

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

HARBOR ISLAND DYNAMIC, LLC,	§	Case No. 2:24-cv-00140-JRG-RSP
	§	
Plaintiff,	§	
	§	<u>JURY TRIAL DEMANDED</u>
v.	§	
	§	
SAMSUNG ELECTRONICS CO., LTD. and	§	
SAMSUNG ELECTRONICS AMERICA,	§	
INC.,	§	
	§	
Defendants.	§	

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

In accordance with Patent Local Rule 4-3, Plaintiff Harbor island Dynamic, LLC (“HID”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively “Samsung”) jointly submit this Joint Claim Construction and Prehearing Statement setting for the parties’ proposed constructions for the herein identified terms, phrases, or clauses of U.S. Patent Nos. 9,245,826 (the “’826 Patent”); 7,772,673 (the “’673 Patent”); 9,147,609 (the “’609 Patent”); and 7,745,886 the “’886 Patent”) (collectively the “Patents-in-Suit”).

I. Disputed Claim Terms, Phrases, or Clauses (P.R. 4-3(a)(2))

The parties’ proposed constructions of each disputed claim term, phrase, or clause of the Asserted Patents are set forth below. Identification of evidence that supports these constructions is attached as Exhibit 1. Each party reserves the right to cite to intrinsic and/or extrinsic evidence cited by the other party.

#	Claim Term(s), Phrase(s), or Clause(s)	HID's Proposed Construction	Samsung's Proposed Construction
1	“disposed in at least one corner of a semiconductor substrate” '826 Patent Claims 1, 11	“an anchor via located outside a rounded geometrical shape inscribed within the edges of the semiconductor die so as to prevent damage to at least one corner of the semiconductor die from stresses caused by fabrication procedures, such as semiconductor die singulation and pick and place processes.”	Indefinite
2	“a backside of said semiconductor substrate” / “backside metal layer” '826 Patent Claims 1, 11	Plain and ordinary meaning	“a side of the semiconductor substrate opposite to a side where active devices are located / a metal layer located on a side of the semiconductor substrate opposite to a side where active devices are located”
3	“an electronic device” '673 Patent Claims 1, 10	Plain and ordinary meaning	“a component for amplifying or controlling the flow of electrical currents”
4	“trench chamfered corner[s]” '673 Patent Claims 1, 3, 10, 12	“a corner with material removed to form a bevel, angle, or other transitional shape”	“corner of a trench with a straight cut edge”
5	“each of said plurality of through silicon vias has a pinched off region at a bottom portion to prevent contamination during	Plain and ordinary meaning	“each of said plurality of through silicon vias has a pinched off region at a portion opposite to an opening for depositing the conductive filler to prevent contamination during