UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before The Honorable Monica Bhattacharyya
Administrative Law Judge

In the Matter of **CERTAIN ELECTRONIC COMPUTING DEVICES, AND COMPONENTS AND MODULES THEREOF**	**Investigation No. 337-TA-1387**

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Ground Rule 6.1 and Order No. 7, Complainant Telefonaktiebolaget LM Ericsson ("Ericsson" or "Complainant"), Respondents Lenovo (United States) Inc., Lenovo (Shanghai) Electronics Technology Co., Ltd., Lenovo Beijing Co., Ltd., Lenovo PC HK Limited, and Lenovo Information Products (Shenzhen) Co., Ltd. (collectively, "Lenovo"), (collectively, "The Parties") hereby submit this Joint Claim Construction Chart.

Further, pursuant to Ground Rule 6.1, the Parties identify the following six (6) terms that the Parties believe are amenable to resolution in the Markman hearing process and likely to be significant to resolving the Parties' dispute. The Parties' respective proposed constructions for these terms are set forth below in Section III.

No.	Patent	Term	Claim(s)
1	U.S. Patent No. 10,708,618	"circuit [configured to]" Proposed by: Respondents	12-16
2	U.S. Patent No. 9,641,841	determin[ing] how many pixels in [a/said] first line of pixels in said block to fil[t]er relative to said block boundary based on [a comparison of] said first filter decision value to a first threshold value	1, 5, 16

INTEL-1026
9,641,841

No.	Patent	Term	Claim(s)
		Proposed by: Respondents	
3	U.S. Patent No. 9,641,841	determin[ing] how many pixels in [a/said] corresponding first line of pixels in said neighboring block to filter relative to said block boundary based on [a comparison of] said second filter decision value to a second threshold value Proposed by: Respondents	1, 5, 16
4	U.S. Patent No. 9,641,841	calculat[ing] said first decision value as: $\|p2_0-2p1_0+p0_0\|+\|p2_3-2p1_3+p0_3\|$" Proposed by: Respondents	2, 6
5	U.S. Patent No. 9,641,841	"calculat[ing] said second filter decision value as: $\|q2_0-2q1_0+q0_0\|+\|q2_3-2q1_3+q0_3\|$ Proposed by: Respondents	2, 6
6	U.S. Patent No. 10,142,659	"A user equipment comprising a deblocking filter unit for reducing blocking artifacts at a block boundary between a block of multiple pixels and a neighboring block of multiple pixels in a video frame, wherein the deblocking filter unit comprises:" Proposed by: Complainant	10

I. Agreed Terms

a. U.S. Patent No. 10,708,618

Term/Phrase	Claim(s)	Agreed Construction
"configured to" Proposed by: Respondents	8, 12, 14, 15	Plain and ordinary meaning, which requires more than mere capability
"A decoder configured to decode an encoded representation of a picture in a video stream of multiple pictures, the decoder comprising" Proposed by: Complainant	8, 12	Preamble is limiting, plain and ordinary meaning

b. U.S. Patent No. 10,708,613

Term/Phrase	Claim(s)	Agreed Construction
"configured to" Proposed by: Respondents	1-3	Plain and ordinary meaning, which requires more than mere capability
"A decoder for managing reference pictures to be used for decoding an encoded representation of a picture of a video sequence, the decoder configured to:" Proposed by: Complainant	1	Preamble is limiting

c. U.S. Patent No. 9,641,841

Term/Phrase	Claim(s)	Agreed Construction
"configured to" Proposed by: Respondents	5-13	Plain and ordinary meaning, which requires more than mere capability
"A non-transitory computer-readable medium comprising, stored thereupon, a computer program for filtering control of a block of multiple pixels in a video frame, each pixel having a respective pixel value, said computer program comprising code means which when run on a computer causes the computer to:" Proposed by: Respondents	16	Preamble is limiting

d. U.S. Patent No. 10,142,659

Term/Phrase	Claim(s)	Agreed Construction
"configured to" Proposed by: Respondents	10-16	Plain and ordinary meaning, which requires more than mere capability
"calculating a second offset to be based on (p2+p0=2xpl+2xΔ)/4" Proposed by: Complainant	4	"calculating a second offset to be based on (p2+p0-2xpl+2xΔ)/4"

II. No Dispute

a. U.S. Patent No. 10,708,613

There are no claim construction disputes concerning the ’613 Patent.

III. Disputed Terms

a. U.S. Patent No. 10,708,618

No.	Term	Claim(s)	Complainant's Proposed Construction	Respondents' Proposed Construction
1	"circuit [configured to]" Proposed by: Respondents	12-16	Plain and ordinary meaning of "arrangement of electrical components [configured to]."	"arrangement of electrical components implemented in hardware, and not effectuated by a processor, [configured to]."

b. U.S. Patent No. 9,641,841

No.	Term	Claim(s)	Complainant's Proposed Construction	Respondents' Proposed Construction
2	determin[ing] how many pixels in [a/said] first line of pixels in said block to fil[t]er relative to said block boundary based on [a comparison of] said first filter decision value to a first threshold value Proposed by: Respondents	1, 5, 16	Plain and ordinary meaning	"determin[ing] how many pixels in [a/said] first line of pixels in said block to fil[t]er relative to said block boundary based on [a comparison of] said first filter decision value [to a first threshold value], wherein determining how many pixels in said first line of pixels in said block has no mathematical basis in (no relationship with) the pixel values of pixels in said neighboring block . . ."
3	determin[ing] how many pixels in [a/said] corresponding first line of pixels in said neighboring block to filter relative to said block boundary based on [a comparison of] said second filter decision	1, 5, 16	Plain and ordinary meaning	"determin[ing] how many pixels in said corresponding first line of pixels in said neighboring block to filter relative to said block boundary based on [a comparison of] said second filter decision value [to a second threshold value], wherein determining how many pixels in said corresponding first line of pixels in said

No.	Term	Claim(s)	Complainant's Proposed Construction	Respondents' Proposed Construction
	value to a second threshold value Proposed by: Respondents			neighboring block has no mathematical basis in (no relationship with) the pixel values of pixels in said block"
4	calculat[ing] said first decision value as: $\|p2_0-2p1_0+p0_0\|+\|p2_3-2p1_3+p0_3\|$" Proposed by: Respondents	2, 6	Not indefinite, plain and ordinary meaning	Indefinite
5	"calculat[ing] said second filter decision value as: $\|q2_0-2q1_0+q0_0\|+\|q2_3-2q1_3+q0_3\|$ Proposed by: Respondents	2, 6	Not indefinite, plain and ordinary meaning	Indefinite

c. U.S. Patent No. 10,142,659

No.	Term	Claim(s)	Complainant's Proposed Construction	Respondents' Proposed Construction
6	"A user equipment comprising a deblocking filter unit for reducing blocking artifacts at a block boundary between a block of multiple pixels and a neighboring block of multiple pixels in a video frame, wherein the	10	Preamble is limiting, plain and ordinary meaning	Preamble is limiting as to "a deblocking filter unit for reducing blocking artifacts at a block boundary between a block of multiple pixels and a neighboring block of multiple pixels in a video frame, wherein the deblocking filter unit comprises:"

No.	Term	Claim(s)	Complainant's Proposed Construction	Respondents' Proposed Construction
	deblocking filter unit comprises:" Proposed by: Complainant			

Date: May 7, 2024

Respectfully submitted,

/s/ Adam D. Swain

Adam D. Swain
Alston & Bird LLP
950 F Street NW
Washington, DC 20004
Telephone: (202) 239-3300
Facsimile: (202) 239-3333
Adam.swain@alston.com

John D. Haynes
Shri Abhyankar
David S. Frist
Katherine M. Donald
Shawn Gannon
Sloane Kyrazis
Alston & Bird LLP
1201 West Peachtree Street, Suite 4900
Atlanta, GA 30309
Telephone: (404) 881-7000
Facsimile: (404) 881-7777
John.haynes@alston.com
Shri.abhyankar@alston.com
David.frist@alston.com
Katie.donald@alston.com
Sloane.kyrazis@alston.com
Shawn.gannon@alston.com

Karlee N. Wroblewski
Alston & Bird LLP
Vantage South End
1120 South Tryon Street
Suite 300
Charlotte, NC 28203-6818
Telephone: 704-444-1000
Facsimile: 704-444-1111
Karlee.wroblewski@alston.com

Ryan Koppelman
Alston & Bird LLP
350 South Grand Avenue
51st Floor
Los Angeles, CA 90071
Telephone: 213-576-1009
Facsimile: 213-576-1100

ryan.koppelman@alston.com

Theodore Stevenson
Alston & Bird LLP
2200 Ross Avenue, Suite 2300
Dallas, TX 75201
Telephone: 214-922-3400
Facsimile: 214-922-3899
ted.stevenson@alston.com

Steven M. Anzalone
Gary Rinkerman
FISHERBROYLES, LLP
1200 G Street N.W., Suite 800
Washington, D.C. 20005
Telephone: (301) 968-0800
Telephone: (202) 321-9179

Michael M. Murray
FISHERBROYLES, LLP
445 Park Avenue, Ninth Floor
New York, NY 10022
Telephone: (203) 542-5711

Kevin D. Jablonski
FISHERBROYLES, LLP
701 Fifth Avenue, Suite 4200
Seattle, WA 98104
Telephone: (206) 235-8125

Nicholas Mathews
nmathews@McKoolSmith.com
Alexander J. Chern
achern@McKoolSmith.com
Casey L. Shomaker
cshomaker@McKoolSmith.com
MCKOOL SMITH, P.C.
300 Crescent Court Suite 1200
Dallas, TX 75201
Telephone: (214) 978-4000
Telecopier: (214) 978-4044

Kevin P. Hess
khess@McKoolSmith.com
R. Mitch Verboncoeur
mverboncoeur@McKoolSmith.com

MCKOOL SMITH, P.C.
303 Colorado Street Suite 2100
Austin, TX 78701
Telephone: (512) 692-8700
Telecopier: (512) 692-8744

Joshua J. Newcomer
jnewcomer@McKoolSmith.com
Blake H. Bailey
bbailey@mckoolsmith.com
MCKOOL SMITH, P.C.
600 Travis Street, Suite 7000
Houston, TX 77002
Telephone: (713) 485-7316
Telecopier: (713) 485-734

Counsel for Complainant
Telefonaktiebolaget LM Ericsson

/s/ Thomas Garten
Brian R. Nester
Maureen F. Browne
Daniel J. Farnoly
Cody J. Reeves
Scott C. Burger
Brian T. Reiser
COVINGTON & BURLING LLP
One CityCenter, 850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-6000

Nitin Subhedar
Alice J. Ahn
Thomas E. Garten
COVINGTON & BURLING LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
Telephone: (415) 591-6000

Anupam Sharma
COVINGTON & BURLING LLP
3000 El Camino Real
5 Palo Alto Square, 10th Floor
Palo Alto, CA 94306-2112

Telephone: (650) 632-4700

Todd M. Friedman, P.C.
Leslie M. Schmidt
Kirkland & Ellis LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

Michael A. Pearson
Abigail Lauer Litow
Kirkland & Ellis LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: (202) 389-5000
Facsimile: (202) 389-5200

Nikhil R. Krishnan
Kirkland & Ellis LLP
300 N La Salle Dr.
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

Counsel for Respondents Lenovo (United States) Inc.; Lenovo (Shanghai) Electronics Technology Co. Ltd.; Lenovo Beijing, Ltd.; Lenovo PC HK Limited; and Lenovo Information Products (Shenzhen) Co. Ltd.

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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2024, copies of the foregoing were filed with and served upon the following as indicated:

The Honorable Lisa R. Barton Secretary to the Commission **U.S. INTERNATIONAL TRADE COMMISSION** 500 E Street, SW, Room 112 Washington, DC 20436	☐ Via First Class Mail ☐ Via Courier (UPS) ☐ Via Hand Delivery ☐ Via Email ☒ Via EDIS
The Honorable Monica Bhattacharyya Administrative Law Judge **U.S. INTERNATIONAL TRADE COMMISSION** 500 E Street, S.W. Room 317 Washington, D.C. 20436 Bhattacharyya337@usitc.gov	☐ Via First Class Mail ☐ Via Courier (UPS) ☐ Via Hand Delivery ☒ Via Email
Monisha Deka, Esq. Office of Unfair Import Investigations **U.S. INTERNATIONAL TRADE COMMISSION** 500 E Street, S.W. Washington, D.C. 20436 Monisha.Deka@usitc.gov	☐ Via First Class Mail ☐ Via Courier (UPS) ☐ Via Hand Delivery ☒ Via Email

COUNSEL FOR RESPONDENTS LENOVO (UNITED STATES) INC.; LENOVO (SHANGHAI) ELECTRONICS TECHNOLOGY CO., LTD.; LENOVO BEIJING CO., LIMITED.; LENOVO PC HK LIMITED; AND LENOVO INFORMATION PRODUCTS (SHENZHEN) CO., LTD.:	
Thomas E. Garten **COVINGTON & BURLING LLP** Salesforce Tower 415 Mission Street San Francisco, CA 94105-2533 tgarten@cov.com; Lenovo-1387-Cov@cov.com	☐ Via First Class Mail ☐ Via Courier (UPS) ☐ Via Hand Delivery ☒ Via Email
Todd M. Friedman, P.C. **Kirkland & Ellis LLP** 601 Lexington Avenue New York, NY 10022 Lenovo_Ericsson_1387_Service@kirkland.com	☐ Via First Class Mail ☐ Via Courier (UPS) ☐ Via Hand Delivery ☒ Via Email
Sudip Kundu **DTO Law** 307 5th Avenue, 12th Floor New York, NY 1001 skundu@dtolaw.com	☐ Via First Class Mail ☐ Via Courier (UPS) ☐ Via Hand Delivery ☒ Via Email
COUNSEL FOR RESPONDENT LENOVO GROUP LIMITED:	
Sudip Kundu **DTO Law** 307 5th Avenue, 12th Floor New York, NY 1001 skundu@dtolaw.com	☐ Via First Class Mail ☐ Via Courier (UPS) ☐ Via Hand Delivery ☒ Via Email

/s/ Bilal Iddinn
Bilal Iddinn
ITC Litigation Paralegal
ALSTON & BIRD
950 F Street, NW
Washington, DC 20004
Telephone: 202-239-3098
E-Mail: bilal.iddinn@alston.com