

From: Mark Scott <Mark_Scott@txwd.uscourts.gov>
Date: Monday, May 2, 2022 at 5:05 PM
To: Alfonso Chan <achan@shorechan.com>, Melissa Copp <Melissa_Copp@txwd.uscourts.gov>, Brian Melton <BMelton@SusmanGodfrey.com>, Halima Shukri Ndai <hndai@shorechan.com>, Krisina Zuniga <KZuniga@susmangodfrey.com>, Michael Shore <mshore@shorechan.com>, Chris Bunt <rcbunt@pbatyler.com>, Scott Glass <SGlass@susmangodfrey.com>, Steven Shepard <sshepard@susmangodfrey.com>, Charley Ainsworth <charley@pbatyler.com>, Brett Thompsen <brett.thompsen@bakerbotts.com>, Frank Zhu <frank.zhu@bakerbotts.com>, Melissa Smith <melissa@gillamsmithlaw.com>, Neil Sirota <neil.sirota@bakerbotts.com>, Robert Maier <robert.maier@bakerbotts.com>, Syed Fareed <syed.fareed@bakerbotts.com>, "kevin.meek@bakerbotts.com" <kevin.meek@bakerbotts.com>, "mark.speegle@bakerbotts.com" <mark.speegle@bakerbotts.com>, "paula.heyman@bakerbotts.com" <paula.heyman@bakerbotts.com>, "tom.brown@dell.com" <tom.brown@dell.com>, "Shelton, Barry K." <bshelton@winston.com>
Cc: TXWDml_Law Clerks WA Judge Albright & Gilliland <TXWDml_LawClerks_WA_JudgeAlbright&Gilliland@txwd.uscourts.gov>
Subject: RE: W21CV398, 933 - MyPAQ vs. Samsung/Dell Tech - Markman Hearing Zoom Link

EXTERNAL Email

Thank you both. The parties are welcome to attend in-person or via zoom tomorrow. We have a hybrid set-up for the hearing.

The Court’s preliminary claim constructions are below. By **11 AM tomorrow**, please send your final demonstratives, as well as the final list of terms that you plan to argue.

| Term | Plaintiff’s Proposed Construction | Defendant’s Proposed Construction | Court’s Preliminary Construction |
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| <p>“the primary-sided switch [...] and the additional components [...], are integrated in at least one additional semiconductor chip”</p> <p>U.S. Patent No. 7,403,399, Cls. 1, 13</p> <p>Proposed by Samsung</p> | Plain and ordinary meaning | Indefinite | Not indefinite. Plain-and-ordinary meaning. |

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| <p>“said semiconductor chip”</p> <p>U.S. Patent No. 7,403,399, Cls. 1, 13</p> <p>Proposed by Samsung</p> | <p>Plain and ordinary meaning</p> | <p>Indefinite</p> | <p>Not indefinite. Plain-and-ordinary meaning wherein the plain-and-ordinary meaning is “said semiconductor chip(s).”</p> |
| <p>Preambles of Claims 1, 6, & 16 of U.S. Patent No. 7,675,759 and Claim 1 of U.S. Patent No. 8,477,514</p> <p>Proposed by Defendants</p> | <p>no construction required</p> | <p>the terms of the preamble are limiting</p> | <p>Preambles are not limiting except for”</p> <ul style="list-style-type: none"> • ’759 Patent, Cl. 1: “power converter,” “power system controller,” and “a signal indicating a system operational state” • ’759 Patent, Cl. 6: “power system” • ’514 Patent, Cl. 1: “power converter” |
| <p>“system operational state of [a/said] load”</p> <p>U.S. Patent No. 7,675,759, Cls. 1, 6, 16 and U.S. Patent No. 8,477,514, Cl. 1</p> <p>Proposed by All Parties</p> | <p>“an operational condition of the load more than just the present output voltage of the power converter”</p> | <p>“an operational condition of the load more than an output voltage of the power converter”</p> | <p>“an operational condition of the load more than just the present output voltage of the power converter”</p> |
| <p>“power converter operational state”</p> <p>U.S. Patent No. 7,675,759, Cls. 1, 2, 3, 6, 11, 12, 16, 19</p> <p>Proposed by All Parties</p> | <p>“state of operation of the power converter”</p> | <p>“an operational condition of the power converter beyond controlling an output characteristic of the power converter”</p> | <p>Plain-and-ordinary meaning wherein the plain-and-ordinary meaning is “state of operation of the power converter”</p> |
| <p>“internal operating characteristic”</p> | <p>plain and ordinary meaning, which is an</p> | <p>plain and ordinary meaning, which is an</p> | <p>Plain-and-ordinary meaning, which is an operating</p> |

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| <p>U.S. Patent No. 7,675,759, Cls. 1, 6, 16, and U.S. Patent No. 8,477,514, Cls. 1, 3, 5–6, 8, 10–11, 14–16, 19–20</p> <p>Proposed by Plaintiff</p> | <p>operating characteristic internal to the power converter. An “internal operating characteristic” and “output characteristic” are not necessarily mutually exclusive.</p> | <p>operating characteristic internal to the power converter</p> | <p>characteristic internal to the power converter¹</p> <p>¹ Note not for the jury: An “internal operating characteristic” and “output characteristic” are not necessarily mutually exclusive.</p> |
| <p>“regulator circuit”</p> <p>U.S. Patent No. 7,978,489, Cls. 1, 5, 22, 26, 43, 47</p> <p>Proposed by Samsung</p> | <p>Plain and ordinary meaning</p> | <p>“a circuit that generates a constant voltage”</p> | <p>Plain-and-ordinary meaning</p> |
| <p>“the connector receptacle”</p> <p>U.S. Patent No. 7,978,489, Cl. 60</p> <p>Proposed by Defendants</p> | <p>Plain and ordinary meaning</p> | <p>Indefinite</p> | <p>Indefinite</p> |
| <p>“a/said signal”</p> <p>U.S. Patent No. 8,477,514, Cls. 1, 6, 11, 16</p> <p>Proposed by Defendants</p> | <p>plain and ordinary meaning</p> | <p>“a signal generated externally from the power converter”</p> | <p>Plain-and-ordinary meaning</p> |
| <p>“gate drive voltage level”</p> <p>U.S. Patent No. 8,477,514, Cls. 5, 10, 15, 20</p> <p>Proposed by All Parties</p> | <p>“voltage level driving the gate”</p> | <p>“variable voltage level applied to the gate of a power switch during the on-state”</p> | <p>Plain-and-ordinary meaning wherein the plain-and-ordinary meaning is “voltage level driving the gate”</p> |

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| <p>“internal direct current bus voltage”</p> <p>U.S. Patent No. 8,477,514, Cls. 5, 10, 15, 20</p> <p>Proposed by Plaintiff</p> | <p>“direct current voltage node originating internally”</p> | <p>plain and ordinary meaning where internal means internal to the power converter</p> | <p>Plain-and-ordinary meaning wherein the plain-and-ordinary meaning of “internal” means “originating internally from the power converter.”</p> |
| <p>Method Steps of Claim 16</p> <p>U.S. Patent No. 8,477,514, Cl. 16</p> <p>Proposed by Defendants</p> | <p>no construction required</p> | <p>method steps must be performed in recited order</p> | <p>No ordering except:</p> <ul style="list-style-type: none"> • Step [2] cannot begin until after the “state of the power drain” is established in step [1]. • Step [3] cannot begin until step [2] completes. |

Have a good evening,
Mark



Mark J. Scott
Law Clerk to the Honorable Derek T. Gilliland
U.S. District Court, Western District of Texas
Office: **254-340-6151**