IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,	)))	Civil Action No. 20-cv-551-CFC-CJB
Plaintiff,	))	
v.	))	
LENOVO (UNITED STATES), INC.; LENOVO HOLDING COMPANY INC.; LENOVO GROUP LTD., and MOTOROLA MOBILITY LLC,	))))))	
Defendants.	)	
FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,	)))	Civil Action No. 20-cv-552-CFC-CJB
Plaintiff,	))	
v.	)))	
TCT MOBILE (US), INC.; TCT MOBILE (US) HOLDINGS, INC.; HUIZHOU TCL MOBILE COMMUNICATION CO. LTD.; and TCL COMMUNICATION, INC.,	))))))	
Defendants.	)	

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Paragraph 15 of the Scheduling Orders entered in the above-

captioned cases (No. 20-cv-551-CFC, D.I. 23; No. 20-cv-551-CFC, D.I. 18),

Plaintiff Fundamental Innovation Systems International LLC ("Fundamental" or

"Plaintiff"), Defendants Lenovo (United States), Inc., Lenovo Holding Co., Inc., and Motorola Mobility LLC ("Lenovo"), and Defendants TCT Mobile (US), Inc., TCT Mobile (US) Holdings, Inc., Huizhou TCL Mobile Communication Co. Ltd., and TCL Communication, Inc. ("TCL"), hereby submit this Joint Claim Construction Chart identifying for the Court certain claim elements of U.S. Patent Nos. 6,936,936 (the "'936 Patent"), 7,239,111 (the "'111 Patent"), 8,624,550 (the "'550 Patent"), 7,453,233 (the "'233 Patent"), 7,834,586 (the "'586 Patent"), 8,232,766 (the "'766 Patent"), 7,986,127 (the "'127 Patent"), and 8,169,187 (the "'187 Patent") (collectively, "the Patents-in-Suit") that at least one party contends need construction, together with the parties' proposed constructions of the claim language and citations to the supporting intrinsic evidence.

Text-searchable PDFs of the Patents-in-Suit are attached hereto as Exhibits A-H.

The parties have agreed to the constructions provided in Section I below. The terms that remain in dispute are identified in Section II below.

I.   AGREED CONSTRUCTIONS

	Asserted Patent and Claims	Claim Term, Phrase, or Clause to be Construed	Agreed Construction
1	'111 patent claims 1-3, 6-8, 16-18	USB / Universal Serial Bus ("USB")	Universal Serial Bus as described in Universal Serial Bus Specification Revision 2.0 and related versions of this standard at the time of the

Asserted Patent and Claims	Claim Term, Phrase, or Clause to be Construed	Agreed Construction
'550 patent claims 1-7, 9, 10, 12-16 '586 patent claims 1, 8 '766 patent claims 1-7, 9, 11-14, 17-21 '127 patent claims 1-2, 4-5, 12 '936 patent claims 1-2, 12-14, 18, 25, 26, 33, 36, 51, 55, 63, 65, 74, 84, 99, 101 '233 patent claims 1-3, 6, 8, 15-16, 18 '187 patent claims 1-7, 9-16, 18		claimed invention.
2 '111 patent claims 1-3, 6-8, 16-18	generate / generating	provide / providing

	Asserted Patent and Claims	Claim Term, Phrase, or Clause to be Construed	Agreed Construction
3	'111 patent claim 18	means for receiving energy from a power socket	This term is subject to 35 U.S.C. § 112 ¶ 6 Function: receiving energy from a power socket. Corresponding Structure: A plug unit and/or plug adapter compatible with a North American power socket, a UK power socket, a European power socket, or a car power socket; and equivalents thereof.
4	'111 patent claim 18	means for regulating the received energy from the power socket to generate a power output	This term is subject to 35 U.S.C. § 112 ¶ 6 Function: regulating the received energy from the power socket to generate a power output. Corresponding structure: power converter 104/304 including at least one of a switching converter, a transformer, a DC source, a voltage regulator, a linear regulator, or rectifier; and equivalents thereof.
5	'111 patent claim 18	means for generating an identification signal that indicates to the mobile device that the power socket is not a USB hub or host	This term is subject to 35 U.S.C. § 112 ¶ 6 Function: generating an identification signal that indicates to the mobile device that the power socket is not a USB hub or host Corresponding Structure: identification subsystem 108, and

	Asserted Patent and Claims	Claim Term, Phrase, or Clause to be Construed	Agreed Construction
			equivalents thereof.
6	'233 Patent, Claim 1, 15	USB-equipped mobile device	Plain meaning in light of the construction of "USB"
7	'111 patent claims 1-3, 6-8, 12, 14, 16-18 '586 patent claims 1, 8 '766 patent claims 17-21 '936 patent claims 1-2, 12-14, 18, 25-26, 33, 36, 51, 55, 63, 65, 74, 84, 99, 101	identification signal	signal that identifies a power source type
8	'766 patent claims 1-7, 9, 11-14, 19-21	abnormal USB data condition detected at said USB communication path	condition on the USB communication path that is not defined as a valid USB data condition
9	'766 patent claims 5, 13	abnormal USB data line condition on said D+ line and said D- line	condition on the D+ line and D- line that is not defined as a valid USB data condition

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