

**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") REPLY CLAIM CONSTRUCTION
BRIEF**

GROUP 1 – TOUCH SENSOR PATENTS

TABLE OF CONTENTS

I. DISPUTED TERMS FOR THE '502 PATENT 1

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

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

II. UNDISPUTED TERM FOR THE '574 PATENT 10

 A. “conductive mesh [of] conductive material” ('574 Patent, claims 1, 8, 15).....10

III. UNDISPUTED TERMS FOR THE '960 PATENT 10

 A. “conductive mesh of conductive material” ('960 Patent, claims 1, 9, 17).....10

 B. “interconnecting mesh segments” ('960 Patent, claims 1, 9, 17)10

IV. UNDISPUTED TERM FOR THE '770 PATENT 11

 A. “generally straight line” ('770 Patent, claim 7)11

V. DISPUTED TERMS FOR THE '784 PATENT 11

 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)11

 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).....14

TABLE OF AUTHORITIES

Cases

<i>O2 Micro Int’l Ltd. v. Beyond Innovation Tech. Co., Ltd.</i> , 521 F.3d 1351 (Fed. Cir. 2008).....	1
<i>Finjan, Inc. v. Secure Computing Corp.</i> , 626 F.3d 1197 (Fed. Cir. 2010);.....	2
<i>KCJ Corp. v. Kinetic Concepts, Inc.</i> , 223 F.3d 1351 (Fed. Cir. 2000).....	4
<i>Kroy IP Holdings, LLC, v. Safeway, Inc.</i> , No. 2:12-cv-800-WCB, 2014 WL 3735222 (E.D. Tex., July 28, 2014)	2
<i>Merck & Co., Inc. v. Teva Pharm, USA, Inc.</i> , 395 F3d 1364 (Fed. Cir. 2005).....	10
<i>Pause Tech., LLC v. Tivo, Inc.</i> , 419 F.3d 1326 (Fed. Cir. 2005).....	9
<i>Phillips v. AWH Corp.</i> , 415 F.3d 1303 (Fed. Cir. 2005).....	8
<i>Thorner v. Sony Computer Ent. Am., LLC</i> , 669 F.3d at 1362 (2012).....	2
<i>Verizon Servs. Corp. v. Cox Fibernet Va., Inc.</i> , 602 F.3d 1325 (Fed.Cir.2010).....	2

TABLE OF ABBREVIATIONS¹

Description	Abbreviation
Defendants' Opening Claim Construction Brief On the Disputed Terms of the Touch Sensor Patents, Dkt. 60.	Defs.' Opening Br.
Defendants' Responsive Claim Construction Brief On the Disputed Terms of the Touch Sensor Patents, Dkt. 66	Defs.' Resp. Br.
Plaintiff Neodron's Opening Claim Construction Brief, Group 1 – Touch Sensor Patents, Dkt. 61	Neodron's Opening Br.
Plaintiff Neodron's Responsive Claim Construction Brief, Group 1 – Touch Sensor Patents, Dkt. 69	Neodron's Resp. Br.
Declaration of Aris K. Silzars Regarding Claim Construction, April 17, 2020, Dkt. 62-3	Silzars Decl.
Opposition Declaration of Richard A. Flasck in Support of Plaintiff Neodron Ltd.'s Responsive Claim Construction Briefs, Dkt. 69-1	Flasck Opp. Decl.

¹ Additional document abbreviations and the numbering of corresponding exhibits can be found on pages 4–5 of Docket No. 61, Neodron's Opening Claim Construction Brief for the Group 1 – Touch Sensor Patents. All relevant exhibits can be found as exhibits to Docket No. 64, Omnibus Declaration of Reza Mirzaie.

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.