

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

SONRAI MEMORY LIMITED,

Plaintiff,

v.

MICRON TECHNOLOGY, INC.,

Defendant.

Case No. 6:22-cv-00855-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

I. Undisputed Constructions

#	Term	Agreed Construction
1	“a target output pump selector for shutting down the variable charge pump circuit when the target output pump voltage (Vcfra) is greater than or equal to a reference voltage (Vref).” ’241 patent, Claims 2, 13	Means-plus-function, subject to § 112, ¶ 6. Function: “shutting down the variable charge pump circuit when the target output pump voltage (Vcfra) is greater than or equal to a reference voltage (Vref).” Structure: comparator 702 as shown in Figure 7 and associated descriptions in the specification and equivalents thereof.
2	“coupled ... to” ’241 Patent, Claims 7, 8, 11	“connected to”
3	“a portable memory apparatus” ’527 Patent Claim 15	The preamble is limiting.

II. Disputed Constructions

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
4	"A charge pump circuit for generating a charge pump voltage having minimal voltage ripples" '241 Patent, Claim 1	The preamble is not limiting except for "charge pump circuit"	The entire preamble ("A charge pump circuit for generating a charge pump voltage having minimal voltage ripple") is limiting.
5	"a load selector means for selectively coupling a load associated with a specific pump voltage to the output of said pumping circuit" '241 Patent, Claim 1	Means-plus-function limitation, subject to § 112 ¶ 6. Function: "selectively coupling a load associated with a specific pump voltage to the output of said pumping circuit." Structure: (i) a plurality of switches (320, 324, and 328) as shown in Figure 3 and associated descriptions in the specification, or shown in Figure 7 (720, 724, 728) and associated descriptions in the specification; (ii) a plurality of transistors 504A as shown in Figure 5A and associated descriptions in the specification; or (iii) a plurality of elevator circuits 502B and transistors 504B as shown in Figure 5B and associated descriptions in the specification; and equivalents thereof.	Means-plus-function, subject to § 112 ¶ 6. Function: "selectively coupling a load associated with a specific pump voltage to the output of said pumping circuit" Structure: the three switches 320, 324, and 328, as shown in Figure 3, together with their respective control signals EN_A, EN_B, and EN_C and the controller that generates the signals and equivalents thereof.
6	"the output pump" '241 Patent, Claim 11	"the output of the pumping circuit"	Plain and ordinary meaning.
7	"volatile memory coupled to said memory controller comprised in the housing"	No construction necessary.	"volatile memory coupled to (and separate from) said memory"

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	'527 Patent, Claim 1		controller comprised in the housing"
8	"data" '527 Patent, Claims 1, 3, 6, 15, 16	No construction necessary.	"user data"
9	"a housing," '527 Patent, Claim 1	No construction necessary.	"a protective enclosure"
10	"wherein, when said connector couples said portable memory apparatus to said computer system, said memory controller chip copies data from said nonvolatile memory to said volatile memory, and said computer system accesses said data in said volatile memory through said connector" '527 Patent Claim 1	<i>Not indefinite.</i> No construction necessary.	<i>Indefinite.</i>

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Respectfully submitted,

By: /s/ Brett Cooper

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document is being served through CM/ECF on
October 18, 2023.

/s/ Brett Cooper
Brett Cooper