

**IN THE 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

**DEFENDANTS' RESPONSIVE CLAIM CONSTRUCTION BRIEF ON
THE DISPUTED TERMS OF THE TOUCH PROCESSING PATENTS**

(U.S. PATENT NOS. 8,102,286 and 10,365,747)

TABLE OF CONTENTS

	Page
I. The Disputed Term Of U.S. Patent No. 8,102,286	1
A. “sensor value” (’286 patent, claims 1, 3-5, 8-10, 13, 15-17, 20-21, 24).....	1
II. The Disputed Term Of U.S. Patent No. 10,365,747	5
A. “to measure a parameter of the first variable resistance electrode” (’747 patent, claims 10, 16).....	5
III. Conclusion	10

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>GPNE Corp. v. Apple Inc.</i> , 830 F.3d 1365 (Fed. Cir. 2016)	2
<i>O2 Micro Int'l, Ltd v. Beyond Innovation Tech. Co., Ltd.</i> , 521 F.3d 1351 (Fed. Cir. 2008)	6
<i>Tex. Instruments, Inc. v. Cypress Semiconductor Corp.</i> , 90 F.3d 1558 (Fed. Cir. 1996)	4

Defendants respectfully submit their responsive claim construction brief for the disputed terms of U.S. Patent Nos. 8,102,286 and 10,365,747 (collectively the “touch processing patents”).¹ The agreed constructions for these patents are set out in the Joint Claim Construction Statement.

I. THE DISPUTED TERM OF U.S. PATENT NO. 8,102,286

A. “sensor value” (’286 patent, claims 1, 3-5, 8-10, 13, 15-17, 20-21, 24)

Claim Term(s)	Defendants’ Construction	Neodron’s Construction
“sensor value” (claims 1, 3-5, 8-10, 13, 15-17, 20-21, 24)	Plain and ordinary meaning: “value indicating the strength of the sensor signal”	Plain and ordinary meaning, which is “sensor signal value”

Neodron agrees the only dispute regarding this term is whether the sensor value indicates the *strength* of the sensor signal, as Defendants assert. Dkt. 63 at 5. While Defendants’ construction finds ample support in the claims and specification of the ’286 Patent (*see* Dkt. 62 at 4-8), Neodron cites no intrinsic evidence whatsoever in support of its construction. Dkt. 63 at 5-7. Neodron instead relies exclusively on extrinsic evidence, quoting attorney arguments at a claim construction hearing in the International Trade Commission (“ITC”) discussing a *different* claim of a *different* patent, albeit one that is related to the ’286 Patent. Dkt. 63 at 6-7. But even that extrinsic evidence is not inconsistent with Defendants’ construction, does not support Neodron’s proposed construction, and does not resolve the parties’ dispute regarding this term. Defendants’ construction should be adopted.

As established in Defendants’ opening brief, the intrinsic record confirms that a “sensor value” indicates the strength of a sensor signal. Dkt. No. 62 at 4-7. Neodron does not—and

¹ The “touch processing patents” also include U.S. Patent No. 8,451,237, for which there are no disputed terms. Defendants are filing a separate responsive claim construction brief to cover the disputed terms of the touch sensor patents, which include U.S. Patent Nos. 8,946,574; 9,086,770; 9,823,784; 10,088,960; and 7,821,502.

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