IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KRAFT FOODS GROUP BRANDS LLC, Plaintiff,	:	C.A. No. 14-028 (LPS)
v.	:	
TC HEARTLAND, LLC d/b/a HEARTLAND FOOD PRODUCTS GROUP, et al., Defendants.	:	

JOINT CLAIM CONSTRUCTION CHART

Pursuant to this Court's February 9, 2015 Scheduling Order (D.I. 38), as amended (D.I. 75), Plaintiff Kraft Foods Group Brands LLC ("Kraft") and Defendants TC Heartland, LLC d/b/a Heartland Food Products Group and Heartland Packaging Corp. (collectively, "Heartland") have met and conferred and hereby jointly submit the Joint Claim Construction Chart attached as Exhibit A.

The parties have set forth their proposed constructions in Exhibit A, which includes Kraft's and Heartland's proposed constructions of each disputed claim term or phrase of U.S. Patent No. 8,293,299 ("the '299 Patent"), U.S. Patent No. 8,603,557 ("the '557 Patent"), and U.S. Patent No. 8,511,472 ("the '472 Patent") (collectively, "the Patents-in-Suit").

Also attached hereto are copies of each of the Patents-in-Suit and cited excerpts from their respective prosecution histories, as follows:

Exhibit B: the '299 Patent

Exhibit C: cited excerpts of the Prosecution History of the '299 Patent

Exhibit D: the '557 Patent

Exhibit E: cited excerpts of the Prosecution History of the '557 Patent

Exhibit F: the ’472 Patent

Exhibit G: cited excerpts of the Prosecution History of the ’472 Patent

The parties reserve the right to supplement, modify, and/or amend the claim constructions set forth in Exhibit A as warranted by additional discovery or further developments in this litigation.

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served on all counsel of record, by the Court's electronic filing system, this 19th day of October, 2015.

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