

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ADVANCED CODING TECHNOLOGIES LLC,

Plaintiffs,

v.

LG ELECTRONICS INC., and LG
ELECTRONICS U.S.A., INC.

Defendants.

Civil Case No. 2:22-cv-00501-JRG
[Lead case]

JURY TRIAL DEMANDED

ADVANCED CODING TECHNOLOGIES LLC,

Plaintiffs,

v.

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.

Defendants.

Civil Case No. 2:22-cv-00499-JRG
[Member case]

JURY TRIAL DEMANDED

**SAMSUNG'S P.R. 4-2 PRELIMINARY CLAIM
CONSTRUCTIONS AND EXTRINSIC EVIDENCE**

Pursuant to P.R. 4-2 and to the Court’s Docket Control Order (Dkt. No. 46), Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively “Samsung” or “Samsung Defendants”), hereby provide their Patent L.R. 4.2(a) and 4.2(b) disclosures.

The chart in Exhibit A includes Samsung’s preliminary claim constructions and extrinsic evidence on the identified terms, phrases, and/or clauses of U.S. Patent Nos. 6,845,128 (“the ’128 patent”); 8,090,025 (“the ’025 patent”); 8,139,150 (“the ’150 patent”); 9,445,041 (“the ’041 patent”); 9,986,303 (“the ’303 patent”); and 10,218,995 (“the ’995 patent”). Samsung’s investigation and discovery are ongoing, and therefore Samsung reserves the right to modify the proposed claim constructions as well as to modify, add, or delete terms, phrases and/or clauses based on, without limitation, the constructions served or proposed by Advanced Coding Technologies LLC (“ACT”), information learned in the course of meeting and conferring with ACT’s counsel, information learned through the course of discovery or other means, and any further changes or amendments to the parties’ infringement or invalidity contentions. Samsung reserves the right to rely on any evidence disclosed by LG Electronics, Inc.; LG Electronics U.S.A., Inc. (collectively, “LG”); or ACT in their Patent L.R. 4.2(a) and 4.2(b) disclosures, including but not limited to any expert testimony submitted by LG or ACT in this action. Samsung also reserves the right to supplement its preliminary claim constructions with extrinsic evidence or expert testimony, including in rebuttal to ACT’s preliminary or subsequent claim constructions. By including evidence in its P.R. 4.2(b) disclosures in Exhibit A, Samsung does not concede that the evidence is properly considered “extrinsic” rather than intrinsic.

Samsung reserves the right to modify, supplement, or amend its list of claim terms, phrases, clauses and/or constructions set forth in Exhibit A. Additionally, Samsung reserves the right to separately request construction of portions of the identified claim terms, phrases, and/or clauses.

For example, these proposed claim constructions are based on ACT's current infringement contentions. Should ACT assert that other claims are infringed, amend its infringement contentions, or should other claims or claim limitations otherwise become relevant, Samsung reserves the right to propose new claim constructions as required. Should ACT seek an improper interpretation of a term, phrase, and/or clause that has not been identified by the parties, either explicitly or implicitly through its discovery responses, expert disclosures, motions, or pleadings, Samsung reserves the right to seek the construction of that term, phrase, and/or clause. Samsung further reserves the right to identify additional extrinsic evidence to rebut ACT's proposed constructions or to address ACT's asserted reasons for disputing Samsung's proposed constructions.

The claim terms, phrases, and/or clauses are generally identified at least with respect to the patent where such terms, phrases, and/or clauses occur. Unless otherwise indicated in Exhibit A, any additional occurrence, including in related asserted patents, of a listed claim term, phrase, and/or clause is intended to receive the same construction as the listed term, phrase, and/or clause, regardless of whether the later occurrence is also listed in Exhibit A.

Samsung's preliminary claim constructions shall not act as a waiver of any defense of noninfringement, invalidity, or unenforceability of any of ACT's asserted patents. Notwithstanding the preliminary claim constructions contained in Exhibit A of any term, phrase, and/or clause, Samsung expressly reserves the right to challenge the validity of any or all claims in ACT's asserted patents on all possible grounds.

Samsung further reserves all rights to assert that terms, phrases, and/or clauses in the patents-in-suit are invalid under 35 U.S.C. § 112, including without limitation the terms, phrases,

and/or clauses listed in Samsung's Invalidity Contentions and any amendments or supplements thereto.

The inclusion of any claim terms, phrases, and/or clauses in Exhibit A is not intended, and should not be construed to mean, that any such terms, phrases, and/or clauses have a special or uncommon meaning. Additionally, the inclusion of any claim terms, phrases, and/or clauses in Exhibit A is not intended to and does not constitute an admission that the term, phrase, and/or clause is capable of construction and not indefinite under 35 U.S.C. § 112, lacking enablement or adequate written description, or otherwise incapable of construction. Samsung reserves the right to contest any such terms, phrases, and/or clauses and the validity of any claim of the patents-in-suit.

To the extent the claim terms, phrases, and/or clauses set forth in Exhibit A include particular terms, phrases, and/or clauses appropriate to be construed separately, such terms, phrases, and/or clauses are deemed part of this disclosure. Similarly, to the extent it is appropriate to construe terms, phrases, and/or clauses listed in Exhibit A in the context of additional claim language, such additional language is deemed part of this disclosure.

I. PRELIMINARY PROPOSED CLAIM CONSTRUCTIONS

Subject to the above limitations and reservations of right, Samsung preliminarily proposes the claim constructions detailed in Exhibit A. In addition to the list of terms identified for construction in Exhibit A, Samsung hereby incorporates the list of terms identified as being indefinite under 35 U.S.C. § 112(2) in Samsung's Invalidity Contentions served on August 8, 2023 and Amended Invalidity Contentions served on November 15, 2023.

Samsung is prepared to meet and confer with ACT at a mutually agreeable time to combine and finalize the parties' respective lists of claim terms, phrases, and/or clauses to be construed and to facilitate the preparation of the Joint Claim Construction and Prehearing Statements.

II. PRELIMINARY IDENTIFICATION OF EXTRINSIC EVIDENCE

In connection with this disclosure, pursuant to P.R. 4-2(b), Samsung also hereby identifies the evidence set forth in Exhibit A. Samsung also hereby provides the documents required by P.R. 4-2(b), including extrinsic evidence that it may rely on to support its claim construction positions. See DXM-00000001 - DXM-00016453. By making this preliminary identification of extrinsic evidence, Samsung does not concede that extrinsic evidence is necessary to construe the claim terms at issue. Samsung expressly reserves the right to rely on extrinsic evidence that ACT relies upon.

Samsung further expressly reserves the right to rely on any prior art cited in Samsung's Invalidity Contentions. In addition, Samsung expressly reserves the right to rely on any other extrinsic evidence identified after further investigation or discovery or for any other reason, including in order to rebut any extrinsic evidence ACT identifies.

Samsung further expressly reserves the right to rely on any extrinsic evidence cited herein as intrinsic evidence. Samsung does not waive any arguments that any evidence is intrinsic, even if cited herein as extrinsic. Any reference to an *Inter Partes* Review (IPR) is intended to refer to

all papers associated with the IPR, including but not limited to the petition, patent owner preliminary response, patent owner response, petitioner reply, patent owner sur-reply, institution decision, final written decision, and all exhibits. In addition, Samsung reserves the right to rely on any IPR proceedings or prior art cited during prosecution of the asserted patents (which are part of the intrinsic record), regardless of whether they are listed herein.

In addition to the extrinsic evidence identified herein, Samsung may rely upon one or more experts to testify regarding indefiniteness, the proposed constructions, or to address constructions or arguments ACT presents. Such testimony could include, *inter alia*, an explanation of the meaning of the identified claim terms in the context of the subject matter disclosed in the asserted patents, a description of the state of the technology relating to the alleged inventions claimed in the asserted patents, and how a person of ordinary skill in the art would interpret the identified claim terms at the time the applications for the asserted patents were filed, including testimony that a person of ordinary skill in the art would find the identified claim terms indefinite for the reasons set forth above.

Date: February 6, 2024

/s/ Daniel A. Tishman

Ruffin B. Cordell
TX Bar No. 04820550
cordell@fr.com
Michael J. McKeon
DC Bar No. 459780
mckeon@fr.com
Ralph A. Phillips
DC Bar No. 475571
rphillips@fr.com
Daniel A. Tishman
DC Bar No. 1013923
tishman@fr.com
Christopher Dryer
D.C. Bar No. 1022460
dryer@fr.com

FISH & RICHARDSON P.C.
1000 Maine Avenue, S.W., Suite 1000
Washington, DC 20024
Telephone: 202-783-5070
Facsimile: 202-783-2331

Noah C. Graubart
GA Bar No. 141862
graubart@fr.com
Lawrence R. Jarvis
GA Bar No. 102116
jarvis@fr.com
FISH & RICHARDSON P.C.
1180 Peachtree St NE
Atlanta, GA 30309
Telephone: 404-892-5005
Facsimile: 404-892-5002

Melissa Richards Smith
melissa@gillamsmith.com
GILLAM & SMITH, LLP
303 South Washington Ave.
Marshall, Texas 75670
Telephone: 903-934-8450
Facsimile: 903-934-9257

*Attorneys for Defendants Samsung Electronics
Co., Ltd.; and Samsung Electronics America,
Inc.*

CERTIFICATE OF SERVICE

I certify that on February 6, 2024, a true and correct copy of the foregoing was served on counsel of record for Plaintiff via electronic mail.

/s/ Daniel A. Tishman

EXHIBIT A

Exhibit A – Defendants’ Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

I. U.S. Patent No. 6,845,128

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
1.	“an emphasis-level setter for setting an emphasis level”	1-3	Plain and ordinary meaning	
2.	“emphasis processing”	1, 4	“increasing the amplitude of the high frequency components of a video signal”	Hargrave’s Communication Dictionary (2001), at 189, 405 Encyclopedia of Telecommunications (1989), at 69 Hatton, “Pre-emphasizing Video Signals” (1951) McMahon, “FM Transmission of Video Signals,” International Telemetry Conference Proceedings, volume 28 (1992), pp. 4-5 and Fig. 3 U.S. Patent No. 5,771,333, “Video Signal Emphasis and Deemphasis Method and Apparatus” Jacaba, “Audio Compression Using Modified Discrete Cosine Transform: The MP3 Coding Standard,” at 55 Inglis and Luther, “Satellite Technology,” Sections 4.2.1.1 and 4.2.2.2 Vaseghi, “Advanced Digital Signal Processing and Noise Reduction,” Second Edition, Section 1.3
3.	“emphasis level”	1-4	“a value that represents the amount by which the amplitude of the high frequency components of	Hargrave’s Communication Dictionary (2001), at 189, 405 Encyclopedia of Telecommunications (1989), at 69

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
			the video signal is increased"	Hatton, "Pre-emphasizing Video Signals" (1951) McMahon, "FM Transmission of Video Signals," International Telemetry Conference Proceedings, volume 28 (1992), pp. 4-5 and Fig. 3 U.S. Patent No. 5,771,333, "Video Signal Emphasis and Deemphasis Method and Apparatus" Jacaba, "Audio Compression Using Modified Discrete Cosine Transform: The MP3 Coding Standard," at 55 Inglis and Luther, "Satellite Technology," Sections 4.2.1.1 and 4.2.2.2 Vaseghi, "Advanced Digital Signal Processing and Noise Reduction," Second Edition, Section 1.3

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

II. U.S. Patent No. 8,090,025

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
4.	“border motion-vector data” / “border motion vector data”	6-8, 10	“data on a motion vector from a border of a rectangular zone in a picture to be coded to a border of a reference picture”	Expert testimony from Dr. Dan Schonfeld, and/or an expert identified by LG and/or ACT, that a person of ordinary skill in the art would understand the meaning of “motion-vector data” as “data on a motion vector from a border of a rectangular zone in a picture to be coded to a border of a reference picture”
5.	“satisfies Poisson’s equation”	6-8, 10	“satisfies the equation $\Delta u_j = K_j$, where ‘u’ is the estimated signal in a block, ‘K _j ’ is a source term, and Δu_j is a Laplacian of the estimated signal ‘u’.”	Expert testimony from Dr. Dan Schonfeld, and/or an expert identified by LG and/or ACT, that a person of ordinary skill in the art would understand the meaning of “satisfies Poisson’s equation” as “satisfies the equation $\Delta u_j = K_j$, where ‘u’ is the estimated signal in a block, ‘K_j’ is a source term, and Δu_j is a Laplacian of the estimated signal ‘u’” Collin, <i>Dictionary of Science and Technology</i> 538 (2d ed. 2007) Shen & Kuo, <i>Review of Postprocessing Techniques for Compression Artifact Removal</i>, 9 J. of Visual Comm’n and Image Representation, no. 1, 2–14 (1998) Lee et al., <i>Blocking Effect Reduction of JPEG Images by Signal Adaptive Filtering</i>, 7 IEEE Transactions on Image Processing, no. 2, 229–34 (1998) U.S. Patent No. 5,796,875 (Read) U.S. Patent No. 7,567,619 (Varma et al.)

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
				U.S. Patent No. 8,345,777 (Lee et al.) U.S. Patent No. 8,861,867 (Teng et al.) Pub. No. US 2005/0262531A1 (Varma et al.) Pub. No. US 2008/0165863A1 (Yan) U.S. Patent No. 6,853,683 (Song et al.) U.S. Patent No. 8,059,903 (Yamatani et al.) Saito & Yamatani, <i>Polyharmonic Local Cosine Transform for Improving the Reproduction Quality of JPEG-Compressed Images</i> (May 16, 2006) Zhao et al., <i>PHLFT5: A Practical and Improved Version of Polyharmonic Local Fourier Transform</i>, 5914 Proc. of SPIE (Sept. 17, 2005) (available at https://doi.org/10.1117/12.618584) Saito & Remy, <i>The Polyharmonic Local Sine Transform: A New Tool for Local Image Analysis and Synthesis Without Edge Effect</i>, 10 Applied Computational Harmonic Analysis 41–73 (2006) Yamatani & Saito, <i>Improvement of DCT-Based Compression Algorithms Using Poisson's Equation</i>, 15 IEEE Transactions on Image Processing 3672–89 (2006)

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
				Provisional Application No. 60/629,094 (Yamatani & Saito)
6.	“boundary condition”	6-7, 10	“a gradient of a video signal on a block border”	Expert testimony from Dr. Dan Schonfeld, and/or an expert identified by LG and/or ACT, that a person of ordinary skill in the art would understand the meaning of “boundary condition” as “a gradient of a video signal on a block border”
7.	“the input signal being obtained by multiplexing a coded bitstream obtained by predictive coding, border motion-vector data and post-quantization data obtained by quantization in the predictive coding”	6-7, 10	Indefinite	Expert testimony from Dr. Dan Schonfeld, and/or an expert identified by LG and/or ACT, that a person of ordinary skill in the art would understand this claim term as being subject to numerous potential interpretations such that a person of ordinary skill in the art would not be able to determine the scope of the claim term with reasonable certainty

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

III. U.S. Patent No. 8,139,150

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
8.	“coded multi-view video signal”	1-4	“a coded video signal for two or more viewpoints, including at least one base viewpoint and at least one non-base viewpoint”	
9.	“picture signal”	1-4	“a signal that represents at least one picture from a viewpoint”	
10.	“coded information representing a desired delay time of the start of decoding a coded signal originating from each of the picture signals corresponding to the viewpoints except the base viewpoint”	1-3	“coded information that represents the desired delay for individual pictures in the non-base viewpoint(s).”	
11.	“first means for decoding the coded information in the coded multi-view video signal to recover the desired delay times for the coded signals originating from the picture signals corresponding to the	1	Means-plus-Function (§ 112(6)) Function: decoding coded information in a coded bitstream to recover information representative of desired delay times and identifying the desired delay	

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
	viewpoints except the base viewpoint”		times from the decoded information Structure: a processor configured to perform the algorithm steps of decoding coded information in a coded bitstream to recover information representative of desired delay times and identifying the desired delay times from the decoded information	
12.	“second means for decoding the coded signal originating from the picture signal corresponding to the base viewpoint”	1	Means-plus-Function (§ 112(6)) Function: generating a decoded picture signal by performing motion-compensated prediction to generate a prediction signal, decoding a coded residual by performing inverse quantization and inverse orthogonal transform on the coded residual signal, and adding the decoded residual signal to the prediction signal Structure: a processor that performs the algorithm steps of generating a decoded	

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
			picture signal by performing motion-compensated prediction to generate a prediction signal, decoding a coded residual by performing inverse quantization and inverse orthogonal transform on the coded residual signal, and adding the decoded residual signal to the prediction signal	
13.	“third means for decoding the coded signals originating from the picture signals corresponding to the viewpoints except the base viewpoint”	1	Means-plus-Function (§ 112(6)) Function: generating a decoded picture signal by performing at least one of motion-compensated prediction or disparity prediction to generate a prediction signal, decoding a coded residual signal by performing inverse quantization and inverse orthogonal transform on the coded residual signal, and adding the decoded signal to the prediction signal Structure: a processor that performs the algorithm steps of generating a decoded	

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
			picture signal by performing at least one of motion-compensated prediction or disparity prediction to generate a prediction signal, decoding a coded residual signal by performing inverse quantization and inverse orthogonal transform on the coded residual signal, and adding the decoded signal to the prediction signal	
14.	“fourth means for delaying the decoding of the coded signals by the third means relative to the decoding of the coded signal by the second means by time intervals equal to the desired delay times recovered by the first means”	1	Means-plus-Function (§ 112(6)) Function: (i) determining whether the present moment has reached the end of a desired decoding delay time, and if not (ii) delaying decoding of a coded picture until the present moment has reached the end of the desired decoding delay time. Structure: a processor configured to perform the algorithm steps of (i) determining whether the present moment has reached the end of a desired decoding delay time, and if not (ii)	

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
			delaying decoding of a coded picture until the present moment has reached the end of the desired decoding delay time.	

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

IV. U.S. Patent No. 9,445,041

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
15.	“a moving image data input unit configured to be input of first moving image data generated at a first frame rate and second image data generated at a second frame rate that is different from the first frame rate”	1	Means-plus-Function (§ 112(6)) Indefinite	Expert testimony of Dr. Patrick Traynor, who will explain why the claim term is a means plus function term without the recital of structure in the specification when viewed from the vantage point of one of ordinary skill in the art
16.	“an input frame rate specification unit configured to specify the first frame rate of the first moving image data and the second frame rate of the second moving image data, the first and second moving image data having been input into the moving image data input unit”	1	Means-plus-Function (§ 112(6)) Indefinite	Expert testimony of Dr. Patrick Traynor, who will explain why the claim term is a means plus function term without the recital of structure in the specification when viewed from the vantage point of one of ordinary skill in the art

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
17.	“an output frame rate specification unit configured to specify output frame rate of the first moving image data and output frame rate of the second moving image data that have been input into the moving image data input unit”	1	Means-plus-Function (§ 112(6)) Indefinite	Expert testimony of Dr. Patrick Traynor, who will explain why the claim term is a means plus function term without the recital of structure in the specification when viewed from the vantage point of one of ordinary skill in the art
18.	“a frame rate conversion unit configured to change a frame rate of the first moving image data based on the first frame rate, the output frame rate, and the playback speed, and change a frame rate of the second moving image data based on the second frame rate, the output frame rate, and the playback speed”	1	Means-plus-Function (§ 112(6)) Function: “to change a frame rate of the first moving image data based on the first frame rate, the output frame rate, and the playback speed, and change a frame rate of the second moving image data based on the second frame rate, the output frame rate, and the playback speed” Structure: Software that carries out the following algorithm: 1. Determine if playback speed is low, normal, or high.	

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
			2. Apply formula $x = F_{out}/M * F_{in}$ to determine change multiplier. 3. If change multiplier is less than 1, then apply decimation to reduce rate by change multiplier. 4. If change multiplier is greater than 1, then apply interpolation to increase rate by change multiplier.	
19.	“a moving image data output unit that outputs the first and second moving image data whose frame rates have been converted by the frame rate conversion unit”	1	Means-plus-Function (§ 112(6)) Function: “output[] the first and second moving image data whose frame rates have been converted by the frame rate conversion unit” Structure: monitor 207 or external display apparatus	
20.	“operating unit”	2	Means-plus-Function (§ 112(6)) Function: “to allow for user operation”	

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
			Structure: “release button 209a, buttons 209b and 209c, and dials 209d and 209e which are illustrated in the exterior view of FIGS. 2A and 2B; and an unillustrated operation key, cross key, lever, or touch panel superimposed on the monitor 207, and the like.”	
21.	“specify[ing] [the] output frame rate”	1, 4, 6	Plain and ordinary meaning	Harry Newton, <i>Newton's Telecom Dictionary 27th Expanded and Updated Edition</i> (2013), at 529 A&C Black London, <i>Dictionary of Computing</i> (6th Ed. 2010), at 145
22.	“a playback speed specification unit configured to specify a same playback speed for the first moving image data and the second moving image data”	1	Plain and ordinary meaning	A&C Black London, <i>Dictionary of Computing</i> (6th Ed. 2010), at 257

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

V. U.S. Patent No. 9,986,303

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
23.	“basic” terms - “basic video image coding data” - “basic hierarchical picture” - “basic hierarchy”	1-2	Plain and ordinary meaning	
24.	“supplementary “ terms - “supplementary video image coding data” - “supplementary hierarchical picture” - “supplementary hierarchy”	1-2	Plain and ordinary meaning	
25.	“a factor of a group of pictures”	1-2	Plain and ordinary meaning	
26.	“reconstructing video image coding data from the basic video image coding data and the supplementary video image coding data”	1-2	Plain and ordinary meaning	

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

VI. U.S. Patent No. 10,218,995

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
27.	"standard resolution"	2-4, 11	"the base resolution of the input picture prior to encoding"	Expert testimony from Dr. Dan Schonfeld, and/or an expert identified by LG and/or ACT, that a person of ordinary skill in the art would understand the meaning of "standard resolution" as "the base resolution of the input picture prior to encoding"
28.	"super-resolution enlarged decoded pictures"	2-4, 11	Plain and ordinary meaning in the art, which is "higher than standard resolution pictures created using two or more different standard resolution pictures"	Expert testimony from Dr. Dan Schonfeld, and/or an expert identified by LG and/or ACT, that a person of ordinary skill in the art would understand the meaning of "super-resolution enlarged decoded pictures" as "higher than standard resolution pictures created using two or more different standard resolution pictures" Tipping (U.S. Patent. No. 7,106,914, issued Sept. 12, 2006) Toma (U.S. Patent Pub. No. 2007/0247529 A1) Park (Sung Cheol Park, et al., "Super-Resolution Image Reconstruction: A Technical Overview," Signal Processing Magazine, vol 20, Issue 3, IEEE, pp 21-37, May 2003)
29.	"extension of the standard resolution"	2-4, 11	Indefinite	Expert testimony from Dr. Dan Schonfeld, and/or an expert identified by LG and/or ACT, that a person of ordinary skill in the art would not understand the meaning of "extension of the standard resolution" in the '995 patent with reasonable certainty

Exhibit A - Defendants' Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Proposed Claim Constructions with Evidence

No.	Term	Claim(s)	Proposed Construction	Extrinsic Evidence
30.	"prescribed"	2-4, 11	Indefinite	Expert testimony from Dr. Dan Schonfeld, and/or an expert identified by LG and/or ACT, that a person of ordinary skill in the art would not understand the meaning of the terms using "prescribed" in the '995 patent with reasonable certainty Merriam-Webster's Collegiate Dictionary (11th ed.) (2009) Macmillan English Dictionary for Advanced Learners (2d. ed) (2007) The American Heritage College Dictionary (4th ed.) (2007) The Penguin English Dictionary (3d. ed) (2007) Cambridge Dictionary of American English (2d. ed) (2008) Collins Dictionary (10th ed) (2010)