

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

GREENTHREAD, LLC	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. 6:22-cv-105-ADA
INTEL CORPORATION, DELL INC., AND	)	
DELL TECHNOLOGIES INC.	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS' PRELIMINARY CLAIM CONSTRUCTIONS**

Pursuant to the Scheduling Order (Dkt. 43) and the Standing Order Governing Proceedings for Patent Cases in the Western District of Texas, Defendants Intel Corporation (“Intel”) and Dell Inc. and Dell Technologies Inc. (collectively, “Dell,” and together with Intel, “Defendants”) hereby provide the following Preliminary Proposed Claim Constructions regarding United States Patent Nos. 10,510,842 (“the ’842 Patent”), 8,106,481 (“the ’481 Patent”), 11,121,222 (“the ’222 Patent”), 8,421,195 (“the ’195 Patent”), 9,190,502 (“the ’502 Patent”), and 11,316,014 (“the ’014 Patent”) (collectively, “the Patents-in-Suit”) that are asserted by Greenthread, LLC (“Plaintiff” or “Greenthread”) for terms that may require construction by the Court, for purposes of this litigation only.

Term	Patent/Claim	Preliminary Proposed Construction
<p>“To aid the movement of minority carriers from ... to ...”</p> <p>“To aid carrier movement from ... [to/towards] ...”</p>	<p>’195: 1</p> <p>’502: 7</p> <p>’842: 1, 9</p> <p>’481: 1, 20</p> <p>’222: 1, 21, 39, 41, 42, 44</p> <p>’014: 1, 21</p>	<p>Indefinite</p> <p>Alternative construction: “To sweep the [minority] carriers vertically downward from ... [to/towards] ...”</p>
<p>“surface layer” / “an active region . . . disposed on one surface of said surface layer” / “a single drift layer disposed between the other surface of said surface layer and [said/the] substrate”</p>	<p>’195: 1</p> <p>’502: 7</p> <p>’222: 44</p>	<p>Indefinite</p>
<p>“active region”</p>	<p>’195: 1</p> <p>’502: 7</p> <p>’842: 1, 5–7, 9, 13–15, 17–18</p> <p>’481: 1, 4–6, 8–9, 13, 20, 24–27</p> <p>’222: 1, 4–6, 8, 13, 20–21, 25–28, 35, 38–42, 44</p> <p>’014: 1, 4–6, 8–9, 13, 20–21, 25–28</p>	<p>“A region that forms the current path of one or more devices when those devices are active, i.e., the source, drain and channel regions of one or more CMOS transistors, or the emitter, base and collector of one or more bipolar transistors.”</p>
<p>“well region”</p>	<p>’195: 1</p> <p>’502: 7</p> <p>’481: 1, 20</p> <p>’222: 1, 21, 40, 44</p> <p>’014: 1, 21</p>	<p>“A well, whether formed by single or multiple implants. Portions of a well are not well regions.”</p>
<p>“said [drift layer further/well region] having a [first/second] static unidirectional electric drift field”</p> <p>“said [drift layer/well region] having a graded concentration of dopants generating a [first/second]</p>	<p>’195: 1</p> <p>’502: 7</p> <p>’222: 44</p>	<p>“said [drift layer further/well region] having a [first/second] static electric drift field that is unidirectional over the [drift layer/well region]”</p>

Term	Patent/Claim	Preliminary Proposed Construction
static unidirectional electric drift field”		
“substrate”	’195: 1 ’502: 7 ’842: 1, 2, 4, 9–10, 12, 17 ’481: 1–3, 8, 15, 20, 22–23, 32 ’222: 1–3, 8, 15, 21, 23–24, 33, 39–42, 44 ’014: 1–3, 8, 15, 21, 23–24	“the initial material within which or on which the semiconductor device is fabricated”
“active region ... within which transistors can be formed”	’842: 1, 9 ’481: 1, 20 ’222: 1, 21, 39, 41, 42 ’014: 1, 21	Indefinite
“a substrate of a first doping type”	’842: 1, 9 ’481: 1, 20 ’222: 1, 21, 39, 41, 42 ’014: 1, 21	“a substrate with either p-type doping or n-type doping”
“disposed adjacent”	’842: 1, 9 ’481: 1, 20 ’222: 1, 21, 39, 41, 42 ’014: 1, 21	Plain and Ordinary Meaning
“isolation region”	’842: 7, 15 ’481: 6, 26 ’222: 6, 27 ’014: 6, 27	Plain and Ordinary Meaning

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Gregory S. Arovas (*Pro Hac Vice*)  
Robert A. Appleby (*Pro Hac Vice*)  
Todd M. Friedman (*Pro Hac Vice*)  
Leslie M. Schmidt (*Pro Hac Vice*)  
Jon R. Carter (*Pro Hac Vice*)  
Christopher DeCoro (*Pro Hac Vice*)  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, NY 10022  
Tel: (212) 446-4800  
Fax: (212) 446-4900  
Email: greg.arovas@kirkland.com  
Email: robert.appleby.com  
Email: todd.friedman@kirkland.com  
Email: leslie.schmidt@kirkland.com  
Email: jon.carter@kirkland.com  
Email: christopher.decoro@kirkland.com

Nyika O. Strickland (*Pro Hac Vice*)  
KIRKLAND & ELLIS LLP  
300 North LaSalle Street  
Chicago, IL 60654  
Tel: (312) 862-2000  
Fax: (202) 862-2200  
Email: nyika.strickland@kirkland.com

Abigail Lauer Litow (*Pro Hac Vice*)  
John Rhine (*Pro Hac Vice*)  
KIRKLAND & ELLIS LLP  
1301 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Tel: (202) 879-5000  
Fax: (202) 879-5200  
Email: abigail.litow@kirkland.com  
Email: john.rhine@kirkland.com

Bao Nguyen (*Pro Hac Vice*)  
KIRKLAND & ELLIS LLP  
555 California Street 27th Floor  
San Francisco, CA 94104  
Tel: (415) 439-1400  
Fax: (415) 439-1500  
Email: bao.nguyen@kirkland.com

Respectfully submitted,

/s/ Robert A. Appleby  
J. Stephen Ravel  
Texas State Bar No. 16584975  
**KELLY HART & HALLMAN LLP**  
303 Colorado, Suite 2000  
Austin, Texas 78701  
Tel: (512) 495-6429  
Email: steve.ravel@kellyhart.com

*Attorneys for Defendants Intel Corporation;  
Dell Inc.; and Dell Technologies Inc.*

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