

EXHIBIT G

Michael Ng (State Bar No. 237915)
Michael.Ng@kobrekim.com
Daniel Zaheer (State Bar No. 237118)
Daniel.Zaheer@kobrekim.com
KOBRE & KIM LLP
150 California Street, 19th Floor
San Francisco, California 94111
Telephone: 415-582-4800
Facsimile: 415-582-4811

Attorneys for Plaintiff
RJ Technology LLC

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

RJ TECHNOLOGY LLC

Plaintiff,

vs.

APPLE INC.,

Defendant.

Case No. 8:22-CV-1874-JVS-JDE

**PLAINTIFF RJ TECHNOLOGY
LLC'S PROPOSED CLAIM
CONSTRUCTIONS**

PROPOSED CLAIM CONSTRUCTION

1 In accordance with the Court's Scheduling Order (Dkt. 35), Plaintiff RJ
2 Technology LLC ("RJ Technology") discloses the following preliminary proposed
3 claim constructions and identification of intrinsic and extrinsic evidence that it may
4 rely on in support of those constructions.

5 **I. Reservation of Rights**

6 RJ Technology may modify these claim constructions as discovery
7 progresses and in a manner consistent with the Federal Rules of Civil Procedure and
8 the Court's rules. RJ Technology additionally reserves all rights to amend and/or
9 supplement these constructions and intrinsic and extrinsic evidence. Nothing herein
10 shall be construed as an admission that RJ Technology agrees with any claim
11 construction positions taken or to be taken by Defendant Apple Inc. ("Defendant"
12 or "Apple").

13 RJ Technology expressly reserves the right to propose alternative
14 constructions to those proposed by Defendant and/or in connection with their Local
15 Patent Rule 4-2 disclosures or otherwise. In addition, RJ Technology reserves the
16 right to reduce the number of terms it ultimately requests the Court to construe.

17 To the extent the claim terms, phrases, or clauses set forth herein include
18 particular terms, phrases, or clauses appropriate to be construed separately, such
19 terms, phrases, or clauses are deemed part of the disclosed list. Similarly, to the
20 extent it is appropriate to construe terms, phrases, or clauses listed herein in the
21 context of additional claim language, such additional language is deemed part of
22 this disclosure.

23 RJ Technology further expressly reserves the right to identify additional
24 intrinsic and extrinsic evidence, including expert testimony, as claim construction
25 proceeds in view of any contentions made or information disclosed by Defendant,
26 including, for example, in rebuttal to their claim construction positions, and/or
27 extrinsic evidence, including expert testimony, they may present in support of its
28 proposed claim construction, including arguments concerning the "ordinary

1 meaning” of claim terms. RJ Technology also reserves the right to rely on references
2 cited in the specifications of U.S. Patent No. 7,749,641 (“the ’641 patent” or the
3 “Asserted Patent”).

4 RJ Technology identifies and reserves the right to use the file history of the
5 Asserted Patent and any patent applications related to the Asserted Patent and
6 related patent applications. RJ Technology reserves the right to use any extrinsic
7 evidence later produced by Defendant, for example, documents from any
8 investigation. RJ Technology reserves the right to use dictionary definitions and
9 definitions from technical publications relating to the subject matter of the Asserted
10 Patent.

11 RJ Technology reserves the right to rely on the expert testimony of Dr. Steve
12 W. Martin in support of any of its proposed constructions or claim construction
13 arguments. The substance of such expert testimony may include a description of Dr.
14 Martin’s qualifications, a description of the state of the art at the time of the
15 invention, a description of one of ordinary skill in the art with respect to the Asserted
16 Patent, a discussion of why a proposed construction of a claim term comports with
17 the plain and ordinary meaning of that term to one of ordinary skill in the art or
18 comports with the patent’s specification or file history, or a discussion of why a
19 proposed construction of a claim term deviates from the plain and ordinary meaning
20 of that term to one of ordinary skill in the art or deviates from the teachings of the
21 patent’s specification or file history.

22 RJ Technology reserves the right to ask Dr. Martin to opine on any claim
23 construction issue for which Defendant may provide expert testimony. RJ
24 Technology further reserves the right to call Dr. Martin as a live witness at the Claim
25 Construction Hearing, should the parties request and be permitted to call any live
26 witnesses at the Claim Construction Hearing.

II. RJ Technology’s Proposed Constructions for Its Proposed Claim Terms

RJ Technology’s preliminary proposals for construction of the disputed claim terms and identification of supporting intrinsic and extrinsic evidence is below. Identification of a term, phrase, or clause for construction applies equally to variations or other instances of that term, phrase, or clause in any of the asserted claims in the Asserted Patent, unless otherwise stated. RJ Technology’s identification of supporting intrinsic and extrinsic evidence is exemplary. Identification of a reference as supporting evidence is not an admission that the reference is “extrinsic,” as opposed to “intrinsic,” evidence. RJ Technology reserves the right to rely on any extrinsic evidence not expressly identified, for example, to respond to Defendant’s proposed constructions, in connection with its Patent Local Rule 4-2 disclosures or otherwise, and to respond to its claim construction arguments. RJ Technology also reserves the right to rely on any extrinsic evidence cited by Defendant in support of their proposed constructions.

Pursuant to Patent Rule 4-2(c), RJ Technology will be available to “meet and confer for the purposes of narrowing the issues and finalizing preparation of a Joint Claim Construction and Prehearing Statement” in advance of the current May 26, 2023, due date for the parties’ joint Patent Rule 4-3 filing.

III. Terms Proposed by RJ Technology

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
“A method for improving the capacity, average operating voltage and specific energy of a secondary lithium ion cell or battery”	1	Claim 1 should be construed as a <i>Jepson</i> claim of the form: “An improvement to a secondary lithium ion cell or battery, the improvement comprising . . .”	Specification of the ’641 patent: 1:5–2:67; 3:1–65; 6:43–7:50
“at least 7500”	11	At least 75%	Specification of the ’641 patent: Claims 11–18; Examples 1–28; Tables 2-4. Prosecution History of the ’641 patent: • May 15, 2009, Applicant’s Amendments to the Claims at 5 • November 13, 2009, Applicant’s Amendments to the Claims at 4
“after 400”	18	After 400 cycles	Specification of the ’641 patent: Claims 11–18; Examples 1–28; Tables 2-4. Prosecution History of the ’641 patent:

			• May 15, 2009, Applicant's Amendments to the Claims at 5 • November 13, 2009, Applicant's Amendments to the Claims at 5
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IV. Terms Proposed by Defendant

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
"improving the capacity, average operating voltage and specific energy of a secondary lithium ion cell or battery"	1	See RJ Technology's proposed construction for the term "A method for improving the capacity, average operating voltage and specific energy of a secondary lithium ion cell or battery"	See RJ Technology's evidence for the term "A method for improving the capacity, average operating voltage and specific energy of a secondary lithium ion cell or battery"
"charge cut-off voltage"	1-3, 5-7	No construction is needed. If this term needs construction, it should be afforded its plain and ordinary meaning, which is the voltage at which the charging changes from constant current charging to	Specification of the '641 patent: Abstract; 1:36–2:67; 3:3–16; 3:55–6:67; 7:23–29; 9:49–55; Examples 1–28; Tables 2-4. Prosecution History of the '641 patent: • October 21, 2008 Applicant's Remarks at 5-6 • May 15, 2009 Applicant's Remarks at 6

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Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
		constant voltage charging	- November 13, 2009 Applicant's Remarks at 8-11 - Notice of Allowance of the '641 patent at 2-3 Prosecution History of US Patent Application No. 12/817,028 - February 9, 2011 Applicant's Remarks at 4 - August 25, 2011 Applicant's Remarks at 4-7 - February 26, 2013 Applicant's Remarks at 4-6 - November 27, 2013 Applicant's Pre-Appeal Brief Request for Review at 1-4 <i>Zou et al., Synthesis of High-Voltage (4.5V) Cycling Doped LiCoO₂ for Use in Lithium Rechargeable Cells, Chemistry of Materials, Vol. 15, No. 25 (2003)</i> The People's Republic of China National Standard - General Specification of Lithium-Ion Battery for Cellular Phone (GB/T 18287-2000) David Linden, Handbook of Batteries, McGraw-Hill Handbooks (2001)

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
			G.G. Amatucci et al., <i>Cobalt dissolution in LiCoO₂-based non-aqueous rechargeable batteries</i>, 83 Solid State Ionics, 167-173 (1996) K. Brandt, <i>Historical development of secondary lithium batteries</i>, 69 Solid State Ionics 173-183 (1994) Dr. Steve Martin may offer expert testimony, consistent with the intrinsic evidence and from the perspective of one of ordinary skill in the art at the time of the invention, that “charge cut-off voltage” as used in this patent has the meaning that Plaintiff proposes.
“positive electrode material”	1, 4-5, 8	No construction is needed. If this term needs construction, it should be afforded its plain and ordinary meaning, which is the cathode material.	Specification of the ’641 patent: 1:40–44; 1:64–2:3; 6:27–34; 8:5–41. David Linden, <i>Handbook of Batteries</i>, McGraw-Hill Handbooks (2001) Dr. Steve Martin may offer expert testimony, consistent with the intrinsic evidence and from the perspective of one of ordinary skill in the art at the time of the invention, that “positive electrode material” as used in this

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
			patent has the meaning that Plaintiff proposes.
“negative electrode material”	1, 4-5, 8	No construction is needed. If this term needs construction, it should be afforded its plain and ordinary meaning, which is the anode material.	Specification of the ’641 patent: 2:15–30; 2:38–41; 4:57–5:18; 8:49–9:7. David Linden, Handbook of Batteries, McGraw-Hill Handbooks (2001) Dr. Steve Martin may offer expert testimony, consistent with the intrinsic evidence and from the perspective of one of ordinary skill in the art at the time of the invention, that “negative electrode material” as used in this patent has the meaning that Plaintiff proposes.
“as calculated by a specific capacity with a charge voltage limited to 4.2 V”	1	No construction is needed. If this term needs construction, it should be afforded its plain and ordinary meaning: the ratio calculated as the product of the capacity of the cathode material per unit measure (e.g., mass or volume) and the amount of the cathode material in the	Specification of the ’641 patent: Abstract; 1:36–44; 1:64–2:3; 3:7–12; 3:17–33; 4:5–9; 4:27–42; 6:43–67; 7:1–8; 7:22–50; Examples 1–28 Prosecution History of the ’641 patent: • May 15, 2009, Applicant’s Remarks at 7 • November 13, 2009, Applicant’s Remarks at 8 • Notice of Allowance of the ’641 patent

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
		same unit measure (e.g., mass or volume) divided by the product of the capacity of the anode material per unit measure (e.g., mass or volume) and the amount of the anode material in the same unit measure (e.g., mass or volume), when the charge voltage is limited to 4.2 V.	David Linden, <i>Handbook of Batteries</i> , McGraw-Hill Handbooks (2001) K. Brandt, <i>Historical development of secondary lithium batteries</i> , 69 Solid State Ionics 173-183 (1994) Dr. Steve Martin may offer expert testimony, consistent with the intrinsic evidence and from the perspective of one of ordinary skill in the art at the time of the invention, that “as calculated by a specific capacity with a charge voltage limited to 4.2 V” as used in this patent has the meaning that Plaintiff proposes.
“as calculated by a theoretic capacity with a charge cut-off voltage set at 4.2 V”	5	No construction is needed. If this term needs construction, it should be afforded its plain and ordinary meaning: the ratio calculated as the product of the capacity of the cathode material per unit measure (e.g., mass or volume) and the amount of the cathode material in the same unit	Specification of the '641 patent: Abstract; 1:36–44; 1:64–2:3; 3:7–12; 4:5–9; 4:27–42; 6:43–67; 7:1–8; 7:22–50; Examples 1–28 Prosecution History of the '641 patent: • May 15, 2009 Applicant’s Remarks at 7 • November 13, 2009 Applicant’s Remarks at 8 • Notice of Allowance of the '641 patent

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
		measure (e.g., mass or volume) divided by the product of the capacity of the anode material per unit measure (e.g., mass or volume) and the amount of the anode material in the same unit measure (e.g., mass or volume), when the charge cutoff voltage is 4.2 V.	Prosecution History of US Patent Application No. 12/817,028 - February 9, 2011 Applicant's Remarks at 4 - August 25, 2011 Applicant's Remarks at 4-7 - February 26, 2013 Applicant's Remarks at 4-6 - November 27, 2013 Applicant's Pre-Appeal Brief Request for Review at 1-4 David Linden, Handbook of Batteries, McGraw-Hill Handbooks (2001) K. Brandt, <i>Historical development of secondary lithium batteries</i>, 69 Solid State Ionics 173-183 (1994) Dr. Steve Martin may offer expert testimony, consistent with the intrinsic evidence and from the perspective of one of ordinary skill in the art at the time of the invention, that "as calculated by a theoretic capacity with a charge cut-off voltage set at 4.2 V" as used in this patent has the meaning that Plaintiff proposes.
"within a range from"	2, 3, 6, 7	No construction is needed. If this	Specification of the '641 patent:

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
		term needs construction, it should be afforded its plain and ordinary meaning, which indicates that a value falls between two specific numbers, inclusive of both the lower bound of the range and the upper bound of the range	6:53-55; 7:34-37; 9:49-55 Dr. Steve Martin may offer expert testimony, consistent with the intrinsic evidence and from the perspective of one of ordinary skill in the art at the time of the invention, that “within a range from” as used in this patent has the meaning that Plaintiff proposes.
“overcharging protection voltage”	9, 10	No construction is needed. If this term needs construction, it should be afforded its plain and ordinary meaning, which is the voltage level at which the battery’s protection mechanism(s) engages to prevent the battery from being charged to a higher voltage.	Specification of the ’641 patent: 1:51-55; 3:34-44; 9:24-48; 16:7-10. David Linden, Handbook of Batteries, McGraw-Hill Handbooks (2001) Dr. Steve Martin may offer expert testimony, consistent with the intrinsic evidence and from the perspective of one of ordinary skill in the art at the time of the invention, that “overcharging protection voltage” as used in this patent has the meaning that Plaintiff proposes.

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
“overcharging protection release voltage”	9, 10	No construction is needed. If this term needs construction, it should be afforded its plain and ordinary meaning, which is the voltage level at which a battery’s protection mechanism(s) disengages or resets.	Specification of the ’641 patent: 1:51–55; 3:34–44; 9:24–48; 16:7–10. David Linden, Handbook of Batteries, McGraw-Hill Handbooks (2001) Dr. Steve Martin may offer expert testimony, consistent with the intrinsic evidence and from the perspective of one of ordinary skill in the art at the time of the invention, that “overcharging protection release voltage” as used in this patent has the meaning that Plaintiff proposes.
“maintains at least 7500 of capacity after 400 cycles”; “maintain at least 75% of capacity after 400 cycles”; “maintains at least 75.83% of capacity after 400 cycles”; “maintains at least 80% of capacity after 400 cycles”; “maintains at least 80.72% of capacity after 400 cycles”; “maintains at least 80.72% of	11-18	No construction is needed. If this term needs construction, it should be afforded its plain and ordinary meaning, which means “maintains at least 75%/75.83%/80%/80.72% of capacity after 400 complete charge and discharge cycles of the battery”	Specification of the ’641 patent: 3:2–7; 5:13–15; Examples 1–28 Prosecution History of the ’641 patent: • May 15, 2009 Applicant’s Remarks at 10–11 • November 13, 2009 Applicant’s Remarks at 8–12 David Linden, Handbook of Batteries, McGraw-Hill Handbooks (2001)

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
capacity after 400”			Dr. Steve Martin may offer expert testimony, consistent with the intrinsic evidence and from the perspective of one of ordinary skill in the art at the time of the invention, that these terms as used in this patent have the meaning that Plaintiff proposes.
“A secondary lithium ion cell or battery, ... and a ratio of positive electrode material to negative electrode material ... as calculated by a theoretic capacity”	5	No construction is needed. <i>See</i> RJ Technology’s proposed construction for the term “as calculated by a theoretic capacity with a charge cut-off voltage set at 4.2 V”	<i>See</i> RJ Technology’s evidence for the term “as calculated by a theoretic capacity with a charge cut-off voltage set at 4.2 V”
“A method for improving the capacity ... of a secondary lithium ion cell or battery, characterized in that the charge cutoff voltage of the secondary lithium ion cell or battery is greater than 4.2 V but less than 5.8 V; and a ratio of positive electrode material to negative electrode material ... is from 1:1.0 to 1:2.5 ...”	1	<i>See</i> RJ Technology’s proposed construction for the term “A method for improving the capacity, average operating voltage and specific energy of a secondary lithium ion cell or battery”	<i>See</i> RJ Technology’s evidence for the term “A method for improving the capacity, average operating voltage and specific energy of a secondary lithium ion cell or battery”

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
“ratio of positive electrode material to negative electrode material”	1, 4, 5, 8	<i>See</i> RJ Technology’s proposed constructions for the terms “as calculated by a specific capacity with a charge voltage limited to 4.2 V” and “as calculated by a theoretic capacity with a charge cut-off voltage set at 4.2 V”	<i>See</i> RJ Technology’s evidence for the terms “as calculated by a specific capacity with a charge voltage limited to 4.2 V” and “as calculated by a theoretic capacity with a charge cut-off voltage set at 4.2 V”
“charge cut-off voltage greater than 4.2 V but less than 5.8 V”	1, 5	No construction is needed. If this term needs construction, it should be afforded its plain and ordinary meaning. <i>See</i> RJ Technology’s proposed construction for the term “charge cut-off voltage.”	<i>See</i> RJ Technology’s evidence for the term “charge cut-off voltage”
“ratio of positive electrode material to negative electrode material as calculated by a [specific/theoretic] capacity with a charge voltage limited to 4.2 V”	1, 5	<i>See</i> RJ Technology’s proposed constructions for the terms “as calculated by a specific capacity with a charge voltage limited to 4.2 V” and “as calculated by	<i>See</i> RJ Technology’s evidence for the terms “as calculated by a specific capacity with a charge voltage limited to 4.2 V” and “as calculated by a theoretic capacity with a charge cut-off voltage set at 4.2 V”

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
		a theoretic capacity with a charge cut-off voltage set at 4.2 V”	
“overcharging protection voltage of greater than 4.35 V”; “overcharging protection voltage of greater than 4.45 V”	9, 10	No construction is needed. If this term needs construction, it should be afforded its plain and ordinary meaning. <i>See</i> RJ Technology’s proposed construction for the term “overcharging protection voltage.”	<i>See</i> RJ Technology’s evidence for the term “overcharging protection voltage”
“overcharging protection release voltage of 4.15 V”; “overcharge protection release voltage of greater than 4.24 V [sic]”	9, 10	No construction is needed. If this term needs construction, it should be afforded its plain and ordinary meaning. <i>See</i> RJ Technology’s proposed construction for the term “overcharging protection release voltage.”	<i>See</i> RJ Technology’s evidence for the term “overcharging protection release voltage”
“7500 of capacity”; “maintains at least 7500 of capacity after 400 cycles”	11	<i>See</i> RJ Technology’s proposed construction for	<i>See</i> RJ Technology’s evidence for the term “at least 7500”

Term	Claim(s)	Proposed Construction	Identification of Intrinsic and Extrinsic Evidence
		the term “at least 7500”	
“after 400”	18	<i>See</i> RJ Technology’s proposed construction for the term “after 400”	<i>See</i> RJ Technology’s evidence for the term “after 400”
“A secondary lithium ion cell or battery ... and a ratio ... as calculated by a theoretic capacity with a charge cut-off voltage set at 4.2 V”	5	<i>See</i> RJ Technology’s proposed construction for the term “A secondary lithium ion cell or battery ... and a ratio of positive electrode material to negative electrode material ... as calculated by a theoretic capacity”	<i>See</i> RJ Technology’s evidence for the term “A secondary lithium ion cell or battery ... and a ratio of positive electrode material to negative electrode material ... as calculated by a theoretic capacity”

1 Dated: May 12, 2023

KOBRE & KIM LLP

2 By: /s/ Michael Ng

3 Michael Ng (State Bar No. 237915)

4 Michael.Ng@kobrekim.com

5 Daniel Zaheer (State Bar No. 237118)

6 Daniel.Zaheer@kobrekim.com

7 KOBRE & KIM LLP

8 150 California Street, 19th Floor

9 San Francisco, California 94111

10 Telephone: 415-582-4800

11 Facsimile: 415-582-4811

12 George Stamatopoulos (Pro Hac Vice)

13 George.Stamatopoulos@kobrekim.com

14 KOBRE & KIM LLP

15 800 Third Avenue

16 New York, New York 10022

17 Telephone: 212-488-1200

18 Facsimile: 212-488-1220

19 Zach Ruby (Pro Hac Vice)

20 Zach.Ruby@kobrekim.com

21 KOBRE & KIM LLP

22 1919 M Street, NW

23 Washington, DC 20036

24 Telephone: 202-664-1900

25 Facsimile: 202-664-1920

26 Hangcheng (Robert) Zhou (State Bar No. 320038)

27 Robert.Zhou@kobrekim.com

28 KOBRE & KIM LLP

43rd Floor, 4302-4304 HKRI Centre

One, HKRI Taikoo Hui

288 Shimen Yi Road

Shanghai, PRC, 200041

Telephone: +86 21-3210-2100

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Franklin D. Kang (State Bar No. 192314)
fkang@onellp.com
One, LLP
23 Corporate Plaza Dr., Suite 150-105
Newport Beach, CA 92660
Telephone: 310-951-1123
Facsimile: 310-943-2085

Attorneys for Plaintiff
RJ Technology LLC