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)

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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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