

**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 OPENING CLAIM CONSTRUCTION BRIEF
FOR GROUP 3 – TOUCH PROCESSING PATENTS

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TABLE OF EXHIBITS AND ABBREVIATIONS

Ex ¹	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	
8	U.S. Patent No. 8,102,286	'286 Patent
9	U.S. Patent No. 10,365,747	'747 Patent
21	Order from the United States International Trade Commission construing relevant terms dated November 25, 2019	ITC Markman Order
22	Transcript from a <i>Markman</i> hearing before the United States International Trade Commission pertaining to relevant terms dated October 22, 2019	ITC Markman Hearing Tr.
31	U.S. Patent No. 9,024,790 Philipp	'790 Patent

¹ A complete set of exhibits are attached to the declaration of Reza Mirzaie filed with Neodron's opening claim construction brief for Group 1 – Touch Sensor Patents. Only the exhibits referenced in this brief are listed in this table.

This is Neodron’s opening claim construction brief for Group 3 – Touch Processing Patents. It addresses the disputed terms for U.S. Patent Nos. 8,102,286 (“’286 patent”) and 10,365,747 (“’747 patent”). Neodron incorporates the introduction and claim construction standards from its opening brief for Group 1 – Touch Sensor Patents.

I. **BACKGROUND OF TOUCH PROCESSING PATENTS**²

A. **The ’286 Patent**

The ’286 Patent is entitled “capacitive keyboard with non-locking reduced keying ambiguity.” It describes techniques for processing information from touch-sensitive keyboards to identify which key a user intended to select. ’286 patent at Abstract.

Physical keyboards use mechanical switches that a user depresses to select a key. A proficient typist using such a keyboard will naturally depress only one key at a time, which causes the switch associated with that key to close—unambiguously signaling the selected key. But with the advent of touch-sensitive keyboards, and especially touchscreen keyboards, problems of ambiguous key detection emerged. For example, touch sensing technology allowed product designers to create on-screen keyboard with small keys that can be difficult to select accurately. But with those keyboards, a user’s finger may touch multiple keys at once, making it unclear which key(s) were intended. *See* ’286 patent at 1:37-41 (“In a small keyboard, for example, a user’s finger is likely to overlap from a desired key to onto adjacent ones. This is especially problematic if the user has large fingers or if he or she presses on the keyboard surface hard enough to deform his or her finger.”). Further, moisture or liquid on the touch screen may create further ambiguity for the

The ’286 patent gives an example of keying ambiguity resulting from inaccurate or overlapping touches.

² For further technology background *see* Flasck Decl.

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