

Subject: RE: Sonrai v. Apple - Claim Construction Meet and Confer

Date: Friday, March 31, 2023 at 12:49:54 PM Eastern Daylight Time

From: Maggiore, Peter

To: Seth Hasenour, Williamson, Carrie, John PetrSORIC, Zolotorev, Jake, Au, John, Guaragna, John, Fowler, Mark, Sonrai Counsel

Counsel,

In the interest of further streamlining the disputes before the Court for next week's Markman hearing, Apple will agree to Sonrai's proposed constructions for the '014 patent. Specifically:

1. "multiple operating systems residing in a memory" ('014 Patent, Claims 1,7) construed as "multiple operating systems residing in the same memory"
2. "multiple processors are connected to said memory via a bus" ('014 Patent, Claim 3) construed as "multiple processors are connected to said memory via the same bus"

Apple intends to notify the Court today to this effect. Thank you.

--Pete

From: Maggiore, Peter

Sent: Friday, March 17, 2023 8:53 AM

To: Seth Hasenour <shasenour@bc-lawgroup.com>; Williamson, Carrie <Carrie.Williamson@us.dlapiper.com>; John PetrSORIC <jpetrsoric@bc-lawgroup.com>; Zolotorev, Jake <Jake.Zolotorev@us.dlapiper.com>; Au, John <John.Au@us.dlapiper.com>; Guaragna, John <John.Guaragna@us.dlapiper.com>; Fowler, Mark <Mark.Fowler@us.dlapiper.com>; Sonrai Counsel <Sonrai_Counsel@b-clg.com>

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Thanks, Seth. Apple agrees to your proposed stipulation that both parties forgo submission of the optional technical tutorials to the Court. Thank you also for preparing the materials for Dr. Yi.

--Pete

From: Seth Hasenour <shasenour@bc-lawgroup.com>

Sent: Thursday, March 16, 2023 10:13 AM

To: Maggiore, Peter <peter.maggiore@us.dlapiper.com>; Williamson, Carrie <Carrie.Williamson@us.dlapiper.com>; John PetrSORIC <jpetrsoric@bc-lawgroup.com>; Zolotorev, Jake <Jake.Zolotorev@us.dlapiper.com>; Au, John <John.Au@us.dlapiper.com>; Guaragna, John <John.Guaragna@us.dlapiper.com>; Fowler, Mark <Mark.Fowler@us.dlapiper.com>; Sonrai Counsel <Sonrai_Counsel@b-clg.com>

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 EXTERNAL MESSAGE

Pete, thank you.

Sonrai also proposes that both parties forgo submission of the optional technical tutorials to the Court (see

March 20 deadline in the Scheduling Order). Please confirm Apple agrees.

In addition, we are sending the technical advisor a binder with the briefs, patents, JCCS and a USB drive with the briefs, exhibits, JCCS, and patents.

Thanks,
Seth

From: "Maggiore, Peter" <peter.maggiore@us.dlapiper.com>
Date: Thursday, March 16, 2023 at 11:52 AM
To: Seth Hasenour <shasenour@bc-lawgroup.com>, "Williamson, Carrie" <Carrie.Williamson@us.dlapiper.com>, John Petrsoric <jpetrsoric@bc-lawgroup.com>, "Zolotorev, Jake" <Jake.Zolotorev@us.dlapiper.com>, "Au, John" <John.Au@us.dlapiper.com>, "Guaragna, John" <John.Guaragna@us.dlapiper.com>, "Fowler, Mark" <Mark.Fowler@us.dlapiper.com>, Sonrai Counsel <Sonrai_Counsel@b-clg.com>
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Thanks, Seth. Please see attached that contains one redline and adds the signature block. If you accept the redlines, you have our permission to file.

--Pete

From: Seth Hasenour <shasenour@bc-lawgroup.com>
Sent: Wednesday, March 15, 2023 6:38 AM
To: Williamson, Carrie <Carrie.Williamson@us.dlapiper.com>; John Petrsoric <jpetrsoric@bc-lawgroup.com>; Zolotorev, Jake <Jake.Zolotorev@us.dlapiper.com>; Au, John <John.Au@us.dlapiper.com>; Guaragna, John <John.Guaragna@us.dlapiper.com>; Fowler, Mark <Mark.Fowler@us.dlapiper.com>; Sonrai Counsel <Sonrai_Counsel@b-clg.com>; Maggiore, Peter <peter.maggiore@us.dlapiper.com>
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 EXTERNAL MESSAGE

Carrie,

Please see the attached JCCS that is due tomorrow. Please add Apple's signature block and confirm your approval to file this.

Thanks,
Seth

From: "Williamson, Carrie" <Carrie.Williamson@us.dlapiper.com>
Date: Friday, January 20, 2023 at 1:09 AM
To: John Petrsoric <jpetrsoric@bc-lawgroup.com>, "Zolotorev, Jake" <Jake.Zolotorev@us.dlapiper.com>, "Au, John" <John.Au@us.dlapiper.com>, "Guaragna, John" <John.Guaragna@us.dlapiper.com>, "Fowler, Mark" <Mark.Fowler@us.dlapiper.com>, Sonrai Counsel <Sonrai_Counsel@b-clg.com>, "Maggiore, Peter" <peter.maggiore@us.dlapiper.com>, Seth Hasenour <shasenour@bc-lawgroup.com>

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John,

Thanks for the email. We have just a few minor additions below.

Thanks

Carrie

From: John Petrscopic <jpetrsoric@bc-lawgroup.com>

Sent: Thursday, January 19, 2023 9:06 AM

To: Williamson, Carrie <Carrie.Williamson@us.dlapiper.com>; Zolotorev, Jake <Jake.Zolotorev@us.dlapiper.com>; Au, John <John.Au@us.dlapiper.com>; Guaragna, John <John.Guaragna@us.dlapiper.com>; Fowler, Mark <Mark.Fowler@us.dlapiper.com>; Sonrai Counsel <Sonrai_Counsel@b-clg.com>; Maggiore, Peter <peter.maggiore@us.dlapiper.com>; Seth Hasenour <shasenour@bc-lawgroup.com>

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 EXTERNAL MESSAGE

Carrie –

Thank you for your response. I can further confirm that Sonrai is in agreement with Apple regarding the recited functions for the “target output selector means” limitation of claim 3 of the ‘241 patent and the “processor means” limitation of claim 3 of the ‘241 patent. With this agreement, as well as the other agreements reached as a result of the meet-and-confer process, please find charts below detailing the parties agreed-to constructions and remaining disputed constructions for each of the ‘241 patent and ‘014 patent. If we’ve missed anything, please let us know.

Best regards,
John

’241 Patent – Agreed Constructions

Claim Term	Agreed Construction
“a load selector means for selectively coupling a load associated with a specific pump voltage to the output of said pumping circuit” [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” Corresponding 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 agree that the corresponding structure should only include the first two alternative structures set forth above.
“the output pump” [Claims 6, 11]	“the output of the pumping circuit”

’241 Patent – Disputed Constructions

Claim Term	Sonrai’s Construction	Apple’s Construction
“A charge pump circuit for generating a charge pump voltage having minimal voltage ripples, comprising” [Claim 1]	The preamble is not limiting except for “charge pump circuit”	Preamble is limiting and should be given its plain and ordinary meaning
“load selector means includes 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)” [Claim 2]	Means-plus-function limitation, 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)” Corresponding structure: comparator 702 as shown in Figure 7 and associated descriptions in the specification, and equivalents thereof	Indefinite 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: 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>Target output pump selector – Indefinite</i>
“load selector means further includes a maximum ripple on the target output selector means for adding a load, whenever a	Means-plus-function limitation, subject to §112, ¶6. Function: “adding a load,	Indefinite Subject to §112 ¶6.

maximum ripple on the target output voltage (Vcfrb) greater than the reference voltage (Vref) then the maximum ripple on the target output selector means adds additional loads until the Vcfrb voltage is less than or equal to the reference voltage (Vref)” [Claim 3]	whenever a maximum ripple on the target output voltage (Vcfrb) greater than the reference voltage (Vref) then the maximum ripple on the target output selector means adds additional loads until the Vcfrb voltage is less than or equal to the reference voltage (Vref).” Corresponding structure: comparator 714 as shown in Figure 7 and associated descriptions in the specification, and equivalents thereof	Function: “adding a load, whenever a maximum ripple on the target output voltage (Vcfrb) greater than the reference voltage (Vref) then the maximum ripple on the target output selector means adds additional loads until the Vcfrb voltage is less than or equal to the reference voltage (Vref).” 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>Target output selector means – Indefinite</i>
“coupled to each load” [Claim 6]	“coupled to each corresponding load”	“connected without intervening resistors or other components to each load”
“Coupling ... to / coupled ... to” [Claims 1, 6, 9, 10, 11]	No construction necessary.	“connected without intervening resistors or other components”
“elevator circuit” [Claims 1, 9]	No construction necessary.	Indefinite
“turning on a load” [Claim 24]	No construction necessary.	Indefinite

’014 Patent – Agreed Constructions

Claim Term	Agreed Construction
“processor means for executing a plurality of operating system means” [Claim 12]	Means-plus-function limitation, subject to §112, ¶6. Function: “executing a plurality of operating system means” Corresponding 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
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'014 Patent – Disputed Constructions

Claim Term	Sonrai's Construction	Apple's Construction
“multiple operating systems residing in a memory” [Claims 1, 7]	“multiple operating systems residing in the same memory”	Plain meaning
“multiple processors are connected to said memory via a bus” [Claim 3]	“multiple processors are connected to said memory via the same bus”	Plain meaning
“simultaneously executing two or more operating systems / simultaneously executing two or more operating system means” [Claims 1, 7, 12]	No construction necessary.	“Simultaneously executing two or more independent operating systems”

From: "Williamson, Carrie" <Carrie.Williamson@us.dlapiper.com>

Date: Thursday, January 19, 2023 at 12:48 AM

To: John Petrscopic <jpetrscopic@bc-lawgroup.com>, "Zolotorev, Jake"

<Jake.Zolotorev@us.dlapiper.com>, "Au, John" <John.Au@us.dlapiper.com>, "Guaragna, John"

<John.Guaragna@us.dlapiper.com>, "Fowler, Mark" <Mark.Fowler@us.dlapiper.com>, Sonrai Counsel

<Sonrai_Counsel@b-clg.com>, "Maggiore, Peter" <peter.maggiore@us.dlapiper.com>, Seth Hasenour

<shasenour@bc-lawgroup.com>

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Dear John and Seth,

Thanks for your email. Please see our responses inline in red text.

Additionally, please note that Apple will drop the “each load is ... a current sinker” term as a term for construction.

Finally, I believe we are still waiting for Sonrai's final position regarding agreeing to the function of “load selector means further includes a maximum ripple on the target output selector means ...” limitation in claim 3 of the '241 Patent. Please let us know if Sonrai will be providing that position on Thursday, January 19.

Thanks

Carrie

From: John Petrusic <jpetrusic@bc-lawgroup.com>

Sent: Tuesday, January 17, 2023 5:03 PM

To: Williamson, Carrie <Carrie.Williamson@us.dlapiper.com>; Zolotorev, Jake <Jake.Zolotorev@us.dlapiper.com>; Au, John <John.Au@us.dlapiper.com>; Guaragna, John <John.Guaragna@us.dlapiper.com>; Fowler, Mark <Mark.Fowler@us.dlapiper.com>; Sonrai Counsel <Sonrai_Counsel@b-clg.com>; Maggiore, Peter <peter.maggiore@us.dlapiper.com>; Seth Hasenour <shasenour@bc-lawgroup.com>

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 EXTERNAL MESSAGE

All –

Thanks for taking the time for a productive conversation this afternoon. I write to follow up on the issues we discussed with respect to both the '241 Patent and the '014 Patent. More specifically:

1. With respect to “a load selector means ...” limitation in claim 1 of the '241 Patent, Sonrai proposes the following for potential compromise with respect to the corresponding structure (subject to the caveat that Apple maintains “elevator circuit” is indefinite):
 - (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 can agree to this compromise proposal. We plan to insert the following language as a footnote after “elevator circuits” in the agreed construction in our claim construction brief: “Apple contends that the elevator circuit is not disclosed with sufficient structure in the specification and therefore the term is indefinite. Nevertheless, for the purpose of narrowing the dispute, the parties have agreed to include this third alternative structure with elevator circuits 502B in the agreed construction. If the Court finds that the term “elevator circuit” is indefinite, then the parties agree that the corresponding should only include the first two alternative structures set forth above.”

2. With respect to the “load selector means further includes a maximum ripple on the target output selector means ...” limitation in claim 3 of the '241 Patent, Sonrai is presently amenable to the recited function proposed by Apple. We will endeavor to confirm full agreement by tomorrow.
3. With respect to the “output pump” term in claims 6 and 11 of the '241 Patent, Sonrai maintains its proposed construction. Consistent with Figure 3 and the proposed corresponding structure

of “a load selector means” in claim 1, the claim language of the dependent claims is clearly referencing that the switches in claim 6, as well as the first resistor of claim 11, are coupled to the output of the pumping circuit.

Apple can agree to Sonrai’s proposed construction for “output pump”.

4. With respect to “processor means ...” limitation of claim 12 of the ‘014 Patent, Sonrai proposes the following for potential compromise with respect to the corresponding 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

Subject to Sonrai’s agreement as to the function, Apple would be willing to agree to this compromise construction for the corresponding structure of “processor means . . .”

As a final note, following Apple’s lead, we will include “and equivalents thereof” in Sonrai’s proposed corresponding structure in any means-plus-function limitations.

We look forward to your thoughts on these points (to the exclusion of the recited function issue for claim 3 of the ‘241 Patent). To the extent you believe a follow up call would be helpful, we’ll be glad to find a convenient time to talk.

Best regards,
John

John Petrusic
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(516) 521-6326 (M)

From: "Williamson, Carrie" <Carrie.Williamson@us.dlapiper.com>

Date: Monday, January 16, 2023 at 5:56 PM

To: "Zolotorev, Jake" <Jake.Zolotorev@us.dlapiper.com>, "Au, John" <John.Au@us.dlapiper.com>, "Guaragna, John" <John.Guaragna@us.dlapiper.com>, "Fowler, Mark"

<Mark.Fowler@us.dlapiper.com>, Sonrai Counsel <Sonrai_Counsel@b-clg.com>, "Maggiore, Peter" <peter.maggiore@us.dlapiper.com>, Seth Hasenour <shasenour@bc-lawgroup.com>

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