

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.
Petitioner

v.

NETWORK SYSTEM TECHNOLOGIES, LLC
Patent Owner

Patent No. 8,086,800

Inter Partes Review No. IPR2024-00339

JOINT PAPER REGARDING
DISTRICT COURT CLAIM CONSTRUCTION

Pursuant to the Board’s May 31, 2024 Order (Paper 10), Petitioner Samsung Electronics Co., Ltd. and Patent Owner Network Systems Technologies, LLC hereby submit this joint paper regarding the district court’s claim construction determinations in *Network System Technologies, LLC v. Samsung Electronics Co., Ltd.*, No. 2:22-cv-00481-JRG (E.D. Tex.) and other district court claim constructions regarding U.S. Patent No. 8,086,800 (“the ’800 patent”).

On April 8, 2024, the parties received an email from Judge Gilstrap’s law clerk indicating that “the Court has determined that it will adopt the same constructions and analysis as Judge Schoeder” in *Network System Technologies, LLC v. Texas Instruments Inc.*, No. 2:22-cv-00482-RWS (E.D. Tex.). In relevant part, the phrases “optimal amount of data to be buffered” and “an optimal moment for sending the data” in claim 12 of the ’800 patent were found to be indefinite. Patent Owner is submitting this email as Exhibit 2063. The district court has not entered a formal claim construction order or opinion on the docket.

To date, Exhibit 2022—which reflects the constructions and analysis of Judge Schroeder in *Network System Technologies, LLC v. Texas Instruments Inc.*, No. 2:22-cv-00482-RWS (E.D. Tex.)—is the only claim construction decision regarding terms in the ’800 patent that has been entered on the docket by a district court.

The parties are not aware of any other claim construction decision regarding this patent.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Joint Paper Regarding Claim Construction** was served on June 5, 2024, by email:

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