

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION

Advanced Silicon Technologies LLC,

Plaintiff,

v.

NXP Semiconductors N.V.,  
NXP B.V., and  
NXP USA, Inc.,

Defendants.

Case No. 6:22-cv-00466-ADA-DTG

**Jury Trial Demanded**

**AST's Responsive Claim Construction Brief**

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## 1. Introduction

The asserted patents reflect two of AMD's seminal advancements in graphics and video processing technology in the early-to-mid 2000s. The asserted claims employ uncomplicated language to teach skilled artisans how to implement the disclosed inventions in view of the patents' robust specifications. NXP's opening brief injects ambiguity and complexity into the disputed terms by reading in additional limitations, misstating the intrinsic evidence, and making mountains out of molehills from preliminary attorney argument in non-instituted IPR proceedings governed by the now obsolete "broadest reasonable interpretation" standard. The Court should decline NXP's invitation to confuse the jury and instead afford these terms their plain and ordinary meaning.

## 2. The Asserted Patents

### 2.1. U.S. Patent No. 7,804,435

The '435 patent disclosed new technology for reducing power consumption in video decoders. Prior art battery-powered devices with low-power modes could only access the mode manually through a user switching the device into low-power mode or automatically based on a triggering event, like battery capacity dropping below a certain threshold. '435 Patent at 1:33-45. But the inventors recognized that the reactive nature of these techniques allowed for significant and wasteful power consumption before the activation of low-power mode. *Id.* at 1:46-50.

The '435 patent teaches systems and methods for conserving power before significant battery discharge occurs, without user intervention. *Id.* at 2:39-41. The patent teaches varying power consumption "in portions of the video decoder in response to encoding characteristics from an input data stream to minimize power consumption while achieving required performance." *Id.* at 2:41-44. A POSITA would have recognized the power consumed by a portion of the video decoder may increase to attain required performance, but the patent's methods would reduce overall power use by reducing power selectively based on the nature of the input data.

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