

## EXHIBIT B1

Defendants’ Proposed Constructions, Intrinsic Evidence, and Extrinsic Evidence Pursuant to Local Rule P.R. 4-3<sup>1</sup>

Term	Proposed Construction, Intrinsic Evidence and Extrinsic Evidence
<p>“USB” / ”Universal Serial Bus (‘USB’)</p> <p><b>’111:</b> 1, 2, 3, 6, 7, 8, 12, 14, 15, 16, 17, 18</p> <p><b>’586:</b> 8, 9, 11, 12</p> <p><b>’766:</b> 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20, 24</p> <p><b>’550:</b> 1, 3, 4, 5, 10, 12, 13, 14</p>	<p>“USB is an abbreviation for ‘Universal Serial Bus,’ which is a computer standard technology described in Universal Serial Bus Specification Revision 2.0 and other versions of this standard promulgated at the time of the claimed invention.”</p> <p>Defendants identify the following intrinsic evidence in support of their construction:</p> <ul style="list-style-type: none"> <li>• ’550 patent<sup>2</sup>: “USB” appears throughout the specification and thus the entire specification is relevant. Defendants further identify: Abstract, 1:41-2:20; 2:19-20, 3:2-10; 3:17-26; 3:46-49, 3:61-4:8, 6:3-28, 7:9-11; 8:15- 29; 9:8-10:44, 12:1-5; Figs. 1-4.</li> <li>• March 2001 Provisional Application 60/273021, including pg. 1-14, Fig. 1-4; Esker ASIC Specification pg. 7, 12, 14.</li> <li>• October 2001 Provisional Application 60/330486, including pg. 1-4, 13, 16; Figs. 1-4.</li> <li>• ’111 File History at 1/20/2006 Applicant Remarks.</li> </ul>

<sup>1</sup> Defendants’ reserve the right to rely on any intrinsic or extrinsic evidence identified by FISFI, including additional portions of documents cited by FISFI for completeness, explanation, or rebuttal. The disclosures provided herein are based on Defendants’ investigation to date per P.R. 4-3, and Defendants reserve the right to rely on additional intrinsic and extrinsic evidence as discovery proceeds. Defendants further reserve the right to rely on any evidence cited for these terms or phrases by FISFI or Defendants in co-pending litigations in Case Nos. 2:17-cv-00145 and 3:17-cv-01827 (N.D. Tex.) (together, “Related Actions”). Defendants further reserve the right to rely on any deposition testimony given or any declarations served or filed with any claim construction briefs in the Related Actions. Defendants may also rely on the lack of disclosure in the intrinsic record or extrinsic evidence. Defendants incorporate all references to the intrinsic and extrinsic record contained in the summary of opinion exhibits.

<sup>2</sup> The Fischer patents were all denominated as continuation applications. Defendants’ identification of portions of the ’550 patent for this term and others should be treated as disclosures of corresponding sections of the remaining Fischer patents.

Term	Proposed Construction, Intrinsic Evidence and Extrinsic Evidence
	<ul style="list-style-type: none"> <li>• The claims of the Fischer patents reciting “USB” or “Universal Serial Bus.”</li> </ul> <p>Defendants identify the following exemplary extrinsic evidence in support of their construction:</p> <ul style="list-style-type: none"> <li>• USB 2.0, including Sections 1.2 and 7.3.2 (LG-FISI0049602 – LG-FISI0050251).</li> <li>• USB 3.1, including Section 11.4.5 (LG-FISI0050252 – LG-FISI0050882).<sup>3</sup></li> <li>• USB Battery Charging 1.2 (LG-FISI0049531 - LG-FISI0049601).<sup>4</sup></li> <li>• USB Power Delivery 3.0 v.1.1 (LG-FISI0050883 - LG-FISI0051461).<sup>5</sup></li> <li>• USB Type-C Specification Release 1.2 (LG-FISI0051883 - LG-FISI0052103).<sup>6</sup></li> <li>• Universal Serial Bus Micro-USB Cables and Connectors Specification Revision 1.01 (LG-FISI0051727 - LG-FISI0051762).<sup>7</sup></li> <li>• On-The-Go and Embedded Host Supplement to the USB Revision 2.0 Specification Revision 2.0 version 1.1a (LG-FISI0051587 - LG-FISI0051682).<sup>8</sup></li> <li>• USB000014-16.</li> <li>• Computer Desktop Encyclopedia, Ninth Edition, 2001, p. 1011 (LG-FISI0051513 - LG-FISI0051518).</li> <li>• Data and Telecommunications Dictionary, 1999, p. 720 (LG-FISI0051522 - LG-FISI0051526).</li> <li>• McGraw-Hill Illustrated Telecom Dictionary, Fourth Edition, 2001, p. 603, 605 (LG-FISI0051571 - LG-FISI0051576).</li> </ul>

<sup>3</sup> Defendants and Mr. Dezmelyk may rely upon such extrinsic evidence for purposes of comparison between the disclosures set forth in USB 2.0, among other things.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

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	<ul style="list-style-type: none"> <li>• Microsoft Computer Dictionary, Fourth Edition, 1999. p. 462 (LG-FISI0051577 - LG-FISI0051581).</li> <li>• Webster’s New World Dictionary of Computer Terms, Eighth Edition, 2000, p. 550 (LG-FISI0052110 - LG-FISI0052114).</li> <li>• Dictionary of Computer and Internet Words, An A to Z Guide to Hardware, Software, and Cyberspace, 2001, p. 279 (LG-FISI0051527 - LG-FISI0051531).</li> <li>• Random House Webster’s Pocket Computer &amp; Internet Dictionary, First Edition, 1999, p. 325 (LG-FISI0051710 - LG-FISI0051715).</li> </ul> <p>Defendants intend to rely on the declaration and/or testimony of Mr. Dezmelyk (CV previously provided to FISI), to explain the technology of the asserted patents, both generally and with respect to this limitation, the state of the art as of the claimed priority date of the asserted patents, the level of ordinary skill in the art, and the meaning of the limitation to a person of ordinary skill in the art at the time of the alleged invention. Mr. Dezmelyk, for example, may explain the requirements and limitations of the USB 2.0 Specification at or before the time of the invention generally, and with respect to this term, and what a person of ordinary skill in the art would have understood about the requirements and limitations of the USB 2.0 Specification with respect to this term and its meaning. Defendants may also rely on Mr. Dezmelyk to respond to FISI’s claim construction positions and alleged support, including why Defendants’ position should be adopted over that of FISI. Mr. Dezmelyk is available for deposition at a mutually agreeable time.</p> <p>Defendants further reserve the right to rely on positions and evidence cited by FISI and/or positions relied on or cited by FISI and/or Samsung in the related litigation.</p>
<p>“identification signal”</p> <p>’111: 1, 6, 17, 18</p> <p>’586: 8, 9, 10, 11, 12, 13</p>	<p>“signal that informs the mobile device that the USB adapter is not limited by the power limits imposed by the USB specification”</p> <p>Defendants identify the following exemplary intrinsic evidence in support of their construction:</p> <ul style="list-style-type: none"> <li>• ’550 patent: 2:64-3:26, 8:27-45, 8:63-9:3, 9:8-30.</li> </ul>

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<p>'766: 17, 19</p>	<ul style="list-style-type: none"> <li>• '111 File History at 1/20/2006 Applicant Remarks.</li> <li>• The claims of the Fischer patents reciting “identification signal.”</li> </ul> <p>Defendants intend to rely on the declaration and/or testimony of Mr. Dezmelyk (CV previously provided to FISl), to explain the technology of the asserted patents, both generally and with respect to this limitation, the state of the art as of the claimed priority date of the asserted patents, the level of ordinary skill in the art, and the meaning of the limitation to a person of ordinary skill in the art at the time of the alleged invention. Mr. Dezmelyk, for example, may explain what one skilled in the art would understand the term “identification signal” to mean in light of the intrinsic evidence. Defendants may also rely on Mr. Dezmelyk to respond to FISl’s claim construction positions and alleged support, including why Defendants’ position should be adopted over that of FISl. Mr. Dezmelyk is available for deposition at a mutually agreeable time.</p> <p>Defendants further reserve the right to rely on positions and evidence cited by FISl and/or positions relied on or cited by FISl and/or Samsung in the related litigation.</p>
<p>“generate” / “generating”</p> <p>'111: 1 and 17</p>	<p>“to produce” / “producing”</p> <p>Defendants identify the following exemplary intrinsic evidence in support of their construction:</p> <ul style="list-style-type: none"> <li>• '550 patent: 8:27-45; 9:26-30; 9:36-44; Fig. 3.</li> </ul> <p>Defendants identify the following extrinsic evidence in support of their construction:</p> <ul style="list-style-type: none"> <li>• Webster’s New World Dictionary and Thesaurus, Second Edition, 2002, p. 265 (LG-FISI0052104 - LG-FISI0052109).</li> <li>• Oxford Paperback Dictionary Thesaurus &amp; Wordpower Guide, 2001, p. 373 (LG-FISI0051698 - LG-FISI0051702).</li> </ul> <p>Defendants intend to rely on the declaration and/or testimony of Mr. Dezmelyk (CV previously provided to FISl), to explain the technology of the asserted patents, both generally and with respect to this limitation, the state of the art as of the claimed priority date of the asserted patents, the level of ordinary skill in the art,</p>

Term	Proposed Construction, Intrinsic Evidence and Extrinsic Evidence
	<p>and the meaning of the limitation to a person of ordinary skill in the art at the time of the alleged invention. Mr. Dezmelyk, for example, may explain what one skilled in the art would understand the terms “generate” and “generating” to mean in light of the intrinsic evidence, dictionary definitions, and experience of a person of ordinary skill in the art. Defendants may also rely on Mr. Dezmelyk to respond to FISI’s claim construction positions and alleged support, including why Defendants’ position should be adopted over that of FISI. Mr. Dezmelyk is available for deposition at a mutually agreeable time.</p> <p>Defendants further reserve the right to rely on positions and evidence cited by FISI and/or positions relied on or cited by FISI and/or Samsung in the related litigation.</p>
<p>“microprocessor”</p> <p>’586: 11</p>	<p>“a CPU on a single chip”</p> <p>Defendants identify the following exemplary intrinsic evidence in support of their construction:</p> <ul style="list-style-type: none"> <li>• ’550 patent: 3:61-66, 4:63-5:6, 5:32-52, 9:20-24, Fig. 1.</li> <li>• March 2001 Provisional Application 60/273021, including Fig. 4.</li> <li>• October 2001 Provisional Application 60/330486, including pg. 8-10.</li> <li>• The claims of the Fischer patents reciting “microprocessor.”</li> </ul> <p>Defendants identify the following exemplary extrinsic evidence in support of their constructions:</p> <ul style="list-style-type: none"> <li>• Comprehensive Dictionary of Electrical Engineering, 1999, p. 95, 149, 411 (LG-FISI0051506 - LG-FISI0051512).</li> <li>• Computer Desktop Encyclopedia, Ninth Edition, 2001, p. 188, 608 (LG-FISI0051513 - LG-FISI0051518).</li> <li>• Dictionary of Computer Science Engineering and Technology, 2001, p. 69-70, 309 (LG-FISI0051532 - LG-FISI0051539).</li> <li>• Hargrave’s Communications Dictionary, 2001, p. 128, 327 (LG-FISI0051547 - LG-FISI0051550).</li> <li>• McGraw-Hill Dictionary of Scientific and Technical Terms, Fifth Edition, 1994, p. 1264 (LG-FISI0051565 - LG-FISI0051570).</li> </ul>

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