

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

Dated: September 19, 2022

Gregory S. Arovas (*Pro Hac Vice*)
Robert A. Appleby (*Pro Hac Vice*)
Todd M. Friedman (*Pro Hac Vice*)
Leslie M. Schmidt (*Pro Hac Vice*)
Jon R. Carter (*Pro Hac Vice*)
Christopher DeCoro (*Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Tel: (212) 446-4800
Fax: (212) 446-4900
Email: greg.arovas@kirkland.com
Email: robert.appleby.com
Email: todd.friedman@kirkland.com
Email: leslie.schmidt@kirkland.com
Email: jon.carter@kirkland.com
Email: christopher.decoro@kirkland.com

Nyika O. Strickland (*Pro Hac Vice*)
KIRKLAND & ELLIS LLP
300 North LaSalle Street
Chicago, IL 60654
Tel: (312) 862-2000
Fax: (202) 862-2200
Email: nyika.strickland@kirkland.com

Abigail Lauer Litow (*Pro Hac Vice*)
John Rhine (*Pro Hac Vice*)
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: (202) 879-5000
Fax: (202) 879-5200
Email: abigail.litow@kirkland.com
Email: john.rhine@kirkland.com

Bao Nguyen (*Pro Hac Vice*)
KIRKLAND & ELLIS LLP
555 California Street 27th Floor
San Francisco, CA 94104
Tel: (415) 439-1400
Fax: (415) 439-1500
Email: bao.nguyen@kirkland.com

Respectfully submitted,

/s/ Robert A. Appleby

J. Stephen Ravel
Texas State Bar No. 16584975
KELLY HART & HALLMAN LLP
303 Colorado, Suite 2000
Austin, Texas 78701
Tel: (512) 495-6429
Email: steve.ravel@kellyhart.com

*Attorneys for Defendants Intel Corporation;
Dell Inc.; and Dell Technologies Inc.*

Lewis Popovski (Pro Hac Vice)
Abhishek Bapna (Pro Hac Vice)
Ryan J. Sheehan (Pro Hac Vice)
George S. Soussou (Pro Hac Vice)
PATTERSON BELKNAP WEBB &
TYLER LLP
1133 Avenue of the Americas
New York, NY 10036
Telephone: (212) 336-2000
Facsimile: (212) 336-2222
lpopovski@pbwt.com
abapna@pbwt.com
rsheehan@pbwt.com
gsoussou@pbwt.com

Michael J. Newton (TX Bar No.
24003844)
Brady Cox (TX Bar No. 24074084)
ALSTON & BIRD LLP
2200 Ross Avenue, Suite 2300
Dallas, Texas 75201
Phone: (214) 922-3400
Fax: (214) 922-3899
mike.newton@alston.com
brady.cox@alston.com

Lauren N. Griffin (NC Bar No. 54766)
ALSTON & BIRD LLP
One South at The Plaza
101 S Tryon St, Suite 4000
Charlotte, NC 28280
Telephone: 704.444.1059
Facsimile: 704.444.1111
lauren.griffin@alston.com

Paige Arnette Amstutz
Texas State Bar No. 00796136
SCOTT DOUGLASS & McCONNICO
LLP
303 Colorado Street, Suite 2400
Austin, Texas 78701
Telephone: (512) 495-6300
Email: pamstutz@scottdoug.com

*Attorneys for Defendants Dell Inc.; and
Dell Technologies Inc.*

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.

/s/Jon R. Carter
Jon R. Carter