

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before the Honorable MaryJoan McNamara
Administrative Law Judge

In the Matter of

CERTAIN LTE- AND 3G-COMPLIANT
CELLULAR COMMUNICATIONS
DEVICES

Investigation No. 337-TA-1138

JOINT DISPUTED PROPOSED CLAIM TERMS FOR CONSTRUCTION

Pursuant to the Procedural Schedule (Order No. 7) and Ground Rule 1.14, Complainant INVT SPE LLC (collectively, "INVT" or "Complainant") Respondents Apple, Inc., HTC Corporation and HTC America, Inc., ZTE Corporation and ZTE (USA) Inc. and the Commission Investigative Staff respectfully submit this listing of disputed proposed claim terms for construction and proposed constructions.

Dated: February 1, 2019

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1. '711 Patent

Claim Term	Complainants' Proposed Construction	Respondents' Proposed Construction	Staff's Proposed Construction
<p>Respondents' Proposed Term: “A transmitting apparatus employing a MIMO (multi-input/multi-output) scheme of transmitting a plurality of data items for a same receiving apparatus using a plurality of antennas in parallel” (Claims 1, 2, 4)</p>	<p>Agreed: Limiting, plain and ordinary meaning: a “multiple-antenna apparatus, which transmits a plurality of data items (transmission data) at the same time and at the same frequency using multiple antennas”</p>		
<p>Respondents' Proposed Term: “a mapping section that...”</p> <p>Full term for construction: “a mapping section that maps the plurality of data items to at least one of the plurality of antennas” (Claims 1, 2, 4)</p>	<p>The full term for construction is: “a mapping section that maps the plurality of data items to at least one of the plurality of antennas . . . wherein the mapping section generates a replica data item by replicating a specific data item of the plurality of data items, and maps the plurality of data items to the at least one of the plurality of antennas such that the specific data item and the replica data item are transmitted from different antennas at a same time”</p> <p>This term is not subject to 35 U.S.C. § 112 ¶ 6; Plain and</p>	<p>Means-plus-function under § 112, ¶ 6</p> <p>Function: “mapping the plurality of data items to at least one of the plurality of antennas”</p> <p>Structure: <i>Indefinite</i></p>	<p>“a signal processing code operating with the claim language thereof”</p>

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