

WACO DIVISION

Plaintiff,

V.

Defendants.

Case No. 6:22-cv-105-ADA

DEFENDANTS' PRELIMINARY CLAIM CONSTRUCTIONS

Pursuant to the Scheduling Order (Dkt. 43) and the Standing Order Governing Proceedings for Patent Cases in the Western District of Texas, Defendants Intel Corporation (“Intel”) and Dell Inc. and Dell Technologies Inc. (collectively, “Dell,” and together with Intel, “Defendants”) hereby provide the following Preliminary Proposed Claim Constructions regarding United States Patent Nos. 10,510,842 (“the ’842 Patent”), 8,106,481 (“the ’481 Patent”), 11,121,222 (“the ’222 Patent”), 8,421,195 (“the ’195 Patent”), 9,190,502 (“the ’502 Patent”), and 11,316,014 (“the ’014 Patent”) (collectively, “the Patents-in-Suit”) that are asserted by Greenthread, LLC (“Plaintiff” or “Greenthread”) for terms that may require construction by the Court, for purposes of this litigation only.

Term	Patent/Claim	Preliminary Proposed Construction
“To aid the movement of minority carriers from ... to ...” “To aid carrier movement from ... [to/towards] ...”	’195: 1 ’502: 7 ’842: 1, 9 ’481: 1, 20 ’222: 1, 21, 39, 41, 42, 44 ’014: 1, 21	Indefinite Alternative construction: “To sweep the [minority] carriers vertically downward from ... [to/towards] ...”
“surface layer” / “an active region . . . disposed on one surface of said surface layer” / “a single drift layer disposed between the other surface of said surface layer and [said/the] substrate”	’195: 1 ’502: 7 ’222: 44	Indefinite
“active region”	’195: 1 ’502: 7 ’842: 1, 5–7, 9, 13–15, 17–18 ’481: 1, 4–6, 8–9, 13, 20, 24–27 ’222: 1, 4–6, 8, 13, 20–21, 25–28, 35, 38–42, 44 ’014: 1, 4–6, 8–9, 13, 20–21, 25–28	“A region that forms the current path of one or more devices when those devices are active, i.e., the source, drain and channel regions of one or more CMOS transistors, or the emitter, base and collector of one or more bipolar transistors.”
“well region”	’195: 1 ’502: 7 ’481: 1, 20 ’222: 1, 21, 40, 44 ’014: 1, 21	“A well, whether formed by single or multiple implants. Portions of a well are not well regions.”
“said [drift layer further/well region] having a [first/second] static unidirectional electric drift field” “said [drift layer/well region] having a graded concentration of dopants generating a [first/second]	’195: 1 ’502: 7 ’222: 44	“said [drift layer further/well region] having a [first/second] static electric drift field that is unidirectional over the [drift layer/well region]”

Term	Patent/Claim	Preliminary Proposed Construction
static unidirectional electric drift field”		
“substrate”	’195: 1 ’502: 7 ’842: 1, 2, 4, 9–10, 12, 17 ’481: 1–3, 8, 15, 20, 22–23, 32 ’222: 1–3, 8, 15, 21, 23–24, 33, 39–42, 44 ’014: 1–3, 8, 15, 21, 23–24	“the initial material within which or on which the semiconductor device is fabricated”
“active region ... within which transistors can be formed”	’842: 1, 9 ’481: 1, 20 ’222: 1, 21, 39, 41, 42 ’014: 1, 21	Indefinite
“a substrate of a first doping type”	’842: 1, 9 ’481: 1, 20 ’222: 1, 21, 39, 41, 42 ’014: 1, 21	“a substrate with either p-type doping or n-type doping”
“disposed adjacent”	’842: 1, 9 ’481: 1, 20 ’222: 1, 21, 39, 41, 42 ’014: 1, 21	Plain and Ordinary Meaning
“isolation region”	’842: 7, 15 ’481: 6, 26 ’222: 6, 27 ’014: 6, 27	Plain and Ordinary Meaning

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served via email on the Plaintiff's counsel of record on September 19, 2022.

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