IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PACT XPP SCHWEIZ AG	)	
	)	
Plaintiff,	)	C.A. No. 19-1006-JDW
	)	
v.	)	
	)	
INTEL CORPORATION,	)	
	)	
Defendant.	)	

PACT XPP SCHWEIZ AG'S PROPOSED CLAIM CONSTRUCTIONS

I. INTRODUCTION

Pursuant to Paragraph 9 of the Scheduling Order (Dkt. No. 20), Plaintiff PACT XPP Schweiz AG ("PACT") hereby provides this list of proposed constructions of the terms identified in parties' December 20, 2019 disclosure.

Discovery in this action is in its early stages, and Plaintiff's investigation is ongoing. Defendant's production of documents remains deficient. Defendant's core technical document production is incomplete. For example, Defendant continues to refuse to provide core technical documents describing how the accused products actually function, *i.e.*, the functions of the Tape-Out Products sold on the market. Plaintiff has repeatedly requested supplementation by Defendant, including in its October 9, 2019 letter, October 23, 2019 letter, November 18, 2019 letter, December 16, 2019 letter, December 20, 2019 letter, and during numerous meet-and-confers, but to date Defendant has failed to correct the deficiencies in its production. During the telephone status conference on January 16, 2020, the Court ordered Intel to produce core technical documents. PACT reserves its right to supplement new terms and revise constructions after Intel produces all core technical documents. Similarly, Defendant's invalidity contentions

INTERIM TERMS AND CONSTRUCTIONS
SUBJECT TO COURT ORDER REQUIRING INTEL TO MAKE

are vague, ambiguous, and fail to identify its invalidity theories. Plaintiff will amend or supplement their identification of proposed constructions in the event it obtains or discerns additional information through further investigation, discovery, or disclosure from Defendant or from third parties.

This list is preliminary and Plaintiff reserves the right to add, delete, and/or amend claim terms and/or constructions from the list based on, without limitation, the list(s) propounded by Defendant pursuant to the Scheduling Order or any information learned throughout the course of discovery.

II. CLAIM CONSTRUCTION

PLAINTIFF'S TERMS

No.	Patent	Claim Terms and Phrases	Plaintiff's Proposed Construction
1	'763	"interconnecting at runtime at least one of data processing cells and memory cells with at least one of memory cells and one or more of the at least one interface unit"	connect at least one data processing cell, at least one memory cell, and at least one interface unit with each other at runtime.
2	'763	"the data processing cells are adapted to connect simultaneously to a plurality of at least one of cells and units of at least one of the memory cells, the data processing cells, and the at least one interface units"	each of the data processing cells is adapted to simultaneously connect to a plurality of elements; each of the elements is either one of the memory cells, another one of the data processing cells, or the interface unit.
3	'763	"cells of the data processing cells are adapted to connect simultaneously to other cells of the data processing cells and to a plurality of at least one of cells and units of at least one of the memory cells, the data processing cells, and the at least one interface units"	the data processing cells are adapted to simultaneously connect each other and to a plurality of elements; each of the elements is either one of the memory cells, another one of the data processing cells, or the interface unit.

No.	Patent	Claim Terms and Phrases	Plaintiff's Proposed Construction
4	'763	"interconnect a data processing cell simultaneously to a plurality of at least one of cells and units of at least one of the memory cells, others of the data processing cells, and the at least one interface units"	simultaneously interconnect a data processing cell to a plurality of elements; each of the elements is either one of the memory cells, another one of the data processing cells, or the interface unit.
5	'763	"interconnect a plurality of data processing cells simultaneously to a plurality of at least one of cells and units of at least one of the memory cells and the interface units"	simultaneously interconnect each one of a plurality of data processing cells to a plurality of elements; each of the elements is either one of the memory cells or the interface unit.
6	'763	Preambles (claims 1 and 31)	Preambles are limiting.
7	'872	Preambles (claims 2, 10, 14, 15)	Preambles are limiting.
8	'301	Preambles (claims 3, 6, 8, 10, 12)	Preambles are limiting.
9	'593	Preambles (claims 1 and 16)	Preambles are limiting.
10	'505	Preambles (claims 1, 14, 16-18, 27)	Preambles are limiting.
11	'807	Preambles (claims 1-6, 24, 26-27, 29, 32, 44, and 73-74)	Preambles are limiting.
12	'605	"sequentially processing data"	passing onto one or more other data processing units for subsequently processing of data.
13	'605	Preamble (claim 1)	Preamble is limiting.
14	'812	Preamble (claim 12)	Preamble is limiting.
15	'908	"train mission" (claim 4)	transmission
16	'631	"may executed" (claim 1)	may be executed
17	'047	"sequentially processing data"	passing onto one or more other data processing units for subsequently processing of data.
18	'047	Preambles (claims 1, 19)	Preambles are limiting.

DEFENDANT'S TERMS

No.	Patent	Claim Terms and Phrases	Plaintiff's Proposed Construction
1	'763	"data processing cells, each adapted for sequentially executing"	Plain and ordinary meaning. No construction necessary.
2	'763	"programmably interconnecting at runtime" / "dynamically interconnecting at runtime"	No construction necessary for "programmably" or "dynamically." Plain and ordinary meaning. For "interconnecting at runtime," *see* PACT's proposed construction of "interconnecting at runtime at least one of data processing cells and memory cells with at least one of memory cells and one or more of the at least one interface unit."
3	'301	"data processing element" and/or "data processing elements adapted for programmably processing sequences"	Plain and ordinary meaning. No construction necessary.
4	'301	"code sections"	Plain and ordinary meaning. No construction necessary.
5	'593	"the bus system includes a first structure dedicated for data transfer in a first direction and a second structure dedicated for data transfer in a second direction"	Plain and ordinary meaning. No construction necessary.
6	'505	"more of the plurality of data processing cores are implemented than used"	Plain and ordinary meaning. No construction necessary.
7	'549	"programmable data processing units"	Plain and ordinary meaning. No construction necessary.
8	'605	"data processing unit" and/or "data processing unit . . . adapted for sequentially processing data"	*See* PACT's proposed construction of "sequentially processing data."
9	'605	"to a minimum"	Plain and ordinary meaning. No construction necessary.
10	'812	"instruction dispatch unit"	Plain and ordinary meaning.

No.	Patent	Claim Terms and Phrases	Plaintiff's Proposed Construction
11	'631	"a plurality of bus segments for each processor"	Plain and ordinary meaning. No construction necessary.
12	'047	"data processing unit" and/or "data processing unit . . . adaptable for sequentially processing data"	*See* PACT's proposed construction of "sequentially processing data."
13	'047	"clocked manner"	Plain and ordinary meaning. No construction necessary.

Dated: January 17, 2020

Respectfully submitted,

/s/ Ziyong Li
Ziyong Li