

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

SONRAI MEMORY LIMITED,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:22-cv-00787-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

I. Undisputed Constructions

#	Term	Agreed Construction
1	“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. Apple contends that the term “elevator circuit” is indefinite. If the Court finds that the term “elevator circuit” is indefinite, then the parties

#	Term	Agreed Construction
		agree that the corresponding structure should only include the first two alternative structures set forth above.
2	“the output pump” '241 patent, Claims 6 and 11	“the output of the pumping circuit”
3	“Processor means for executing a plurality of operating system means” '014 patent, claim 12	Means-plus-function limitation, subject to § 112 ¶ 6. Function: “executing a plurality of operating system means.” Structure: chip multiprocessor 350 having multiple processors 305-320 mounted on a single die 360 as shown in Figure 3 and associated descriptions in the specification; or chip multiprocessor 450 having multiple processors 405-420 mounted on a single die 460 as shown in Figure 4 and associated descriptions in the specification; and equivalents thereof.
4	“simultaneously executing two or more operating systems” / “simultaneously executing two or more operating system means” '014 Patent Claims 1, 7, 12	“simultaneously executing two or more independent operating systems”

II. Disputed Constructions

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
5	“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 preamble is limiting and should be given its plain and ordinary meaning.
6	“coupling... to / coupled ... to” '241 Patent, Claims 1, 6, 9, 10, 11	No construction necessary. Alternatively, for claims 6, 9, 10, and 11 “connected without intervening	“connected without intervening resistors or other components that substantially change the voltage”

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		components that substantially change the voltage"	
7	"load selector means includes a target output pump selector for shutting down the variable charge pump circuit when the target output pump voltage (V_{cfra}) is greater than or equal to a reference voltage (V_{ref})" '241 Patent, Claim 2	Means-plus-function limitation. Function: "shutting down the variable charge pump circuit when the target output pump voltage (V_{cfra}) is greater than or equal to a reference voltage (V_{ref})" Corresponding structure: comparator 702 as shown in Figure 7 and associated descriptions in the specification, and equivalents thereof.	Subject to § 112 ¶ 6. Function: "shutting down the variable charge pump circuit when the target output pump voltage (V_{cfra}) is greater than or equal to a reference voltage (V_{ref})." Structure: there is no corresponding structure in the specification that comprises a load selector means that includes a target output pump selector that performs the claimed function. <i>Indefinite.</i>
8	"load selector means further includes a maximum ripple on the target output selector means for adding a load, whenever a maximum ripple on the target output voltage (V_{cfrb}) greater than the reference voltage (V_{ref}) then the maximum ripple on the target output selector means adds additional loads until the V_{cfrb} voltage is less than or equal to the reference voltage (V_{ref})" '241 Patent, Claim 3	Means-plus-function limitation. Function: "adding a load, whenever a maximum ripple on the target output voltage (V_{cfrb}) greater than the reference voltage (V_{ref}) then the maximum ripple on the target output selector means adds additional loads until the V_{cfrb} voltage is less than or equal to the reference voltage (V_{ref})" Corresponding structure: comparator 714 as shown in Figure 7 and associated descriptions in the specification, and equivalents thereof.	Subject to § 112 ¶ 6. Function: "adding a load, whenever a maximum ripple on the target output voltage (V_{cfrb}) greater than the reference voltage (V_{ref}) then the maximum ripple on the target output selector means adds additional loads until the V_{cfrb} voltage is less than or equal to the reference voltage (V_{ref})" Structure: there is no corresponding structure in the specification that comprises a load selector means that also includes a maximum ripple on the target output selector that performs the claimed function. <i>Indefinite.</i>
9	"coupled to each load" '241 Patent, Claim 6	"coupled to each corresponding load"	"connected without intervening resistors or other components that substantially change the voltage to each load"

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
10	"an elevator circuit" '241 Patent, Claim 9	No construction necessary. Alternatively, "a level shifter"	<i>Indefinite.</i>
11	"turning on a load" '241 Patent, Claim 24	No construction necessary. Alternatively, "connecting a load"	<i>Indefinite.</i>
12	"multiple operating systems residing in a memory" '014 Patent, Claims 1,7	multiple operating systems residing in the same memory	No construction necessary/plain meaning.
13	"multiple processors are connected to said memory via a bus" '014 Patent, Claim 3	multiple processors are connected to said memory via the same bus	No construction necessary/plain meaning.

Dated: March 16, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendant on March 16, 2023 via electronic service.

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