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18 *Kingston Technology Company, Inc.*

19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**

21 POLARIS INNOVATIONS
22 LIMITED, an Irish limited company

23 Plaintiff,

24 vs.

25 KINGSTON TECHNOLOGY
26 COMPANY, INC., a Delaware
27 corporation,

28 Defendant.

Case No. 8:16-cv-300 CJC (RAO)

**DEFENDANT KINGSTON
TECHNOLOGY COMPANY, INC.'S
PRELIMINARY CLAIM
CONSTRUCTIONS AND
IDENTIFICATION OF
SUPPORTING EVIDENCE**

29 Pursuant to the schedule agreed by the Parties in the Update to Joint Rule 26(f)
30 Report (Dkt. 70), Defendant Kingston Technology Company, Inc. provides the
following proposed claim constructions and identification of supporting evidence:

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Claim Term	Claims	Kingston's Proposed Construction	Int
Claim preamble	'589 Patent cl. 11	Preamble is limiting	'589 Pa limited
"dynamic semiconductor memory device of a random access type"	'589 Patent cl. 11	"dynamic random-access memory such as DRAM or SDRAM"	'589 Pa limited 1:43-46 3:47-48
"initialization circuit"	'589 Patent cl. 11	Governed by 35 U.S.C. § 112 ¶ 6 <u>Function</u> : Controlling a switching-on operation of the dynamic semiconductor memory device and of its circuit components <u>Structure</u> : A hardware circuit having the structure depicted in Figure 1	'589 Pa limited 31; 3:51
"switching-on operation"	'589 Patent cl. 11	"initial powering up operation"	'589 Pa limited 13; 1:16 2:7-14; 51; 4:3-5:10-21

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Claim Term	Claims	Kingston's Proposed Construction	Int
"supply voltage stable signal"	'589 Patent cl. 11	"a signal that becomes active only when internal power supply voltages have reached the values necessary for proper operation of the component"	'589 Pa limited 1:13-16 2:60-62 4:41-48
"enable circuit"	'589 Patent cl. 11	Governed by 35 U.S.C. § 112 ¶ 6 <u>Function</u> : Supplying an enable signal <u>Structure</u> : A hardware circuit having the structure depicted in Figure 2 or 4	'589 Pa limited 2:46-3: 4:9-23;
"enable signal"	'589 Patent cl. 11	"a signal that is asserted only upon completion of an initialization sequence in order to activate proper operation of a device"	'589 Pa limited 2:21-28 3:32-33 4:49-58
"unlatching of a control circuit provided for a proper operation of the dynamic semiconductor memory device"	'589 Patent cl. 11	"switching a control circuit from a disabled state to an enabled state to activate proper operation of the dynamic semiconductor memory device"	'589 Pa limited 1:43-2: 4:14-20 6:60-64