EXHIBIT B

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CYWEE GROUP LTD.,

Plaintiff,

v.

HTC CORPORATION, and HTC AMERICA, INC.,

Defendants.

HTC CORPORATION, and HTC AMERICA, INC.,

Third-Party Plaintiffs,

v.

STMicroelectronics N.V., STMicroelectronics, Inc., and CyWee Motion Group Ltd.,

Third-Party Defendants.

CASE NO.: 2:17-cv-00932-JLR

DEFENDANTS HTC CORPORATION AND HTC AMERICA, INC.'S DISCLOSURE OF PRELIMINARY CLAIM CONSTRUCTIONS AND EVIDENCE FOR U.S. PATENT NOS. 8,441,438 AND 8,522,978

JURY TRIAL DEMANDED

Pursuant to Patent L.R. 131, Defendants HTC Corporation and HTC America, Inc. (collectively, "HTC") by and through their undersigned counsel, hereby disclose to Plaintiff CyWee Group Ltd. ("CyWee") their proposed claim constructions for terms of claims 1, 3, 4, 5, 14, 15, 17, and 19 of U.S. Patent No. 8,441,438 ("the '438 Patent"), and claims 10 and 12 of U.S. Patent No. 8,522,978 ("the '978 Patent") disclosed by the parties pursuant to Patent L.R. 130. HTC notes that its position regarding claim construction is preliminary, and HTC reserves the right to supplement and/or amend its constructions once CyWee identifies the constructions it believes are in dispute as part of the meet and confer process required under Patent L.R. 4-1(c) and/or in light of CyWee's proposed claim construction(s). HTC incorporates by reference discovery and evidence from related actions in the Western District of Washington, including *CyWee Group Ltd. v. Apple Inc.* (Case No. 4-14-cv-01853); *CyWee Group Ltd. v. Samsung Electronics Co. Ltd. et al* (Case No. 2-17-cv-00140); *CyWee Group Ltd. v. LG Electronics, Inc.* et al (Case No. 3-17-cv-01102); *CyWee Group Ltd. v. Huawei Technologies, Co., Inc.* (Case No. 2:17-cv-00495); *CyWee Group Ltd. v. Motorola Mobility LLC* (Case No. 1-17-cv-00780); and *CyWee Group Ltd. v. ZTE Corporation* (Case No. 3-17-cv-02130).

In accordance with the above, HTC provides the following list of those claim terms in need of construction along with their respective proposed constructions:

Claim Term (Claim)	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
1. "three-dimensional (3D) pointing device / 3D pointing device" ('438 patent at claims 1, 3, 4, 5, 14, 15, 16, 17, and 19; '978 patent at claim 10)	a device that detects the motion of the device in three-dimensions and translates the detected motions to control the movement of a cursor or pointer on a display	'438 Patent, Abstract, Figs. 1, 2, 3, 5, 9, cols. 1:15–2:37, 9:6-10:8; 16:16–17:47 '978 Patent, Abstract, Figs. 1, 2, 3, 5, 9, cols. 1:21–2:40, 3:53–4:11; 12:20-13:4; 20:49–	McGraw-Hill Dictionary of Scientific and Technical Terms 2144 (6th ed. 2003) (definitions of "three-dimensional" and "three-dimensional display system")

Claim Term (Claim)	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
		22:8; 22:34–40; 23:8–17; 47–58; 26:40–45; 35:30–38	THE NEW OXFORD AMERICAN DICTIONARY 1318 (2001) (defines a "pointing device" as a device "used to control the movement of a cursor on a computer screen.") THE AMERICAN HERITAGE DICTIONARY 1355 (4th ed. 2001) (defines a "pointing device" as a device "with which one can move or manipulate a cursor or pointer on a GUI.")
2. "six-axis motion sensor" ('438 patent at claims 1, 5, 14, 15, 16, 17, and 19)	a module consisting of only two types of sensors: (i) rotation sensor and (ii) accelerometer	'438 Patent, Figs. 3, 4, 5, 6, cols. 7:26–55; 7:56–8:18; 9:7–27; 10:9–29 1/28/13 Non-Final Rejection for '978 patent, including at 2-3; 4/17/13 Response to Office Action, including at 2-3, 9-10	MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS 1944 (6th ed. 2003) (definition of "six-axis system")
3. "a predicted measurement obtained based on the first signal set without using any	predicted axial accelerations calculated using the angular velocities without computing	'438 Patent 6:13-19, 8:52-56, 13:6-10, FIG. 7, 11:8-44.	

Claim Term (Claim)	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
derivatives of the first signal set" ('438 patent at claim 1)	derivatives of said angular velocities (i.e., angular accelerations)	10/15/12 Response to Office Action for '438 patent at 10-11	
4. "using the orientation output and the rotation output to generate a transformed output associated with a fixed reference frame associated with a display device" ('978 patent at claim 10)	using the orientation output and the rotation output to generate a transformed output that corresponds to a two-dimensional movement in a plane that is parallel to the screen of a display device	'978 Patent, Abstract, Figs. 1, 2, 8, 9, 11, 13, cols. 5:11-45; 7:55-67; 8:1-12; 11:31-43; 19:61-20:24; 31:50-32:3; 33:4-19	
5. "quaternion" ('438 patent at claims 14, 16 and 19; '978 patent at claim 12)	a quantity or operator expressed as the sum of a real number and three complex numbers, equivalent to the quotient of two vectors	'438 Patent, Figs. 7, 8, cols. 10:42–15:26; 15:37–39 '978 Patent, Abstract, Figs. 7, 8, 10, 11, cols. 14:32-15:3; 15:27-52; 16:9-19:60; 22:43-23:8; 23:17-46; 23:66-24:56; 25:2-10; 25:15-20; 25:28-35; 25:35-47; 25:65-26:2; 29:35-49; 31:4-50; 33-53-65	THE PENGUIN COMPLETE ENGLISH DICTIONARY 1181 (2006) (definition of "quaternion") OXFORD ENGLISH REFERENCE DICTIONARY 1143 (2nd ed., revised 2003) (definition of "quaternion")
6. "communicating with the six-axis motion sensor module to calculate a resulting deviation comprising resultant angles in said spatial pointer reference	Indefinite	'438 Patent, Abstract, Figs. 3-8, cols. 1:16–27; 4:8–19; 4:20–30; 4:59–65; 5:50–67; 6:4–27; 7:36–55; 7:56–63; 8:19–9:5; 9:6–26; 9:26–46; 9:47–10:8;	MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS 1944 (6th ed. 2003) (definition of "six-axis system")

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