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**INTERTRUST TECHNOLOGIES  
 CORPORATION**

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

DOLBY LABORATORIES, INC.,  
 Plaintiff and Counterclaim-Defendant,  
 v.  
 INTERTRUST TECHNOLOGIES  
 CORPORATION,  
 Defendant and Counterclaim-Plaintiff.

Case No. 3:19-cv-03371-EMC

Assigned to: Hon. Edward M. Chen

**JOINT STIPULATION REGARDING  
 CLAIM TERMS AND CLAIM  
 CONSTRUCTION SCHEDULE**

Pursuant to the Court's August 5, 2020 Order directing the parties to meet and confer to reach agreement on the ten disputed claim terms for construction and to set a new claim construction briefing and hearing schedule (Dkt. No. 98), Defendant/Counterclaim-Plaintiff Intertrust

Technologies Corporation ("Intertrust") and Plaintiff/Counterclaim-Defendant Dolby Laboratories, Inc. ("Dolby") have met and conferred and respectfully **HEREBY STIPULATE AND AGREE**, through their undersigned counsel, and subject to the approval of the Court, to the following:

**1. The Ten Disputed Claim Terms for Construction**

The parties identify the following 10 disputed claim terms for construction. These terms are not presented in order of significance.

	Claim Term	Claim(s)
1	"rendering application"	'106 (claim 17)
	"application program capable of rendering electronic content"	'342 (claims 1 and 12)
2	"rule"	'158 (claim 4)
3	"control information"	'304 (claim 24)
4	"receiving...separately" / "receiving, separately"	'304 (claim 24); '157 (claims 69, 84, 99); '106 (claim 17)
5	"received[ing]...separately...and via separate delivery" / "receiving...independently...via separate delivery"	'157 (claims 53, 69, 86) '158 (claim 4)
6	"generating a progression of check values, each check value in the progression being derived from a portion of the block of data and from at least one other check value in the progression"	'602 (claim 25)
7	"the user"	'721 (claims 9 and 29)
8	"each error-check value being operable to facilitate authentication of a portion of the block of data and of a check value in the progression of check values"	'602 (claim 25)
9	"secure processing unit"	'157 (claims 69, 87, 89) '158 (claim 4)
10	"wherein the piece of electronic content comprises an authorizing document, and the second entity associates the second digital certificate with the authorizing document if the authorizing document originated from a certified entity"	'342 (claim 1)

**2. Proposed Constructions for the Ten Disputed Claim Terms**

The table below sets forth the parties' current proposed constructions for the ten disputed claim terms identified above in Section 1.

Claim Term	Intertrust's Construction	Dolby's Construction
"rendering application" / "application program capable of rendering electronic content"	"application program that processes content to play it through an audio output (e.g., speakers) or display it on a video output (e.g., a screen)"	"software program that presents electronic content in a form designed for human perception or viewing"
"rule"	"information and/or programming controlling operations on or use of resources"	"information, such as executable code or associated data, related to controlling use of a digital file"
"control information"	"information and/or programming controlling operations on or use of resources"	"information, such as executable code or associated data, related to controlling use of a digital file"
"receiving...separately" / "receiving, separately"	"receiving over different paths, or from different sources, or at different times"	"receiving in a different package and/or via delivery at a different time, over a different path, or from a different source"
"received[ing]...separately...and via separate delivery" / "receiving...independently...via separate delivery"	"receiv[ed/ing] through a different path"	"receiving via delivery at a different time, over a different path, or from a different source"
"generating a progression of check values, each check value in the progression being derived from a portion of the block of data and from at least one other check value in the progression"	plain and ordinary meaning	indefinite
"the user"	plain and ordinary meaning	indefinite

"each error-check value being operable to facilitate authentication of a portion of the block of data and of a check value in the progression of check values"	plain and ordinary meaning	indefinite
"secure processing unit"	"processing unit that makes information and processes resistant to unauthorized use"	"processing circuitry that functions in a self-contained, trusted computing environment"
"wherein the piece of electronic content comprises an authorizing document, and the second entity associates the second digital certificate with the authorizing document if the authorizing document originated from a certified entity"	Clause is limiting, but does not add an additional claim step performed by a second entity	The claimed method includes an action ("associates ...") to be performed by the second entity

**3. Construction of Additional Claim Terms on Which the Parties Agree**

In addition to the agreed constructions identified in the Joint Claim Construction Statement (see Dkt. No. 80, 2-3), the parties have now agreed to the following constructions.

Claim Term	Claim(s)	Agreed Construction
"electronic appliance"	'157 (claims 53, 54, 56, 57, 58, 59, 60, 64, 65, 66, 69, 86, 87, 89); '158 (claim 4)	"one or more electronic components designed or configured to together perform one or more specialized tasks"
Order of "processing" and "evaluating" steps	'603 (claim 1)	"processing at least a portion of said piece of electronic media content using at least one of the one or more software modules" occurs before "evaluating whether the at least one of the one or more software modules process the portion of the electronic media content in an authorized manner...."

"load module"	"721 (claims 5, 9)"	"executable code and any associated data"
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4. **Proposed Claim Construction Briefing and Hearing Schedule**

Subject to the Court's availability, the parties propose the following schedule for claim construction briefing, the technology tutorial, and the claim construction hearing.

Event	Proposed Date
Intertrust's Opening Claim Construction Brief	August 26, 2020
Dolby's Responsive Brief	September 9, 2020
Intertrust's Reply Brief	September 16, 2020
Technology Tutorial	<del>October 6, 2020</del> , 2:30 p.m. October 20, 2020
Claim Construction Hearing	<del>October 20, 2020</del> , 1:30 p.m. November 3, 2020

**IT IS SO STIPULATED**, through counsel of record.

Respectfully submitted,

Date: August 11, 2020

By: /s/ Stepan Starchenko

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Date: August 11, 2020


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INTERTRUST TECHNOLOGIES  
CORPORATION

1 PURSUANT TO STIPULATION, IT IS SO ORDERED AS MODIFIED.

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4 Dated: August 12, 2020

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HON. EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE