

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

INTELLECTUAL VENTURES I LLC

Plaintiff,

v.

TCL ELECTRONICS HOLDINGS LTD. and
TCL INDUSTRIES HOLDINGS CO., LTD.

Defendants.

Civil Action No. 6:23-cv-00309-ADA

CORRECTED JOINT CLAIM CONSTRUCTION STATEMENT

In accordance with the Court’s March 5, 2024, Scheduling Order (Dkt. No. 26), the parties hereby submit this Joint Claim Construction Statement with respect to the patents-in-suit, U.S. Patent Nos. 7,089,443 (“the ‘443 patent”); and 7,623,439 (“the ‘439 patent”), (collectively, “the patents-in-suit”).

I. Agreed to Constructions

- a. “cyclically advancing the first OFDM packet by shifting the samples in a first direction” (‘439 patent, claims 1 and 8)

Agreed to Construction
“cyclically advancing the first OFDM packet by shifting the samples in the direction of transmission” ¹

¹ IV maintains its objections to this construction as set forth in the briefing in this case as well as in *Intellectual Ventures I LLC, et al., v. Lenovo Group Limited*, Case No. 6:23-cv-00307-ADA, and *Intellectual Ventures I LLC et al., v. Zebra Technologies Corporation*, Case No. 6:23-cv-00292-ADA, however, IV recognizes that the Court has construed this term as TCL proposes in the *Lenovo* and *Zebra* cases.

II. Disputed Constructions

- b. “operating the microprocessor such that each domain operates synchronously, while the domains operate asynchronously relative to one another” (‘443 patent, claim 8)

IV’s Proposed Construction	TCL’s Proposed Construction
Plain and ordinary meaning	“synchronously” means “using the same clock with a fixed phase relationship” and “asynchronously” means “using independent clocks with no known phase relationship”

- c. “generating a first OFDM packet” / “cyclically advancing the first OFDM packet . . . to generate a shifted version of the first OFDM packet” (‘439 patent, claims 1 and 8)

IV’s Proposed Construction	TCL’s Proposed Construction
Plain and ordinary meaning	Order of steps: “generating a first OFDM packet...” must occur before “cyclically advancing the first OFDM packet ... to generate a shifted version of the first OFDM packet”

Dated: July 18, 2024.

Respectfully submitted,

/s/Karl Rupp

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COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been delivered to all counsel of record via the Court's CM/ECF service on this 18^h day of July, 2024.

/s/Karl Rupp
Karl Rupp