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Semiconductor Design Technologies, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SEMICONDUCTOR DESIGN
TECHNOLOGIES, LLC,

Plaintiff,

v.

CADENCE DESIGN SYSTEMS, INC.,

Defendant.

Case No. 3:23-cv-01001-RFL

**PLAINTIFF'S PATENT L.R. 4-2
DISCLOSURE OF PRELIMINARY
CLAIM CONSTRUCTIONS AND
EXTRINSIC EVIDENCE**

1 Pursuant to Patent Local Rule 4-2, Plaintiff Semiconductor Design Technologies, LLC
2 (“SDT”) hereby discloses its preliminary claim constructions and intrinsic and extrinsic evidence
3 for the claim terms and elements listed in Exhibit A for U.S. Patent Nos. 7,603,636 (the “’636
4 patent”) and 7,971,167 (the “’167 Patent”). SDT reserves the right to supplement, amend, or modify
5 its preliminary claim constructions and/or to identify additional intrinsic and extrinsic evidence for
6 any reason, including in response to Cadence Design Systems, Inc.’s (“Defendant” or “Cadence”)
7 preliminary terms or claim constructions or extrinsic evidence, in response to any argument or
8 position taken by Defendant, or to facilitate the ultimate preparation of the Joint Claim Construction
9 and Prehearing Statement.

10 **Intrinsic Evidence**

11 In support of the proposed constructions, SDT will reference specific sections of the
12 specifications and prosecution histories of the asserted patents. Where relevant, SDT may also cite
13 portions of the prosecution history that involve prior-art references and may rely on these references
14 as needed. SDT retains the right to cite any of the claims of the asserted patents and any documents
15 or testimony from *inter partes* review proceedings in support of or in response to any proposed
16 constructions.

17 **Extrinsic Evidence**

18 SDT has identified extrinsic evidence, including dictionary definitions, treatises, other prior
19 art, and expert witness testimony, to support its preliminary claim constructions. While SDT does
20 not currently intend to rely heavily on expert testimony for claim term definitions, it reserves the
21 right to do so in response to Defendant’s reliance on such testimony for any claim term. SDT further
22 reserves the right to respond to any evidence cited by Cadence and to present additional evidence
23 as necessary.

24 **Expert Witnesses**

25 For its claim construction briefing, SDT intends to submit and may rely upon expert
26 declarations, particularly from John Berg, who is qualified to offer opinions on the understanding
27 of those skilled in the art. His expertise will provide insights into the technical background of the
28 asserted patents, the context of the technology at the time of invention, and the interpretation of

1 disputed claim terms in light of the specifications, file histories, and related patents. In addition,
2 Mr. Berg may provide opinions related to those set forth in his declaration (Dkt. No. 41-4)
3 accompanying the first amended complaint.

4 SDT also reserves the right to assess and respond to any extrinsic evidence introduced by
5 Cadence, including expert declarations. Should Cadence present expert declarations in their claim
6 construction briefing, SDT's experts, including Mr. Berg and potentially others, will analyze and
7 provide rebuttal testimony as necessary.

8 By identifying its experts, SDT does not waive any rights and remains open to relying on
9 additional experts with similar qualifications.

10
11 Dated: December 4, 2023

/s/ Robert F. Kramer
ROBERT F. KRAMER
KRAMER ALBERTI LIM
& TONKOVICH LLP

Attorneys for Plaintiff
Semiconductor Design Technologies, LLC

1 **CERTIFICATE OF SERVICE**

2 I am a resident of the State of California, over the age of eighteen years, and not a party to
3 the within action. My business address is Kramer Alberti Lim & Tonkovich LLP, 577 Airport
4 Boulevard, Suite 250, Burlingame, California 94010.

5 On December 4, 2023, I caused the foregoing document described as: **PLAINTIFF'S**
6 **PATENT L.R. 4-2 DISCLOSURE OF PRELIMINARY CLAIM CONSTRUCTIONS AND**
7 **EXTRINSIC EVIDENCE** to be served upon the following, at the addresses stated below, via the
8 method of service indicated below:

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23 *Attorneys for Defendant*

24 Cadence Design Systems, Inc.

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25 I declare under penalty of perjury under the laws of the United States of America that the
26 foregoing is true and correct. Executed on December 4, 2023, in San Francisco, California.

27 /s/ Morgan Nguyen
28 Morgan Nguyen

EXHIBIT A

**PLAINTIFF SEMICONDUCTOR DESIGN TECHNOLOGIES, LLC'S
PRELIMINARY CONSTRUCTIONS AND EVIDENCE**

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
“graphically editing” (’636 patent, claims 1, 7, 8, 14)	editing with a graphical user interface	Cols. 3:64-4:52, 5:14-18, 6:57-62, 7:51-11:11, 11:59-12:10, 12:18-44, Figs. 2-8, 10-15, claims 1, 7, 8, 14	Expert declaration from J. Berg who may opine that SDT’s proposed construction is supported by the intrinsic and extrinsic evidence. Mr. Berg may opine that Defendant’s proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant’s expert. Any extrinsic evidence introduced by Defendant.
“specification of the semiconductor integrated circuit” (’636 patent, claims 1, 7, 8, 14)	plain and ordinary meaning	Cols. 3:64-4:60, 5:14-47, 6:57-62, 7:51-11:11, 11:52-12:10, 12:18-13:22, Figs. 2-8, 10-15, claims 1, 7, 8, 14	Property Specification Language Reference Manual, Version 1.0, Jan 31, 2003, p. 1 SDT00000864-987 Expert declaration from J. Berg who may opine why the claim term should be afforded its plain and ordinary meaning, what that plain and ordinary meaning is, and why there is no unambiguous disclaimer or disavowal

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			of claim scope. Mr. Berg may opine that Defendant's proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant's expert. Any extrinsic evidence introduced by Defendant.
"specification inputting unit that generates design data or specifications and a document for confirming a specification of the semiconductor integrated circuit" ('636 patent, claims 1, 7)	plain and ordinary meaning	Cols. 3:64-4:60, 5:14-47, 6:57-62, 7:51-11:11, 11:52-12:10, 12:18-13:22, Figs. 2-8, 10-15, claims 1, 7	Property Specification Language Reference Manual, Version 1.0, Jan 31, 2003, pp. 1, 9 SDT00000864-987 Dictionary definitions for "generate" and "synthesi(ze/zer/sis)" identified below in connection with "a property generating unit" Expert declaration from J. Berg who may opine why the claim term should be afforded its plain and ordinary meaning, what that plain and ordinary meaning is, and why there is no unambiguous disclaimer or disavowal of claim scope. Mr. Berg may opine that Defendant's proposed construction

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant's expert. Any extrinsic evidence introduced by Defendant.
“property” ('636 patent, claims 1, 7, 8, 14)	plain and ordinary meaning	Cols. 1:8-30, 1:46-63, 2:24-47, 4:35-5:60, 7:7-9, 7:61-8:61, 9:53-10:50, 11:52-13:22, Figs. 2-15, claims 1, 7, 8, 14	Property Specification Language Reference Manual, Version 1.0, Jan 31, 2003, p. 11 SDT00000864-987 The IEEE Standard Dictionary of Electrical and Electronics Terms, 6th Ed. (1996) (attribute, property) SDT00000754-763 Dictionary of Computer Science, Engineering, and Technology (2001) (property) SDT00000780-784 Dictionary of Computer and Internet Terms (Vol. 1) (2016) (property) SDT00000857-863 Expert declaration from J. Berg who may opine why the claim term should be afforded its plain and ordinary

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			meaning, what that plain and ordinary meaning is, and why there is no unambiguous disclaimer or disavowal of claim scope. Mr. Berg may opine that Defendant's proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant's expert. Any extrinsic evidence introduced by Defendant.
"a property generating unit" ('636 patent, claims 1, 7)	an automated unit that generates a property which matches and verifies the specification of the semiconductor integrated circuit by (1) reading the design data generated by the specification inputting unit from the first storing unit and (2) using the read design data to generate the property	Cols. 1:8-30, 1:46-63, 2:24-47, 3:54-60, 4:4-5:60, 7:7-9, 7:61-8:61, 9:3-10:50, 10:60-11:51, 11:52-13:22, Figs. 2-15, claims 1, 7	Property Specification Language Reference Manual, Version 1.0, Jan 31, 2003, pp. 1, 11 SDT00000864-987 Microsoft Computer Dictionary, 4th Ed. (1999) (synthesis, synthesizer) SDT00000769-774 Webster's New World Computer Dictionary, 9th Ed. (2001) (generate) SDT00000785-789

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			Dictionary of Computing, 4th Ed. (2002) (generate, synthesis, synthesize, synthesizer) SDT00000803-809 Dictionary of Information Technology, 3rd Ed. (2002) (synthesis, synthesize, synthesizer) SDT00000790-795 Microsoft Computer Dictionary, 5th Ed. (2002) (synthesis, synthesizer) SDT00000796-802 The New International Webster's Pocket Computer Dictionary of the English Language (2002) (generate) SDT00000810-814 Webster's New World Computer Dictionary, 10th Ed. (2003) (generate) SDT00000825-829 Webster's II New College Dictionary, 3rd Ed., 2005 (generate, synthesize) SDT00000835-840 Merriam-Webster's Concise Dictionary (2006) (generate, synthesis) SDT00000846-851 Webster's Dictionary & Thesaurus (2012) (generate) SDT00000852-856

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			Dictionary definitions for “property” identified above in connection with “property” Expert declaration from J. Berg who may opine that SDT’s proposed construction is supported by the intrinsic and extrinsic evidence. Mr. Berg may opine that Defendant’s proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant’s expert. Defendant’s Motion to Dismiss, SDT’s Opposition to Defendant’s Motion to Dismiss, including Declaration from J. Berg ISO Opposition; Defendant’s Reply ISO Motion to Dismiss. Any extrinsic evidence introduced by Defendant.
“a property generating step” (’636 patent, claims 8, 14)	an automated step that (1) reads the design data generated at the specification inputting step from the storage	Cols. 1:8-30, 1:46-63, 2:24-47, 3:54-60, 4:4-5:60, 7:7-9, 7:61-8:61, 9:3-10:50, 10:60-11:51,	Property Specification Language Reference Manual, Version 1.0, Jan 31,

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
	and (2) generates a property which matches and verifies the specification of the semiconductor integrated circuit using the read design data and (3) inputs the property in the storage	11:52-13:22, Figs. 2-15, claims 8, 14	2003, pp. 1, 11 SDT00000864-987 Dictionary definitions for “generate” and “synthesi(ze/zer/sis)” identified above in connection with “a property generating unit” Dictionary definitions for “property” identified above in connection with “property” Expert declaration from J. Berg who may opine that SDT’s proposed construction is supported by the intrinsic and extrinsic evidence. Mr. Berg may opine that Defendant’s proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant’s expert. Defendant’s Motion to Dismiss, SDT’s Opposition to Defendant’s Motion to Dismiss, including Declaration from J.

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			Berg ISO Opposition; Defendant's Reply ISO Motion to Dismiss. Any extrinsic evidence introduced by Defendant.
"generates a property which verifies the specification of the semiconductor integrated circuit" ('636 patent, claims 1, 7, 8, 14)	generates a property which matches and verifies the specification of the semiconductor integrated circuit	Cols. 1:8-30, 1:46-63, 2:24-47, 3:54-60, 4:4-5:60, 7:7-9, 7:61-8:61, 9:3-10:50, 10:60-11:51, 11:52-13:22, Figs. 2-15, claims 1, 7, 8, 14	Property Specification Language Reference Manual, Version 1.0, Jan 31, 2003, pp. 1, 11 SDT00000864-987 Dictionary definitions for "generate" and "synthesi(ze/zer/sis)" identified above in connection with "a property generating unit" Dictionary definitions for "property" identified above in connection with "property" Expert declaration from J. Berg who may opine that SDT's proposed construction is supported by the intrinsic and extrinsic evidence. Mr. Berg may opine that Defendant's proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			counter any positions taken by Defendant or Defendant's expert. Any extrinsic evidence introduced by Defendant.
"automatically converts the property into an assertion description" ('636 patent, claims 1, 7, 8, 14)	plain and ordinary meaning	Cols. 1:46-54, 4:39-62, 5:23-26, 5:40-47, 8:55-13:22, Figs. 2-15, claims 1, 7, 8, 14	Property Specification Language Reference Manual, Version 1.0, Jan 31, 2003, pp. 9, 11 SDT00000864-987 The IEEE Standard Dictionary of Electrical and Electronics Terms, 6th Ed. (1996) (convert) SDT00000754-763 The Illustrated Dictionary of Electronics, 7th Ed. (1997) (convert) SDT00000764-768 Dictionary of Information Technology, 3rd Ed. (2002) (convert) SDT00000790-795 Dictionary of Computing, 4th Ed. (2002) (convert) SDT00000803-809 Dictionary of Computing & Communications (2003) (convert) SDT00000815-819

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			Dictionary of Scientific and Technical Terms, 6th Ed. (2003) (convert) SDT00000820-824 Dictionary of Electrical & Computer Engineering (2004) (convert) SDT00000830-834 Specialist Computing Computer Jargon Dictionary and Thesaurus, 2nd Ed. (2006) (convert) SDT00000841-845 Dictionary of Computer and Internet Terms (Vol. 1) (2016) (convert) SDT00000857-863 Dictionary definitions for “property” identified above in connection with “property” Expert declaration from J. Berg who may opine that SDT’s proposed construction is supported by the intrinsic and extrinsic evidence. Mr. Berg may opine that Defendant’s proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			counter any positions taken by Defendant or Defendant's expert. Any extrinsic evidence introduced by Defendant.
"an assertion generating unit that automatically converts the property into an assertion description if the property is to be verified during assertion verification by reading the property generated by the property generating unit from the second storing unit" ('636 patent, claims 1, 7)	plain and ordinary meaning	Cols. 1:46-54, 4:39-62, 5:23-26, 5:40-47, 8:55-13:22, Figs. 2-15, claims 1, 7	Property Specification Language Reference Manual, Version 1.0, Jan 31, 2003, pp. 9, 11, 12 SDT00000864-987 Dictionary definitions of "convert" identified above in connection with "automatically converts..." term Dictionary definitions for "property" identified above in connection with "property" Dictionary definitions for "generate" and "synthesi(ze/zer/sis)" identified above in connection with "a property generating unit" Expert declaration from J. Berg who may opine that SDT's proposed construction is supported by the intrinsic and extrinsic evidence. Mr. Berg may opine that Defendant's proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr.

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant's expert. Any extrinsic evidence introduced by Defendant.
"an assertion generating step that reads the property generated at the property generating step from the storage and automatically converts the property into an assertion description if the property is to be verified during assertion verification" ('636 patent, claims 8, 14)	plain and ordinary meaning	Cols. 1:46-54, 4:39-62, 5:23-26, 5:40-47, 8:55-13:22, Figs. 2-15, claims 8, 14	Property Specification Language Reference Manual, Version 1.0, Jan 31, 2003, pp. 9, 11, 12 SDT00000864-987 Dictionary definitions of "convert" identified above in connection with "automatically converts..." term Dictionary definitions for "property" identified above in connection with "property" Dictionary definitions for "generate" and "synthesi(ze/zer/sis)" identified above in connection with "a property generating unit" Expert declaration from J. Berg who may opine that SDT's proposed construction is supported by the intrinsic and extrinsic evidence. Mr.

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			Berg may opine that Defendant's proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant's expert. Any extrinsic evidence introduced by Defendant.
"motion level" ('167 patent, claims 1, 3)	behavioral level	Cols. 1:45-47, 2:3-34, 3:19-51, claims 1, 3	Cadence's Petition for IPR, p. 23. Expert declaration from J. Berg who may opine that SDT's proposed construction is supported by the intrinsic and extrinsic evidence. Mr. Berg may opine that Defendant's proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant's expert.

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			Any extrinsic evidence introduced by Defendant.
“recognize a concept including register and clock synchronism particular to the hardware” (’167 patent, claims 1, 3)	plain and ordinary meaning	Cols. 1:36-62, 2:5-2:34, 3:19-67, 4:45-51, Figs. 1-5, claims 1, 3	E Expert declaration from J. Berg who may opine that SDT’s proposed construction is supported by the intrinsic and extrinsic evidence. Mr. Berg may opine that Defendant’s proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant’s expert. Any extrinsic evidence introduced by Defendant.
“a latency in each block representing an operation in a predetermined unit in the behavioral description” (’167 patent claims 1, 3)	a latency of each block, where each block represents an operation in a predetermined unit in the behavioral description	Cols. 2:1-38, 3:25-5:60, Figs. 2-5 claims 1, 3	Dictionary definitions for “block” identified below in connection with “block” Expert declaration from J. Berg who may opine that SDT’s proposed construction is supported by the intrinsic and extrinsic evidence. Mr. Berg may opine that Defendant’s proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant's expert. Defendant's Motion to Dismiss, SDT's Opposition to Defendant's Motion to Dismiss, including Declaration from J. Berg ISO Opposition; Defendant's Reply ISO Motion to Dismiss. Any extrinsic evidence introduced by Defendant.
"block" ('167 patent, claims 1-4)	plain and ordinary meaning	Cols. 2:1-38, 3:25-5:60, Figs. 2-5 claims 1-4	The IEEE Standard Dictionary of Electrical and Electronics Terms, 6th Ed. (1996) (block) SDT00000754-763 Microsoft Computer Dictionary, 4th Ed. (1999) (block) SDT00000769-774 Hargrave's Communications Dictionary (2001) (block) SDT00000775-779 Dictionary of Computer Science, Engineering, and Technology (2001) (block) SDT00000780-784

Claim Term	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			Microsoft Computer Dictionary, 5th Ed. (2002) (block) SDT00000796-802 Dictionary of Computer and Internet Terms (Vol. 1) (2016) (block) SDT00000857-863 Expert declaration from J. Berg who may opine that SDT's proposed construction is supported by the intrinsic and extrinsic evidence. Mr. Berg may opine that Defendant's proposed construction is unduly limiting, <i>e.g.</i>, it is limited to a preferred embodiment, or otherwise faulty. Mr. Berg may rely on any of the intrinsic and extrinsic evidence cited by either party. Mr. Berg may provide an additional rebuttal expert declaration to counter any positions taken by Defendant or Defendant's expert. Any extrinsic evidence introduced by Defendant.