by a device’s clock”
7,571,014 9,213,357 10,541,883 10,853,023	player/playback device	“data network device configured to process and output audio”
7,571,014 9,213,357 10,853,023	network interface	“physical component of a device that provides an interconnection with a data network”

The table below identifies claim terms and phrases whose constructions are in dispute and includes each party’s respective construction/position and corresponding support from the respective intrinsic record.

Copies of the Asserted Patents and other portions of the intrinsic records of the Asserted Patents relied upon by the parties are attached, as follows:

<b>Ex. #</b>	<b>Description</b>	<b>Ex. #</b>	<b>Description</b>	<b>Ex. #</b>	<b>Description</b>
1	US 7,571,014	20	US 9,195,258	39	US 11,301,207
2	US 9,164,532	21	US 9,207,905	40	US 11,550,539
3	US 9,213,357	22	US 9,218,017	41	US 10,613,817
4	US 10,146,498	23	US 9,727,303	42	US 11,934,739
5	US 10,541,883	24	US 9,727,304	43	US 10,439,896
6	US 10,853,023	25	US 9,733,893	44	US 10,965,545
7	Provisional App. No. 60/490,768	26	US 10,157,033	45	US 11,456,928
8	Provisional App. No. 60/577,284	27	US 10,175,930	46	9,176,520 file history excerpts
9	7,571,014 file history excerpts	28	US 10,175,932	47	9,195,258 file history excerpts
10	7,571,014 reexam file history excerpts	29	US 10,185,541	48	9,218,017 file history excerpts
11	9,164,532 file history excerpts	30	US 10,209,953	49	10,296,283 file history excerpts
12	9,213,357 file history excerpts	31	US 10,216,473	50	10,613,817 file history excerpts
13	9,213,357 reexam file history excerpts	32	US 10,228,902	51	8,938,312 file history excerpts
14	10,146,498 file history excerpts	33	US 10,296,283	52	US 6,611,537
15	10,541,883 file history excerpts	34	US 10,445,054	53	8,234,395 file history excerpts
16	10,853,023 file history excerpts	35	US 10,545,723	54	9,182,777 file history excerpts
17	US 8,234,395	36	US 10,754,613	55	US 8,938,312
18	US 9,176,520	37	US 10,963,215	56	9,681,223 file history excerpts
19	US 9,182,777	38	US 11,200,025	57	9,686,606 file history excerpts

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**Joint Claim Construction Chart**

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
1	<p>“zone player”</p> <p><b>Sonos's Explanation:</b> resolution of the dispute for this term will not affect any current issue in the case</p> <p><b>Linkplay's Explanation:</b> resolution of the dispute for this term may narrow the scope and affect valuations of alleged infringement</p>	'532, '498	<p>“data network device configured to process and output audio” as construed by Judge Andrews in <i>Sonos v. D&amp;M Holdings</i> (see 14-cv-1330, D.I. 219)</p> <p><u>'532/'498 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● U.S. Provisional App. No. 60/490,768 dated 07/28/03, at pp. 1-11, Figs. 1-4</li> <li>● U.S. Pat. No. 9,182,777 (“'777 Patent”<sup>1</sup>) at Figs. 1-3, 1:22-32, 1:44-3:11, 3:20-24, 3:29-30, 3:38-7:38, 7:48-13:11, 13:44-17:37, 17:50-31:32, 31:40-32:4, 32:15-34:51, 34:60-35:6, 35:25-52, 36:11-51.</li> <li>● U.S. Pat. No. 8,234,395 (“'395 Patent”) at 66:53-67:18, 67:39-45, 68:9-15, 69:64-70:21, Claims 1-20</li> <li>● '532 Patent at Claims 1-34</li> <li>● '498 Patent at Claims 1-23</li> <li>● '357 Patent File History                         <ul style="list-style-type: none"> <li>○ Ex Parte Reexam. 90/013,959: 2017-10-20 Non-Final Office Action</li> </ul> </li> </ul>	<p>“data network device configured to process and output audio to a defined location”</p> <p>U.S. Patent No. 10,146,498: 1:56-2:18, 4:22-51.</p> <p>U.S. Patent No. 9,164,532: 1:53-2:11, 4:11-39.</p> <p>U.S. Patent No. 7,571,014: Abstract, Figs. 3A, 3B, 3C, 4A, 4B, 5, 6, 7A, 7B, 7C, 7D, 4:11-37, 4:58-5:7, 8:38-9:6, 9:18-11:40, 11:53-13:8, 14:6-42.</p> <p>Prosecution history of U.S. Patent Application No. 13/864,250 ('498 Patent): May 16, 2017 Final Office Action at 3-4.</p> <p>Prosecution history of U.S. Patent Application No. 13/435,776 ('532 Patent): August 5, 2015 Notice of Allowance at 17; June 10, 2015 Applicant-Initiated Interview Summary at 2-3; March 4, 2015 Non-Final Office Action at 6-8, 10-11.</p>

<sup>1</sup> Because the '532, '357, and '498 Patents all claim priority to and share a common specification with the '777 Patent, Sonos cites to the '777 Patent's specification for ease of reference in connection with the disclosures found in this common specification. Sonos expressly reserves the right to rely on the same disclosure found in the specific specification of the '532, '357, and/or '498 Patents.

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
			<ul style="list-style-type: none"> <li>o <i>Ex Parte</i> Reexam. 90/013,959; 2017-12-20 Response to Reexam. Non-Final Office Action</li> </ul>	<p>Prosecution history of U.S. Patent Application No. 10/861,653 ('014 Patent): February 18, 2009 Non-Final Office Action at 4-8, 11-12</p> <p>Reexamination No. 90/013,882 ('014 Reexam): April 20, 2017 EPR NFOA at 76, 78, 79-80, 160-61, 165-66; January 26, 2017 Reexamination Order at 7-15.</p>
2	<p>“playback timing information for the audio content”</p> <p>“playback timing information associated with the audio information”</p> <p>“playback timing information”</p> <p><b>Sonos's Explanation:</b></p>	<p>'532</p> <p>'357</p> <p>'498</p>	<p>“information indicating when the audio [information / content] is to be played back” as construed by Judge Andrews in <i>Sonos v. D&amp;M Holdings</i> (see 14-cv-1330, D.I. 399)</p> <p><u>'532/'357/'498 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>• U.S. App. No. 60/490,768 Provisional Application dated 07/28/03, at pp. 1-2, 4-8, 10, Figs. 3-4</li> <li>• '777 Patent at Figs. 2, 2A, 4, Abstract, 1:22-32, 1:44-3:11, 5:1-6, 6:42-54, 7:5-21, 7:31-38, 7:63-8:13, 10:5-10, 10:50-11:21, 11:44-53, 12:15-63, 13:44-50, 14:3-9, 14:30-15:4, 15:63-16:38, 18:4-19:13, 19:14-20:51, 21:53-60, 21:61-22:9, 22:41-50, 23:15-24:10, 24:11-25:35, 26:60-31:18, 32:15-34:27, 35:30-47</li> </ul>	<p>“information representing a time value indicating when the audio information [content] is to be played back”</p> <p>U.S. Patent No. 9,213,357: 2:56-62; 11:4-24; 12:57-67; 15:9-17:41; 19:4-20:56; 22:15-32; 22:65-23:19; 24:16-31:23; 32:21-34:30; claims 1, 2, 8, 9, 10, 17; FIGs. 1-4.</p> <p>U.S. Patent No. 9,164,532: 2:53-59; 10:68-11:20; 12:52-62, 15:3-17:32; 18:60-20:45; 22:4-21; 22:54-23:8; 24:5-31:14; 32:12-34:21; claims 1, 10, 22, 34; FIGs. 1-4.</p> <p>U.S. Patent No. 10,146,498: 2:60-67; 11:23-44; 13:11-21; 15:33-17:65; 19:29-21:16; 22:44-61; 23:27-48; 24:46-31:64;</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	<p>resolution of the dispute for this term will not affect any current issue in the case</p> <p><b>Linkplay's Explanation:</b>                      resolution of the dispute for this term will affect infringement issues</p>		<ul style="list-style-type: none"> <li>● '395 Patent at 60:19-36, 66:31-43, 66:53-67:22, 69:26-57, 69:64-70:21</li> <li>● '532 Patent at Claims 1, 10, 22, 34</li> <li>● '357 Patent at Claims 1-2, 8-10, 17</li> <li>● '357 Patent File History                             <ul style="list-style-type: none"> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2017-12-20 Response to Reexam. Non-Final Office Action</li> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2017-12-20 Response to Reexam. Non-Final Office Action, Declaration of Dr. Wolfe</li> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2018-03-16 Final Office Action</li> </ul> </li> <li>● '498 Patent at Claims 7, 13, 14, 22, 23</li> <li>● U.S. Pat. No. 9,195,258 ("258 Patent") at Claims 1, 10, 11, 16, 17, 26</li> <li>● U.S. Pat. No. 9,207,905 at Claims 1, 7, 8, 17, 18, 26</li> <li>● U.S. Pat. No. 10,185,541 at Claims 1, 2, 7, 16, 25, 26</li> <li>● U.S. Pat. No. 10,209,953 at Claims 1, 7, 25</li> <li>● U.S. Pat. No. 10,216,473 at Claims 1, 11, 14, 24, 27, 37</li> <li>● U.S. Pat. No. 10,445,054 at Claims 1, 3, 8, 10, 14, 16</li> <li>● U.S. Pat. No. 10,754,613 at Claims 1, 11, 21</li> <li>● U.S. Pat. No. 11,301,207 at Claims 1, 10, 12, 13</li> </ul>	<p>32:62-35:8; claims 6, 7, 13, 14, 22, 23; FIGs. 1-4.</p> <p>Reexamination No. 90/013,959 ('357 Reexam): October 20, 2017 Non-Final Office Action at 3-5; 12-16; 19-20; December 20, 2017 Response at 7-16; March 16, 2018 Final Office Action at 6, 12-14, 18-23, 25-26.</p> <p>U.S. Patent Application No. 60/490,768 as-filed application at [0004], [0011]-[0018], [0020]-[0029].</p> <p>Prosecution history of U.S. Patent Application No. 10/816,217 (U.S. Pat. No. 8,234,395): January 18, 2008 Non-Final Rejection at 12-14; April 22, 2008 Response at 2-13, 24-25; June 30, 2008 Final Rejection at 4-7; September 5, 2008 Response at 2-12, 14; January 22, 2009 Non-Final Rejection at 8-9; April 22, 2009 Response at 2-7, 12-15; July 13, 2009 Final Rejection at 6-12; September 11, 2009 Response at 2-6, 8-13; September 28, 2009 Advisory Action at 7-13; October 13, 2009 Pre-Appeal Brief Conference Request at 2-5; May 7, 2010 Response at 2-6, 8-10, 12-13; June 25, 2010 Non-Final Rejection at 4-14; December 9, 2010 Response at 2-11; June 21, 2011 Non-Final Rejection at 4-11;</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
3	<p>“remain independently clocked while playing the audio content in synchrony” / “remain independently clocked during synchronous playback of the</p>	<p>'532, '357</p>	<p>As construed by Judge Andrews in <i>Sonos v. D&amp;M Holdings</i> (see 14-cv-1330, D.I. 219), the phrases “wherein the first and second zone players remain independently clocked while playing the audio content in synchrony” and “wherein the first and second playback devices remain independently clocked during synchronous playback of the audio information” mean the zone players/playback devices “operating in accordance with their own</p>	<p>September 14, 2011 Response at 2-5, 7-9; October 21, 2011 Final Rejection at 2-8; November 30, 2011 Response at 2-6, 8-9; December 27, 2011 Notice of Allowance at 8.</p> <p>Prosecution history of U.S. Patent Application No. 13/297,000 (U.S. Pat. No. 9,182,777): September 13, 2012 Final Rejection at 2-6; March 12, 2013 Response at 2-8, 12; July 6, 2015 Notice of Allowance at 2.</p> <p>Prosecution history of U.S. Patent Application No. 14/516,867 ('357 Patent): March 9, 2015 Final Rejection at 2-4; May 11, 2015 Response at 2-8, 12-17; July 7, 2015 Response at 2-11; August 4, 2015 Notice of Allowance at 2-3, 5.</p>
				<p>“operating according to each player’s own clock that does not depend on any other player’s clock at all times of synchronous playback.”</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	<p>audio information”</p> <p><b>Explanation:</b>                      resolution of the dispute for this term may affect infringement issues</p>		<p><i>respective clocks during synchronous playback.”</i></p> <p><i>'532/'357 Intrinsic Evidence:</i></p> <ul style="list-style-type: none"> <li>● U.S. App. No. 60/490,768 Provisional Application dated 7/28/03, at pp. 1-11, Figs. 1-4</li> <li>● '777 Patent at Title, Abstract, 1:22-40, 1:44-2:25, 2:29-3:11, 7:63-8:13, 11:11-55, 12:33-41, 14:42-49, 16:34-38, 22:41-50, 22:60-23:14, 24:11-25:35, 31:25-32, 32:15-34:27</li> <li>● '395 Patent at Title, 66:53-67:18, Claims 1, 10, 14</li> <li>● '532 Patent at Claims 1, 10, 22, 34</li> <li>● '532 Patent File History                             <ul style="list-style-type: none"> <li>○ 2015-08-05 Notice of Allowance</li> </ul> </li> <li>● '357 Patent at Claims 1, 8-9</li> <li>● '357 Patent File History                             <ul style="list-style-type: none"> <li>○ 2015-07-07 RCE</li> <li>○ 2015-08-04 Notice of Allowance</li> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2017-11-22 Examiner Interview Summary, attached Interview Agenda                                     <ul style="list-style-type: none"> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2017-12-20 Response to Reexam. Non-Final Office Action</li> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2017-12-20 Response to Reexam.</li> </ul> </li> </ul> </li> </ul>	<p>U.S. Patent No. 9,213,357: 1:25-44; 2:21-3:15; 11:14-58; 19:4-20:56; 22:15-32; 22:65-23:19; 24:16-31:23; 31:30-44; 32:21-34:30; claim 1, 8, 9; FIGs. 1-4.</p> <p>U.S. Patent No. 9,164,532: 1:22-41; 2:18-3:12; 11:10-54; 18:60-20:45; 22:4-21; 22:54-23:8; 24:5-31:14; 31:21-35; 32:12-34:21; claims 1, 10, 22, 34; FIGs. 1-4.</p> <p>Reexamination No. 90/013,959 ('357 Reexam): October 20, 2017 Non-Final Office Action at 3-5; 16-18; December 20, 2017 Response to Non-Final Office Action at 16-20; March 16, 2018 Final Office Action at 12-14, 23-25.</p> <p>U.S. Patent Application No. 60/490,768 as-filed application at [0004], [0011]-[0018], [0020]-[0029].</p> <p>Prosecution history of U.S. Patent Application No. 10/816,217 (U.S. Pat. No. 8,234,395): January 18, 2008 Non-Final Rejection at 12-14; April 22, 2008 Response at 2-13, 24-25; June 30, 2008 Final Rejection at 4-7; September 5, 2008 Response at 2-12, 14; January 22, 2009</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
			<p>Non-Final Office Action, Declaration of Dr. Wolfe</p> <ul style="list-style-type: none"> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2018-03-16 Final Office Action</li> <li>● '258 Patent at Claims 1, 11, 17</li> <li>● '258 Patent File History                             <ul style="list-style-type: none"> <li>○ 2015-07-02 Notice of Allowance</li> <li>○ 2015-09-07 Amendment Submitted with a RCE</li> <li>○ 2015-09-24 Notice of Allowance</li> </ul> </li> </ul>	<p>Non-Final Rejection at 8-9; April 22, 2009 Response at 2-7, 12-15; July 13, 2009 Final Rejection at 6-12; September 11, 2009 Response at 2-6, 8-13; September 28, 2009 Advisory Action at 7-13; October 13, 2009 Pre-Appeal Brief Conference Request at 2-5; May 7, 2010 Response at 2-6, 8-10, 12-13; June 25, 2010 Non-Final Rejection at 4-14; December 9, 2010 Response at 2-11; June 21, 2011 Non-Final Rejection at 4-11; September 14, 2011 Response at 2-5, 7-9; October 21, 2011 Final Rejection at 2-8; November 30, 2011 Response at 2-6, 8-9; December 27, 2011 Notice of Allowance at 8.</p> <p>Prosecution history of U.S. Patent Application No. 13/297,000 (U.S. Pat. No. 9,182,777): September 13, 2012 Final Rejection at 2-6; March 12, 2013 Response at 2-8, 12; July 6, 2015 Notice of Allowance at 2.</p> <p>Prosecution history of U.S. Patent Application No. 14/516,867 ('357 Patent): March 9, 2015 Final Rejection at 2-4; May 11, 2015 Response at 2-8, 12-17; July 7, 2015 Response at 2-11; August 4, 2015 Notice of Allowance at 2-3, 5.</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
4	<p>“a synchrony group”</p> <p><b>Sonos's Explanation:</b>                      resolution of the dispute for this term will not affect any current issue in the case</p> <p><b>Linkplay's Explanation:</b>                      resolution of the dispute for this term may affect infringement issues</p>	<p>'532, '357, '498</p>	<p>“A set of two or more [zone players / playback devices] that are to play the same audio program synchronously”</p> <p><u>'532/'357/'498 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>• '777 Patent, at 4:66-5:47, 5:48-6:4, 6:5-7:47, 8:53-63, 18:43-64, 26:7-18</li> <li>• '532 Patent, Claims 22, 34</li> <li>• '357 Patent, Claims 4, 12</li> <li>• '498 Patent, Claims 1, 8, 15</li> </ul>	<p>“sets of zone players that are playing the same audio program synchronously”</p> <p>U.S. Patent No. 10,146,498: Figs. 1, 2, 2A, 5:11-39, 5:40-7:2, 7:65-8:46, 8:56-9:6, 12:14-57, 14:4-56, 25:13-29, 25:50-58, 33:38-34:8, 35:9-24; claims 1-4, 6-11, 13-16, 19, 21-23; FIGs. 1, 2, 2A.</p> <p>U.S. Patent No. 9,164,532: Figs. 1, 2, 2A, 4:66-5:26, 5:27-6:54, 7:27-8:26, 9:9-27, 11:55-12:31, 13-43:14:28, 24:38-53, 25:6-14, 32:53-33:22, 34:22-36; claims 22-27, 28-34; FIGs. 1, 2, 2A.</p> <p>U.S. Patent No. 9,213,357: Figs. 1, 2, 2A, 5:4-31, 5:32-6:58, 7:51-8:31, 8:60-9:10, 11-59-12:36, 13:48-14:33, 24:49-64, 25:17-25, 32:62-33:31, 34:31-45; claims 4-7, 12-16; FIGs. 1, 2, 2A.</p> <p>Prosecution history of U.S. Patent Application No. 13/864,250 ('498 Patent):                      September 12, 2018 Notice of Allowance at 2-3, May 9, 2018 NFOA Response at 13-19, March 29, 2018 Applicant-Initiated Interview Summary at 2-5, January 9, 2018 Non-Final Office Action at 3-9, July 17, 2017 FOA Response at 9-13, 14-15; June 19, 2017 Applicant-Initiated Interview Summary at 2-3; May 16, 2017 Final</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
5	<p>“wherein said determining an audio source for the zone comprises selecting”</p> <p><b>Explanation:</b> resolution of</p>	'014	<p>“wherein said determining an audio source for the zone <u>group</u> comprises selecting”</p> <p><u>'014 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● '014 Patent at 5:34-6:5, 8:50-57, 9:24-10:15, 10:36-62, 11:62-12:27, 14:6-26, Figs. 3A-7D, Claims 1 and 3-7</li> <li>● '014 Patent File History                             <ul style="list-style-type: none"> <li>○ 2004-06-05 Application</li> </ul> </li> </ul>	<p>Office Action at 3-5, 7; January 5, 2017 NFOA Response at 9-10; December 28, 2016 Applicant-Initiated Interview Summary at transmittal, 1-3; October 5, 2016 Non-Final Office Action at 3-5.</p> <p>Prosecution history of U.S. Patent Application No. 13/435,776 ('532 Patent): November 18, 2014 Applicant-Initiated Interview Summary at 2; October 24, 2014 Non-Final Office Action at 4-8.</p> <p>Prosecution history of U.S. Patent Application No. 14/516,867 ('357 Patent): March 9, 2015 Non-Final Office Action at 8-10, December 1, 2014 Non-Final Office Action at 6-8.</p> <p>Reexamination No. 90/013,959 ('357 Reexam): March 16, 2018 Final Office Action at 27-30, October 20, 2017 Non-Final Office Action at 4, 7-9, 23-25, 39-42.</p> <p>Indefinite</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	the dispute for this term will affect the validity of asserted claim 4 of the '014 Patent		<ul style="list-style-type: none"> <li>o 2008-06-27 Non-Final Rejection</li> <li>o 2009-02-18 Non-Final Rejection</li> <li>o 2009-06-16 Notice of Allowance</li> </ul>	
6	“The computing device of claim 1, further comprising program instructions stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the computing device to perform functions comprising:”	'883	<p>“The playback device of claim 1, further comprising program instructions stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the playback device to perform functions comprising:”</p> <p><u>'883 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● '883 Patent at 6:21-33, 7:26-8:60, 9:15-22, Claims 1-20</li> <li>● '883 Patent File History                             <ul style="list-style-type: none"> <li>o 2019-03-11 Application As Filed</li> </ul> </li> <li>● U.S. Provisional App. No. 60/577,284 dated 06/05/2004, at pp. 5-6, 9-13, Appendix at p. 1</li> <li>● U.S. Pat. No. 10,439,896 at Claims 1-20</li> <li>● U.S. Pat. No. 10,965,545 at Claims 1-25</li> <li>● U.S. Pat. No. 11,456,928 at Claims 1-41</li> </ul>	<p>Indefinite, or alternatively, plain and ordinary meaning</p> <p>U.S. Patent No. 10,541,883, Abstract, 3:55-67, 4:42-48, 6:34-7:19, 8:23-42, 9:1-25, 15:31-17:6, Figs. 2A-2C, 4A, cls. 1, 4, 7-9, 11, 13.</p> <p>Prosecution history of U.S. Patent Application No. 16/298,515 ('883 Patent), May 30, 2019 Non-Final Rejection at 11-18.</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
7	<p><b>Explanation:</b> resolution of the dispute for this term may affect the validity of asserted claim 13 of the '883 Patent</p> <p><b>“zone(s)”</b></p> <p><b>Sonos's Explanation:</b> resolution of the dispute for this term will not affect any current issue in the case</p> <p><b>Linkplay's Explanation:</b> resolution of the dispute for this term may narrow the scope and affect valuations of alleged infringement</p>	'532, '014, '498	<p>“zone(s)” does not appear in isolation in any of the asserted claims of the '532, '014 (see Term No. 5 above), or '498 Patents.</p> <p><u>'532/'498 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● See Term No. 1 (“zone player”)</li> <li>● '532 Patent at Claims 1-34</li> <li>● '498 Patent at Claims 1-23</li> </ul> <p><u>'014 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● '014 Patent at 4:28-36, 4:58-67, 5:1-8, 5:34-6:5, 6:62-7:3, 7:38-40, 8:28-33, 8:50-9:6, 9:18-10:15, 10:37-62, 11:10-16, 11:27-40, 11:53-12:27, 12:61-13:14, 13:32-52, 14:17-29, Figs. 3A, 3C, and 4B-7D, Claims 1, 3-8, 10-12, 25, 27-32, and 34.</li> </ul>	<p>“defined location for audio output”</p> <p>U.S. Patent No. 10,146,498: 1:56-2:18, 4:22-51.</p> <p>U.S. Patent No. 9,164,532: 1:53-2:11, 4:11-39, claims 1, 6, 7, 8, 10, 18, 19, 20.</p> <p>U.S. Patent No. 7,571,014: Abstract, Figs. 3A, 3B, 3C, 4A, 4B, 5, 6, 7A, 7B, 7C, 7D, 4:11-37, 4:58-5:7, 8:38-9:6, 9:18-11:40, 11:53-13:8, 14:6-42.</p> <p>Prosecution history of U.S. Patent Application No. 13/864,250 ('498 Patent): May 16, 2017 Final Office Action at 3-4.</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
8	<p>“play back the audio content... according to the playback timing and the device clock information” / “playing back, by the first playback device, the audio information... by using the</p>	<p>'532, '357</p>	<p>No construction necessary. The plain and ordinary meaning of these terms is the exact language, i.e., “play back the audio content... according to the playback timing and the device clock information” and “playing back, by the first playback device, the audio information... by using the playback timing information associated with the audio information and the device clock information of the first playback device to play back the audio information,” which is not limited to “play[ing] back the audio content... according to... the device clock information received by the second playback device.”</p>	<p>Prosecution history of U.S. Patent Application No. 13/435,776 ('532 Patent): August 5, 2015 Notice of Allowance at 17; June 10, 2015 Applicant-Initiated Interview Summary at 2-3; March 4, 2015 Non-Final Office Action at 6-8, 10-11.</p> <p>Prosecution history of U.S. Patent Application No. 10/861,653 ('014 Patent): February 18, 2009 Non-Final Office Action at 4-8, 11-12.</p> <p>Reexamination No. 90/013,882 ('014 Reexam): April 20, 2017 EPR NFOA at 76, 78, 79-80, 160-61, 165-66; January 26, 2017 Reexamination Order at 7-15.</p> <p>Indefinite, or alternatively “the first playback device plays back the audio content... according to the playback timing and the device clock information received by the second playback device”</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	<p>playback timing information associated with the audio information and the device clock information of the first playback device to play back the audio information”</p> <p><b>Explanation:</b>                      resolution of the dispute for this term may affect at least one of the infringement or validity issues of asserted claims of the '532 and/or '357 Patents</p>		<p><u>'532/'357 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● '777 Patent at Fig. 3, 2:29-3:11, 7:63-8:13, 10:50-11:55, 12:15-32, 17:50-19:13, 20:25-51, 21:47-23:14, 24:11-43, 24:60-25:20, 26:60-29:10, 32:59-64, 33:4-28</li> <li>● '532 Patent at Claims 1, 10, 22, 34</li> <li>● '357 Patent at Claims 1, 8, 9</li> <li>● '532 Patent File History                             <ul style="list-style-type: none"> <li>○ 2015-05-30 Interview Agenda</li> <li>○ 2015-06-04 Response to Non-Final Office Action</li> <li>○ 2015-08-05 Notice of Allowance</li> </ul> </li> <li>● '357 Patent File History                             <ul style="list-style-type: none"> <li>○ 2015-05-11 Response to Final Office Action</li> <li>○ 2015-06-01 Advisory Action</li> <li>○ 2015-07-07 RCE</li> </ul> </li> <li>● U.S. Patent No. 9,176,520 at Claims 2, 21</li> <li>● U.S. Patent No. 9,176,520 File History                             <ul style="list-style-type: none"> <li>○ 2015-08-27 Notice of Allowance</li> </ul> </li> <li>● U.S. Patent No. 9,733,893 at Claims 4, 23</li> <li>● U.S. Patent No. 9,727,304 at Claims 1, 2, 7, 9, 19, 20</li> <li>● U.S. Patent No. 10,157,033 at Claims 1, 10, 21</li> </ul>	<p>U.S. Patent No. 9,164,532: 8:56-62, 10:49-11:20, 15:38-16:61, 23:9-25:14, 32:25-34:21.</p> <p>U.S. Patent No. 9,213,357: 8:60-66, 10:53-11:24, 15:45-17:3, 23:20-25:25, 32:34-34:30</p> <p>Prosecution history of U.S. Patent Application No. 13/435,776 ('532 Patent): Notice of Allowance dated August 5, 2015, pp. 4-17.</p> <p>Prosecution history of U.S. Patent Application No. 14/516,867 ('357 Patent): August 4, 2015 Notice of Allowance 2-3, 5, July 7, 2015 Advisory Action Response at 2-11, May 13, 2015 Applicant-Initiated Interview Summary at 2-6, May 11, 2015 FOA Response at 10-18.</p> <p>Reexamination No. 90/013,959 ('357 Reexam): May 31, 2019 Decision on Appeal at 1-7, March 25, 2019 Appeal Docket Examiner Brief at 2-13, January 7, 2019 Appeal Docket Sonos Reply Brief 10, 12-17, May 16, 2018 Applicant-Initiated Interview Summary at 6-10, May 16, 2018</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
9	<p>“the controller configuring the first group” / “the controller configuring ... a first zone player”</p> <p><b>Explanation:</b> resolution of the dispute for this term may affect the validity of asserted claims of the '532 Patent</p>	'532	<p>No construction necessary. The plain and ordinary meaning of these terms is the exact language, i.e., “the controller configuring the first group” (the “wherein configuring the first group comprises the controller configuring...” clause indicates how “the controller configure[s] the first group”) and “the controller ... a first zone player,” which is not limited to the controller sending information directly to the first zone player.</p> <p><u>'532 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>• '777 Patent at Figs. 1, 2, 2A, 3, 3:38-45, 5:15-18, 5:27-39, 5:48-7:38, 8:13-67, 11:56-12:14, 12:15-32, 14:21-29, 17:65-18:3, 25:36-26:6, 34:28-42</li> <li>• '532 Patent at Claims 1, 6, 7, 10, 18, 19, 20, 22, 32, 34</li> <li>• '532 Patent File History                             <ul style="list-style-type: none"> <li>o 2015-05-30 Interview Agenda</li> </ul> </li> </ul>	<p>FOA Response at 8-19, March 16, 2018 Final Office Action at 6-12, 21-23, 27-28, December 20, 2017 NFOA Response at 8-10, 15-19, 21-23. Wolfe Dec. ISO NFOA 12/20/2017 Response at 6-7, November 22, 2017 Applicant-Initiated Interview Summary at 2-8, October 20, 2017 Non-Final Office Action dated at 7-9, 14-16, 23, 33-40, August 9, 2017 Order at 2-6, 9-18.</p> <p>Indefinite, or alternatively “sending control information to a first zone player of the first group to enable other member players of the first group to” / “sending control information to the first player to enable the first player to”</p> <p>U.S. Patent No. 9,164,532: 8:52-9:15, 9:54-10:4, 10:37-48, 11:55-12:13, 12:63-14:65, 22:35-53, 34:22-45.</p> <p>Prosecution history of U.S. Patent Application No. 13/435,776 ('532 Patent): August 5, 2015 Notice of Allowance at 4-17; June 4, 2015 NFOA Response at 15-18, March 4, 2015 Non-Final Office Action at</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
10	<p>“an address identifying a [location / network location] of audio information available at an audio information source”</p> <p><b>Sonos's Explanation:</b></p>	'357	<ul style="list-style-type: none"> <li>o 2015-06-04 Response to Non-Final Office Action</li> <li>o 2015-08-05 Notice of Allowance</li> <li>• U.S. Pat. No. 9,218,017 at Claims 1, 2, 3, 4, 6 14, 26</li> <li>• U.S. Pat. No. 9,218,017 File History</li> <li>o 2015-04-28 Final Office Action</li> <li>o 2015-07-07 Response to Final Office Action</li> <li>o 2015-07-29 Examiner-Initiated Interview Summary</li> <li>o 2015-07-29 Notice of Allowance</li> <li>• U.S. Pat. No. 9,727,303 at Claims 1, 4, 5, 7, 10, 11, 12, 14, 16, 18, 19</li> <li>• U.S. Pat. No. 11,200,025 at Claims 1, 2, 3, 25</li> </ul>	<p>6, 11-12, October 24, 2014 Non-Final Office Action at 4, 8.</p>
			<p>No construction necessary. The plain and ordinary meaning of this term is the exact language, i.e., “an address identifying a [location / network location] of audio information available at an audio information source,” which is not limited to “an address identifying a storage location within an audio source.”.</p> <p><u>'357 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>• '777 Patent at Fig. 1, 3:45-4:10, 40:40-65, 10:11-37, 15:22-27, 15:46-16:10, 16:39-17:4, 18:43-64</li> <li>• '357 Patent, Claims 4, 12</li> </ul>	<p>“an address identifying a (network) storage location within an audio information source from which the audio information is to be retrieved”</p> <p>U.S. Patent No. 9,213,357: 3:41-5:31; 6:66-7:3; 10:14-52; 18:21-40; claims 1, 8, 9, 19; FIGs. 1-2.</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
11	<p>resolution of the dispute for this term will not affect any current issue in the case</p> <p><b>Linkplay's Explanation:</b> resolution of the dispute for this term may affect infringement issues</p>	'014	<ul style="list-style-type: none"> <li>● '357 Patent File History                             <ul style="list-style-type: none"> <li>○ 2014-10-17 Application As Filed</li> <li>○ 2014-12-01 Non-Final Office Action</li> </ul> </li> <li>○ 2015-03-09 Final Office Action</li> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2017-10-20 Non-Final Office Action</li> </ul>	<p>Reexamination No. 90/013,959 ('357 Reexam): October 20, 2017 Non-Final Office Action at 11-12; March 16, 2018 Final Office Action at 17-18.</p>
	<p>“any one of the players in the group serves as a zone group head”</p> <p><b>Explanation:</b> resolution of the dispute for this term may affect at least one of the infringement or validity issues of asserted claims</p>		<p>No construction necessary. The plain and ordinary meaning of this term is the exact language, i.e., “any one of the players in the group serves as a zone group head,” which does not require that “each of the players in an [already] existing zone group can serve as the zone group head for that [already existing] zone group.”.</p> <p><i>'014 Intrinsic Evidence:</i></p> <ul style="list-style-type: none"> <li>● '014 Patent at 5:34-6:5, 8:50-61, 9:24-10:15, 10:36-62, 11:62-12:27, 14:6-26, Figs. 3A, 3C, 5, 7A-7C, Claims 25 and 27-28</li> <li>● '014 Patent File History                             <ul style="list-style-type: none"> <li>○ 2004-06-05 Application</li> </ul> </li> </ul>	<p>Indefinite, or alternatively “each of the players in an existing zone group can serve as the zone group head for that zone group”</p> <p>U.S. Patent No. 7,571,014: abstract; 2:35-36; 2:52-64; 3:6-21; 4:34-27; 5:40-53; 6:27-29; 8:4-18; 8:45-61; 9:24-67; 10:16-28; 11:62-12:9; 13:53-59; 14:15-24; claims 1, 25; FIGs. 1, 3A-3C, 4A-4B, 5.</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	of the '014 Patent		<ul style="list-style-type: none"> <li>o 2008-06-27 Non-Final Rejection</li> <li>o 2009-02-18 Non-Final Rejection</li> <li>o 2009-06-16 Notice of Allowance</li> </ul>	
12	"screen" <b>Explanation:</b> resolution of the dispute for this term may affect at least one of the infringement or validity issues of asserted claims of the '014 Patent	'014	Plain and ordinary meaning, which is "a physical component of a device on which text, images, and/or other information is displayed" <u>'014 Intrinsic Evidence:</u> <ul style="list-style-type: none"> <li>• '014 Patent at 2:41-46, 2:51-3:28, 3:55-64, 4:4-6, 7:43-8:37, 9:1-11:26, 13:32-42, 14:6-29, 14:35-40, Figs. 1, 2B-4B, and 7A-7D, Claims 1, 2, 13, 15, 16, 25, 26, 35, 37, and 38</li> <li>• '014 Patent File History                             <ul style="list-style-type: none"> <li>o 2004-06-05 Application</li> <li>o 2008-06-27 Non-Final Rejection</li> <li>o 2009-02-18 Non-Final Rejection</li> <li>o 2009-06-16 Notice of Allowance</li> <li>o <i>Ex Parte</i> Reexam. 90/013,882:</li> <li>o 2017-01-26 Determination Reexam Ordered</li> </ul> </li> </ul>	Indefinite, or alternatively if a construction is required, "screen" as in the instances of claim language " <i>display(ing) . . . on a/the screen</i> " should be construed as "screen display page"  U.S. Patent No. 7,571,014: 2:52-3:28; 7:42-8:37; 9:7-11:26; 11:64-12:2; 12:35-44; 13:39-42; 14:6-15; claims 1-2, 13, 15, 15-16, 25, 26, 33, 35, 37, 38, 41, 42; FIGs. 3A-3C, 4A-4B, 7A-7D.  Prosecution history of U.S. Patent Application No. 10/861,653 ('014 Patent): February 18, 2009 Non-final Office Action at 3-4, 7-8, 10; June 27, 2008 Non-final Office Action at 8.
13	"asynchronous network" <b>Sonos's Explanation:</b> resolution of the dispute for this term may	'498	Plain and ordinary meaning, which is "a network in which data is transmitted free from timing constraints" <u>'498 Intrinsic Evidence:</u> <ul style="list-style-type: none"> <li>• '777 Patent at Figs. 1, 2, 3, 4, 2:6-17, 3:38-5:26, 6:55-62, 7:13-17, 8:53-9:26, 10:11-49, 10:50-10:67, 11:1-21, 11:22-</li> </ul>	Indefinite, or alternatively, "a network for <i>unsynchronized devices that does not support synchronous transmissions</i> "  Prosecution history of the U.S. Patent Application No. 13/864,250 ('498 Patent): September 12, 2018 Notice of Allowance; May 9, 2018 Response to Non-Final Office

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	<p>affect the validity of asserted claims of the '498 Patent</p> <p><b>Linkplay's Explanation:</b>                      resolution of the dispute for this term may affect at least one of the infringement and validity issues of asserted claims of the '498 Patent</p>		<p>55, 11:56-12:14, 12:15-32, 12:33-41, 12:45-63, 13:12-24, 13:25-43, 15:16-52, 16:4-10, 17:50-19:13, 20:25-51, 20:52-21:3, 21:13-22:27, 22:41-59, 22:60-23:14, 23:15-39, 23:39-49, 23:56-24:10, 24:11-26:28, 26:60-30:64, 31:25-32, 31:40-32:14, 32:14-33:3, 35:30-36:46</p> <ul style="list-style-type: none"> <li>● '498 Patent at Claims 1, 8, 15, 19, 21</li> <li>● '498 Patent File History                             <ul style="list-style-type: none"> <li>○ 2018-01-09 Non-Final Office Action</li> <li>○ U.S. Pat. No. 6,611,537</li> <li>○ 2018-03-29 Applicant-Initiated Interview Summary</li> <li>○ 2018-03-29 Office Action Appendix</li> <li>○ 2018-05-09 Response to Non-Final Office Action</li> <li>○ 2018-09-12 Notice of Allowance</li> </ul> </li> <li>● '357 Patent File History                             <ul style="list-style-type: none"> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2017-11-22 Examiner Interview Summary, attached Interview Agenda</li> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2017-12-20 Response to Reexam. Non-Final Office Action</li> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2017-12-20 Response to Reexam. Non-Final Office Action, Declaration of Dr. Wolfe</li> </ul> </li> </ul>	<p>Action at 2-18; March 29, 2018 Applicant-Initiated Interview Summary including the interview agenda.</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
			<ul style="list-style-type: none"> <li>○ <i>Ex Parte</i> Reexam. 90/013,959: 2018-03-16 Final Office Action</li> <li>● U.S. Pat. No. 10,296,283 File History               <ul style="list-style-type: none"> <li>○ 2018-03-14 Response to Non-Final Office Action</li> <li>○ 2018-03-27 Applicant-Initiated Interview Summary and Appendix</li> <li>○ 2018-07-11 Final Office Action</li> </ul> </li> <li>● U.S. Pat. No. 10,157,033 at Claims 1, 7, 9, 10, 18, 20, 21, 23, 26, 28</li> <li>● U.S. Pat. No. 10,175,930 at Claims 1, 10, 19</li> <li>● U.S. Pat. No. 10,296,283 at Claims 1, 4-6, 8-10, 11, 14, 16</li> <li>● U.S. Pat. No. 10,545,723 at Claims 1, 3-5, 7, 9, 13-15, 18, 21, 23-25, 27</li> <li>● U.S. Pat. No. 10,963,215 at Claims 1, 2, 3, 8</li> <li>● U.S. Pat. No. 11,200,025 at Claims 1, 2, 3, 8, 11, 13-14, 16-17, 19-21, 25, 27, 30</li> <li>● U.S. Pat. No. 11,301,207 at Claims 1, 4, 14, 17, 21, 25, 26, 28, 30</li> <li>● U.S. Pat. No. 11,550,539 at Claims 1, 3, 7-9, 11, 17, 20-23, 25, 30-31, 33, 35-36, 38-39, 41-43, 49-51</li> <li>● U.S. Pat. No. 11,934,739 at Claims 1, 3, 5, 6, 8, 13, 16, 17, 19</li> <li>● U.S. Pat. No. 10,175,932 at Claims 1-5, 8-12, 19</li> <li>● U.S. Pat. No. 10,228,902 at Claims 1, 7, 25</li> </ul>	

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
14	<p>“joining a first synchrony group”</p> <p><b>Explanation:</b> resolution of the dispute for this term may affect infringement issues</p>	'498	<p>No construction necessary. The plain and ordinary meaning of this term is the exact language, i.e., “<i>joining a first synchrony group</i>,” which does not require the first synchrony group to exist beforehand.</p> <p><u>'498 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● '777 Patent at 4:66-7:38, 11:56-12:63, 25:36-26:6, 34:28-42</li> <li>● '498 Patent at Claims 1, 8, 15, 23</li> <li>● '498 Patent File History                             <ul style="list-style-type: none"> <li>○ 2018-05-09 Response to Non-Final Office Action</li> <li>○ 2018-09-12 Notice of Allowance</li> </ul> </li> <li>● U.S. Pat. No. 10,613,817 at Claims 1, 10</li> <li>● U.S. Pat. No. 10,613,817 File History                             <ul style="list-style-type: none"> <li>○ 2018-10-15 RCE</li> <li>○ 2018-11-19 Notice of Allowance</li> </ul> </li> <li>● '357 Patent File History                             <ul style="list-style-type: none"> <li>○ 2014-10-17 Application As Filed</li> <li>○ 2014-12-01 Non-Final Rejection</li> </ul> </li> </ul>	<p>“<i>becoming a new member of an already existing first synchrony group</i>”</p> <p>U.S. Patent No. 10,146,498: 6:19-7:3; 7:15-38; 7:48-55; 9:9-36; 12:14-13:3; 26:7-24; FIGs. 1, 2, 2A.</p> <p>Prosecution history of U.S. Patent Application No. 13/864,250 ('498 Patent): May 9, 2018 Response to Non-final Office Action at 2-6, 14-15; March 29, 2018 Applicant-Initiated Interview Summary including the attached interview agenda.</p>
15	<p>“disengaging the first zone player from the first synchrony group”</p>	'498	<p>No construction necessary. The plain and ordinary meaning of this term is the exact language, i.e., “<i>disengaging the first zone player from the first synchrony group</i>,” which places no requirements on the status of the first synchrony group after disengagement.</p>	<p>“<i>causing the first zone player to leave, without terminating the existence of, a first synchrony group</i>”</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	<p><b>Explanation:</b> resolution of the dispute for this term may affect infringement issues</p>		<p><u>'498 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● '777 Patent at 4:66-7:21, 8:13-9:7, 12:64-13:11, 15:41-52</li> <li>● '498 Patent at Claims 1, 2, 3, 8, 9, 15, 16</li> <li>● '498 Patent File History                             <ul style="list-style-type: none"> <li>○ 2013-04-17 Application As Filed</li> <li>○ 2017-01-05 Response to Non-Final Office Action</li> </ul> </li> </ul>	<p>U.S. Patent No. 10,146,498: 6:46-52; 6:19-41; 7:20-29; 13:22-36; claims 1-4, 8-11, and 15-18; FIGs. 1, 2, 2A.</p> <p>Prosecution history of U.S. Patent Application No. 13/864,250 ('498 Patent): January 9, 2018 Non-final Office Action at 5-7; July 17, 2017 Response to Final Office Action at 9-11; May 16, 2017 Final Office Action at 4-5; January 5, 2017 Response to Non-final Office Action at 3-10, October 5, 2016 Non-final Office Action at 3-4; April 17, 2013 Preliminary Amendment at 4-7.</p>
16	<p>“joining a first synchrony group comprising the first zone player and a second zone player”</p> <p><b>Explanation:</b> resolution of the dispute for this term may affect at least one of the infringement or validity issues</p>	'498	<p>No construction necessary. The plain and ordinary meaning of this term is the exact language, i.e., “<i>joining a first synchrony group comprising the first zone player and a second zone player</i>,” which does not require the first synchrony group to exist beforehand.</p> <p><u>'498 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● '777 Patent at 4:66-7:38, 11:56-12:63, 25:36-26:6, 34:28-42</li> <li>● '498 Patent at Claims 1, 8, 15, 23</li> <li>● '498 Patent File History                             <ul style="list-style-type: none"> <li>○ 2018-05-09 Response to Non-Final Office Action</li> <li>○ 2018-09-12 Notice of Allowance</li> </ul> </li> </ul>	<p>Indefinite, or alternatively “<i>becoming a new member of an already existing, first synchrony group having the first zone player and a second zone player as its members</i>”</p> <p>U.S. Patent No. 10,146,498: 6:19-7:3; 7:15-38; 7:48-55; 9:9-36; 12:14-13:3; 26:7-24; FIGs. 1, 2, 2A.</p> <p>Prosecution history of U.S. Patent Application No. 13/864,250 ('498 Patent): May 9, 2018 Response to Non-final Office Action at 2-6, 14-15; March 29, 2018</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	of asserted claims of the '498 Patent		<ul style="list-style-type: none"> <li>● U.S. Pat. No. 10,613,817 at Claims 1, 10</li> <li>● U.S. Pat. No. 10,613,817 File History                             <ul style="list-style-type: none"> <li>○ 2018-10-15 RCE</li> <li>○ 2018-11-19 Notice of Allowance</li> </ul> </li> <li>● '357 Patent File History                             <ul style="list-style-type: none"> <li>○ 2014-10-17 Application As Filed</li> <li>○ 2014-12-01 Non-Final Rejection</li> </ul> </li> </ul>	Applicant-Initiated Interview Summary including the attached interview agenda.  U.S. Patent Application No. 60/490,768 at [00019]-[00029], claims 5-7.
17	“at least a second message containing network configuration parameters, wherein the network configuration parameters comprise an identifier of the secure WLAN and a security key for the secure WLAN”  <b>Sonos's Explanation:</b> resolution of the dispute for	'883	Fed Circuit:  “At least one second message containing network configuration parameters, wherein the network configuration parameters comprise an identifier of the secure WLAN and a security key for the secure WLAN.”	“at least one second message containing network configuration parameters, wherein the network configuration parameters comprise an identifier of the secure WLAN and a security key for the secure WLAN, wherein the identifier of the secure WLAN and the security key for the secure WLAN must be contained in the same message”  Fed. Circuit in <i>Sonos, Inc. v. Int'l Trade Comm'n</i> (Fed. Cir. 2024): “The Commission construed this limitation as requiring transmission of at least one single ‘second message’ containing both the claimed ‘identifier’ and the claimed ‘security key.’”  U.S. Patent No. 10,541,883, Abstract, 2:16-29, 2:45-63, 3:11-4:24, 4:49-54, 5:1-13,

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	<p>this term will not affect any current issue in the case</p> <p><b>Linkplay's Explanation:</b>                      resolution of the dispute for this term will clarify the meaning of the term for the jury</p>			<p>9:28-52, 13:4-42, 14:1-37, Figs. 3A-3B, cls. 1, 4, 12, 14, 19, 20.</p> <p>U.S. Patent No. 10,439,896, 2:21-27, 2:45-47, 3:11-4:24, 13:4-42, 14:1-37, Fig. 3B, cls. 1, 10.</p>
18	<p>“transitioning from communicating with the computing device via the initial communication path to communicating with the computing device via the secure WLAN”</p>	'883	<p>No construction necessary. The plain and ordinary meaning of this term is the exact language, i.e., “<i>transitioning from communicating with the computing device via the initial communication path to communicating with the computing device via the secure WLAN</i>,” which does not require that the initial communication path be “replac[ed],” “temporary” and “only used for initial device configuration.”</p> <p><u>'883 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>'883 Patent at 2:50-63, 3:11-30, 3:31-54, 4:1-24, 4:25-28, 9:11-14, 10:9-20, 12:10-16, 12:21-14:34, 15:31-17:38,</li> </ul>	<p>“<i>replacing communicating with the computer device via the temporary communication path which is only used for initial device configuration with communicating with the computing device via the secure WLAN</i>”</p> <p>U.S. Patent No. 10,541,883, Abstract, 2:16-44, 2:64-4:24, 4:49-54, 5:1-13, 10:9-30, 10:63-11:8, 12:10-20, 12:63-14:51, 15:31-</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	<p><b>Sonos's Explanation:</b> resolution of the dispute for this term will not affect any current issue in the case</p> <p><b>Linkplay's Explanation:</b> resolution of the dispute for this term may affect infringement issues</p>		<p>Figs. 4A and 4B, Claims 1, 10, 11, 13, 14, 19, and 20</p> <ul style="list-style-type: none"> <li>U.S. Provisional App. No. 60/577,284 dated 06/05/2004, at pp. 13-18, Appendix at pp. 2, 3, 5-13</li> </ul>	<p>17:38, Figs. 3A-3B, 4A-4B, cls. 1, 4-6, 11, 14, 16-20.</p>
19	<p>“in response to determining that playback device is receiving the first type of media content, ceasing playback of the second type of media content”</p> <p><b>Explanation:</b> resolution of</p>	'023	<p>No construction necessary. The plain and ordinary meaning of this term is the exact language, i.e., “in response to determining that playback device is receiving the first type of media content, ceasing playback of the second type of media content,” which is not limited to “[d]etermination of the receipt of audio content from the first source causes the playback device to cease playback of the audio content from the second source.”.</p> <p><u>'023 Intrinsic Evidence:</u></p>	<p>“determination of the receipt of audio content from the first source causes the playback device to cease playback of the audio content from the second source”</p> <p>U.S. Patent No. 10,853,023, Abstract, 2:26-3:34, 3:49-4:17, 5:21-36, 6:41-7:57, 7:61-</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	the dispute for this term may affect infringement issues		<ul style="list-style-type: none"> <li>● '023 Patent at Abstract, 2:38-3:34, 3:57-64, 4:6-17, 6:38-7:29, 8:47-61, 23:28-38, 23:61-24:9, Figs. 2A, 11</li> <li>● '023 Patent at Claims 1, 8, 14</li> <li>● '023 Patent File History                             <ul style="list-style-type: none"> <li>○ 2020-07-23 Notice of Allowance</li> </ul> </li> <li>● U.S. Pat. No. 8,938,312 ("'312 Patent") File History                             <ul style="list-style-type: none"> <li>○ 2011-04-18 Application As Filed</li> <li>○ 2014-09-22 Response After Final</li> <li>○ 2014-12-08 Comments on the Statement of Reasons for Allowance</li> </ul> </li> </ul>	<p>9:2, 9:32-56, 23:26-24:41, Fig. 11, cls. 1, 8, 14.</p> <p>U.S. Patent No. 8,938,312 Patent, cls. 1-19.</p> <p>Prosecution history of U.S. Patent Application No. 16/166,518 ('023 Patent), January 14, 2019 Preliminary Amendment at 1-8, October 16, 2019 Non-Final Rejection at 2-10, April 16, 2020 Response at 7-9, July 17, 2020 Terminal Disclaimer, July 23, 2020 Notice of Allowance at 2-6 and Interview Summary.</p> <p>Prosecution history of U.S. Patent Application No. 14/561,421 (U.S. Pat. No. 9,681,223), April 7, 2016 Non-Final Office Action at 2-11, July 7, 2016 Response at 2-12.</p> <p>Prosecution history of U.S. Patent Application No. 14/628,999 (U.S. Pat. No. 9,686,606), April 7, 2016 Non-Final Office Action at 2-9, July 5, 2016, Interview Agenda, July 7, 2016 Response at 2-11.</p>
20	"line-in connector"	'023	As construed by Judge Andrews in <i>Sonos v. D&amp;M Holdings</i> (see 14-cv-1330, D.I. 219), plain and ordinary meaning, which does not exclude digital inputs.	"wired, analog input connector"
	<b>Explanation:</b> resolution of			

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	the dispute for this term may affect infringement issues		<p><u>'023 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● '023 Patent at Abstract, 2:37-3:48, 3:57-67, 4:6-17, 6:23-7:12, 7:30-36, 7:61-8:1, 8:49-9:2, 23:28-60, Figs. 1, 2A, 11</li> <li>● '023 Patent at Claims 1, 8, 14</li> <li>● '023 Patent File History                             <ul style="list-style-type: none"> <li>○ 2020-07-23 Notice of Allowance</li> </ul> </li> <li>● '312 Patent File History                             <ul style="list-style-type: none"> <li>○ 2011-04-18 Application As Filed</li> </ul> </li> </ul>	<p>U.S. Patent No. 10,853,023, Abstract, 1:25-30, 1:57-65, 2:26-27, 2:42-4:17, 5:21-36, 6:15-7:45, 7:61-9:2, 9:12-56, 23:26-24:41, Figs. 2A, 2D, 11, cls. 1-2, 8-9, 14-15.</p> <p>Prosecution history of U.S. Patent Application No. 16/166,518 ('023 Patent), January 14, 2019 Preliminary Amendment at 1-8, October 16, 2019 Non-Final Rejection at 2-10, April 16, 2020 Response at 7-9, July 17, 2020 Terminal Disclaimer, July 23, 2020 Notice of Allowance at 2-6 and Interview Summary.</p> <p>Prosecution history of U.S. Patent Application No. 13/089,167 (U.S. Pat. No. 8,938,312), April 24, 2014 Non-Final Rejection at 2-8, July 3, 2014 Response at 2-10, July 25, 2014 Final Office Action at 3-9, September 22, 2014 Response at 8-10, October 1, 2014 Notice of Allowance at 2-8.</p>
21	“determining that the playback device is receiving the first type of media content via a line-in connector”/	'023	No construction necessary. The plain and ordinary meaning of these terms is the exact language, i.e., “ <i>determining that the playback device is receiving the first type of media content via a line-in connector,</i> ” which is not limited to “analyzing audio content to confirm that the playback device is receiving audio content from the first source,” and “ <i>determining that the playback</i>	<p>“<i>analyzing audio content to confirm that the playback device is receiving audio content from the first source via a line-in connector</i>”</p> <p>“<i>analyzing audio content to confirm that the playback device is no longer receiving audio content from the first source</i>”</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
	<p>“determining that the playback device is no longer receiving the first type of media content”</p> <p><b>Explanation:</b> resolution of the dispute for this term may affect infringement issues</p>		<p><i>device is no longer receiving the first type of media content,”</i> which is not limited to “analyzing audio content to confirm that the playback device is no longer receiving audio content from the first source.” .</p> <p><u>'023 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● '023 Patent at Abstract, 2:38-3:34, 3:57-67, 4:7-17, 6:41-7:29, 8:47-61, 23:61-24:9, 24:18-35, Fig. 11</li> <li>● '023 Patent at Claims 1, 8, 14</li> <li>● '023 Patent File History                             <ul style="list-style-type: none"> <li>○ 2020-07-23 Notice of Allowance</li> </ul> </li> <li>● '312 Patent File History                             <ul style="list-style-type: none"> <li>○ 2011-04-18 Application As Filed</li> <li>○ 2014-09-22 Response After Final</li> <li>○ 2014-10-01 Notice of Allowance</li> </ul> </li> </ul>	<p>U.S. Patent No. 10,853,023, Abstract, 2:26-3:34, 3:49-4:17, 5:21-36, 6:41-7:57, 7:61-9:2, 9:32-56, 23:26-24:41, Fig. 11, cls. 1, 8, 14.</p> <p>U.S. Patent No. 8,938,312 Patent, cls. 1-19.</p> <p>Prosecution history of U.S. Patent Application No. 16/166,518 ('023 Patent), January 14, 2019 Preliminary Amendment at 1-8, October 16, 2019 Non-Final Rejection at 2-10, April 16, 2020 Response at 7-9, July 17, 2020 Terminal Disclaimer, July 23, 2020 Notice of Allowance at 2-6 and Interview Summary.</p> <p>Prosecution history of U.S. Patent Application No. 14/561,421 (U.S. Pat. No. 9,681,223), April 7, 2016 Non-Final Office Action at 2-11, July 7, 2016 Response at 2-12.</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
22	<p>“rearming”</p> <p><b>Explanation:</b> resolution of the dispute for this term may affect infringement issues</p>	'023	<p>No construction necessary. The plain and ordinary meaning of this term is the exact language, i.e., “rearming.” Indeed, Linkplay has not explained what it contends “arming” means in the first instance and so, its proposal of “performing the ‘arming’ operation again” is unclear to Sonos. But because the plain and ordinary meaning of “arming the playback device so receipt of a first type of media content preempts playback of a second type of media content” refers to the playback device entering a state in which receipt of a first type of media content preempts playback of a second type of media content, the plain and ordinary meaning of “rearming the playback device so that subsequent receipt of the first type of media content preempts playback of the second type of media content” refers to the playback device entering back into a state in which receipt of the first type of media content preempts playback of the second type of media content.</p>	<p>Prosecution history of U.S. Patent Application No. 14/628,999 (U.S. Pat. No. 9,686,606), April 7, 2016 Non-Final Office Action at 2-9, July 5, 2016, Interview Agenda, July 7, 2016 Response at 2-11.</p> <p>“performing the ‘arming’ operation again”</p> <p>Linkplay objects to Sonos’s improper inclusion of argument in the joint claim chart. The scheduling order in this action precludes the parties from including such argument. D.I. 44 at ¶ 6 (“In this joint [claim chart] submission, the parties shall not provide argument.”).</p>
				<p>U.S. Patent No. 10,853,023, Abstract, 2:26-27, 2:37-58, 6:61-7:12, 7:25-29, 8:47-61, Fig. 11, cls. 1, 8, 14.</p>

No.	Claim Term	Patent(s)	Sonos's Proposed Construction & Intrinsic Evidence	Linkplay's Proposed Construction & Intrinsic Evidence
			<p><u>'023 Intrinsic Evidence:</u></p> <ul style="list-style-type: none"> <li>● '023 Patent at Abstract, 2:38-56, 6:41-7-29, 8:47-61, 23:61-67, 24:18-35, Fig. 11</li> <li>● '023 Patent at Claims 1, 8, 14</li> <li>● '023 Patent File History                             <ul style="list-style-type: none"> <li>○ 2020-07-23 Notice of Allowance</li> </ul> </li> </ul>	<p>Prosecution history of U.S. Patent Application No. 14/628,999 (U.S. Pat. No. 9,686,606), April 7, 2016 Non-Final Office Action at 2-9, July 5, 2016, Interview Agenda, July 7, 2016 Response at 2-11.</p>