

EXHIBIT 24

From: [Rumpler, Joseph](#)
To: [Wells, Maclain](#)
Cc: [Hattenbach, Ben](#); [Zhong, Annita](#); [Chu, Morgan \(Internet\)](#); [Ou, Philip](#); [Soobert, Allan M.](#); [Chaikovsky, Yar R.](#); [Milvenan, Rick](#); [Barton, Travis](#); [Schnell, Austin](#); [Nash, Brian C.](#); [Steve Ravel](#); [sonal.mehta_wilmerhale.com](#); [Specht, Claire](#); ["Cosmin Maier"](#)
Subject: Demaray v. Intel/Samsung -- claim construction of "narrow band rejection filter"
Date: Thursday, March 18, 2021 6:59:00 PM

Maclain,

In an effort to narrow or resolve the parties' dispute on claim construction for the term "narrow band rejection filter" and the longer phrases including the term, Defendants amend their proposed construction of "narrow band rejection filter" from (changes annotated in red):

"filter which rejects a narrow band of frequencies and passes all frequencies outside of the narrow band"

to

"filter which rejects a narrow band of frequencies (but passes all frequencies outside of the narrow band)"

While we do not believe it necessary considering, for example, Dr. Glew's testimony as to how a POSITA would understand "all" in the context of Dr. Demaray's declaration to the PTO and in our construction (see, e.g., Glew Tr. 230:17-233:11), to the extent it facilitates agreement on a construction, we would also not oppose including "substantially" into the proposed construction:

"filter which rejects a narrow band of frequencies (but passes substantially all frequencies outside of the narrow band)"

Please let us know if either of these modifications eliminate the dispute and you can agree to our proposal. We are available to discuss tomorrow if helpful.

One additional alternative we would also be willing to agree to is amending your construction from (changes annotated in red):

"filter which rejects a narrow band of frequencies"

to

"filter which rejects a narrow band of frequencies centered on one RF bias frequency"

We believe this is well supported by the specification and intrinsic record, including Dr. Demaray's declaration made to the PTO and the patentee's subsequent statements. This would also remove the dispute you have raised in your opening brief regarding what the filter "passes."

If we can agree on any of the proposals above, we would also agree that the Court need not

construe the longer phrases including this term.

Understanding the current deadline for your reply brief is tomorrow, if you would like additional time to consider these alternative proposals, confer and see if we can agree on this term, we would not oppose extending your deadline to submit your reply to over the weekend.

If you'd like to discuss, or have other alternatives for the parties to consider so that we may reach agreement on these terms in view of the arguments made in briefing so far, please let us know.

Thanks,
Joe