

Christina N. Goodrich (SBN 261722)
christina.goodrich@klgates.com
Cassidy T. Young (SBN 342891)
cassidy.young@klgates.com
K&L Gates LLP
10100 Santa Monica Boulevard
Eighth Floor
Los Angeles, California 90067
Telephone: +1 310 552 5000
Facsimile: +1 310 552 5001

[Additional counsel on signature page]

**Attorneys for Plaintiff Entropic
Communications, LLC**

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS,
LLC,

Plaintiff,

v.

COX COMMUNICATIONS, INC., *et*
al.,

Defendants.

Case No. 2:23-cv-1049-JWH-KES
(Lead Case)

Case No. 2:23-cv-01050-JWH-KES
(Related Case)

**ENTROPIC COMMUNICATIONS,
LLC'S DISCLOSURE OF
PROPOSED CONSTRUCTIONS**

Hearing Date: July 16, 2024
Hearing Time: 10:00 a.m.
Courtroom: 9D

ENTROPIC COMMUNICATIONS,
LLC,

Plaintiff,

v.

COMCAST CORPORATION, *et al.*,

Defendants.

Comcast, Ex. 1039
Comcast v. Entropic
IPR2024-00430

ENTROPIC'S DISCLOSURE OF PROPOSED CONSTRUCTIONS

Pursuant to the Court’s August 21, 2023 Order (ECF No. 75), Plaintiff Entropic Communications, LLC (“Plaintiff” or “Entropic”) proposes the following constructions for the claim term, phrases, or clauses from U.S. Patent Nos. 8,223,775 (the “’775 Patent”), 8,284,690 (the “’690 Patent”), 8,792,008 (the “’008 Patent”), 9,210,362 (the “’362 Patent”), 9,825,826 (the “’826 Patent”), 10,135,682 (the “’682 Patent”), 11,381,866 (the “’866 Patent”), and 11,399,206 (the “’206 Patent”) that Entropic and Defendants Comcast Corporation, Comcast Cable Communications, LLC, and Comcast Cable Communications Management, LLC (collectively, “Comcast”) and Defendants Cox Communications, Inc., Coxcom, LLC, and Cox Communications California LLC (collectively, “Cox”) (together with Comcast, “Defendants”) identified on February 16, 2024.

Entropic’s proposed constructions are based on information that is currently available to Entropic. Entropic reserves the right to modify this disclosure should additional information become available. Further, Entropic reserves the right to supplement, amend, and/or modify this disclosure for any other reason to facilitate the preparation of the Joint Claim Construction and Prehearing Statement, and in light of arguments made or positions taken by Defendants as this case proceeds.

In view of the foregoing, Entropic proposes the following:

No.	Party Proposing	Term	Preliminary Proposed Construction
1.	Defendants	“content payload” (’690 patent, claim 1)	Plain and Ordinary Meaning
2.	Defendants	“cable modem termination system (CMTS)” (’682 Patent, claims 1, 3-5, 9)	Plain and Ordinary Meaning

No.	Party Proposing	Term	Preliminary Proposed Construction
3.	Defendants	“based at least in part on a worst-case SNR profile of said SNR related metrics corresponding to said one of said SNR related plurality of service groups” (’682 Patent, claim 1)	Plain and Ordinary Meaning Note: the correct claim language is: “based at least in part on a worst-case SNR profile of said SNR-related metrics corresponding to said one of said plurality of service groups”
4.	Defendants	“SNR-related metric” (’682 Patent, claim 1, 9)	Plain and Ordinary Meaning
5.	Entropic	“wherein the cable modem functions performed by the cable modem engine are completely partitioned from the home networking functions performed by the data networking engine” (’775 Patent, claim 18)	“wherein the cable modem engine and the data networking engine are not necessarily physically separate but are functionally separate such that the cable modem functions are performed only by the cable modem engine and the home networking functions are performed only by the data networking engine”
6.	Entropic	“network management messages” (’826 Patent, claim 1)	“messages which report on the network based on the measured characteristics”
7.	Entropic	“operable to” (’008 Patent, claim 1)	“configured to”
8.	Entropic	“probe” (’690 Patent, claim 1, 7, 8)	“a signal transmitted to a network node that the network node can compare to a reference signal having a known form in order to determine characteristics of the channel on which the signal was transmitted”

No.	Party Proposing	Term	Preliminary Proposed Construction
9.	Entropic	“probe request” (’690 Patent, claim 1, 7, 8)	“a request, sent by one network node to another network node, that specifies the form of a probe to be generated and transmitted”
10.	Entropic	[Order of the Steps] (’362 Patent, claim 11)	In Claim 11 of the ’362 Patent, the “digitizing . . .” step must be performed before the “selecting . . .” step, and the “selecting . . .” step must be performed before the “outputting . . .” step. No other order of steps is required.

Dated: March 15, 2024

K&L GATES LLP

By: /s/ Connor J. Meggs

Christina Goodrich (SBN 261722)
 Connor J. Meggs (SBN 336159)
 Cassidy T. Young (SBN 342891)
 Rachel Berman
K&L Gates, LLP
 10100 Santa Monica Boulevard,
 8th Floor
 Los Angeles, CA 90067
 Telephone: (310) 552-5000
 Fax: (310) 552-5001
 christina.goodrich@klgates.com
 cassidy.young@klgates.com
 connor.meggs@klgates.com

James A. Shimota (*pro hac vice*)
 Jason A. Engel (*pro hac vice*)
 Kyle M. Kantarek (*pro hac vice*)
 70 W. Madison Street, Ste 3300
 Chicago, Illinois 60602
 Telephone: (312) 807-4299
 Fax: (312) 827-8000
 jim.shimota@klgates.com
 jason.engel@klgates.com
 kyle.kantarek@klgates.com

Courtney A. Neufeld
 925 Fourth Avenue, Suite 2900
 Seattle, WA 98104
 courtney.neufeld@klgates.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Alan E. Littmann
Douglas J. Winnard
Michael T. Pieja
Xaviere N. Giroud
Kurt A. Holtzman
Jennifer M. Hartjes
Shu Zhang
**GOLDMAN ISMAIL TOMASELLI
BRENNAN AND BAUM LLP**
200 South Wacker Driver, 22nd Floor
Chicago, IL 60606
Telephone: (312) 681-6000
Fax: (312) 881-5191
alittman@goldmanismail.com
dwinnard@goldmanismail.com
mpieja@goldmanismail.com
xgiroud@goldmanismail.com
kholtzman@goldmanismail.com
jhartjes@goldmanismail.com
szhang@goldmanismail.com

*Attorneys for Plaintiff, Entropic
Communications, LLC*

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4
5

6

7
8

9

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

1 Mitchell G. Stockwell 2 Andrew N. Saul 3 Christopher S. Leah 4 Courtney S. Dabbieri 5 Michael J. Turton 6 Vaibhav P. Kadaba 7 1100 Peachtree Street, Suite 2800 8 Atlanta, GA 30309-4530 9 Telephone: 404-815-6214 10 mstockwell@kilpatricktownsend.com 11 asaul@kilpatricktownsend.com 12 cleah@kilpatricktownsend.com 13 cdabbieri@kilpatricktownsend.com 14 mturton@kilpatricktownsend.com 15 wkadaba@kilpatricktownsend.com 9 April Elizabeth Isaacson 10 2 Embarcadero Center, Suite 1900 11 San Francisco, CA 94111 12 Telephone: 415-273-8306 13 aisaacson@kilpatricktownsend.com 12 Rishi Gupta 13 Sarah Y Kamran 14 1801 Century Park East, Suite 2300 15 Los Angeles, CA 90067 16 Telephone: 310-248-3830 17 rgupta@kilpatricktownsend.com 18 skamran@kilpatricktownsend.com	and Cox Communications California LLC
---	--

☒ **BY ELECTRONIC SERVICE:** by transmitting a true copy of the foregoing document(s) to the e-mail addresses set forth as stated on the attached mailing list.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 15, 2024, at Los Angeles, California.

/s/ Connor J. Meggs

Connor J. Meggs