

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

COLLISION COMMUNICATIONS, INC.,

Plaintiff,

v.

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

Defendants.

Case No. 2:23-cv-00587

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Local Patent Rule (“P.R.”) 4-3, and the Court’s April 17, 2024 Scheduling Order (Dkt. No. 36), Plaintiff Collision Communications, Inc. (“Collision”) and Defendants Samsung Electronics Co., LTD and Samsung Electronics America, Inc. (collectively “Samsung”) hereby submit by and through their counsel, this Joint Claim Construction and Prehearing Statement. The Parties hereby reserve their rights to supplement, modify and/or amend these proposed constructions or the rebuttal to same.

I. AGREED TERMS (P.R. 4-3)(a)(1))

The parties have agreed to the following constructions:

Term	Agreed Construction
multi-user detector decision unit using decision criteria to determine a selected multi-user detector (’492 claim 1)	This term is subject to 35 U.S.C. 112 ¶ 6. The claimed function is “using decision criteria to determine a selected multi-user detector,” and the corresponding structure is “MUD decision unit 220 (or decision logic unit 520) configured to perform one or more of the algorithms described at 8:12–18, 13:35–14:40, 15:3–21, 19:43–48, 19:56–62, and 20:41–49; and equivalents thereof.”
a multi-user detector decision unit . . . wherein said multi-user detector decision unit selects a multi-user detector based upon at least one	The term “multi-user detector decision unit selects a multi-user detector based upon at least one threshold” is subject to 35 U.S.C. 112 ¶ 6.

threshold ('492 claim 10)	The claimed function is “selects a multi-user detector based upon at least one threshold,” and the corresponding structure is “MUD decision unit 220 (or decision logic unit 520) configured to perform one or more of the algorithms described at 8:12–18, 13:35–14:40, 15:3–21, 19:43–48, 19:56–62, and 20:41–49; and equivalents thereof.”
means coupled to said channel transfer function determining signal processor for providing uninterrupted estimates of the channel transfer function parameters on a real-time basis ('505 claims 1, 9)	This term is governed by 35 U.S.C. sec. 112 para. 6. The claimed function is providing uninterrupted estimates of the channel transfer function parameters on a real-time basis by first deriving the estimated channel transfer function for each of said interfering signals. The corresponding structure is a parameter tracking unit and equivalents thereof as discussed at fig. 1, 5:20–40, 6:9–23, fig. 3, fig. 4 (item 90, 90', 90''), 7 45–8:40.
wherein the signals of the one of a legacy protocol mode can be selected from the group consisting of low data rate BPSK, QPSK, GMSK and OAM	“wherein the signals of one of the protocol modes can be selected from the group consisting of low data rate BPSK, QPSK, GMSK, and QAM”

II. DISPUTED TERMS (P.R. 4-3(a)(2))

Attached hereto as Exhibit A is a joint chart setting forth the constructions and indefiniteness positions proposed by each side for each disputed claim term, phrase, or clause. Exhibits B and C set forth the Plaintiff's and Defendants' respective identifications of the information (if any) set forth in P.R. 4-3(a)(2) for each disputed term.

The parties hereby reserve their right to rely upon all evidence cited or referenced in the opposing side's chart and exhibit relating to disputed terms.

III. LENGTH OF TIME NECESSARY FOR CLAIM CONSTRUCTION HEARING (P.R. 4-3(a)(3))

At this time, the Parties anticipate a combined total of about three hours for presentation at the Claim Construction Hearing, with each side having equal time.

IV. WITNESSES AT THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(a)(4))

At this time, the Parties do not propose to call any witnesses at the Claim Construction Hearing.

V. ADDITIONAL ISSUES (P.R. 4-3(a)(5))

At this time, neither Party is aware of any other issues that might be appropriately addressed at a prehearing conference prior to the Claim Construction Hearing.

VI. ESTIMATED BRIEFING LENGTH FOR DISPUTED CLAIMS

Pursuant to the Court's Scheduling Order (Dkt. No. 36), the Parties agree that the page limitations governing dispositive motions pursuant to Local Rule CV-7(a) shall apply to claim construction briefing as set forth in P.R. 4-5(e).

DATED: December 16, 2024

Respectfully submitted,

/s/ Brian Mack

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served upon all counsel of record via electronic mail on December 16, 2024.

/s/ James Smith

James Smith