### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

SAINT LAWRENCE COMMUNICATIONS	§	
LLC,	§	
Plaintiff,	§ §	Case No. 2:16-cv-00082-JRG
<b>v.</b>	§ §	Jury Trial Demanded
APPLE INC., AT&T MOBILITY LLC,	\$ §	
and CELLCO PARTNERSHIP D/B/A	§	
VERIZON WIRELESS,	§	
Defendants.	§	
	§	

### **JOINT CLAIM CONSTRUCTION CHART PURSUANT TO P.R. 4-5(D)**

Plaintiff Saint Lawrence Communications LLC ("St. Lawrence") and Defendants Apple Inc., AT&T Mobility LLC, and Cellco Partnership d/b/a Verizon Wireless (Collectively, "Defendants"), hereby submit their Joint Claim Construction Chart pursuant to Local Patent Rule 4-5(d).

Appendix A is a chart listing the complete language of disputed claims with the disputed terms in bold type. The claims currently asserted by St. Lawrence are as follows:

- U.S. Patent Number 6,795,805: claims 1-3, 6, 11-13, 16, 21-23, 26, 31-33, 36, 51-53, 56, 61-63, and 66;
- U.S. Patent Number 6,807,524: claims 1-21, 29-42;
- U.S. Patent Number 7,151,802: claims 1-3, 8-11, 16, 25-27, 32-35, 40, 49-50, 52-53;
- U.S. Patent Number 7,191,123: claims 1-11, 13-16, 18-31, 33-36, 53-63, 65-79, 81-84, 102-03; and
- U.S. Patent Number 7,260,521: claims 1, 2, 5-8, 10, 11, 14, 15, 17, 28, 29, 32, 33, 35, 37, 38, 41, 42, 44, 55, 56, 59, 60, and 62.

Appendix A contains the complete language of these asserted claims but also contains the



complete language of any unasserted claims from which these asserted claims depend.

Appendix B contains the parties' proposed constructions for the disputed terms.

Dated: January 18, 2017

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 18, 2017.

/s/ Melissa R. Smith
Melissa R. Smith



### APPENDIX A

### **U.S. Patent Number 6,795,805**

- 1. A device for enhancing periodicity of an excitation signal produced in relation to a pitch codevector and an innovative codevector for supplying a signal synthesis filter in view of synthesizing a wideband speech signal, said periodicity enhancing device comprising:
- a) a factor generator for calculating a periodicity factor related to the **wideband speech signal**; and
- b) an innovation filter for filtering the innovative codevector in relation to said periodicity factor to thereby reduce energy of a **low frequency portion** of the innovative codevector and enhance periodicity of a **low frequency portion** of the excitation signal.
- 11. A method for enhancing periodicity of an excitation signal produced in relation to a pitch codevector and an innovative codevector for supplying a signal synthesis filter in view of synthesizing a wideband speech signal, said periodicity enhancing method comprising:
- a) calculating a periodicity factor related to the wideband speech signal; and
- b) filtering the innovative codevector in relation to said periodicity factor to thereby reduce energy of a low frequency portion of the innovative codevector and enhance periodicity of a low frequency portion of the excitation signal.
- 21. A decoder for producing a synthesized wideband speech signal, comprising:
- a) a signal fragmenting device for receiving an encoded **wideband speech signal** and extracting from said encoded **wideband speech signal** at least pitch codebook parameters, innovative codebook parameters, and synthesis filter coefficients;
- b) an pitch codebook responsive to said pitch codebook parameters for producing a pitch codevector;
- c) an innovative codebook responsive to said innovative codebook parameters for producing an innovative codevector;
- d) a periodicity enhancing device as recited in claim 1 comprising said factor generator for calculating a periodicity factor related to the **wideband speech signal**, and said innovation filter for filtering the innovative codevector;
- e) a combiner circuit for combining said pitch codevector and said innovative codevector filtered by said innovation filter to thereby produce said periodicity enhanced excitation signal; and f) a signal synthesis filter for filtering said periodicity enhanced excitation signal in relation to said synthesis filter coefficients to thereby produce said **synthesized wideband speech signal**.
- 22. A decoder for producing a **synthesized wideband speech signal** as defined in claim 21, wherein said factor generator comprises a means for calculating a periodicity factor in response to the pitch codevector and the innovative codevector.
- 23. A decoder for producing a **synthesized wideband speech signal** as defined in claim 21, wherein said innovation filter has a transfer function of the form:

$$F(z) = -\infty z + 1 - \infty z^{-1}$$

where  $\propto$  is a periodicity factor derived from a level of periodicity of the excitation signal.

26. A decoder for producing a **synthesized wideband speech signal** as defined in claim 23, wherein said factor generator comprises a means for calculating said periodicity factor  $\propto$  using the relation:



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