Exhibit G

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

GESTURE TECHNOLOGY PARTNERS, LLC,	§ § §	
Plaintiff	§ §	
v.	§ § §	CASE NO. 2:21-cv-00040-JRG (Lead Case)
HUAWEI DEVICE CO., LTD., HUAWEI DEVICE USA, INC.,	§ § §	JURY TRIAL DEMANDED
Defendants.	§ §	

GESTURE TECHNOLOGY PARTNERS, LLC,	§ § §	
Plaintiff	§ §	
v.	§ § §	CASE NO. 2:21-cv-00041-JRG (Member Case)
SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.,	§ § § §	JURY TRIAL DEMANDED
Defendants.	§ §	

SUPPLEMENTAL DECLARATION OF DEFENDANTS' EXPERT ROBERT LOUIS STEVENSON, PH.D., ON CLAIM CONSTRUCTION

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I, Robert Louis Stevenson, Ph.D., hereby state and declare:

I.   INTRODUCTION

1.   I am over the age of 18 and am competent to make this declaration. I have personal knowledge, or have developed knowledge, of these technologies based upon my education, training, and/or experience, of the matters set forth herein.

2.   I have been retained by counsel for Defendants Huawei Device Co., Ltd., Huawei Device USA, Inc., Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Defendants"), in the above captioned matter to offer opinions as to the scope and meaning that would have been given to certain disputed terms and phrases in U.S. Patent No. 7,933,431 (the "'431 Patent"), U.S. Patent No. 8,194,924 (the "'924 Patent"), U.S. Patent No. 8,553,079 (the "'079 Patent"), and U.S. Patent No. 8,878,949 (the "'949 Patent") (collectively, the "Asserted Patents") by one of ordinary skill in the art at the time of the invention. I previously submitted a declaration in this case regarding claim construction for the Asserted Patents.

3.   I have been asked to provide my opinions concerning GTP's modified construction for the "means for controlling" claim limitation that was provided to Defendants for the first time on July 16, 2020.

4.   I reserve the right to supplement and/or amend my opinions in this declaration based on future opinions taken by the parties, their experts, additional documents, testimony, or other information provided by the parties or their witnesses, any orders from the Court, or as otherwise necessary.

VI. DISPUTED CLAIM TERMS

A. '431 Patent

1. "means for controlling a function of said apparatus using said information"

Claim Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
"means for controlling a function of said apparatus using said information"	Structure: a control system associated with a camera (previously, "A computer with at least one microprocessor specially programmed for controlling said apparatus using said information"). Function: "controlling a function of said apparatus using said information"	Means-plus-function **Function**: "controlling a function of said [handheld computer] apparatus using said information [concerning a position or movement of said object positioned by a user operating said object]" The dependent claims currently asserted by Plaintiff further add to the function, including: (1) wherein said object is a finger (Claim 8) **Structure**: Indefinite

5.   Plaintiff's newly proposed structure ("a control system associated with a camera") is not clearly linked to the claimed function in the specification and still does not identify the necessary algorithm for performing the claimed function.

6.   The patent only refers to a "control system" in two portions of the '431 Patent: (1) generically when referring to "the robustness of control systems built on such camera based acquisition," and (2) in an embodiment wherein a control system positions a robot for purposes of 3D acoustic imaging. In the first instance, the patent discloses that the potential for target acquisition in a millisecond or two using pixel addressable CMOS cameras "has major ramifications for the robustness of control systems built on such camera based acquisition, be

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