

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

**Before the Honorable MaryJoan McNamara
Administrative Law Judge**

In the Matter of

**CERTAIN LIDAR (LIGHT DETECTION
AND RANGING) SYSTEMS AND
COMPONENTS THEREOF**

Inv. No. 337-TA-1363

JOINT CLAIM CONSTRUCTION CHART

Pursuant to the June 14, 2023 Adopted Procedural Schedule and Ground Rules 1.13 and 1.14, Complainant Ouster, Inc. (“Ouster”); the Commission Investigative Staff (“Staff”); and Respondents Hesai Group, Hesai Technology Co. Ltd., and Hesai Inc. (collectively, “Hesai”) hereby submit this Joint Claim Construction Chart.

Since there are only nine disputed terms, the parties have not identified ten terms likely to be most significant to resolving the parties’ disputes per Ground Rule 1.14.

I. Disputed Terms

No.	Term	Patents and Asserted Claims ¹	Ouster Proposed Construction	Staff Proposed Construction	Hesai Proposed Construction
1	“single photon avalanche diodes (SPADs)” “single photon avalanche detectors (SPADs)”	’405 patent, claims 21, 26 ’381 patent, claims 1, 14 ’750 patent, claim 44 ’515 patent, claims 13, 21, 22 ’236 patent, claims 1, 10, 12, 16, 23	No construction necessary.	A semiconductor photodetector able to detect single photons.	“photodiodes that operate above their breakdown voltage”
2	“aperture”	’405 patent, claims 21, 26, 34 ’381 patent, claims 6-8, 17 ’750 patent, claim 44 ’236 patent, claims 8, 14, 19-21, 25	“opening or optically transparent region”	Plain and ordinary meaning, for example, an opening or a hole.	“a small hole that defines a field of view for an individual pixel”

¹ Per Hesai’s identification of terms for construction, this table lists the claims Ouster has asserted for alleged infringement. Proposed constructions apply to any claims Ouster is using to support domestic industry that include the same terms.

No.	Term	Patents and Asserted Claims ¹	Ouster Proposed Construction	Staff Proposed Construction	Hesai Proposed Construction
3	“field of view” (of a pixel or receiver channel)	’405 patent, claims 24, 32 ’381 patent, claims 1, 14 ’750 patent, claim 44 ’515 patent, claims 12, 20 ’236 patent, claims 11, 13, 14, 16, 20, 21	No construction necessary. Alternatively, if construction is necessary: “observable or viewable area”	Plain and ordinary meaning, for example, the extent of the external world whose light is detectable by a photosensor	“detection area defined by an aperture or lens tube”
4	“a first/second/third/fourth optical path to the first/second/third/fourth photosensor through the first/second/third/fourth aperture” (405 Patent) “a first/second/third/fourth optical path that extends between the bulk imaging optic and the first/second/third/fourth pixel through the first/second/third/fourth aperture” (381 Patent)	’405 patent, claims 21, 26 ’381 patent, claim 8 ’750 patent, claims 44, 45 ’236 patent, claims 14, 19, 20, 21	Ouster understands that Hesai is seeking to construe the “first . . . through . . . first”, etc, language in each phrase and not other language in the phrases not otherwise identified in its amended list of claim terms. With that understanding, no construction is necessary.	Plain and ordinary meaning.	“a first/second/third/fourth optical path [through the bulk imaging optic] that creates a one-to-one correspondence between the first/second/third/fourth [photosensor/pixel] and the first/second/third/fourth aperture”

No.	Term	Patents and Asserted Claims ¹	Ouster Proposed Construction	Staff Proposed Construction	Hesai Proposed Construction
	“a first/second/third/fourth aperture disposed in a first/second/third/fourth optical path extending between the bulk imaging optic and the first/second/third/fourth pixel” (750 Patent) “a first/second optical path that extends through the first/second” (236 Patent) “the first/second/third/fourth pixel is operable to detect photons emitted from the first/second/third/fourth emitter and received through the bulk imaging optic after being reflected from surfaces within the field and passed through the				

No.	Term	Patents and Asserted Claims ¹	Ouster Proposed Construction	Staff Proposed Construction	Hesai Proposed Construction
	first/second/third/fourth aperture” (236 Patent) “the first aperture is disposed in a first optical path that extends from the bulk imaging optic, through the first aperture to the first pixel (236 Patent)				
5	“rotor assembly ... coupled to the rotor circuit board” “rotor assembly coupled to the rotor circuit board” “rotor component coupled to the rotor circuit board assembly” “stator assembly ... coupled to the stator circuit board”	’515 patent, claims 1, 14, 22	By grouping the terms, we understand that Hesai is seeking to construe the “coupled” claim language in each phrase and not other language in the phrases not otherwise identified in its amended list of claim terms. Proposed construction of “coupled”: “directly or indirectly connected”	Plain and ordinary meaning. “Coupled to” encompasses direct or indirect coupling.	“the rotor / stator assembly / component is attached or mounted directly to the rotor / stator circuit board”

No.	Term	Patents and Asserted Claims ¹	Ouster Proposed Construction	Staff Proposed Construction	Hesai Proposed Construction
	“stator assembly coupled to the stator circuit board”				
6	“sleeve”	’515 patent, claims 1, 14, 22	No construction necessary.	Plain and ordinary meaning, for example a tube that encloses a shaft.	“cylindrical tube”
7	“spaced apart from”	’515 patent, claim 22	No construction necessary.	Plain and ordinary meaning.	“disposed along a different plane”
8	“a plurality of magnetic segments”	’515 patent, claim 22	“more than one magnetic segment”	Plain and ordinary meaning, for example, a plurality of magnets.	“two or more individual magnets”
9	“horizontally and vertically offset”	’236 patent, claims 1, 8, 10, 14, 16, 19, 21, 23, 25	No construction necessary	Plain and ordinary meaning.	“having a skewed grid arrangement relative to”

CONTAINS CONFIDENTIAL BUSINESS INFORMATION SUBJECT TO
PROTECTIVE ORDER

Dated: July 7, 2023

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CERTIFICATE OF SERVICE

I hereby certify that July 7, 2023, copies of the foregoing document were served upon the following parties as indicated below:

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