

**UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON D.C.**

**Before the Honorable Cameron R. Elliot  
Administrative Law Judge**

**In the Matter of**

**CERTAIN INTEGRATED CIRCUITS,  
COMPONENTS THEREOF, AND  
PRODUCTS CONTAINING THE SAME**

**INVESTIGATION NO. 337-TA-1350**

**COMPLAINANT’S PROPOSED CLAIM CONSTRUCTIONS**

Pursuant to Ground Rule 6 and the modified Procedural Schedule set by Order No. 8 in this Investigation, Complainant Realtek Semiconductor Corporation (“Realtek”), hereby sets forth the following list of preliminary claim constructions in this Investigation.

**1. U.S. Patent No. 7,936,245**

| <b>Claim(s)</b> | <b>Proposed Term for Construction</b> | <b>Party Proposing Claim Term</b> | <b>Realtek’s Proposed Construction</b> |
|-----------------|---------------------------------------|-----------------------------------|----------------------------------------|
| 1, 2, 8         | Preamble                              | Realtek                           | Preamble is limiting                   |

**2. U.S. Patent No. 8,006,218**

| <b>Claim(s)</b> | <b>Proposed Term for Construction</b>                | <b>Party Proposing Claim Term</b> | <b>Realtek’s Proposed Construction</b>                               |
|-----------------|------------------------------------------------------|-----------------------------------|----------------------------------------------------------------------|
| 12 & 13-18      | “first local power mesh” / “second local power mesh” | Realtek                           | “first partial local power mesh” / “second partial local power mesh” |
| 12 & 13-18      | “power domain”                                       | AMD                               | Ordinary and customary meaning                                       |
| 12 & 13-18      | “power mesh”                                         | AMD                               | Ordinary and customary meaning                                       |
| 12 & 13-18      | “partial local power mesh”                           | AMD                               | Ordinary and customary                                               |

| <b>Claim(s)</b> | <b>Proposed Term for Construction</b> | <b>Party Proposing Claim Term</b> | <b>Realtek's Proposed Construction</b>                                                                                                                |
|-----------------|---------------------------------------|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 |                                       |                                   | meaning                                                                                                                                               |
| 12 & 13-18      | "global power mesh"                   | AMD                               | Ordinary and customary meaning                                                                                                                        |
| 12 & 13-18      | "local power mesh"                    | AMD                               | Refers back to "first partial local power mesh" and "second partial local power mesh" depending on the context in which the term appears in the claim |

### 3. U.S. Patent No. 9,590,582

| <b>Claim(s)</b> | <b>Proposed Term for Construction</b>                                                              | <b>Party Proposing Claim Term</b> | <b>Realtek's Proposed Construction</b>                                                                                                                                                       |
|-----------------|----------------------------------------------------------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1, 2-4 & 9      | "two extension-conductor segments"                                                                 | Realtek                           | "the portions of the inductor that are joined to the end of the coil conductor segment"                                                                                                      |
| 1, 2-4 & 9      | "coil-conductor segment"                                                                           | Realtek                           | "portion of the inductor that forms any part of the coil"                                                                                                                                    |
| 1, 2-4 & 9      | "a first region is defined by the two extension-conductor segments and the coil-conductor segment" | AMD                               | Ordinary and customary meaning for the portion of the term other than "two extension-conductor segments" and "coil-conductor segment" which Realtek proposes be construed as set forth above |

| <b>Claim(s)</b> | <b>Proposed Term for Construction</b>                                                                                            | <b>Party Proposing Claim Term</b> | <b>Realtek's Proposed Construction</b> |
|-----------------|----------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|----------------------------------------|
| 1, 2-4 & 9      | "capacitor component"                                                                                                            | AMD                               | Ordinary and customary meaning         |
| 1, 2-4 & 9      | "arranged corresponding to the first region in an embedded manner on the other surface ... of the first insulation layer"        | AMD                               | Ordinary and customary meaning         |
| 1, 2-4 & 9      | "plurality of connecting segments are respectively overlapped with the two extension-conductor segments in a vertical direction" | AMD                               | Ordinary and customary meaning         |

Complainant's proposed claim term constructions are based on the information that is currently available to Complainant. Complainant reserves all rights to amend, modify, supplement, or reduce this list of terms and their respective proposed constructions, including in response to the patent claim terms and their proposed constructions identified for construction by Respondent AMD, as a result of or as a part of the meet and confer process and/or as discovery continues. Complainant reserves its right to cite intrinsic and extrinsic evidence, including patent documents, dictionary definitions, citations to learned treatises and prior art, and testimony, to support its proposed constructions and to rebut the proposed constructions of Respondent AMD. Complainant also reserves the right to put forth expert testimony in response to any expert testimony that Respondent may offer in support of its proposed constructions.

Complainant will identify its terms for briefing under Ground Rule 6 after the parties exchange proposed constructions, attempt to reach agreement on constructions, and/or otherwise meet and confer.

Dated: May 1, 2023

Respectfully submitted,

/s/ Theodore J. Angelis

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### CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing, COMPLAINANT'S PROPOSED CLAIM CONSTRUCTIONS, has been served upon the following parties as indicated below on this 1st day of May 2023.

|                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Lisa R. Barton<br/>Secretary to the Commission<br/>U.S. International Trade Commission<br/>500 E. Street, S.W.<br/>Washington, D.C. 20436</p>                                                                                               | <p><input type="checkbox"/> EDIS Electronic Filing<br/><input type="checkbox"/> Via Hand Delivery<br/><input type="checkbox"/> Via Overnight Carrier<br/><input type="checkbox"/> Via Electronic Mail<br/><input type="checkbox"/> Via U.S. First Class Mail</p>                      |
| <p>The Honorable Cameron R. Elliot<br/>Administrative Law Judge<br/><b>U.S. International Trade Commission</b><br/>500 E. Street, S.W., Room 317<br/>Washington, DC 20436<br/>Email: Michael.Turner@usitc.gov</p>                              | <p><input type="checkbox"/> Via Hand Delivery<br/><input type="checkbox"/> Via Overnight Carrier<br/><input type="checkbox"/> Via Electronic Mail<br/><input type="checkbox"/> Via File Transfer Protocol (FTP)<br/><input type="checkbox"/> Via U.S. First Class Mail</p>            |
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