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

GESTURE TECHNOLOGY PARTNERS, LLC,	\$ \$	
Plaintiff v. HUAWEI DEVICE CO., LTD., HUAWEI DEVICE USA, INC., Defendants.	<pre>§ CASE NO. 2:21-cv-00040-JRG § (Lead Case) § JURY TRIAL DEMANDED § §</pre>	
GESTURE TECHNOLOGY PARTNERS, LLC, Plaintiff v. SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.,	<pre>§ § S S S S S S S S S S CASE NO. 2:21-cv-00041-JRG (Member Case) S S JURY TRIAL DEMANDED S S S S S S S S S S S S S S S S S S</pre>	
Defendants.	8	

P.R. 4-3 – JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

In accordance with the Court's Docket Control Order (D.I. 44) and Local Patent Rule 4-3,

all parties to the above-captioned action hereby submit their Joint Claim Construction and

Prehearing Statement regarding U.S. Patent Nos. 7,933,431, 8,194,924, 8,553,079, and 8,878,949.

I. CONSTRUCTION OF CLAIM TERMS ON WHICH THE PARTIES AGREE

Pursuant to P.R. 4-3(a)(1), the parties have agreed on the following constructions:

Claim Term	Agreed Construction
"a camera means associated with said housing	1
for obtaining an image using reflected light of	

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at least one object positioned by a user operating said object"	"a camera associated with said housing for obtaining an image using reflected light of at
	least one object positioned by a user operating
('431 Patent, Claim 7)	said object"

II. EACH PARTY'S PROPOSED CONSTRUCTION OF EACH DISPUTED CLAIM TERM

Pursuant to P.R. 4-3(a)(2), the parties have attached a chart hereto as Appendix 1, which shows each party's proposed construction of each disputed claim term, phrase, or clause, together with an identification of all references from the specification or file history that support that construction, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its proposed construction or to oppose any other party's proposed construction, including but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses. Where intrinsic and extrinsic citations have been made for a particular claim term, phrase, or clause, they should be understood as applicable to each other instance where the same term, phrase, or clause appears elsewhere.

III. ANTICIPATED LENGTH OF TIME FOR CLAIM CONSTRUCTION HEARING

Pursuant to P.R. 4-3(a)(3), the parties anticipate that they will need a combined total of 3 hours for presentation at the Claim Construction Hearing.

IV. WITNESS TESTIMONY AT CLAIM CONSTRUCTION HEARING

Pursuant to P.R. 4-3(a)(4), the parties do not at this time anticipate calling witnesses at the Claim Construction Hearing.

V. OTHER ISSUES FOR PREHEARING CONFERENCE

Pursuant to P.R. 4-3(a)(5), the parties do not believe there are any prehearing issues to be addressed by the Court.

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DATED: July 16, 2021

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Respectfully submitted,

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