

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

SMART MOBILE TECHNOLOGIES LLC,

Plaintiff,

v.

APPLE INC.

Defendant.

Case No. 6:21-cv-00603-ADA

SMART MOBILE TECHNOLOGIES LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 6:21-cv-00701-ADA

**DEFENDANTS' REPLY CLAIM CONSTRUCTION BRIEF
REGARDING THE '434 PATENT FAMILY**

TABLE OF CONTENTS

I. REPLY TO SMART MOBILE’S CLAIM CONSTRUCTION ARGUMENTS 1

A. “system on a chip” (’291) 1

B. “is configured to” (’434)..... 1

C. “wherein a [first] transmission interface is created . . .” (’653, ’946) 2

D. “wherein . . . using one or more antennas simultaneously” (’653, ’946)..... 3

E. “USB communication” (’291, ’946)..... 4

F. “dynamically” (’434) 5

G. “ports” (’653, ’863, ’291, ’946, ’083, ’075) 6

H. “application” (’434, ’653, ’863, ’291, ’946)..... 8

I. “one or more subtasks are assigned to one or more channels” (’943)..... 9

J. “channel” (’943, ’083) 10

K. “the device is ... further configured with enhanced capabilities to differentiate between various signals or to combine multiple paths into a single communication channel” (’943)..... 13

L. “interface” (’653, ’836, ’946) 15

1. SMT’s construction would render the claims invalid for lack of written description and/or failure to enable the claims. 15

2. SMT’s remaining citations fail to disclose “a virtual ... point of connection between software.” 17

M. “multiplex / multiplexes / multiplexed / multiplexing” (’653, ’083, ’075, ’943, ’946, ’291) 19

II. CONCLUSION..... 21

TABLE OF AUTHORITIES

Cases	Page(s)
<i>Agilent Techs., Inc. v. Affymetrix, Inc.</i> , 567 F.3d 1366 (Fed. Cir. 2009).....	16
<i>AK Steel Corp. v. Sollac & Ugine</i> , 344 F.3d 1234 (Fed. Cir. 2003).....	14
<i>Amgen Inc. v. Hoechst Marion Roussel, Inc.</i> , 314 F.3d 1313 (Fed. Cir. 2003).....	16, 18
<i>Ariad Pharms., Inc. v. Eli Lilly & Co.</i> , 598 F.3d 1336 (Fed. Cir. 2010).....	16
<i>Berkheimer v. HP Inc.</i> , 881 F.3d 1360 (Fed. Cir. 2018).....	14
<i>Cellspin Soft, Inc. v. Fitbit, Inc.</i> , No. 17-CV-05928-YGR, 2021 WL 1417419 (N.D. Cal. Apr. 14, 2021)	5, 6, 7
<i>Celltrace LLC v. AT&T Inc.</i> , No. 6:09-CV-294-LED-JDL, 2011 WL 738927 (E.D. Tex. Feb. 23, 2011).....	5
<i>Eon Corp. IP Holdings v. Silver Spring Networks</i> , 815 F.3d 1314 (Fed. Cir. 2016).....	6
<i>Fundamental Innovation Systems Int'l LLC v. Samsung Electronics Co. Ltd.</i> , 2018 WL 647734 (E.D. Tex. Jan. 31, 2018).....	5
<i>In re Katz Interactive Call Processing Pat. Litig.</i> , 639 F.3d 1303 (Fed. Cir. 2011).....	8
<i>Nazomi Communs., Inc. v. ARM Holdings, PLC</i> , 403 F.3d 1364 (Fed. Cir. 2005).....	3, 14
<i>Novo Indus., L.P. v. Micro Molds Corp.</i> , 350 F.3d 1348 (Fed. Cir. 2003).....	3
<i>Phillips v. AWH Corp.</i> , 415 F.3d 1303 (Fed. Cir. 2005).....	8, 9, 15
<i>Soverain Software LLC v. Amazon.com, Inc.</i> , No. 6:04-CV-14, 2005 WL 6225276 (E.D. Tex. Apr. 7, 2005).....	5
<i>SuperGuide Corp. v. DirecTV Enter., Inc.</i> , 358 F.3d 870	5

Thorner v. Sony Comput. Ent. Am. LLC,
669 F.3d 1362 (Fed. Cir. 2012).....19, 20

Trustees of Bos. Univ. v. Everlight Elecs. Co.,
896 F.3d 1357 (Fed. Cir. 2018).....8

VirnetX Inc. v. Apple Inc.,
792 Fed. Appx. 796 (Fed. Cir. 2019).....12

I. REPLY TO SMART MOBILE’S CLAIM CONSTRUCTION ARGUMENTS

Smart Mobile agrees that the preamble for claim 5 of the ’291 patent is limiting. Defendants’ brief thus focuses on the remaining terms from the ’434 patent family below.

A. “system on a chip”¹ (’291)

The ordinary meaning of “system on a chip” requires a “system” that is contained on a chip. D46 at 4. SMT’s construction focuses on the number of components included in the chip (whether all or most), which is irrelevant as to whether the chip contains a system.

Defendants explained why SMT’s requirement of multiple components was both over and under inclusive. *Id.* at 5. SMT does not address that criticism. It offers a new construction, which adds the requirement of multiple functions being supported on the chip, but that construction is subject to the same criticism of being limited only by numerosity (and not if the chip is a “system”). This new construction also runs contrary to SMT’s own dictionary definition, which defines a “system on a chip” in terms of its contribution to the system (“contribute to a functional computer system”) and not the number of components on the chip.

B. “is configured to” (’434)

SMT provided its proposed construction for the first time in its responsive claim construction brief. Defendants do not dispute this limitation could be satisfied by a particular hardware configuration and given SMT’s acknowledgement that “actually” is understood to be a part of its construction, Defendants adopt SMT’s proposed construction. In doing so, Defendants do not agree with SMT’s argument as to what constitutes infringement under the proposed constructions, but such a determination is based on attributes of the accused product and irrelevant

¹ Similar to Defendants’ brief for the ’501 patent family, the disputed terms are in shorthand and can be found in the parties’ initial briefs for the ’434 patent family. *See* D46; D66, as filed in the Apple case. Emphasis added except where otherwise noted.

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