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	**Investigation No. 337-TA-1363**

RESPONDENTS' PROPOSED LIST OF TERMS TO BE CONSTRUED

Pursuant to Order No. 6 and Ground Rule 1.14, Respondents Hesai Group, Hesai Technology Co. Ltd., and Hesai Inc. (collectively "Hesai") identify the following list of terms and phrases of the asserted claims that Respondents contend should be construed. Respondents identify the following terms and phrases to be construed in anticipation of the meet-and-confer process set forth in Ground Rule 1.14. Respondents are willing to work with Complainant and Staff to determine whether to construe the identified terms/phrases, only certain portions of the identified phrases, or larger phrases of which the identified terms/phrases are a part, in order to better focus the claim construction issues between the parties

I. U.S. PATENT NO. 11,175,405

- "extending fully around a periphery of the stationary housing" – claims 21, 26
- "single photon avalanche diodes (SPADs)" – claims 21, 26
- "photosensor" / "photosensors" – claims 21, 23-26, 31-34
- "aperture" / "apertures" – claims 21, 26, 34
- "a first optical path to the first photosensor through the first aperture, a second optical path to the second photosensor through the second aperture, a third optical path to the third photosensor through the third aperture, and a fourth optical path to the fourth photosensor through the fourth aperture" – claims 21, 26

- “coincident with” – claims 24, 32
- “field of view” – claims 24, 32
- “non-overlapping” – claims 24, 25, 32, 33
- “across a range of distances” – claims 25, 33
- “substantially matches, in size and geometry” – claims 25, 33

II. U.S. PATENT NO. 11,178,381

- “non-overlapping emission regions” – claims 1, 14
- “single photon avalanche diodes (SPADs)” – claims 1, 14
- “aperture” / “apertures” – claims 6-8, 17
- “a first optical path that extends between the bulk imaging optic and the first pixel through the first aperture, a second optical path that extends between the bulk imaging optic and the second pixel through the second aperture, a third optical path that extends between the bulk imaging optic and the third pixel through the third aperture, and a fourth optical path that extends between the bulk imaging optic and the fourth pixel through the fourth aperture” – claim 8
- “coincident with” – claims 1, 14
- “field of view” – claims 1, 14
- “adjacent” – claim 1
- “arranged behind” – claims 1, 14
- “paired” – claim 14
- “a second arrangement, proportional to the first arrangement” – claim 3

III. U.S. PATENT NO. 11,190,750

- “non-overlapping beyond a threshold distance” – claim 44
- “single photon avalanche diodes (SPADs)” – claim 44
- “aperture” / “apertures” – claim 44
- “ first aperture disposed in a first optical path extending between the bulk imaging optic and the first pixel and a second aperture disposed in a second optical path extending between the bulk imaging optic and the second pixel” – claim 44

- "a third aperture disposed in a third optical path extending between the bulk imaging optic and the third pixel and a fourth aperture disposed in a fourth optical path extending between the bulk imaging optic and the fourth pixel" – claim 45
- "coincident with" – claim 44
- "field of view" – claim 44
- "adjacent" – claim 44
- "arranged behind" – claim 44

IV. U.S. PATENT NO. 11,287,515

- "extending fully around a periphery of the enclosure" – claims 1, 14, 22
- "a stator assembly … coupled to the stator circuit board" – claim 1
- "a rotor assembly … coupled to the rotor circuit board" – claim 1
- "a stator assembly coupled to the stator circuit board" – claim 14
- "a rotor assembly coupled to the rotor circuit board" – claim 14
- "a rotor component coupled to the rotor circuit board assembly" – claim 22
- "the rotor assembly including an annular arrangement" – claims 1, 14
- "the rotor component comprising an annular arrangement" – claim 22
- "sleeve" – claims 1, 14, 22
- "spaced apart from" – claim 22
- "stator driver circuit" – claims 1, 9, 14, 22
- "a plurality of magnetic segments" – claim 22
- "a first annular transformer coil disposed on a surface of the stator circuit board and a second annular transformer coil disposed on a surface of the rotor circuit board" – claim 22
- "single photon avalanche diodes (SPADs)" – claims 13, 21, 22
- "coincident with" – claims 12, 20
- "field of view" – claims 12, 20

- "non-overlapping" – claims 12, 20, 25
- "across a range of distances" – claim 25
- "substantially matches, in size and geometry" – claim 25

V. U.S. PATENT NO. 11,422,236

- "single photon avalanche diodes (SPADs)" – claims 1, 10, 12, 16, 23
- "horizontally and vertically offset" – claims 1, 8, 10, 14, 16, 19, 21, 23, 25
- "each pixel in the plurality of pixels traverses a unique circular path parallel to and vertically offset from a unique circular path traversed by every/each other pixel" / "each pixel in the plurality of pixels traverses a unique circular path parallel to and vertically offset from a unique circular path traversed by each other pixel" / "each pixel in the plurality of pixels traverses a unique circular path parallel to and vertically offset from a unique circular path traversed by the other pixels in the plurality of pixels" – claims 1, 10, 16, 23
- "aperture" / "apertures" – claims 8, 14, 19-21, 25
- "a first optical path that extends through the first aperture and … a second optical path that extends through the second aperture" – claims 8, 25
- "the first aperture is disposed in a first optical path that extends from the bulk imaging optic, through the first aperture and to the first pixel; and the first aperture is disposed in a second optical path that extends from the bulk imaging optic, through the second aperture and to the second pixel." – claim 19
- "coincident with" – claims 11, 14, 20, 21
- "field of view" – claims 11, 13, 14, 16, 20, 21
- "non-overlapping" – claims 11, 16
- "across a range of distances" – claim 16
- "substantially matches, in size and geometry" – claim 16
- "the circular paths traversed by pixels from the second set of pixels in the second column are interleaved with the circular paths traversed by pixels from the first set of pixels in the first column" – claims 7, 22

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Michael R. Doman, Jr., hereby certify that on June 21, 2023 copies of the foregoing documents were served upon the following parties as indicated:

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