

Subject: MPS v. Reed/Nengda, Nos. 23-1155, 24-165, 24-166 (D. Del.) - MPS claim terms for construction

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Counsel,

Pursuant to the Consolidated Scheduling Order, D.I. 81, Plaintiff Monolithic Power Systems, Inc. ("MPS") hereby provides its list of claims terms/phrases that MPS believes need construction. This identification addresses:

- the claims of U.S. Patent No. 9,590,608 asserted in MPS's First Amended Complaints in Monolithic Power Systems Inc. v. Reed Semiconductor Corp., No. 23-1155 (D. Del.) ("Reed I"), D.I. 8., and Monolithic Power Systems Inc. v. Nengda Microelectronics (Shenzhen) Co., Ltd. et al, No. 24-166 (D. Del.) ("Nengda"), D.I. 9; and
- the claims of U.S. Patent No. 9,041,377 asserted in MPS's Complaint in Monolithic Power Systems Inc. v. Reed Semiconductor Corp., No. 24-165 (D. Del.) ("Reed II"), D.I. 1, and in MPS's First Amended Complaint in Nengda, D.I.9.

For the '608 Patent, MPS identifies the following terms for which MPS seeks to offer a construction:

Term/phrase	Claim(s)
"difference signal"	1, 11
"when the feedback signal is smaller than"	1, 11
"based on the difference signal so as to charge"	1, 11
"bootstrap refresh threshold"	1, 2, 11, 12, 16

MPS contends that all other terms of the '608 patent, as well as all terms of the '377 Patent, do not require a separate construction, and should be given their plain and ordinary meaning.

MPS provides this list based on information currently available to MPS, including, but not limited to, its current knowledge, its current understanding of the '608 and '377 Patents, and Defendants' Invalidity Contentions to date. MPS has not completed its investigation of the facts relating to this case and discovery in this action is ongoing. Accordingly, MPS reserves the right to supplement or modify its list of proposed terms

for construction, including in response to Plaintiffs' identification of proposed claim terms for construction. MPS also reserves the right to propose constructions for any terms/phrases Reed seeks to construe, or to oppose construction of such terms.

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