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**

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

In accordance with the Third Amended Docket Control Order (Dkt. 98) and P.R. 4-3(a), Plaintiffs Pantech Corporation and Pantech Wireless, LLC (collectively, "Pantech") and Defendants LG Electronics Inc. and LG Electronics U.S.A., Inc. (collectively, "LGE") hereby provide the following joint claim construction and prehearing statement.

The claim terms listed below occur in U.S. Patent Nos. 9,136,924 (the "'924 patent"), 9,854,545 (the "'545 patent"), 8,313,809 (the "'809 patent"), 7,283,839 (the "'839 patent"), and 9,575,631 (the "'631 patent"), which are asserted against LGE.

I. AGREED CLAIM CONSTRUCTION

The parties have agreed to the construction as set forth in the following chart:

No.	Term	Agreed Construction / Understanding
1.	"[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	Each preamble is limiting in its entirety

No.	Term	Agreed Construction / Understanding
	using an enhanced dedicated channel (E-DCH) resource while in a cell forward access channel (CELL_FACH) state, [the method comprising: / the WTRU comprising:]" (U.S. Patent No. 8,313,809, claims 1, 6)	

II. POSITIONS OF EACH PARTY ON DISPUTED CLAIM TERMS, PHRASES, OR CLAUSES

Set forth below is each party's proposed construction of each disputed claim term, phrase, or clause, together with an identification of all references from the specification or prosecution history that support that construction, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its proposed construction of the claim or to oppose any other party's proposed construction of the claim, including, but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses. Each party further reserves the right to rely on the intrinsic or extrinsic evidence identified by any other party in the tables below.

No.	Term	Proposed Constructions	Evidence
1.	"eNB" / "evolved NodeB (eNB)" (U.S. Patent No. 9,854,545, claims 2, 3)	<u>Pantech's Construction</u> base station <u>LGE's Construction</u> Plain and ordinary meaning	<u>Pantech's Evidence</u> 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 the priority date of the ’545 Patent. ’545 Patent at Abstract; 3:64-4:45; 8:19-20; Claims 1-3. <u>LGE’s Evidence</u> LGE expects to present expert testimony of Dr. van der Weide regarding what a person of ordinary skill in the art would have understood the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the ’545 patent, in view of the claim language, the figures, the written description, the specification of the ’545 patent as a whole, the file history of the ’545 patent, and the extrinsic evidence. 3G Evolution: HSPA and LTE for Mobile Broadband (Second Edition, 2008) (LGE_0095962-LGE_0095980) ’545 patent, 1:29-33, 3:15-38, 3:61-4:51, 5:30-36, 5:42-6:19, 6:23-7:6, 7:12-32, 7:39-49, 8:19-20, 8:23-64, 9:35-57, 10:15-55, 13:4-40, 14:15-43, 15:18-17:48, 18:23-19:3, Fig. 3-8, 10, claims 1-3 ’545 Prosecution History and references cited therein, including the 12/30/2016 Office Action, 3/27/17 Response
2.	“the description data”[1]	<u>Pantech’s Construction</u> Plain and ordinary meaning (*i.e.*, information describing message	<u>Pantech’s Evidence</u> 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

[1] LGE and Pantech both contend that the construction of this term will be dispositive as to this claim.

	(U.S. Patent No. 7,283,839, claim 2)	characteristics, such as a sender/recipient name, a nickname, a telephone number, an icon, thumbnail, snapshot, or the like) <u>LGE's Construction</u> Indefinite	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. '839 Patent at Fig. 2, 4:46-61, 5:16-19 <u>LGE's Evidence</u> LGE expects to present expert testimony of Dr. Vijay Madisetti regarding what a person of ordinary skill in the art would have understood the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '839 patent, in view of the claim language, the figures, the written description, the specification of the '839 patent as a whole, the file history of the '839 patent, and the extrinsic evidence. '839 patent, 1:63-2:40, 3:38-58, 3:64-65, 4:26-5:28, 5:43-59, 6:22-32, Figs. 2-3, claims 1-5. '839 Prosecution History and references cited therein including the 09/08/2006 Office Action; 10/10/2006 Response to the Office Action of 09/08/2006; and 06/29/2007 Notice of Allowability.
3.	"description data" (U.S. Patent No. 7,283,839, claims 1, 2)	<u>Pantech's Construction</u> Plain and ordinary meaning (*i.e.*, information describing message characteristics, such as a sender/recipient name, a nickname, a telephone number, an icon, thumbnail, snapshot, or the like) <u>LGE's Construction</u>	<u>Pantech's Evidence</u> 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. '839 Patent at Fig. 2, 4:46-61, 5:16-19 <u>LGE's Evidence</u>

		Plain and ordinary meaning	LGE expects to present expert testimony of Dr. Vijay Madisetti regarding what a person of ordinary skill in the art would have understood the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '839 patent, in view of the claim language, the figures, the written description, the specification of the '839 patent as a whole, the file history of the '839 patent, and the extrinsic evidence. '839 patent, 1:63-2:40, 3:38-58, 3:64-65, 4:26-5:28, 5:43-59, 6:22-32, Figs. 2-3, claims 1-5. '839 Prosecution History and references cited therein including the 09/08/2006 Office Action; 10/10/2006 Response to the Office Action of 09/08/2006; and 06/29/2007 Notice of Allowability.
4.	"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"[2] (U.S. Patent No. 9,854,545, claims 2, 3)	<u>Pantech's Construction</u> Plain and ordinary meaning <u>LGE's Construction</u> "wherein each TA value is transmitted from the eNB for the respective UL timing group in response to the transmitted RAP through its delegate CC of the respective UL timing group"	<u>Pantech's Evidence</u> 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 The Chambers Dictionary, 12th Edition (2011) at 408 Merriam-Webster's Advanced Learner's English Dictionary (2008) at 438 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

[2] LGE contends that the construction of this term will be dispositive as to these claims.

			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. ’545 Patent at Fig. 2, Figs. 4-9; 2:17-3:8; 3:64-4:18; 4:36-45; 6:12-7:32; 11:16-29; 12:45-64; 13:41-50; 13:60-14:10; 14:44-15:13; 16:31-54; 17:29-63; 20:21-29; 21:21-55; 22:8-11; 22:25-39; 23:30-24:2; 24:27-63; 25:59-67; Claims 1-3. <u>LGE’s Evidence</u> LGE expects to present expert testimony of Dr. van der Weide regarding what a person of ordinary skill in the art would have understood the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the ’545 patent, in view of the claim language, the figures, the written description, the specification of the ’545 patent as a whole, the file history of the ’545 patent, and the extrinsic evidence. ’545 patent, 22:27-31, 25:54-58, 13:6-64, 17:49-53, 19:62-63, claims 1-3
5.	“control menu” (U.S. Patent No. 9,575,631, claims 1, 3)	<u>Pantech’s Construction</u> Plain and ordinary meaning (*e.g.*, a pop-up menu, a menu window, or the like) <u>LGE’s Construction</u> Plain and ordinary meaning	<u>Pantech’s Evidence</u> Wiley Electrical and Electronics Engineering Dictionary (2004) (“menu”) Dictionary of Computing, Fifth Ed. (2004) (“menu”) Dictionary of Multimedia Terms & Acronyms, Fourth Edition (2005) (“menu”) 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. ’631 Patent at Abstract; 5:40-6:6; 6:13-28; 6:40-45; Fig. 8A-8B <u>LGE’s Evidence</u> LGE expects to present expert testimony of Dr. Vijay Madisetti regarding what a person of ordinary skill in the art would have understood the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the ’631 patent, in view of the claim language, the figures, the written description, the specification of the ’631 patent as a whole, the file history of the ’631 patent, and the extrinsic evidence. ’631 patent, 2:55-58, 3:1-12, 3:43-54, 5:40-54, 6:13-65, Figs. 7-9, claims 1-20. ’631 Prosecution History and references cited therein, including 05/19/2016 Office Action; 09/19/2016 Response to Office Action of 05/19/2016; 10/07/2016 Notice of Allowability.
6.	“period of transmitting the information relating to the precoding matrix …” (U.S. Patent No. 9,136,924, claims 17, 23)[3]	<u>Pantech’s Construction</u> Plain and ordinary meaning <u>LGE’s Construction</u> “time interval between periodically transmitting the information relating to the precoding matrix …”	<u>Pantech’s Evidence</u> New Oxford American Dictionary, 3rd Ed. (2010), at 1303 A Dictionary of Computing, 6th Ed. (2008), at 377 Chambers Dictionary of Science and Technology (2007), at 884 Dictionary of Science and Technology, 2nd Ed. (2007), at 458 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

[3] LGE contends that the construction of this term will be dispositive as to these claims.

			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. ’924 Patent at 3:57-4:9, 4:16-27, 5:20-6:22, 14:62-15:3, and Fig. 4. <u>LGE’s Evidence</u> A Dictionary of Computing (Sixth Edition, 2008) (LGE_0095981- LGE_0095983) Microsoft Computer Dictionary (Fifth Edition, 2002) (LGE_0095996-LGE_0095999) LGE expects to present expert Testimony of Dr. Bertrand Hochwald regarding what a person of ordinary skill in the art would have understood the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the ’924 patent, in view of the claim language, the figures, the written description, the specification of the ’924 patent as a whole, the file history of the ’924 patent, and the extrinsic evidence. ’924 patent, 6:23-29, 14:62-15:3, claims 1-28 ’924 Prosecution History and references cited therein, including the 6/2/2014 Office Action; 9/2/2014 Response; 9/17/2014 Office Action; 11/14/2014 Response; 11/21/2014 Advisory Action, 1/9/2015 Office Action, 4/9/2015 Response, 5/11/2015 Allowance
7.	“predetermined function”	<u>Pantech’s Construction</u> Plain and ordinary meaning	<u>Pantech’s Evidence</u> Pantech expects to present expert testimony from Charles Mauro in support of Pantech’s proposed construction. This testimony may

	(U.S. Patent No. 9,575,631, claims 1, 2)	(*i.e.*, a function among those selected in advance) <u>LGE's Construction</u> Plain and ordinary meaning	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. '631 Patent at 1:23-28; 3:1-12 <u>LGE's Evidence</u> LGE expects to present expert testimony of Dr. Vijay Madisetti regarding what a person of ordinary skill in the art would have understood the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '631 patent, in view of the claim language, the figures, the written description, the specification of the '631 patent as a whole, the file history of the '631 patent, and the extrinsic evidence. '631 patent, 2:1-5, 7-9, 2:55-58, 3:1-12, 3:27-30, 3:43-54, 5:40-54, 6:13-28, 6:46-56; Figs. 3, 7-9, claims 1-20. '631 Prosecution History and references cited therein, including 05/19/2016 Office Action; 09/19/2016 Response to Office Action of 05/19/2016; 10/07/2016 Notice of Allowability.
8.	"sequentially displaying icons" / "performing sequential display of icons" (U.S. Patent No. 9,575,631, claims 1, 8)	<u>Pantech's Construction</u> Plain and ordinary meaning <u>LGE's Construction</u> "displaying the next icon in place of the prior icon in a sequence"	<u>Pantech's Evidence</u> Dictionary of Computing, Fifth Ed. (2004) Collins Dictionary Electronics (2007) Wiley Electrical and Electronics Engineering Dictionary (2004) Dictionary of Multimedia Terms & Acronyms, Fourth Edition (2005) 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. ’631 Patent at 5:1-16; 7:8-12 <u>LGE’s Evidence</u> LGE expects to present expert testimony of Dr. Vijay Madisetti regarding what a person of ordinary skill in the art would have understood the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the ’631 patent, in view of the claim language, the figures, the written description, the specification of the ’631 patent as a whole, the file history of the ’631 patent, and the extrinsic evidence. IEEE 100: The Authoritative Dictionary of IEEE Standards Terms (Seventh Edition, 2000) (LGE_0095984- LGE_0095987) McGraw-Hill Dictionary of Computing and Communications (First Edition, 2003) (LGE_0095988-LGE_0095991) Microsoft Computer Dictionary (Fifth Edition, 2002) (LGE_0095996-LGE_0095999) Merriam Webster's Collegiate Dictionary (Eleventh Edition, 2003) (LGE_0095992-LGE_0095995) The American Heritage College Dictionary (Fourth Edition, 2002) (LGE_0096000-LGE_0096004) ’631 patent, 2:59-67, 3:64-4:11, 4:28-52, 5:1-16, Figs. 5A-5D, 6, claims 1-20. ’631 Prosecution History and references cited therein, including 05/19/2016 Office Action; 09/19/2016 Response to Office

			Action of 05/19/2016; 10/07/2016 Notice of Allowability. U.S. Patent No. 9,122,518 (App. No. 11/495863) Prosecution History of and references cited therein, including 09/23/2014 Office Action; 01/23/2015 Response to Office Action of 09/23/2014; 04/22/2015 Notice of Allowability.
9.	"displaying one icon in a designated portion of a display" (U.S. Patent No. 9,575,631, claim 1)	<u>Pantech's Construction</u> Plain and ordinary meaning <u>LGE's Construction</u> "displaying a single icon in a designated portion of a display"	<u>Pantech's Evidence</u> 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. '631 Patent at 4:6-11; 4:22-27; 4:46-52; 6:15-20; Fig. 5D <u>LGE's Evidence</u> LGE expects to present expert testimony of Dr. Vijay Madisetti regarding what a person of ordinary skill in the art would have understood the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '631 patent, in view of the claim language, the figures, the written description, the specification of the '631 patent as a whole, the file history of the '631 patent, and the extrinsic evidence. Merriam-Webster's Collegiate Dictionary (Eleventh Edition, 2003) (LGE_0095992-LGE_0095995) The American Heritage College Dictionary (Fourth Edition, 2002) (LGE_0096000-LGE_0096004)

			’631 patent, 3:64-4:11, 4:28-52, 5:1-16, Figs. 5A-5D, 6, 8A-8B, claims 1-20. ’631 Prosecution History and references cited therein, including 05/19/2016 Office Action; 09/19/2016 Response to Office Action of 05/19/2016; 10/07/2016 Notice of Allowability. U.S. Patent No. 10,282,054
10.	“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”[4] (U.S. Patent No. 9,136,924, claim 25)	<u>Pantech’s Construction</u> Plain and ordinary meaning <u>LGE’s Construction</u> Indefinite	<u>Pantech’s Evidence</u> 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. ’924 Patent at 3:57-4:9, 4:16-27, 4:55-64, 5:20-6:22, 6:64-7:3, 11:56-12:50, 14:62-15:3, 17:1-7 and Fig. 4. <u>LGE’s Evidence</u> LGE expects to present expert Testimony of Dr. Bertrand Hochwald regarding what a person of ordinary skill in the art would have understood the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the ’924 patent, in view of the claim language, the figures, the written description, the specification of the ’924 patent as a whole, the file history of the ’924 patent, and the extrinsic evidence.

[4] LGE and Pantech both contend that the construction of this term will be dispositive as to this claim.

			’924 patent, 10:25-14:60, 15:48-18:12, Tables 2-5, claims 1-28 ’924 Prosecution History and references cited therein, including the 6/2/2014 Office Action; 9/2/2014 Response; 9/17/2014 Office Action; 11/14/2014 Response; 11/21/2014 Advisory Action, 1/9/2015 Office Action, 4/9/2015 Response, 5/11/2015 Allowance

III. ANTICIPATED LENGTH OF CLAIM CONSTRUCTION HEARING

The parties respectfully request 4 hours as the total length of time for the Claim Construction Hearing.

IV. PROPOSED WITNESSES AT CLAIM CONSTRUCTION HEARING

At this time, neither Pantech nor LGE expects to call any witnesses.

V. OTHER ISSUES

The parties have no other issues to address at this time.

Dated: June 16, 2023

By: *<u>/s/ James A. Fussell, III</u>*

Geoffrey Culbertson
Kelly Tidwell
PATTON TIDWELL & CULBERTSON, LLP
2800 Texas Blvd. (75503)
Post Office Box 5398
Texarkana, TX 75505-5398
(P) (903) 792-7080
(F) (903) 792-8233
gpc@texarkanalaw.com
kbt@texarkanalaw.com

James A. Fussell, III
Jamie B. Beaber
Saqib J. Siddiqui
Tiffany A. Miller
Baldine Paul
Clark S. Bakewell
Tariq Javed
Seth W. Bruneel
Courtney Krawice
MAYER BROWN LLP
1999 K Street, N.W.
Washington D.C. 20006
(202) 263-3000
jbeaber@mayerbrown.com
jfussell@mayerbrown.com
ssiddqui@mayerbrown.com
tmiller@mayerbrown.com
bpaul@mayerbrown.com
cbakewell@mayerbrown.com
tjaved@mayerbrown.com
sbruneel@mayerbrown.com
ckrawice@mayerbrown.com

Graham M. Buccigross
MAYER BROWN LLP
Two Palo Alto Square, Suite 300
3000 El Camino Real
Palo Alto, CA 94306
(650) 331-2000
gbuccigross@mayerbrown.com

Gregory J. Apgar
MAYER BROWN LLP
1221 Avenue of the Americas
New York, NY 10020
(212) 506-2500
gapgar@mayerbrown.com

Luiz Miranda
MAYER BROWN LLP
71 S. Wacker Drive
Chicago, IL 60606
(312) 782-0600
lmiranda@mayerbrown.com

Counsel for Plaintiff Pantech Corporation

/s/ Jennifer H. Doan
Jennifer H. Doan
Texas Bar No. 08809050
Mariah L. Hornok
Texas Bar No. 24113074
HALTOM & DOAN
6500 Summerhill Road, Suite 100
Texarkana, TX 75503
Telephone: (903) 255-1000
Facsimile: (903) 255-0800
Email: jdoan@haltomdoan.com
Email: mhornok@haltomdoan.com

James R. Batchelder
(CA Bar No. 136347)
(Eastern District of Texas Member)
David S. Chun
(CA Bar No. 315958)
(Eastern District of Texas Member)
James L. Davis, Jr.
(CA Bar No. 304830)
(Eastern District of Texas Member)
Daniel W. Richards
(CA Bar No. 280595)
(Eastern District of Texas Member)
ROPES & GRAY LLP
1900 University Avenue 6th Floor
East Palo Alto, CA 94303
Telephone: (650) 617-4000
Facsimile: (650) 617-4090
Email: James.Batchelder@ropesgray.com
Email: David.Chun@ropesgray.com
Email: James.L.Davis@ropesgray.com
Email: Daniel.Richards@ropesgray.com

Matthew R. Shapiro
(NY Bar No. 5102017)
(Eastern District of Texas Member)
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
Email: Matthew.Shapiro@ropesgray.com
ATTORNEYS FOR DEFENDANTS
LG ELECTRONICS INC.
AND LG ELECTRONICS U.S.A., INC.

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2023, all counsel of record who are deemed to have consented to electronic service are being served a copy of this JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT via the Court's CM/ECF system.

Dated: June 16, 2023

/s/ Clark S. Bakewell
Clark S. Bakewell