

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

ADEIA TECHNOLOGIES, INC., ADEIA  
GUIDES INC. and ADEIA MEDIA  
HOLDINGS LLC,

Plaintiffs,

v.

THE WALT DISNEY COMPANY, DISNEY  
MEDIA AND ENTERTAINMENT  
DISTRIBUTION LLC, DISNEY DTC LLC,  
DISNEY STREAMING SERVICES LLC,  
DISNEY ENTERTAINMENT & SPORTS  
LLC, DISNEY PLATFORM  
DISTRIBUTION, INC., BAMTECH, LLC,  
HULU, LLC and ESPN, INC.,

Defendants.

C.A. No. 24-cv-1231-MN

**PLAINTIFFS' INITIAL PROPOSED CLAIM CONSTRUCTIONS**

Pursuant to paragraph 10 of the Scheduling Order (D.I. 25), Plaintiffs Adeia Technologies Inc., Adeia Guides Inc., and Adeia Media Holdings LLC (collectively, "Plaintiffs") hereby propose the following constructions for the claim terms and phrases exchanged by the parties on August 15, 2025.

Claim Term	Proposed Construction
"chunking protocol" '639 Patent, Claim 8	Plain and ordinary meaning
"at least one beaconing URL which, when used, is indicative of [playback of at least one advertisement / a certain point has been reached in playback of the requested media source]" '639 Patent, Claims 14 and 15	Plain and ordinary meaning
Order of steps 8[b] to 8[e] '639 Patent, Claim 8	Steps 8[b] to 8[e] do not need to be performed in sequential order

Claim Term	Proposed Construction
Order of steps 8[g] to 8[j] '639 Patent, Claim 8	Steps 8[g] to 8[j] do not need to be performed in sequential order
“data object” '987 Patent, Claims 1, 3-13	“data structure that contains information about a media asset”
“the third server and the second server are data persistence cache servers” <sup>1</sup> '987 Patent, Claim 7	“the third server and second server are on the same level”
“[first/second] progress point” '595 Patent, Claim 1 '324 Patent, Claim 1	Plain and ordinary meaning
“serial program” '595 Patent: Claims 1, 4, 5, 6 '324 Patent: Claims 1, 4, 5, 6	“program containing a temporal component, such as a recommended order of viewing”
“media aggregation server” '705 Patent, Claim 1	“mechanism for obtaining media content from a large number of sources in order to provide the media content to mobile devices in live broadcast streams”
“wherein a plurality of buffers at the streaming server are allocated on a per group of pictures (GOP) basis” '705 Patent, Claim 1	Plain and ordinary meaning
“key frame” '705 Patent, Claims 1, 5-7	“frame that can be displayed substantially on its own (i.e., without reference to other frames)”
“group of pictures (GOP)” '705 Patent, Claims 1, 5	“sequence of different frame types, beginning with a key frame and ending just before a subsequent key frame”
“predictive frame” '705 Patent, Claim 1	“frame that relies on information from a reference key frame”

---

<sup>1</sup> Although Defendants proposed the term “data persistence cache servers”—standing alone—for construction, Plaintiffs believe the term needs to be construed within the context of the broader phrase in which it appears: “the third server and the second server are data persistence cache servers.”

<b>Claim Term</b>	<b>Proposed Construction</b>
“identifying a next available key frame associated with the second media stream” '705 Patent, Claim 1	Not indefinite
“wherein the next available key frame is provided as the second key frame in response to the channel change request, wherein no predictive frames are transmitted at the beginning of the channel change request” '705 Patent, Claim 1	Not indefinite
Order of steps among elements recited in Claim 1 '705 Patent, Claim 1	The steps of Claim 1 do not need to be performed in sequential order
“wherein the first media stream is a first video stream and the second media stream is a second video stream” '705 Patent, Claim 2	Plain and ordinary meaning
“the ox” '428 Patent: Claim 9	“the proxy”
“the proxy appears to the renderer as a single monolithic application program” <sup>2</sup> '428 Patent, Claim 9	“details of the components that make up the application program are hidden from the renderer”
“a workflow manager to communicate one or more document viewers and associated user interface components to the proxy” '428 Patent, Claim 9	Plain and ordinary meaning
“operating a renderer to render a graphical user interface (GUI) for an application program” '428 Patent, Claim 9	Plain and ordinary meaning
“wherein the proxy functions to hide details of each component which makes up the application program from the renderer” '428 Patent, Claim 10	Not indefinite

---

<sup>2</sup> Although Defendants proposed the term “single monolithic application program”—standing alone—for construction, Plaintiffs believe the term needs to be construed within the context of the broader phrase in which it appears: “the proxy appears to the renderer as a single monolithic application program.”

Claim Term	Proposed Construction
“wherein the proxy functions to enable each component which makes up the application program to be modified in a manner that is transparent to the renderer” ’428 Patent, Claim 11	Not indefinite

Plaintiffs reserve the right to supplement, amend, or revise this list of claim constructions consistent with the Court’s Scheduling Order, including in view of Defendants’ disclosures and further discovery. Specifically, Defendants’ identification of certain terms and/or phrases for construction, without further explanation, fails to provide Plaintiffs with any sort of clarity regarding Defendants’ position on the proper construction of certain terms and/or phrases and fails to demonstrate to Plaintiffs that the parties have a dispute regarding the construction of any or all of the terms and/or phrases. Given this lack of clarity, Plaintiffs reserves the right to supplement and/or amend its proposed constructions at any time, including but not limited to, following any meet and confer or other exchange that occurs between the parties.

Moreover, it is also unclear whether and on what basis Defendants intend to raise an indefiniteness challenge regarding the following terms listed in their Initial Invalidity Contentions dated August 1, 2025: “identifying a next available key frame associated with the second media stream” (’705 Patent, Claim 1); “wherein no predictive frames are transmitted at the beginning of the channel change request” (’705 Patent, Claim 1); “where in the proxy functions to hide details of each component which makes up the application program from the renderer” (’428 Patent, Claim 10); and “wherein the proxy functions to enable each component which makes up the application program to be modified in a manner that is transparent to the renderer” (’428 Patent, Claim 11). These terms are among those Defendants have proposed for construction, although a much larger number of terms listed in Defendants’ invalidity contentions have been omitted.

Plaintiffs therefore presume Defendants will contend that the four phrases identified above are indefinite and that Defendants are dropping the remaining indefiniteness issues listed in their invalidity contentions. Even with respect to these four phrases, however, Defendants have provided no information regarding what arguments it may raise related to indefiniteness, or even which portions of the listed claim phrases it proposes are indefinite. As a result of Defendants' failure to disclose their indefiniteness arguments, Plaintiffs reserve the right to later propose a construction for one or more of these claim terms.

Dated: September 5, 2025

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

Brian E. Farnan (Bar No. 4089)  
Michael J. Farnan (Bar No. 5165)  
919 North Market Street, 12th Floor  
Wilmington, DE 19801  
Tel: (302) 777-0300  
Fax: (302) 777-0301  
bfarnan@farnanlaw.com  
mfarnan@farnanlaw.com

Bradley W. Caldwell (admitted *pro hac vice*)  
Jason D. Cassady (admitted *pro hac vice*)  
John Austin Curry (admitted *pro hac vice*)  
Brian D. Johnston (admitted *pro hac vice*)  
**Caldwell Cassady & Curry PC**  
2121 N Pearl St., Suite 1200  
Dallas, TX 75201  
Telephone: (214) 888-4848  
bcaldwell@caldwellcc.com  
jcassady@caldwellcc.com  
acurry@caldwellcc.com  
bjohnston@caldwellcc.com

*Attorneys for Plaintiffs Adeia Technologies  
Inc., Adeia Guides Inc., and Adeia Media  
Holdings, LLC*

CERTIFICATE OF SERVICE

I, Brian E. Farnan, hereby certify that on September 5, 2025, a copy of Plaintiffs' Initial

Proposed Claim Constructions was served on the following as indicated:

Via E-Mail

Robert W. Whetzel  
Jason J. Rawnsley  
Gabriela Z. Monasterio  
RICHARDS, LAYTON & FINGER, P.A.  
920 North King Street  
Wilmington, DE 19801  
whetzel@rlf.com  
rawnsley@rlf.com  
monasterio@rlf.com

*Attorneys for Defendants The Walt Disney Company, Disney Media and Entertainment Distribution LLC, Disney DTC LLC, Disney Streaming Services LLC, Disney Entertainment & Sports LLC, Disney Platform Distribution, Inc., BAMTech, LLC, Hulu, LLC, and ESPN, Inc.*

Via E-Mail

Ryan K. Yagura  
Xin-Yi Zhou  
Laura Burson  
Bradley M. Berg  
O'MELVENY & MYERS LLP  
ryagura@omm.com  
vzhou@omm.com  
lburson@omm.com  
bmberg@omm.com

*Attorneys for Defendants The Walt Disney Company, Disney Media and Entertainment Distribution LLC, Disney DTC LLC, Disney Streaming Services LLC, Disney Entertainment & Sports LLC, Disney Platform Distribution, Inc., BAMTech, LLC, Hulu, LLC, and ESPN, Inc.*

/s/ Brian E. Farnan

Brian E. Farnan (Bar No. 4089)