

**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' REPLY 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
1. Neodron incorrectly contends that Defendants’ construction imports limitations from the specification	2
2. Neodron incorrectly contends that the claims fail to support Defendants’ construction.....	6
3. Neodron incorrectly contends that the extrinsic evidence fails to support Defendants’ construction	8
4. Neodron incorrectly contends that Defendants mischaracterize the ITC claim construction proceedings.....	8
5. Neodron’s construction is unsupported	9
II. The Disputed Term Of U.S. Patent No. 10,365,747	10
A. “to measure a parameter of the first variable resistance electrode” (’747 patent, claims 10, 16).....	10

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TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>McRO, Inc., d/b/a Planet Blue v. Bandai Namco Games Am. Inc., et al.</i> , Case No. 2019-1557 (Fed. Cir. May 20, 2020) (slip op.).....	2, 3
<i>O2 Micro Int'l, Ltd v. Beyond Innovation Tech. Co., Ltd.</i> , 521 F.3d 1351 (Fed. Cir. 2008)	10
<i>Phillips v. AWH Corp.</i> , 415 F.3d 1303 (Fed. Cir. 2005)	1, 2, 8
<i>Ruckus Wireless, Inc. v. Innovative Wireless Solutions, LLC</i> , 824 F.3d 999 (Fed. Cir. 2018)	1
<i>Storage Tech. Corp. v. Cisco Sys., Inc.</i> , 329 F.3d 823 (Fed. Cir. 2003)	4, 8, 9
<i>Trustees of Columbia Univ. v. Symantec Corp.</i> , 811 F.3d 1359 (Fed. Cir. 2016)	2, 4, 11
<i>Vitronics Corp. v. Conceptoronic, Inc.</i> , 90 F.3d 1576, 39 USPQ2d 1573 (Fed. Cir. 1996)	2, 9

Defendants respectfully submit their reply 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’s opening and responsive briefs do not include a single intrinsic evidence cite in support of its construction. Nor does Neodron offer any evidence that one of ordinary skill in the art would understand “sensor value” to mean “sensor signal value,” or even explain what it contends “sensor signal value” means. Neodron also fails to explain how the specification and claims could support any construction other than the one offered by Defendants; namely, “value indicating the strength of the sensor signal.” Instead, Neodron wrongly asserts that Defendants’ construction imports limitations from the specification. In fact, Defendants’ construction reflects the plain meaning of “sensor value” in view of the intrinsic record, as the Federal Circuit has consistently required. The Federal Circuit recently confirmed its longstanding guidance:

The proper claim construction is based “not only in the context of the particular claim in which the disputed term appears, but in the context of the entire patent, including the specification.” *Phillips v. AWH Corp.*, 415 F.3d 1303, 1313–16 (Fed. Cir. 2005); *see Ruckus Wireless, Inc. v. Innovative Wireless Solutions, LLC*, 824 F.3d 999, 1003 (Fed. Cir. 2018) (“Ultimately, [t]he only meaning that matters in

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 reply 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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