UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JOLED INC.,	§	Case No.: 6:20-cv-00559-ADA
Plaintiff,	§	
	§	
v.	§	**JURY TRIAL DEMANDED**
	§	
SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG DISPLAY CO., LTD., and SAMSUNG ELECTRONICS CO., LTD.	§	
Defendants.	§	

PLAINTIFF JOLED INC.'S PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the Court's Scheduling Order (D.I. 24), Plaintiff JOLED Inc. ("JOLED") provides the following proposed claim constructions for the terms identified by the parties for construction. JOLED proposes these constructions based on information currently available to it and reserves the right to revise its proposed claim constructions as additional information becomes available. For example, in response to JOLED's inquires, Defendants have refused to explain why they believe any of the terms that they have identified require construction or where they believe a dispute in the terms' meanings exists. JOLED anticipates Defendants will clarify their positions as the claim construction process continues. Additionally, Defendants' technical document production has been insufficient to show the operation of the accused products and, thus, Defendants have failed to satisfy the technical document production requirement in the Court's Order Governing Proceedings – Patent Case Version 3.2 (the "OGP"). JOLED thus reserves the right to revise its proposed claim constructions based on clarifications about Defendants' claim construction positions or claim construction disputes evident from production of additional technical documents in compliance with Defendants' obligations under the OGP.

PLAINTIFF'S PROPOSED CLAIM TERMS FOR CONSTRUCTION

Term Number	Term	Proposed Construction
1.	**"initially resetting the pixel circuit"** / **"initially resets a gate terminal of the driving transistor"** / **"resetting . . . a second pixel"**	*See* Defendants' Proposed Terms 6 and 7 below.

DEFENDANTS' PROPOSED CLAIM TERMS FOR CONSTRUCTION

Term Number	Term	Proposed Construction
1.	**"a gate driver circuit which includes a first gate driver circuit, a second gate driver circuit…"** / **"a gate driver circuit which includes a first gate driver circuit and a second gate driver circuit…"** / **"the gate driver circuit includes a first gate driver circuit and a second gate driver circuit"** / **"a gate driver circuit including a first gate driver circuit…and a second gate driver circuit…"** ('130, cls. 1, 13; '597, cls. 1, 16; '108, cls. 1, 16; '336, cls. 10, 18; '992, cls. 1, 8, 10)	plain meaning, no construction necessary

Term Number	Term	Proposed Construction
2.	"wherein the first switch transistor and the second switch transistor are independently on/off controlled by the first gate driver circuit and the second gate driver circuit" / "the first gate driver circuit and second gate driver circuit control the first gate signal line and the second gate signal line independently" / "the first switching transistor and the second switching transistor are independently on/off controlled by the first gate driver circuit and the second gate driver circuit" / "independently on/off controlling the first switching transistor and the second switching transistor by the first gate driver circuit and the second gate driver circuit" / "wherein, by the first gate driver circuit and the second gate driver circuit, the first switch transistor is independently on/off controlled from the second switch transistor and the third switch transistor" ('130, cls. 1, 13; '597, cl. 4; '108, cl. 4; '336, cls. 11, 18)	plain meaning, no construction necessary

Term Number	Term	Proposed Construction
3.	"**the first gate driver circuit is configured to select the plurality of first gate signal lines as a block simultaneously**" / "**selecting, by the first gate driver circuit, the plurality of first gate signal lines as a block simultaneously**" / "**selecting the plurality of first gate signal lines via the first gate driver circuit as a block simultaneously**" ('108, cls. 6, 20; '992, cls. 6, 8, 14)	plain meaning, no construction necessary
4.	"**the source driver circuit [is/being] provided as a semiconductor chip and [is/being] attached to the EL display apparatus**" **('130, cls. 1, 13)**	plain meaning, no construction necessary
5.	"**the second gate driver circuit is arranged at a second side of the display screen**" ('130, cl. 4)	plain meaning, no construction necessary
6.	"**initially resetting the pixel circuit**" / "**initially resets the pixel circuit**" / "**resetting…[a/the] second pixel**" ('597, cls. 1, 16, 17; '108, cls. 1, 16, 17)	"setting the pixel circuit to a predetermined state to render the pixel ready for programming" "sets the pixel circuit to a predetermined state to render the pixel ready for programming" "setting . . . [a/the] second pixel circuit to a predetermined state to render the second pixel ready for programming"
7.	"**initially resets [a/the] gate terminal of the driving transistor**" / "**a gate terminal of the driving transistor is initially reset**" / "**[a/the] gate terminal of the driving transistor is reset**" ('597, cls. 1, 6, 16, 17; '108, cls. 7, 9, 17-19)	"sets [a/the] gate terminal of the driving transistor to a predetermined state to render the pixel ready for programming" "a gate terminal of the driving transistor is set to a predetermined state to render the pixel ready for programming" "[a/the] gate terminal of the driving transistor is set to a predetermined state to render the pixel ready for programming"

Term Number	Term	Proposed Construction
8.	**"when the third switch transistor initially resets the gate terminal of the driving transistor"** / **"when the third switch transistor initially resets the pixel circuit"** ('597, cls. 1, 16; '108, cls. 1, 16)	"when the third switch transistor sets the gate terminal of the driving transistor to a predetermined state to render the pixel ready for programming" "when the third switch transistor sets the pixel circuit to a predetermined state to render the pixel ready for programming"
9.	**"the first switch transistor of the Nth row is controlled in an OFF state by the first gate driver circuit"** / **"the first switch transistor of the Nth pixel row is controlled in an OFF state by the first gate driver circuit"** ('597, cl. 10; '108, cl. 11)	plain meaning, no construction necessary
10.	**"the gate driver circuit is configured to change a ratio of an area of the plurality of band-shaped non-display regions on the display screen to an area of the plurality of band-shaped display regions on the display screen depending on at least one of a brightness adjustment, a type of image data, or whether a display image is a motion image or a still image"** / **"the gate driver circuit is configured to change a number of divisions by which the display screen is divided into the plurality of band-shaped non-display regions and the plurality of band-shaped display regions depending on the type of image data"** / **"type of image data"** ('336, cls. 1, 6, 19)	plain meaning, no construction necessary

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