IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETWORK SYSTEM TECHNOLOGIES, LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG AUSTIN SEMICONDUCTOR, LLC, SAMSUNG SEMICONDUCTOR, INC., ONEPLUS TECHNOLOGY (SHENZHEN) CO., LTD., Defendants.	Civil Action No. 2:22-CV-00481-JRG **JURY TRIAL DEMANDED**

SAMSUNG'S P.R. 4–1 IDENTIFICATION OF
PROPOSED TERMS AND CLAIM ELEMENTS FOR CONSTRUCTION

Pursuant to P.R. 4-1(a), Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Austin Semiconductor, LLC, and Samsung Semiconductor, Inc. (collectively, "Defendants" or "Samsung") hereby provide their list of claim terms, phrases, or clauses that Defendants contend should be construed or found indefinite by the Court, including an identification of claim elements that Defendant contend should be governed by 35 U.S.C. § 112(f).

Subject to discussion between the parties as contemplated in P.R. 4-1(b), Defendants identify the following claim terms, phrases, or clauses.[1]

[1] Defendants reserve all rights to assert that terms or phrases in the asserted patent claims should be found invalid under 35 U.S.C. § 112, including without limitation the terms and phrases listed in Defendants P.R. 4-1 disclosures and Invalidity Contentions. Defendants also reserve the right to add or subtract proposed terms for construction during the claim construction process, including to offer constructions for terms that Plaintiff contends require construction.

I. ’818 Patent

Claim Terms, Phrases, or Clauses for Construction	Claims
“dropping means (DM) for dropping data exchanged by said first and second module (M, S)”	’818 patent, claims 1, 3, 5
“interface means (ANIP, PNIP) for managing the interface between a module (M, S) and the network (N, RN), wherein said interface means (ANIP, PNIP) comprises a first dropping means (DM) for dropping data, and wherein the dropping of data and therefore the transaction completion can be controlled by the interface means”	’818 patent, claims 1, 6, 7

II. ’449 Patent

Claim Terms, Phrases, or Clauses for Construction	Claims
Preamble	’449 patent, claim 10
“communication manager [(CM) for managing the communication between different modules]”	’449 patent, claims 2, 6, 10
“at least one connection with said communication channels is available” / “a target connection with the desired connection properties is available”	’449 patent claims 1, 10
“at least one of a switch and a router”	’449 patent claims 3, 11

III. ’052 Patent

Claim Terms, Phrases, or Clauses for Construction	Claims
Preamble	’052 patent, claim 6
“mapping means (A) for mapping the requested at least one communication service based on said specific communication properties to a connection based on a set of connection properties according to said at least one communication service identification”	’052 patent, claims 1, 2, 7

IV. ’9893 Patent

Claim Terms, Phrases, or Clauses for Construction	Claims
Preamble	’9893 patent, claim 4
“arranging … the first and second information comprising said issued message as a single address”	’9893 patent, claim 4

V. ’2893 Patent

Claim Terms, Phrases, or Clauses for Construction	Claims
Preamble	’2893 patent, claim 10
“each data package comprising N data elements”	’2893 patent, claims 1, 10

VI. ’800 Patent

Claim Terms, Phrases, or Clauses for Construction	Claims
“optimal amount of data to be buffered”	’800 patent, claim 12
“optimal moment for sending the data”	’800 patent, claim 12
“determination unit”	’800 patent, claim 12
“said first wrapper” / “said second wrapper”	’800 patent, claim 12

Dated: November 28, 2023

Respectfully Submitted

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document by email this November 28, 2023.

/s/ Melissa R. Smith
Melissa R. Smith