

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

PANTECH CORPORATION and PANTECH
WIRELESS, LLC,

Plaintiffs,

v.

LG ELECTRONICS INC. and LG
ELECTRONICS U.S.A., INC.,

Defendants.

Case No. 5:22-cv-00113-RWS

JURY TRIAL DEMANDED

PLAINTIFFS' PATENT RULE 4-1(a) PROPOSED LIST OF TERMS FOR CONSTRUCTION

In accordance with P.R. 4-2, Plaintiffs Pantech Corporation and Pantech Wireless, LLC (collectively, "Pantech") hereby identifies the following preliminary proposed constructions and supporting extrinsic evidence.

A. U.S. Patent No. 9,136,924

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
1	“period of transmitting the information relating to the precoding matrix ...” (claims 17, 23)	Plain and ordinary meaning	New Oxford American Dictionary, 3rd Ed. (2010), at 1303 (“pe-ri-od [1] a length or portion of time; [3] the interval of time between successive occurrences of the same state”) A Dictionary of Computing, 6th Ed. (2008), at 377 (“period The time required for a periodic waveform – i.e. waveform recurring at fixed intervals – to repeat itself.”) Chambers Dictionary of Science and Technology (2007), at 884 (“period [] Time taken for one complete cycle of an alternating quantity. Reciprocal of frequency.”) Dictionary of Science and Technology, 2nd Ed. (2007), at 458 (“period [1] a length of time”; “periodic [1] happening from time to time”) 3GPP TS 136.213 - V9.2.0, Section 7.2 Pantech expects to present expert testimony from Dr. Todor Cooklev in support of Pantech’s proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
			'924 Patent, the extrinsic evidence above, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of the priority date of the '924 Patent.
2	“the use of precoding matrices for the second precoder that make pairs with restricted precoding matrices of the second matrix group is restricted based on the second bit sequence” (claim 25)	Plain and ordinary meaning	3GPP TS 136.213 - V9.2.0, Section 7.2 Pantech expects to present expert testimony from Dr. Todor Cooklev in support of Pantech’s proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the '924 Patent, the extrinsic evidence above, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of the priority date of the '924 Patent.

B. U.S. Patent No. 9,854,545

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
3	“[transmitting/transmits] a Random Access Preamble (RAP)” / “transmitting an RAP” / “transmitted RAP”	Plain and ordinary meaning	3GPP TS 36.213 - V9.0.1 3GPP TS 36.300 - V9.1.0 3GPP TS 36.321 - V9.1.0

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
	(claims 2, 3)		3GPP TS 36.211 - V9.0.0 3GPP TS 36.331 - V9.1.0 Pantech expects to present expert testimony from Dr. Peter Rysavy in support of Pantech's proposed construction. This testimony may include, at least, an explanation of the meaning of these term(s) in the context of the intrinsic evidence and subject matter disclosed in the '545 Patent, the extrinsic evidence above, a description of the state of the technology, and how a person of ordinary skill in the art would interpret these term(s) as of the priority date of the '545 Patent.
4	"[receiving/receives] a Random Access Response (RAR)" (claims 2, 3)	Plain and ordinary meaning	3GPP TS 36.213 - V9.0.1 3GPP TS 36.300 - V9.1.0 3GPP TS 36.321 - V9.1.0 3GPP TS 36.211 - V9.0.0 3GPP TS 36.331 - V9.1.0 Pantech expects to present expert testimony from Dr. Peter Rysavy in support of Pantech's proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
			'545 Patent, the extrinsic evidence above, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of the priority date of the '545 Patent.
5	“wherein each TA value is transmitted from the eNB for the respective UL timing group based on the transmitted RAP associated with a delegate CC of the respective UL timing group” (claims 2, 3) (confirm dropped)	Plain and ordinary meaning	3GPP TS 36.213 - V9.0.1 3GPP TS 36.300 - V9.1.0 3GPP TS 36.321 - V9.1.0 3GPP TS 36.211 - V9.0.0 3GPP TS 36.331 - V9.1.0 The American Heritage Dictionary of the English Language, Fifth Edition (2011) at 479 (“delegate <i>n.</i> 1. A person authorized to act as representative for another; a deputy or agent.”) The Chambers Dictionary, 12th Edition (2011) at 408 (“delegate . . . <i>n</i> /-gət/ a person who is delegated; a deputy or representative;”) Merriam-Webster’s Advanced Learner’s English Dictionary (2008) at 438 (“¹delegate . . . : REPRESENTATIVE”)

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
			Pantech expects to present expert testimony from Dr. Peter Rysavy in support of Pantech’s proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the ’545 Patent, the extrinsic evidence above, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of the priority date of the ’545 Patent.
6	“eNB” (claims 2, 3)	base station	3GPP TS 36.213 - V9.0.1 3GPP TS 36.300 – V9.1.0 3GPP TS 36.321 - V9.1.0 3GPP TS 36.211 - V9.0.0 3GPP TS 36.331 - V9.1.0 Pantech expects to present expert testimony from Dr. Peter Rysavy in support of Pantech’s proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the ’545 Patent, the extrinsic evidence above, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
			the priority date of the '545 Patent.

C. U.S. Patent No. 9,313,809

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
7	“[A method performed by a wireless transmit/receive unit (WTRU) to communicate / A wireless transmit/receive unit (WTRU) capable of communicating] with a base station using an enhanced dedicated channel (E-DCH) resource while in a cell forward access channel (CELL_FACH) state, [the method comprising: / the WTRU comprising:]” (claims 1, 6)	Plain and ordinary meaning	3GPP TS 25.101 v7.4.0 3GPP TS 25.321 v7.4.0 Pantech expects to present expert testimony from Dr. Todor Cooklev in support of Pantech’s proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the '809 Patent, the extrinsic evidence above, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of the priority date of the '809 Patent.

D. U.S. Patent No. 7,283,839

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
8	“description data” (claims 1, 2)	Plain and ordinary meaning (<i>i.e.</i> , information describing message characteristics, such as a sender/recipient name, a nickname, a telephone number, an icon, thumbnail, snapshot, or the like)	Pantech expects to present expert testimony from Charles Mauro in support of Pantech’s proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the ’839 Patent, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of the priority date of the ’839 Patent.
9	“the description data” (claim 2)	Plain and ordinary meaning (<i>i.e.</i> , information describing message characteristics, such as a sender/recipient name, a nickname, a telephone number, an icon, thumbnail, snapshot, or the like)	Pantech expects to present expert testimony from Charles Mauro in support of Pantech’s proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the ’839 Patent, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of the priority date of the ’839 Patent.

E. U.S. Patent No. 9,575,631

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
10	“sequentially displaying icons” / “performing sequential display of icons” (claims 1, 8)	Plain and ordinary meaning	Dictionary of Computing, Fifth Ed. (2004) (“sequentially [] one after another, in sequence”) Collins Dictionary Electronics (2007) (“sequential of or relating to anything following a sequence or series; one by one”) Wiley Electrical and Electronics Engineering Dictionary (2004) (“sequence 1. An arrangement of two or more things, entities, or events, in a given order. 2. An arrangement of two or more things, entities, or events, in a successive order.”) (“sequential Consisting of, having, following, or characterized by a sequence”) Dictionary of Multimedia Terms & Acronyms, Fourth Edition (2005) (“sequence (n.) A progression of data, events, images, or sounds in a specified order.”) Pantech expects to present expert testimony from Charles Mauro in support of Pantech’s proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the ’631 Patent, the extrinsic evidence above, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
			the priority date of the '631 Patent.
11	“displaying one icon in a designated portion of a display” (claim 1)	Plain and ordinary meaning	Pantech expects to present expert testimony from Charles Mauro in support of Pantech’s proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the '631 Patent, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of the priority date of the '631 Patent.
12	“control menu” (claims 1, 3)	Plain and ordinary meaning (<i>e.g.</i> , a pop-up menu, a menu window, or the like)	Wiley Electrical and Electronics Engineering Dictionary (2004) (“menu 1. A list of commands, options, or functions which are available to a computer user. Such menus are common in GUIs, and come in various forms, including pull-down, and may be accessed using a mouse or other pointing device, or the keyboard. A logically organized menu can help users maximize the usefulness of any given application. 2. A list of commands, options, or functions which are available to a user of a given device, piece of equipment, or system.”) Dictionary of Computing, Fifth Ed. (2004) (“menu [] a list of options or programs available to the user”) Dictionary of Multimedia Terms & Acronyms, Fourth

No.	Term and Applicable Claims	Pantech Proposed Construction	Extrinsic Evidence
			Edition (2005) (“menu (n.) A list of options from which users may choose. The options are often available through a drop-down menu bar at the top of a graphical user interface (GUI) screen.”) Pantech expects to present expert testimony from Charles Mauro in support of Pantech’s proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the ’631 Patent, the extrinsic evidence above, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of the priority date of the ’631 Patent.
13	“predetermined function” (claims 1, 2)	Plain and ordinary meaning (<i>i.e.</i>, a function among those selected in advance)	Pantech expects to present expert testimony from Charles Mauro in support of Pantech’s proposed construction. This testimony may include, at least, an explanation of the meaning of this term in the context of the intrinsic evidence and subject matter disclosed in the ’631 Patent, a description of the state of the technology, and how a person of ordinary skill in the art would interpret this term as of the priority date of the ’631 Patent.

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