

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

STARZ ENTERTAINMENT, LLC,
STARZ, LLC
STARZPLAY MANAGEMENT US,
LLC and
STARZPLAY US, LLC

Plaintiffs/Counter-Defendants,

v.

VL COLLECTIVE IP, LLC and
VIDEOLABS, INC.,

Defendants/Counter-Plaintiffs.

Civil Action No. 21-cv-1448-JLH

JURY TRIAL DEMANDED

DEFENDANT VIDEOLABS' ANSWERING CLAIM CONSTRUCTION
BRIEF

that each sequential audio segment is aligned with every second video segment (e.g., if the segments are constructed so that every audio segment is twice as long as each video segment). *See id.* By creating relationships between the data segments, assignment rules enable the quick and efficient alignment of segments.

ii. Preambles

Term	Agreed Construction
Preambles (Claims 1, 9)	The preambles are construed to be limiting. In addition to the other limitations set forth in the preamble, the referenced first data file and second data file cannot be the same data file

Upon receiving Starz’s opening claim construction brief, it seemed to VideoLabs that the parties were in agreement about the proper interpretation of the preambles for claims 1 and 9 of the ’794 patent. Counsel for VideoLabs thus reached out to counsel for Starz, and after discussing, the parties agreed on the above construction. This construction captures the meaning of VideoLabs’ originally proposed construction, while addressing Starz’s concerns about perceived ambiguities.

iii. “assignment rule for assigning each one of the content-related second data segments to one of the content-related first data segments” / “assignment rule for assigning each one of the content-related second data segments to each one of the content-related first data segment” / “assignment rule” / “the assignment rule is not based on a timestamp” (collectively, the “assignment rule limitations”)

Term	VideoLabs’ Construction ⁷	Starz’s Construction
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⁷ VideoLabs proposes a construction for the first two identified terms in the chart, which appear in claims 1 and 9, respectively. VideoLabs’ position is that none of the assignment rule claim terms are indefinite.