

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

**Before the Honorable Bryan F. Moore
Administrative Law Judge**

In the Matter of

**CERTAIN ACTIVE MATRIX ORGANIC
LIGHT-EMITTING DIODE DISPLAY
PANELS AND MODULES FOR MOBILE
DEVICES, AND COMPONENTS THEREOF**

Investigation No. 337-TA-1351

**THE PARTIES' JOINT SUBMISSION REGARDING
AGREED UPON AND REMAINING DISPUTED CLAIM TERMS**

In addition to the parties' claim construction briefs, and for the benefit of the Administrative Law Judge and the Commission, Complainant Samsung Display Co., Ltd., Respondents Mianyang BOE Optoelectronics Technology Co., Ltd., Apt-Ability, LLC d/b/a MobileSentry and Mobile Defenders LLC (collectively, "Mianyang BOE and MobileSentry Respondents"),¹ and the Commission Investigative Staff hereby jointly submit lists of (1) constructions of claim terms to which all parties have agreed, and (2) disputed claim terms not being briefed during the *Markman* phase of the Investigation. The agreed-upon constructions are provided in Table 1 below. The additional disputed constructions are provided in Table 2 below.

¹ Respondents DFW Imports LLC d/b/a DFW Cellphone and Parts; Electronics Universe, Inc. d/b/a Fixez.com and Repairs Universe, LLC; eTech Parts Plus, LLC; Gadgetfix Corp.; Injured Gadgets, LLC; LCTech International Inc. d/b/a SEGMobile.com; Parts4Cells, Inc.; Parts4LCD and Phone LCD Parts LLC; and Wholesale Gadget Parts, Inc. stated that they seek construction of no terms, and have not participated in the claim construction process.

TABLE 1: AGREED-UPON CONSTRUCTIONS

#	Claim Term	Agreed-Upon Construction
1.	“current scan line signal” / “current scan signal” (’599, cls. 1, 7, 14)	Plain and ordinary meaning, i.e., “scan signal of the current scan line (i.e., SCAN[n])”
2.	“current light-emitting signal” (’599, cls. 1, 14, 15, 17)	Plain and ordinary meaning, i.e., “light emitting signal of the current emission line (i.e., EMI[n])”
3.	“fourth initialization transistor” / “sixth initialization transistor” (’599, cls. 2, 8)	fourth transistor, which is an initialization transistor sixth transistor, which is an initialization transistor
4.	“scan signal just before the current scan signal” / “scan line just before the associated scan line” (’599, cls. 2, 8, 16, 18)	Plain and ordinary meaning, i.e., “scan signal of the immediately previous scan line (i.e., SCAN[n-1])” “the immediately previous scan line (i.e., the (n-1)th scan line)”
5.	“self-compensating threshold voltage deviation in the second transistor” (claim 1) / “the second transistor detects and compensates its threshold voltage deviation in itself” (claim 7) / “self-compensate a threshold voltage of the second transistor” (claim 14) (’599, cls. 1, 7, 14)	Plain and ordinary meaning, i.e., “eliminating or nearly eliminating the effect of a threshold voltage deviation of the particular second transistor”
6.	“directly controls” (’593, cls. 1, 15)	Plain and ordinary meaning, i.e., “controls with no intervening circuit elements”
7.	“wherein the transistor controls the voltage of the second node according to the on/off operation thereof” (’593, cl. 14)	Plain and ordinary meaning, i.e., “wherein the transistor controls the voltage of the second node based on the on/off operation of the transistor”
8.	“each of the stage circuits generating a corresponding scan signal of the scan signals” (’593, cl. 15)	Plain and ordinary meaning, i.e., “each stage circuit generates a scan signal and provides it to a corresponding scan line”
9.	“a data driver for supplying data signals to the pixels through the data lines” (’593, cl. 15)	Plain and ordinary meaning
10.	“a scan driver for supplying scan signals to the pixels through the scan lines” (’593, cl. 15)	Plain and ordinary meaning
11.	“coinciding with”	“occupying the same place in space”

	(’803, cl. 1)	
12.	“a third pixel separate from the first pixel” / “another third pixel separated from the first pixel” / “another third pixel separated from the first pixel” / “separated from each other by the first pixel” / “the second pixels and the third pixels enclose the first pixel in the virtual square” (’803, cls. 1-5)	The first pixel” refers to the claim 1’s “a first pixel” and does not refer to the claim 1’s “another first pixel”/“the other first pixel.”
13.	“line” / “lines” (’803, cl. 1; ’683, cls. 1, 9, 13, 14; ’578, cls. 1, 2, 3, 4, 42)	“straight line” / “straight lines”
14.	“center” / “centers” (’803, cls. 1-3; ’683, cls. 1, 8, 9, 13, 14; ’578, cls. 1, 42)	center point(s), wherein there is only one center point per pixel
15.	“entirely offset” (’578, cl. 1)	Plain and ordinary meaning
16.	“arranged along” (’578, cls. 1, 42)	located on or near the length of a line extending in
17.	“larger area” (’578, cl. 10, 42)	Plain and ordinary meaning
18.	“smaller area” (’578, cl. 17)	Plain and ordinary meaning
19.	“different in size” (’578, cl. 21)	Plain and ordinary meaning, wherein “size” refers to “area.”

TABLE 2: ADDITIONAL DISPUTED CONSTRUCTIONS

#	Claim Term	Complainant's Construction	Mianyang BOE and MobileSentry Respondents' Construction	Staff's Construction
1.	"virtual square" (’803, cl. 1-4)	A "square formed by imaginary lines that can be superimposed to describe relationships among pixels," which in the ’803 patent is superimposed on pixels adjacent to a central pixel.	a square formed by imaginary lines that can be superimposed to describe relationships among pixels adjacent to a central pixel	a square formed by imaginary lines extending between pixels adjacent to a central pixel
2.	"a first distance between the second pixels is greater than a second distance between one of the second pixels and a neighboring one of the third pixels" (’683, cls. 1, 13)	Plain and ordinary meaning, i.e., "a [first/second] distance between [two pixels]" refers to a distance between the centers of the two pixels or between the closest edges of the two pixels"	Indefinite	Plain and ordinary meaning, wherein "distance" can be either (1) the distance between the edges of adjacent pixels and (2) the distance between the centers of adjacent pixels.
3.	"substantially equidistant" (’683, cl. 7)	Plain and ordinary meaning, i.e., "approximately at equal distances"	Indefinite	approximately equidistant This term may render the claim indefinite to the extent fact and expert discovery reveal a lack of reasonable certainty as to the term's scope.
4.	("first," "second," "third," "fourth") direction (’578, cls. 1, 40-45, 51, 52)	Plain and ordinary meaning, i.e., the first, second, third, and fourth directions refer to four different directions	Indefinite	"First," "second," "third," and "fourth" should be given their plain and ordinary meanings and identify different directions.

#	Claim Term	Complainant's Construction	Mianyang BOE and MobileSentrix Respondents' Construction	Staff's Construction
5.	"region having a width in the second direction that is equal to a width of the first pixels in the second direction" (’578, cl. 1)	Plain and ordinary meaning; no construction needed	Indefinite	Plain and ordinary meaning.
6.	"elongated" (’578, cls. 40, 41, 43, 44, 51, 52)	Plain and ordinary meaning, i.e., "extended"	having more length in one dimension relative to an orthogonal dimension	Claims 40, 41, 43, and 44: the parallel sides extending in the third or fourth directions are longer than the "two connection portions" Claims 51 and 52: the parallel edges extending in the first or second directions are longer than the "remaining edges"
7.	"shortest distance between [two pixels]" (’578, cls. 1, 5, 22, 41, 42, 44, 45, 52) "shortest distance between [the] two [elongated sides/parallel sides/parallel edges]" (’578, cls. 40, 41, 43, 44, 51, 52)	Plain and ordinary meaning, i.e., "distance between the closest edges of" Plain and ordinary meaning; no construction needed	Indefinite	the distance between the nearest edges of two pixels. Plain and ordinary meaning; no construction needed
8.	"[a virtual quadrangle	Plain and ordinary meaning, i.e., "a	Indefinite	the edges of the virtual quadrangle

#	Claim Term	Complainant's Construction	Mianyang BOE and MobileSentrix Respondents' Construction	Staff's Construction
	containing] outer edges comprising some of the edges of a group of four neighboring ones of the plurality of first pixels” (’578, cls. 45, 46, 47, 51, 52)	virtual quadrangle whose edges coincide with portions of the edges of a group of four neighboring ones of the plurality of first pixels”	<u>Alternatively</u> : “group of four neighboring ones of the plurality of first pixels only includes four first pixels, and not more than that”	coincide with some of the edges of the four neighboring first pixels
9.	“does not cross any other of the first pixels, the second pixels, or the third pixels” (’578, cl. 47)	Plain and ordinary meaning; no construction needed	Indefinite	the virtual quadrangle does not overlap any of the first, second, and third pixels other than the “only one of the second pixels and the third pixels [that] is included in [the] virtual quadrangle” and the edges of the four neighboring first pixels that coincide with the edges of the virtual quadrangle
10.	“wherein a shortest distance between two parallel edges that are elongated in a first direction or a second direction crossing the first direction from among the edges of one of the group of four neighboring ones of the	Plain and ordinary meaning; no construction needed	Indefinite	a first pixel belonging to the group of four neighboring first pixels has two edges that are parallel to each other and are elongated either (1) in a first direction or (2) in a second direction crossing the first direction, wherein a shortest distance between the two parallel edges is less than a shortest

#	Claim Term	Complainant's Construction	Mianyang BOE and MobileSentry Respondents' Construction	Staff's Construction
	plurality of first pixels is less than a shortest distance between the one of the group of four neighboring ones of the plurality of first pixels and the only one of the second pixels and the third pixels included in the virtual quadrangle” ('578, cl. 52)			distance between the first pixel and the second pixel or third pixel included in the virtual quadrangle
11.	“polygonal shapes” ('803, cl. 5; '683, cl. 2; '578, cl. 12)	planar shapes (two-dimensional) with straight sides	planar shapes (two-dimensional) having only straight sides	planar shapes (two-dimensional) having only straight sides

Dated: June 29, 2023

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Danute D. Abrishami, certify that on June 29, 2023, copies of the foregoing THE PARTIES' JOINT SUBMISSION REGARDING AGREED UPON AND REMAINING DISPUTED CLAIM TERMS were delivered, pursuant to Commission regulations, to the following interested parties as indicated:

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