

Michael Shanahan

From: Daniel Lee <lee@fr.com>
Sent: Friday, June 23, 2023 5:00 PM
To: Cochran, Andrew; bfarnan@farnanlaw.com; Flattmann Jr., Gerald J.; John C. Stellabotte; mfarnan@farnanlaw.com; Michael Shanahan; Scott H. Kaliko
Cc: Dan Wade; Jeffrey Shneidman; David Hoffman; Warren Mabey, Jr.; XilinxFRService-Sentient
Subject: RE: Sentient Sensors, LLC v. Xilinx, Inc., DED Case No. 1:22-cv-000173-MN - Exchange of list re claim construction

Counsel,

Please find below Xilinx's list of claim terms/phrases for construction and proposed constructions of those terms/phrases. Xilinx reserves its rights to modify the proposed constructions or add or remove terms/phrases for construction in response to later developments in the case, including, but not limited to, changes to Sentient's infringement theory, discovery, Sentient's proposed constructions, Sentient's express or implied construction in the IPR proceeding, etc.

	Claims	Term / Phrase	Proposed Construction
1	All	Claim scope of all asserted claims	Claims are limited to multi-chip modules. The claims do not encompass system-on-a-chip devices.
2	1, 6, 15, 19	"coupled"	coupled on a multi-chip module
3	1, 6, 15	"embedded"	Plain and ordinary meaning, i.e., "embedded within the component that is required in that part of the claim"
4	15	"power converter"	Plain and ordinary meaning, i.e., "a power converter converts power"
5	1, 6	"a processor coupled to both the non-volatile memory storage component and the large volatile memory storage components, the processor capable of high-frequency and low-frequency operations and having an embedded memory for storing an initialization program that enables the processor to start up processing without first retrieving a program from the non-volatile memory"	Plain and ordinary meaning. The "embedded memory" recited in the claim cannot be the same as the "non-volatile memory" recited in the claim.
6	1, 6	"a plurality of analog-to-digital converters [for] receiving a plurality of analog inputs, digitizing the analog inputs at one of at least two possible bit depths, thereby generating digital	Plain and ordinary meaning. The analog-to-digital converters must be capable of converting analog inputs at variable bit depths.

	inputs, and providing [the] digital inputs to the processor"	
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Best,
-Daniel

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From: Cochran, Andrew <ACochran@cahill.com>
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Subject: RE: Sentient Sensors, LLC v. Xilinx, Inc., DED Case No. 1:22-cv-000173-MN - Exchange of list re claim construction

[This email originated outside of F&R.]

Agreed.

Thanks, Daniel.

- Andy

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From: Daniel Lee <lee@fr.com>
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Subject: Sentient Sensors, LLC v. Xilinx, Inc., DED Case No. 1:22-cv-000173-MN - Exchange of list re claim construction

Counsel,

Today, under paragraph 11 of the Scheduling Order (Dkt. 30), the parties are to exchange a list of claim terms/phrases for construction and proposed constructions of those terms/phrases. We propose exchanging the list at 5:00PM ET today.

Please let us know if you agree.

Best,
-Daniel

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