UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

GREENTHREAD, LLC, Plaintiff, v. INTEL CORPORATION, DELL INC., AND DELL TECHNOLOGIES INC., Defendants.	Civil Action No. 6:22-cv-00105-ADA JURY TRIAL DEMANDED

GREENTHREAD'S PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the Court's Standing Order Governing Proceedings (OGP) 4.1 – Patent Cases ("OGP"), (Dkt. 35) and the Scheduling Order (Dkt. 43), Greenthread proposes the following claim constructions for the claim terms identified by Intel Corporation, Dell Inc., and Dell Technologies Inc. (collectively, "Defendants") and by Greenthread. Greenthread reserves the right to amend or clarify its proposed constructions to rebut positions taken by Defendants and/or narrow the issues to be decided by the Court.

#	Claim(s)	Terms	Identified By	Greenthread's Proposed Construction
1	US 10,510,842:1, 9 US 10,734,481:1, 20 US 11,121,222:1, 21, 39, 41, 42 US 11,316,014:1, 21	"a substrate of a first doping type"	Greenthread	a substrate with either p-type doping or n-type doping
2	US 10,510,842:1, 9 US 10,734,481:1, 20 US 11,121,222:1, 21, 39, 41, 42 US 11,316,014:1, 21	"disposed adjacent"	Greenthread	next to or close to
3	US 10,510,842:7, 15 US 10,734,481:6, 26 US 11,121,222:6, 27 US 11,316,014:6, 27	"isolation region"	Greenthread	region that electrically isolates
4	US 8,421,195:1 US 9,190,502:7 US 10,510,842:1, 9 US 10,734,481:1, 20 US 11,121,222:1, 21, 39, 41, 42, 44 US 11,316,014:1, 21	"To aid the movement of minority carriers from … to …" / "To aid carrier movement from … [to/towards] …"	Dell and Intel	plain meaning
5	US 8,421,195:1 US 9,190,502:7 US 11,121,222: 44	"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"	Dell and Intel	plain meaning
6	US 8,421,195:1 US 9,190,502:7 US 10,510,842:1, 9 US 10,734,481:1, 20 US 11,121,222:1, 21, 39, 41, 42, 44 US 11,316,014:1, 21	"active region"	Dell and Intel	plain meaning
7	US 8,421,195:1 US 9,190,502:7 US 10,734,481:1, 20	"well region"	Dell and Intel	plain meaning

	US 11,121,222:1, 21, 39, 41, 42, 44 US 11,316,014:1, 21			
8	US 8,421,195:1 US 9,190,502:7 US 11,121,222: 44	"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] static unidirectional electric drift field"	Dell and Intel	plain meaning
9	US 8,421,195:1 US 9,190,502:7 US 10,510,842:1, 9 US 10,734,481:1, 20 US 11,121,222:1, 21, 39, 41, 42, 44 US 11,316,014:1, 21	"substrate"	Dell and Intel	plain meaning
10	US 10,510,842:1, 9 US 10,734,481:1, 20 US 11,121,222:1, 21, 39, 41, 42 US 11,316,014:1, 21	"active region … within which transistors can be formed"	Dell and Intel	plain meaning

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on Defendants' counsel of record via email on September 19, 2022.

/s/ Arvind Jairam
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