IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PERSONALIZED MEDIA COMMUNICATIONS, LLC	)	
Plaintiff	)	**CIVIL ACTION NO. 13-cv-1608-RGA**
v.	)	**JURY TRIAL DEMANDED**
AMAZON.COM, INC., AMAZON WEB SERVICES, LLC,	)	REDACTED VERSION
Defendants.	)	

JOINT CLAIM CONSTRUCTION SUBMISSION

Pursuant to Paragraph 7 of the Court's Scheduling Order and the Parties' August 5, 2014 Stipulation, Plaintiff Personalized Media Communications, LLC and Defendants Amazon.com, Inc. and Amazon Web Services, LLC (collectively, the "Parties") hereby submit their Joint Claim Construction Submission. Attached as Exhibit A hereto is an identification of the terms the parties propose for construction. Attached hereto as Exhibit B is a chart listing each of the terms proposed for construction, along with proposed constructions and citations to supporting intrinsic evidence. The Parties reserve the right to amend their construction and to rely on additional evidence not cited herein in their claim construction briefs, including in rebuttal to evidence cited herein.

Also pursuant to the Court's Scheduling Order, the Parties hereby submit supporting documents, including asserted U.S. Patent No. 5,887, 243 (Exhibit C), as well as copies of the front page and claims from the six other asserted patents (Exhibits D through I), all of which share a common specification. For ease of reference, in the Joint Claim Construction Chart, all citations to the specification are to the '243 patent specification. Portions of the intrinsic record relied upon by the Parties are attached as Exhibits J through W.

A full index of all Exhibits attached hereto is as follows:

Exhibit	Document
A	Terms Proposed for Construction In Claim Context
B	Joint Claim Construction Chart with Proposed Constructions and Supporting Intrinsic Evidence
C	U.S. Patent No. 5,887, 243 (’243 patent)
D	U.S. Patent No. 7,801,304 (’304 patent) – First page and claims only
E	U.S. Patent No. 7,864,956 (’956 patent) – First page and claims only
F	U.S. Patent No. 7,827,587 (’587 patent) – First page and claims only
G	U.S. Patent No. 8,046,791 (’791 patent) – First page and claims only
H	U.S. Patent No. 7,805,749 (’749 patent) – First page and claims only
I	U.S. Patent No. 7,783,252 (’252 patent) – First page and claims only
J	U.S. Patent No. 4,694,490
K	Excerpts from the ’304 Patent File History
L	Excerpts from the ’956 Patent File History
M	Excerpts from the ’587 Patent File History
N	This exhibit intentionally left blank.
O	Excerpts from the ’791 Patent File History
P	Excerpts from the ’252 Patent File History
Q	BPAI Appeal 2007-1837 Request for Rehearing
R	BPAI Appeal 2007-1837 - 2009-06-24 Decision (PMC-AMZ 00004403-4407)
S	1998-10-21 Amendment (PMCLIT00085540-576)
T	08-448810 Application (PMCLIT00146742-7104)
U	IPR2013-00156 Decision (PMCLIT00609504-534)
V	“Decision on Appeal,” Ex parte Personal Media Communications, LLC, Reexamination Control Nos. 90/006,563 & 90/006,689 (U.S. Pat. No. 5,335,277) (USPTO BPAI Jan. 19, 2010) (PMCLIT00689618-PMCLIT00689724)
W	2008-12-08 BPAI Decision in Ex parte Reexamination Control 90/006,536, Appeal 2008-4228 (PMCLIT00660241-PMCLIT00660356)

Dated: September 16, 2014

FARNAN LLP

By: */s/ Brian E. Farnan*
Brian E. Farnan (#4089)
919 North Market Street, 12th Fl.
Wilmington, DE 19801
Tel: (302) 777-0300
bfarnan@farnanlaw.com

Attorneys for Plaintiff
Personalized Media Communications, LLC

POTTER ANDERSON & CORROON LLP

By: */s/ David A. Moore*
Richard L. Horwitz (#2246)
David E. Moore (#3983)
Bindu A. Palapura (#5370)
Hercules Plaza 6th Floor
1313 N. Market Street
Wilmington, DE 19899
Tel: (302) 984-6000
rhorwitz@potteranderson.com
dmoore@potteranderson.com
bpalapura@potteranderson.com

Attorneys for Defendants Amazon.com, Inc. and Amazon Web Services, LLC