UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before the Honorable MaryJoan McNamara
Administrative Law Judge

In the Matter of **CERTAIN ELECTRONIC DEVICES, INCLUDING SMARTPHONES, COMPUTERS, TABLET COMPUTERS, AND COMPONENTS THEREOF**	**Inv. No. 337-TA-1373**

COMPLAINANTS' PROPOSED CONSTRUCTION OF DISPUTED CLAIM TERMS

Pursuant to the November 6, 2023 Order Adopting Procedural Schedule (Order No. 8), Complainants InterDigital, Inc., InterDigital VC Holdings, Inc., InterDigital Patent Holdings, Inc., and InterDigital Madison Patent Holdings SAS ("InterDigital") hereby provide the following constructions of disputed claim terms for U.S. Patent No. 8,674,859 ("the '859 patent"); U.S. Patent No. 8,737,933 ("the '933 patent); U.S. Patent No. 9,173,054 ("the '054 patent); U.S. Patent No. 9,674,556 ("the '556 patent); and U.S. Patent No. 10,025,877 ("the '877 patent").

The following constructions are based on Complainants' current knowledge and understanding relating to Respondent's allegations. Complainants provide the below constructions without prejudice to any of their rights. Complainants reserve the right to revise, supplement, expand, add, change, alter, amend, and/or otherwise modify the below constructions.

MICROSOFT CORP.
EXHIBIT 1270

Petitioner has added a romanette to page (i) and page number 12 to the last page. Otherwise, it leaves the original page numbering.

’859 Patent

Claim Term	Claim(s)	Proposed Construction
At least the following terms in the preamble are limiting: “stream,” “switching points,” and “current symbol”	Claim 10	The preamble is not limiting Alternatively, a stream is a stream of data. A switching point is a point in the stream at the level of which the probability model used to code the current symbol can be modified. A current symbol is a symbol that is currently being decoded.
Preamble of claim 10 - “arithmetic decoding method for symbols coded in the form of a stream, comprising the following steps applied at switching points distributed in said stream to decode a current symbol” (claim 10)	Claim 10	The preamble is not limiting. Alternatively, a stream is a stream of data. A switching point is a point in the stream at the level of which the probability model used to code the current symbol can be modified. A current symbol is a symbol that is currently being decoded.
“wherein subset comprises”	Claim 10	wherein said subset comprises

Claim Term	Claim(s)	Proposed Construction
"means for decoding from the stream … a probability model identifier'	Claim 15	Function: decoding from the stream . . . a probability model identifier The presumption under pre-AIA § 112, ¶ 6 is rebutted because the claim includes sufficient structure, material, or acts corresponding to the function. Alternatively, at least Figure 13 discloses a decoding device, and equivalents thereof; at least Figures 3, 4, 6, 7, 10, and 11 disclose an algorithm, and equivalents thereof. In addition, a corresponding algorithm/structure can also be found in the following passages: 9:55-67, 11:11-34, 13:25-52, and equivalents thereof.
"means for decoding from the stream, at switching points distributed in said stream to decode a current symbol, for said current symbol, a probability model identifier"	Claim 15	Function: decoding from the stream . . . a probability model identifier The presumption under pre-AIA § 112, ¶ 6 is rebutted because the claim includes sufficient structure, material, or acts corresponding to the function. Alternatively, at least Figure 13 discloses a decoding device, and equivalents thereof; at least Figures 3, 4, 6, 7, 10, and 11 disclose an algorithm, and equivalents thereof. In addition, a corresponding algorithm/structure can also be found in the following passages: 9:55-67, 11:11-34, 13:25-52, and equivalents thereof.

Claim Term	Claim(s)	Proposed Construction
"means for selecting … a probability model"	Claim 15	Function: selecting . . . a probability model The presumption under pre-AIA § 112, ¶ 6 is rebutted because the claim includes sufficient structure, material, or acts corresponding to the function. Alternatively, at least Figure 13 discloses a decoding device, and equivalents thereof; at least Figures 3, 5, 6, 7, 10, and 11 disclose an algorithm, and equivalents thereof. In addition, a corresponding algorithm/structure can also be found in the following passages: 5:10-14, 6:34-40, 7:27-49, 11:35-36, 13:25-52, and equivalents thereof.
"means for selecting using said probability model identifier a probability model in a set comprising a current probability model defined from symbols coded previous to the current symbol and a subset of probability models wherein subset comprises at least one probability model defined by default"	Claim 15	Function: selecting . . . a probability model The presumption under pre-AIA § 112, ¶ 6 is rebutted because the claim includes sufficient structure, material, or acts corresponding to the function. Alternatively, at least Figure 13 discloses a decoding device, and equivalents thereof; at least Figures 3, 5, 6, 7, 10, and 11 disclose an algorithm, and equivalents thereof. In addition, a corresponding algorithm/structure can also be found in the following passages: 5:10-14, 6:34-40, 7:27-49, 11:35-36, 13:25-52, and equivalents thereof.

Claim Term	Claim(s)	Proposed Construction
"means for selecting using said probability model identifier a probability model … defined by default"	Claim 15	Function: selecting. . . a probability model The presumption under pre-AIA § 112, ¶ 6 is rebutted because the claim includes sufficient structure, material, or acts corresponding to the function. Alternatively, at least Figure 13 discloses a decoding device, and equivalents thereof; at least Figures 3, 5, 6, 7, 10, and 11 disclose an algorithm, and equivalents thereof. In addition, a corresponding algorithm/structure can also be found in the following passages: 5:10-14, 6:34-40, 7:27-49, 11:35-36, 13:25-52, and equivalents thereof..
"wherein subset comprises"	Claim 15	"wherein said subset comprises"

Claim Term	Claim(s)	Proposed Construction
"means for adding in said subset said current probability model"	Claim 15	Function: adding in said subset said current probability model The presumption under pre-AIA § 112, ¶ 6 is rebutted because the claim includes sufficient structure, material, or acts corresponding to the function. Alternatively, at least Figure 13 discloses a decoding device, and equivalents thereof; at least Figures 5, 8, and 11 disclose an algorithm, and equivalents thereof. In addition, a corresponding algorithm/structure can also be found in the following passages: 8:8-50, 10:14-17, 11:37-43, 13:25-52, and equivalents thereof.
"means for adding in said subset said current probability model, the selected probability model becoming the current probability model"	Claim 15	Function: adding in said subset said current probability model The presumption under pre-AIA § 112, ¶ 6 is rebutted because the claim includes sufficient structure, material, or acts corresponding to the function. Alternatively, at least Figure 13 discloses a decoding device, and equivalents thereof; at least Figures 5, 8, and 11 disclose an algorithm, and equivalents thereof. In addition, a corresponding algorithm/structure can also be found in the following passages: 8:8-50, 10:14-17, 11:37-43, 13:25-52, and equivalents thereof.

Claim Term	Claim(s)	Proposed Construction
"means for decoding said current symbol with said current probability model"	Claim 15	Function: decoding said current symbol The presumption under pre-AIA § 112, ¶ 6 is rebutted because the claim includes sufficient structure, material, or acts corresponding to the function. Alternatively, at least Figure 13 discloses a decoding device, and equivalents thereof; at least Figures 8 and 11 disclose an algorithm, and equivalents thereof. In addition, a corresponding algorithm/structure can also be found in the following passages: 1:23-33, 11:55-57, 13:25-52, and equivalents thereof.
"means for updating said current probability model according to the decoding of said current symbol"	Claim 15	Function: updating said current probability model The presumption under pre-AIA § 112, ¶ 6 is rebutted because the claim includes sufficient structure, material, or acts corresponding to the function. Alternatively, at least Figure 13 discloses a decoding device, and equivalents thereof; at least Figure 11 discloses an algorithm, and equivalents thereof. In addition, a corresponding algorithm/structure can also be found in the following passages: 1:23-33, 1:47-54, 10:20-22, 11:30-34, 11:56-61, 13:25-52, and equivalents thereof.

<u>'877 Patent</u>

Claim Term	Claim(s)	Proposed Construction
"circuit configured to"	Claims 7, 8	The preamble is not limiting

’556 Patent

Claim Term	Claim(s)	Proposed Construction
“sparse denoising filter”	Claims 1, 5	A filter that reduces noise in a sparse signal
“adaptive sparse de-noising filter”	Claims 1, 5	A sparse denoising filter that can adapt filtering according to the image region

’054 and 933 Patents

Claim Term	Claim(s)	Proposed Construction
“circuitry configured to process, from a touch display, an input to select media in an application”	’054 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6
“a processor configured to process a touchscreen input to select a media element”	’933 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6
“processor configured to process”	’933 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6
“circuitry configured to process”	’054 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6
“circuitry configured to detect, by the WTRU over bluetooth, another WTRU” “circuitry configured to detect, using Bluetooth, a plurality of WTRUs in proximity to the WTRU”	’054 Patent, Claim 23 ’933 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6
“circuitry configured to detect”	’933 Patent, Claim 23 & ’054 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6

Claim Term	Claim(s)	Proposed Construction
"the circuitry further configured to process another input from the touch display to select the another WTRU" "the processor is further configured to process another touchscreen input to select a WTRU of the plurality of WTRUs"	'054 Patent, Claim 23 '933 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6
"circuitry configured to send, by the WTRU to the selected another WTRU, a message to transfer the selected media" "circuitry configured to send a message to transfer the selected media element to the selected WTRU"	'054 Patent, Claim 23 '933 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6
"circuitry configured to send"	'933 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6
"circuitry configured to receive, by the WTRU, an acceptance to transfer the selected media" "circuitry configured to receive an acceptance to transfer the selected media element to the selected WTRU"	'054 Patent, Claim 23 '933 patent claim 23	Not subject to Pre-AIA § 112, ¶ 6
"circuitry configured to receive"	'933 Patent, Claim 23 & '054 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6

Claim Term	Claim(s)	Proposed Construction
"circuitry configured to transfer, by the WTRU to the selected another WTRU over WiFi, the selected media" "circuitry configured to transfer, using a WiFi communication, the selected media element to the selected WTRU."	'054 Patent, Claim 23 '933 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6
"circuitry configured to transfer"	'933 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6
"circuitry configured to display"	'054 Patent, Claim 23	Not subject to Pre-AIA § 112, ¶ 6

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served via email on all counsel of record, on November 30, 2023.

s/ Adam D. Swain
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