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 CLAIM CONSTRUCTIONS

Pursuant to Order No. 6 and Ground Rule 1.14, Respondents Hesai Group, Hesai Technology Co. Ltd., and Hesai Inc. (collectively "Hesai") hereby provide the following proposed claim constructions for the claim terms identified by the parties for claim construction. This disclosure is made based on the information presently known to Hesai, and Hesai reserves the right to modify, amend, or supplement these disclosures based on the positions, constructions and/or extrinsic evidence identified by Complainant or as other information becomes available.

Respondents' Proposed Constructions

No.	Term	Patents and Asserted Claims[1]	Respondents' Proposed Construction
1	"single photon avalanche diodes (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	"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	"a small hole that defines a field of view for an individual pixel"
3	"field of view"	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	"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	405 Patent, claims 21, 26 381 Patent, claim 8 750 Patent, claims 44, 45 236 Patent, claims 14, 19, 20, 21	"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"

[1] Hesai's proposed constructions will apply to any claims Ouster relies on for alleged domestic industry that include the same terms.

Ouster Exhibit 2002
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	optic and the first/second/third/fourth pixel through the first/second/third/fourth aperture" (381 Patent) "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 pixel disposed in a first/second optical path that extends through the first/second aperture" (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 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	"photosensor"	405 Patent, claims 21, 23-26, 31-34	"pixel"
6	"rotor assembly … coupled to the rotor circuit board" "rotor assembly coupled to the rotor circuit board" "rotor component coupled to the rotor circuit board" "stator assembly … coupled to the stator circuit board" "stator assembly coupled to the stator circuit board"	515 Patent, claims 1, 14, 22	"the rotor / stator assembly / component is attached or mounted directly to the rotor / stator circuit board"
7	"sleeve"	515 Patent, claims 1, 14, 22	"cylindrical tube"
8	"spaced apart from"	515 Patent, claim 22	"disposed along a different plane"
9	"a plurality of magnetic segments"	515 Patent, claim 22	"two or more individual magnets"
10	"horizontally and vertically offset from"	236 Patent, claims 1, 8, 10, 14, 16, 19, 21, 23, 25	"having a skewed grid arrangement relative to"
11	"each pixel in the plurality of pixels traverses a unique circular path parallel to and vertically offset from a unique	236 Patent, claims 1, 10, 16, 23	The "plurality of pixels" includes all pixels defining the first and second columns.

	circular path traversed by every 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”		

Dated: June 28, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Michael R. Doman, Jr., hereby certify that on June 28, 2023 copies of the foregoing documents were served upon the following parties as indicated:

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/s/ Michael R. Doman, Jr.
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