

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

**Before the Honorable Cameron R. Elliot
Administrative Law Judge**

In the Matter of

**CERTAIN CAMERAS, CAMERA SYSTEMS,
AND ACCESSORIES USED THEREWITH**

Inv. No. 337-TA-1400

RESPONDENTS INSTA360’S PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the Order regarding Notice of Ground Rules (Order No. 2) and the Order Setting Procedural Schedule (Order No. 5), Respondents Arashi Vision Inc. d/b/a Insta360 and Arashi Vision (U.S.) LLC d/b/a Insta360 (collectively, “Respondents” or “Insta360”) identify proposed constructions for the claim terms that Respondents contend should be construed in this Investigation or identified by Complainant.

Insta360’s identification of proposed constructions are subject to amendment and/or supplementation because GoPro’s initial infringement and domestic industry contentions are deficient and fail to provide notice of its theories. Insta360 also reserves the right to amend and/or supplement its proposed construction, including without limitation based on the meet and confer with Complainant to discuss the disputed claim terms.

U.S. Patent No. 10,015,413

Terms	Claims	Insta360's Proposed Construction
"source aspect ratio" / "target aspect ratio"	Claims 1, 2, and 5	Indefinite If not indefinite: "ratio of the width to the height of the input image" / "ratio of the width to the height of the output image"
"the output image having a target aspect ratio different than the source aspect ratio"	Claims 1 and 2	Indefinite If not indefinite: "the output image having a target aspect ratio different than the source aspect ratio while maintaining the same field of view as the input image"
"the transformation non-uniformly shifts the pixels" / "the transformation non-uniformly shifts the pixels from the input positions to the output positions"	Claims 1, 2, and 10	Indefinite If not indefinite: "the transformation non-uniformly moves the pixels" / "the transformation non-uniformly moves the pixels from the input positions to the output positions"

Insta360 additionally incorporates by reference all the terms it identifies as indefinite in the '413 patent in its July 12, 2024 invalidity contentions and any supplements thereof.

U.S. Patent No. 10,529,052

Terms	Claims	Insta360's Proposed Construction
"the desired lens distortion and the input lens distortion exhibiting consistent lens characteristics"	Claim 1	Indefinite If not indefinite: "the desired lens distortion and the input lens distortion exhibiting distortion characteristics of the lens of the camera"
"portions of the scene depicted in the sub-frames appear to have been captured using the reduced fields of view"	Claim 1	Indefinite If not indefinite: "portions of the scene depicted in the sub-frames appear to have been captured by the lens of the camera using the reduced fields of view"
"wherein image stabilization is applied to the input images"	Claim 2	"wherein image stabilization is applied to the input images before generating output images"

Terms	Claims	Insta360's Proposed Construction
"consistent frame-to-frame lens characteristics"	Claim 7	Indefinite

Insta360 additionally incorporates by reference all the terms it identifies as indefinite in the '052 patent in its July 12, 2024 invalidity contentions and any supplements thereof.

U.S. Patent No. 10,958,840

Terms	Claims	Insta360's Proposed Construction
"trajectory"	Claims 1-21	"path"
"a trajectory of the housing during the capture duration based on the position information" / "a trajectory of the image capture device during the capture duration based on the position information"	Claim 1 and 16	Indefinite If not indefinite: "a path experienced by the housing [image capture device] during the capture duration generated based on the position information during the capture duration"
"a smoothed trajectory of the housing based on a look-ahead of the trajectory" / "a smoothed trajectory of the image capture device based on a look-ahead of the trajectory"	Claims 1 and 16	Indefinite If not indefinite: "a smoothed path of the housing [image capture device] based on a look-ahead of the path and not based solely on applying any low-pass filter"
"weight-balance parameter"	Claims 1, 13, 16, 17	Indefinite If not indefinite: "a parameter that controls to what extent a combination of different types of motion are minimized in generating the smoothed path"
"low-light high-pass parameter"	Claims 1, 14, 16, 17	Indefinite If not indefinite: "a parameter that controls the amount or strength of

Terms	Claims	Insta360's Proposed Construction
		smoothing performed to generate the smoothed path to adjust motion blur compensation"
"stickiness parameter"	Claims 1, 15, 16, 17	Indefinite If not indefinite: "a parameter that controls the extent by which a preceding portion of the path determines the smoothed path"
"a temporal horizon of motion experienced by the image capture device"	Claims 1 and 16	Indefinite If not indefinite: "motion experienced by the image capture device in a duration that corresponds to successive future frames and is subsequent to a moment"
"enabling approximation of intentional motion of the image capture device while causing a delay in the determination of the smoothed trajectory"	Claims 1 and 16	Indefinite If not indefinite: "determining and preserving a user's intended motion for the image capture device at the moment while causing the determination of the smoothed path to wait for the image capture device to experience the motion, wherein the intended motion is not determined or preserved solely by applying any low-pass filter"
"a punchout of the visual content"	Claims 1 and 16	Indefinite If not indefinite: "a cropped or cut-out portion of the visual content"
"the punchout of the one or more extents of the visual content within the viewing window"	Claims 1 and 16	Indefinite If not indefinite: "a cropped or cut-out portion of the cropped or cut-out portion of the visual content within the viewing window"
"effectuates stabilization of the visual content via selective cropping"	Claims 1 and 16	"generates stabilized visual content by selectively cutting out a portion of the visual content"
"the iterations of smoothing resulting in convergence of the smoothed trajectory"	Claims 4 and 20	"the iterations of smoothing on the small scale using the fine scale approach and smoothing on the large

Terms	Claims	Insta360's Proposed Construction
		scale using the coarse approach resulting in the smoothed path"
"a fine scale approach to smooth on a small scale" / "a coarse approach to smooth on a large scale"	Claims 4 and 20	Indefinite
"minimization" / "minimized"	Claims 6, 7, 13, 17, and 21	Indefinite If not indefinite: "performing minimization calculation on an objective function that consists of groups of terms" / "subject to minimization calculation on an objective function that consists of groups of terms"

Insta360 additionally incorporates by reference all the terms it identifies as indefinite in the '840 patent in its July 12, 2024 invalidity contentions and any supplements thereof.

U.S. Patent No. 10,574,894

Terms	Claims	Insta360's Proposed Construction
"trajectory"	Claim 1, 2, 6-9, 11-12, and 16-19	"path"
"an observed trajectory of the housing during the capture duration based on the position information"	Claims 1 and 11	Indefinite If not indefinite: "an observed path experienced by the housing during the capture duration generated based on the position information during the capture duration"
"a capture trajectory of the housing based on a look ahead of the observed trajectory"	Claims 1 and 11	Indefinite If not indefinite: "a smoothed path of the housing based on a look ahead of the observed path and not based solely on applying any low-pass filter"

Terms	Claims	Insta360's Proposed Construction
“the capture trajectory reflecting actual and/or virtual positions of the housing”	Claims 1 and 11	Indefinite
“the capture trajectory is determined to include a path that minimizes a combination of rotational velocity and rotational acceleration of the housing”	Claims 1 and 11	Indefinite If not indefinite: “the smoothed path is generated by finding a path by performing minimization calculation on an objective function that includes one term expressing angular velocity and another term expressing angular acceleration”
“a [the] punch-out of [the] visual content of the images within the capture field of view”	Claims 1, 10, 11, and 20	Indefinite If not indefinite: “a [the] cropped or cut-out portion of [the] visual content of the images within the capture field of view”
“past positions of the image capture device supply context for the user's intended motion of the image capture device”	Claims 3 and 13	Indefinite If not indefinite: “past positions of the image capture device are used to determine the user's intended motion for the image capture device”
“the capture trajectory of the housing is determined to minimize inter-frame motion while preserving intra-frame motion”	Claims 6 and 16	Indefinite If not indefinite: “the smoothed path of the housing is generated by minimizing motion of the housing between frames and preserving motion of the housing during the exposure of a frame” “minimize” means “perform minimization on an objective function that includes one term expressing angular velocity and another term expressing angular acceleration”
“the intra-frame motion is preserved based on intra-frame motion of the housing during frame exposure such that the	Claims 6, 16	“the smoothed path of the housing follows the motion of the housing during the exposure of the frame in the same direction and with the same speed”

Terms	Claims	Insta360's Proposed Construction
capture trajectory follows the intra-frame motion"		

Insta360 additionally incorporates by reference all the terms it identifies as indefinite in the '894 patent in its July 12, 2024 invalidity contentions and any supplements thereof.

U.S. Patent No. 11,336,832

Terms	Claims	Insta360's Proposed Construction
"horizon" / "horizon leveling" / "horizon-leveled visual content"	Claims 1-3	"horizon": "the plane perpendicular to the direction of gravity" "horizon leveling": "leveling to the plane perpendicular to the direction of gravity" "horizon-leveled visual content": "visual content depicting a scene leveled to the plane perpendicular to the direction of gravity."
"capture duration"	Claims 1, 7	"duration during which the image capture device captures the video content"
"progress length"	Claims 1, 7, and 8	"duration of the video content when played back"
"function of progress through the progress length" / "function of progress through the capture duration"	Claims 1, 7, and 8	"function of progress through the progress length" means "function of passage of time through the duration of the video content when played back" "function of progress through the capture duration" means "function of passage of time through the duration during which the image capture device captures the video content"

Terms	Claims	Insta360's Proposed Construction
"a punchout of the extents of the visual content defined by the viewing window"	Claim 1	"a cropped portion of the visual content defined by the viewing window"

Insta360 additionally incorporates by reference all the terms it identifies as indefinite in the '832 patent in its July 12, 2024 invalidity contentions and any supplements thereof.

U.S. Patent No. D789,435

Insta360 incorporates by reference all the limitations it identifies as indefinite in the 'D435 patent in its July 12, 2024 Invalidity Contentions as well as in its August 6 Proposed Terms for Claim Constructions and any supplements thereof.

Dated: August 16, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was caused to be served upon the following parties, as indicated on August 16, 2024:

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