

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NEODRON LTD.,

Plaintiff,

v.

PANASONIC CORPORATION; PANASONIC
CORPORATION OF NORTH AMERICA,

Defendants.

Case No. 2:20-cv-00241-JRG-RSP

LPR 4-3 JOINT CLAIM CONSTRUCTION CHART AND PREHEARING STATEMENT

Pursuant to P.R. 4-3 and the Docket Control Order (Dkt. No. 31), Plaintiff Neodron Ltd. (“Neodron”) and Defendants Panasonic Corporation and Panasonic Corporation of North America (collectively, “Panasonic”) file this Joint Claim Construction Chart and Prehearing Statement.

A. Terms on Which the Parties Agree (P.R. 4-3(a)(1))

The parties agree to the construction of the following claim terms:

| Patent Claim Term/Phrase/Clause | Agreed Construction |
|---|---|
| 1. “the substrate, with drive or sense electrodes of a touch sensor disposed on a first surface and a second surface of the substrate, the first surface being opposite the second surface, the drive or sense electrodes being made of a conductive mesh conductive material comprising metal” (’574 Patent, Claims 1, 8) | Plain and ordinary meaning, which is “the substrate, having a first surface and a second surface opposite the first surface, with drive electrodes of a touch sensor disposed on one of the first or second surfaces and sense electrodes of the touch sensor disposed on the other surface opposite the drive electrodes, the drive or sense electrodes being made of a conductive mesh conductive material comprising metal.” |
| 2. “conductive mesh [of] conductive material” (’574 Patent, Claims 1, 8, 15) | “conductive mesh of conductive material excluding transparent conductive materials such as indium tin oxide (ITO)” |
| 3. “one or more of the following being true?” | For claim 1, either the claim elements at lines 27-45 |

| | |
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| ('960 Patent, Claims 1, 9, 17) | For claim 9: either the claim elements at lines 26-35 or the claim elements at lines 36-50 must be true. For claim 17: either the claim elements at lines 30-37 or the claim elements at lines 38-52 must be true. |
| 4. “conductive mesh of conductive material” (‘960 Patent, Claims 1, 9, 17) | “conductive mesh of conductive material excluding transparent conductive materials such as indium tin oxide (ITO)” |
| 5. “interconnecting mesh segments” (‘960 Patent, Claims 1, 9, 17) | “interconnecting lines of conductive electrode material forming a mesh pattern, instead of a continuous layer of conductive electrode material” |
| 6. “pitch” (‘784 Patent, Claims 1-3) | Plain and ordinary meaning, which is “distance from the center of one electrode to the center of an adjacent electrode” |
| 7. “wherein the plurality of drive electrodes are substantially area filling within the sensing region relative to the plurality of sense electrodes” (‘784 Patent, Claims 1-3) | Plain and ordinary meaning, which is “where the drive electrodes are substantially area filling and where the drive electrodes are more area filling than the sense electrodes.” |
| 8. “together, the plurality of sense electrodes and the plurality of isolated conductive elements are substantially area filling within the sensing region relative to the plurality of sense electrodes” (‘784 Patent, Claims 1-3) | Plain and ordinary meaning, which is “where the sense electrodes and isolated conductive elements are substantially area filling and where the sense electrodes and isolated conductive elements are more area filling than the sense electrodes.” |

B. Proposed Constructions for Terms on Which the Parties Do Not Agree (P.R. 4-3(a)(2))

There are no terms where the constructions are in dispute.

C. Length of Claim Construction Hearing (P.R. 4-3(a)(3))

Since there are no terms where the constructions are in dispute, the parties request that the

Court take the claim construction hearing off-calendar.

D. Witness and/or Expert Testimony (P.R. 4-3(a)(4))

Since the parties are requesting that the Court take the claim construction hearing off-calendar, none of the parties plans to call any witnesses at the scheduled claim construction hearing.

E. Issues for a Pre-Hearing Conference (P.R. 4-3(a)(5))

The parties do not currently have any issues that need to be taken up with the Court at a pre-hearing conference, and thus do not believe a pre-hearing conference is necessary.

Dated: March 2, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel for record for Defendants on
March 2, 2021 via electronic service.

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