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"

Dated: July 7, 2023

Respectfully submitted,

By: */s/ Phillip E. Morton*

Stephen R. Smith
Phillip E. Morton
COOLEY LLP
1299 Pennsylvania Avenue, NW
Suite 700
Washington, DC 20004
Tel: 202.842.7800

Matthew J. Brigham
Dena Chen
Patrick Lauppe
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304-1130
Tel: 650.843.5000

Attorneys for Complainant Ouster Inc.

Respectfully submitted,

By: */s/ Jared W. Newton*

S. Alex Lasher
Jared Newton
Michael R. Doman, Jr.
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
1300 I Street, NW, Suite 900
Washington, D.C. 20005
Tel.: (202) 538-8000

Steven Cherny
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
111 Huntington Ave, Suite 520
Boston, MA 02199
Tel.: (617) 712-7100

Ron Hagiz
Sean T. Gloth
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor,
New York, New York 10010
Tel.: (212) 849 7000

Jodie Cheng
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California Street, 22nd Floor

San Francisco, California 94111
Tel.: (415) 875 6600

Chunmeng Yang
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
1109 First Avenue, Suite 210
Seattle, WA 98101
Tel.: (206) 905 7000

Jun Zheng
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
300 West 6th St, Suite 2010
Austin, TX 78701
Tel.: (737) 667 6100

Counsel for Proposed Respondents
Hesai Group,
Hesai Technology Co., and Hesai Inc.

Respectfully submitted,

By: */s/ W. Peter Guarnieri*

Margaret Macdonald, Director
Jeffrey T. Hsu, Supervisory Attorney
W. Peter Guarnieri, Investigative Attorney
U.S. International Trade Commission
Office of Unfair Import Investigations
Suite 401
500 E Street SW
Washington, D.C. 20436

CERTIFICATE OF SERVICE

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

The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E Street, SW Washington, DC 20436	☒ Via EDIS ☐ Via Hand Delivery ☐ Via Express Delivery ☐ Not Served
The Honorable MaryJoan McNamara Administrative Law Judge U.S. International Trade Commission 500 E Street, S.W., Room 317 Washington, DC 20436 Email: McNamara337@usitc.gov	☐ Via EDIS ☐ Via Hand Delivery ☒ Via Email ☐ Not Served

Office of Unfair Import Investigations

Peter Guarnieri, Esq. Investigative Attorney Office of Unfair Import Investigations U.S. International Trade Commission 500 E Street, S.W., Suite 401 Washington, DC 20436 Email: Peter.Guarnieri@usitc.gov	☐ Via Hand Delivery ☐ Via Express Delivery ☒ Via Email ☒ Via BOX

On Behalf of Respondents Hesai Group, Hesai Technology Co., Ltd, and Hesai, Inc.:

S. Alex Lasher Jared Newton Mike R. Doman, Jr. **Quinn Emanuel Urquhart & Sullivan, LLP** 1300 I Street, NW, Suite 900 Washington, DC 20005	☐ Via Hand Delivery ☐ Via Express Delivery ☒ Via Email ☐ Not Served
Steven Cherny **Quinn Emanuel Urquhart & Sullivan, LLP** 111 Huntington Ave, Suite 520 Boston, MA 02199	
Ron Hagiz Sean T. Gloth **Quinn Emanuel Urquhart & Sullivan, LLP** 51 Madison Avenue, 22nd Floor, New York, New York 10010	

Jodie Cheng
Quinn Emanuel Urquhart & Sullivan, LLP
50 California Street, 22nd Floor
San Francisco, California 94111

Chunmeng Yang
Quinn Emanuel Urquhart & Sullivan, LLP
1109 First Avenue, Suite 210
Seattle, WA 98101

Jun Zheng
Quinn Emanuel Urquhart & Sullivan, LLP
300 West 6th St, Suite 2010
Austin, TX 78701

Email: qe-hesai-ouster@quinnemanuel.com
alexlasher@quinnemanuel.com

/s/ Larissa Diaz
Larissa Diaz