

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

TOPIA TECHNOLOGY, INC.,

Plaintiff,

v.

BOX, INC., SAILPOINT TECHNOLOGIES
HOLDINGS, INC. AND VISTRA CORP.,

Defendants.

Case No. 6:21-cv-01372-ADA

JURY TRIAL DEMANDED

TOPIA TECHNOLOGY, INC.,

Plaintiff,

v.

DROPBOX, INC., SAILPOINT
TECHNOLOGIES HOLDINGS, INC. AND
CLEAR CHANNEL OUTDOOR
HOLDINGS, INC.,

Defendants.

Case No. 6:21-cv-01373-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION CHART

The chart addresses the claim construction positions of the parties regarding U.S. Patent No. 9,143,561; U.S. Patent No. 10,067,942; U.S. Patent No. 10,289,607; U.S. Patent No. 10,642,787; U.S. Patent No. 10,754,823; and U.S. Patent No. 11,003,622.

Below is a table identifying the parties' proposed constructions. Based on the parties' present understanding, the parties agree that any terms in the asserted claims of the Patents-in-Suit not appearing in this table do not require construction by the Court.

Claim Term	Asserted Claim(s)	Plaintiffs' Proposed Construction	Defendants' Proposed Construction
<p>“when the user modifies a content of the file” / “when a content ... is modified by the user”</p> <p>(Proposed by Defendants)</p>	<p>'561 Patent, claims 1, 8</p>	<p>If construction is required, plain and ordinary meaning</p>	<p>at the time the user modifies a content, which does not include synchronization performed periodically, or at predetermined times, or based on synchronization of another device, or when logging into or out of a web-portal, or manually upon press of a “sync” button</p>
<p>“responsive to the user modifying a content”</p> <p>(Proposed by Defendants)</p>	<p>'942 Patent, claims 1, 10; '607 Patent, claims 1, 5, 7, 12, 17, 19; '787 Patent, claims 1, 3, 4, 8, 10, 11, 13, 15, 16; '823 Patent, claims 1, 3, 4, 8, 10, 11, 13, 15, 16; '622 Patent, claims 1, 5, 7, 11, 16</p>	<p>If construction is required, plain and ordinary meaning</p>	<p>responsive to the user modifying the content, as opposed to being performed on a periodic or other timing basis</p>

Dated: October 24, 2022

Respectfully submitted,

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