

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

FUTURE LINK SYSTEMS, LLC Plaintiff, v. APPLE INC., Defendant.	Civil Action No. 6:21-cv-00263-ADA JURY TRIAL DEMANDED
FUTURE LINK SYSTEMS, LLC Plaintiff, v. BROADCOM INC., BROADCOM CORP., Defendants.	Civil Action No. 6:21-cv-00264-ADA JURY TRIAL DEMANDED
FUTURE LINK SYSTEMS, LLC Plaintiff, v. QUALCOMM INCORPORATED, QUALCOMM TECHNOLOGIES, INC., Defendants.	Civil Action No. 6:21-cv-00265-ADA JURY TRIAL DEMANDED
FUTURE LINK SYSTEMS, LLC Plaintiff, v. REALTEK SEMICONDUCTOR CORPORATION, Defendant.	Civil Action No. 6:21-cv-00363-ADA JURY TRIAL DEMANDED

**DEFENDANTS APPLE INC., BROADCOM INC., BROADCOM CORP.,
QUALCOMM INC., QUALCOMM TECHNOLOGIES, INC. AND
REALTEK SEMICONDUCTOR CORP.'S REPLY CLAIM CONSTRUCTION BRIEF**

U.S. PATENT NOS. 7,917,680; 6,317,804; and 6,807,505

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The Defendants jointly submit this reply brief pursuant to the Court’s Joint Agreed Scheduling Order, to construe the terms of U.S. Patent Nos. 7,917,680 (the “’680 patent”); 6,317,804 (the “’804 patent”); and 6,807,505 (the “’505 patent”). ECF No. 29 at 3.

I. DISPUTED CLAIM CONSTRUCTIONS

A. “A circuit arrangement for interfacing a plurality of functional blocks to one another in an integrated circuit device, the circuit arrangement comprising” ’804 Patent, Cl. 1

The preamble is not limiting where the body of a claim “describes a structurally complete invention.” *Catalina Mktg. Int’l, Inc. v. Coolsavings.com, Inc.*, 289 F.3d 801, 809 (Fed. Cir. 2002). FLS’s arguments confirm that the preamble does not add structure to what is recited in the body of the claim, but rather merely requires that the arrangement is “in” a certain type of device. Pl. Br. 1 (“the claimed ‘circuit arrangement’ is ‘in an integrated circuit device.’”).

The specification does not support FLS’s position. FLS alleges that “every embodiment of the ’804 Patent connects functional blocks together within an integrated circuit device” (Pl. Br. 3), but that is not correct. In addition to being used in “integrated circuit devices,” the patent discloses that “serial interconnects consistent with the invention” can be used in “data processing systems.” ’804 Patent at 19:66-20:3. It then discloses an embodiment in Figs. 11-12 in which a “system controller 202” that is “using a concurrent serial interconnect consistent with the invention” can be used to connect “external devices” to each other, *i.e.*, devices that are not in the same integrated circuit. *Id.* at 20:13-14.

FLS further fails to meaningfully contest Defendants’ argument that the preamble merely recites an intended purpose. It attempts to distinguish *Artic Cat* on the basis that the preamble there recited “what the invention was for, not what the invention was structurally comprised in,” but the Federal Circuit understood the preamble to be referring to a power distribution module *in* a personal recreational vehicle. *Arctic Cat Inc. v. GEP Power Prods.*, 919 F.3d 1320, 1328 (Fed.

Cir. 2019) (“module . . . in a personal recreational vehicle”).

B. “functional block[s]” ’804 Patent, Cls. 1, 2, 9, 10, 17, 40

In arguing that the patent’s explicit definition is “an *example* of what a functional block *may include*,” and that the specification’s examples are “non-limiting,” Pl. Br. 4, FLS ignores that the written description states that it is “refer[ring] to herein as functional blocks” the “more advanced components” whose common attribute is that they are “configured to perform one or more high level functions in a design.” ’804 Patent at 1:45-51. Although the specification uses the word “typically,” it goes on to explain that components are referred to functional blocks “insofar as” they have the important attribute of performing one or more high level functions. This requirement to perform one or more high level functions is likewise repeated in the patent’s explicit definition of “functional block” to include “any *logic circuitry configured to perform one or more high level functions in an integrated circuit device design.*” ’804 Patent at 4:40-51 (emphasis added). The touchstone of the specification’s definition is the performance of high level functions, which is part of Defendants’ construction. *See* Defs. Br. 6.

Defendants’ construction does not, as FLS implies, ignore that the specification provides an open set of exemplary functional blocks. To the contrary, it uses “such as” to illuminate the meaning of “high level function” to a lay jury without limiting the construction to those specific examples: “such as that of microprocessors, memory controllers, communications interface controllers, etc.” *See Terlep v. Brinkmann Corp.*, 418 F.3d 1379, 1382 (Fed. Cir. 2005).

Defendants’ construction stays true to the patent’s definition and the role the recited functional blocks play in the alleged invention. According to the patent, the increase in “complexity of the generic components” such as the “more advanced components [that] typically replicate higher level functions . . . referred to herein as *functional blocks*” resulted in a “*difficulty associated with the use of components such as functional blocks*” arising from the

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