

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

EMPIRE TECHNOLOGY DEVELOPMENT
LLC,

Plaintiff,

V.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

NO. 2:23-CV-00427-JRG-RSP

PRELIMINARY CONSTRUCTIONS

ID	Disputed Term	Preliminary Construction
A	“wherein the controller is configured to receive a control signal and, in accordance with the control signal, to select between a multiple-input multiple- output (MIMO) mode . . . and a single-input multiple-output (SIMO) mode . . .” (’120 Patent, Claims 25, 29)	“in accordance with”: “as indicated by”
B	“a power consumption of the first and second circuitry” (’120 Patent, Claims 25, 29)	Plain and ordinary meaning [NOTE: excludes “signal energy emitted by the antennas”]
C	“an idle power consumption of the mobile station” (’120 Patent, Claim 25)	“power consumed by the first and second circuitry when the mobile station is powered on, enabled for transmitting, but waiting to send”
D	“pilot symbol” (’331 Patent, Claims 1, 5)	“symbol that is known to the transmitter and receiver”

ID	Disputed Term	Preliminary Construction
E	“a channel matrix of the communications channel” (‘331 Patent, Claims 1, 5)	“a matrix of data representing the operation of the communications channel on the transmitted data symbols”
F	“replicated data” (‘331 Patent, Claims 1–5)	Plain and ordinary meaning [NOTE: excludes multiple instances of data that occur by happenstance]