

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

NEODRON LTD.,

Plaintiff,

v.

DELL TECHNOLOGIES INC.,

Defendant.

Case No. 1:19-cv-00819-ADA

NEODRON LTD.,

Plaintiff,

v.

HP, INC.,

Defendant.

Case No. 1:19-cv-00873-ADA

NEODRON LTD.,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 1:19-cv-00874-ADA

NEODRON LTD.,

Plaintiff,

v.

AMAZON.COM, INC.,

Defendant.

Case No. 1:19-cv-00898-ADA

NEODRON LTD.,

Plaintiff,

v.

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

Defendant.

Case No. 1:19-cv-00903-ADA

**PLAINTIFF NEODRON LTD.'S ("NEODRON'S") OPENING CLAIM**  
**CONSTRUCTION BRIEF**  
**GROUP 1 – TOUCH SENSOR PATENTS**

**TABLE OF CONTENTS**

**I. INTRODUCTION ..... 1**

**II. BACKGROUND OF ASSERTED PATENTS ..... 2**

    A. U.S. Patent No. 8,946,574 (the “574 Patent”) .....2

    B. U.S. Patent No. 9,086,770 (the “770 Patent”) .....6

    C. U.S. Patent No. 9,823,784 (the “784 Patent”) .....7

    D. U.S. Patent No. 10,088,960 (the “960 Patent”) .....9

    E. U.S. Patent No. 7,821,502 (the “502 Patent”) .....13

**III. CLAIM CONSTRUCTION PRINCIPLES ..... 14**

**IV. DISPUTED TERMS FOR THE ’502 PATENT ..... 16**

    A. “a substrate having a surface with an arrangement of electrodes mounted thereon”  
     (’502 Patent, claims 1, 2, 5–8, 11–14, 16) .....16

    B. “sensing area” (’502 Patent, claims 1, 2, 5–8, 11–14, 16) .....18

    C. “wherein row sensing electrodes of sensing cells at opposing ends of at least one of  
     the rows are electrically coupled to one another by respective row wrap-around  
     connections made outside of the sensing area” (’502 Patent, claims 1, 2, 5–8, 11–  
     14, 16) .....21

**V. DISPUTED TERM FOR THE ’574 PATENT ..... 25**

    A. “mesh” (’574 Patent, claims 1, 8, 15) .....25

**VI. DISPUTED TERM FOR THE ’960 PATENT ..... 28**

    A. “interconnecting mesh segments” (’960 Patent, claims 1, 9, 17) .....28

**VII. DISPUTED TERMS FOR THE ’770 PATENT ..... 30**

    A. “generally straight line” (’770 Patent, claim 7) .....30

**VIII. DISPUTED TERMS FOR THE ’784 PATENT ..... 33**

    A. “wherein the plurality of drive electrodes are substantially area filling within the  
     sensing region relative to the plurality of sense electrodes” (’784 Patent, claims 1,  
     2, 3) .....33

    B. “together, the plurality of sense electrodes and the plurality of isolated conductive  
     elements are substantially area filling within the sensing region relative to the  
     plurality of sense electrodes” (’784 Patent, claims 1, 2, 3) .....37

## TABLE OF EXHIBITS AND ABBREVIATIONS

Ex <sup>1</sup>	Document Description	Abbreviation
1	Declaration of Richard A. Flasck in support of Neodron Ltd's opening claim construction briefs.	Flasck. Decl.
2	Curriculum Vitae of Richard A. Flasck	
3	U.S. Patent No. 8,946,574	'574 Patent
4	U.S. Patent No. 9,086,770	'770 Patent
5	U.S. Patent No. 9,823,784	'784 Patent
6	U.S. Patent No. 10,088,960	'960 Patent
7	U.S. Patent No. 7,821,502	'502 Patent
8	U.S. Patent No. 8,102,286	'286 Patent
9	U.S. Patent No. 10,365,747	'747 Patent
10	Definition of "surface" by Lexico.	
11	Definition of "surface" by Merriam-Webster.	
12	Definition of "coupled" by Lexico.	
13	Definition of "coupled" by Merriam-Webster.	
14	Definition of "mesh" by Lexico.	
15	Definition of "mesh" by Merriam-Webster.	
16	Definition of "generally" by Lexico.	
17	Definition of "generally" by Merriam-Webster.	
18	Definition of "substantially" by Lexico.	
19	Definition of "substantially" by Merriam-Webster.	
20	Amazon's Identification of Extrinsic Evidence	
21	Order from the United States International Trade Commission	ITC Markman Order
22	Excerpted transcript from a <i>Markman</i> hearing before the United States International Trade Commission	Markman Hearing Tr.
23	Email thread from James M. Heintz to Reza Mirzaie regarding claim construction	
24	Dell's Identification of Extrinsic Evidence	
25	Microsoft's Identification of Extrinsic Evidence	

<sup>1</sup> All exhibits attached to the concurrently filed declaration of Reza Mirzaie.

26	Excerpted U.S. Patent No. 9,823,784 Patent File History	'784 File History
27	Excerpted Petition for <i>Inter Partes</i> Review of U.S. Patent No. 8,946,574 in IPR2020-00459	'574 IPR Petition
28	U.S. Patent No. 4,550,221 to Mabusth	Mabusth
29	Excerpted U.S. Patent No. 8,821,502 Patent File History, Response to Office Action dated November 24, 2009	
30	Excerpted U.S. Patent No. 8,821,502 Patent File History, Response to Office Action dated April 19, 2010	
31	U.S. Patent No. 9,024,790 to Philipp	
32	Email from Nicholas Whilt regarding claim construction	

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.