

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

**Before the Honorable Bryan F. Moore
Administrative Law Judge**

In the Matter of

**CERTAIN SEMICONDUCTOR DEVICES
AND PRODUCTS CONTAINING
THE SAME**

Investigation No. 337-TA-1414

JOINT PROPOSED CLAIM CONSTRUCTION CHART

Pursuant to the Procedural Schedule (Order No. 6) and Ground Rule 7.4 (Order No. 2), Complainants Infineon Technologies Austria AG and Infineon Technologies Americas Corp. (collectively, “Infineon” or “Complainants”) and Respondents Innoscience (Suzhou) Technology Holding Co., Ltd., Innoscience (Suzhou) Semiconductor Co., Ltd., Innoscience (Zhuhai) Technology Company, Ltd., and Innoscience America, Inc. (collectively, “Innoscience” or “Respondents”) (all together, the “Parties”) respectfully submit their proposed claim construction chart incorporating revisions to the constructions that have changed in the parties submitted their *Markman* briefs. The chart also includes a number of agreed-upon constructions not specifically reflected in the parties’ Markman briefs. The parties respectfully request entry of these agreed-upon constructions.

I. U.S. PATENT NO. 9,899,481

TERMS BRIEFED AND ARGUED AT <i>MARKMAN</i> HEARING			
TERM	CLAIMS	COMPLAINANTS' CONSTRUCTION	RESPONDENTS' CONSTRUCTION
“wherein the [first/second] current electrode is coupled to the [die pad/second lead] by a plurality of bond wires or a contact clip”	1, 6, and 7	Plain and ordinary meaning, e.g., wherein the [<i>first/second</i>] current electrode is electrically connected either directly or with intervening elements present to the [<i>die pad/second lead</i>] by a plurality of wires or a contact clip	wherein one end of a plurality of bond wires or one end of a contact clip is attached to the [first/second] current electrode and another end of the plurality of bond wires or another end of the contact clip is attached to the [<i>die pad/second lead</i>]
“die pad”	1 and 17	Part of a leadframe that supports the die of the transistor device	Structure that supports the die of the semiconductor device

AGREED-UPON TERM		
TERM	CLAIMS	AGREED-UPON CONSTRUCTION
“Group III-nitride”	2 and 17	A compound semiconductor that includes nitrogen (N) and at least one Group III element including aluminum (Al), gallium (Ga), indium (In), and boron (B), and including but not limited to any of its alloys, such as aluminum gallium nitride ($\text{Al}_x\text{Ga}_{(1-x)}\text{N}$), indium gallium nitride ($\text{In}_y\text{Ga}_{(1-y)}\text{N}$), aluminum indium gallium nitride ($\text{Al}_x\text{In}_y\text{Ga}_{(1-x-y)}\text{N}$), gallium arsenide phosphide nitride ($\text{GaAs}_a\text{P}_b\text{N}_{(1-a-b)}$), and aluminum indium gallium arsenide phosphide nitride ($\text{Al}_x\text{In}_y\text{Ga}_{(1-x-y)}\text{As}_a\text{P}_b\text{N}_{(1-a-b)}$), for example. Aluminum gallium nitride and AlGaN refers to an alloy described by the formula $\text{Al}_x\text{Ga}_{(1-x)}\text{N}$, where $0 < x < 1$

II. U.S. PATENT NO. 8,686,562

TERM BRIEFED AND ARGUED AT <i>MARKMAN</i> HEARING			
TERM	CLAIMS	COMPLAINANTS' CONSTRUCTION	RESPONDENTS' CONSTRUCTION
“said refractory metal nitride/metal ... having a thickness greater than that of a bottommost layer of said plurality of metal layers	1 and 13	Plain and ordinary meaning, e.g., a thickness of the refractory metal nitride/metal is greater than a thickness of a bottommost layer	Said refractory metal nitride/metal ... having a thickness, wherein the thickness along an entire length of the refractory metal nitride/metal is greater than a thickness along an entire length of a bottommost layer of said plurality of metal layers

AGREED-UPON TERMS		
TERM	CLAIMS	AGREED-UPON CONSTRUCTION
“refractory metal nitride”	1 and 13	compound material including nitrogen chemically bonded with elements Ti, zirconium (Zr), or vanadium (Vn), as well as the traditionally recognized refractory metals niobium (Nb), molybdenum (Mo), tantalum (Ta), and tungsten (W), and further may refer to any of TiN, TaN, ZrN, VN, NbN, MoN, and WN ₂ , or any combination of those refractory nitride compounds
“group III-V semiconductor”	8-11 and 13-16	A compound semiconductor that includes at least one group III element and at least one group V element, such as, but not limited to, gallium nitride (GaN), GaAs, AlGaAs, InGaN, and the like.

III. U.S. PATENT NO. 9,070,755

TERM BRIEFED AND ARGUED AT <i>MARKMAN</i> HEARING			
TERM	CLAIMS	COMPLAINANTS' CONSTRUCTION	RESPONDENTS' CONSTRUCTION
“wherein at least a portion of said drain finger end is noncoplanar with said drain finger electrode main body”	1	Plain and ordinary meaning, e.g., wherein at least a portion of said drain finger end is noncoplanar with the main portion of the drain finger electrode body	wherein at least a portion of said drain finger end is on a horizontal plane that is not on the same horizontal plane as any part of said drain finger electrode main body

AGREED-UPON TERM		
TERM	CLAIMS	AGREED-UPON CONSTRUCTION
“group III-V transistor”	9	a transistor including a compound semiconductor that includes at least one group III element and at least one group V element

IV. U.S. PATENT NO. 8,264,003

TERMS BRIEFED AND ARGUED AT <i>MARKMAN</i> HEARING			
TERM	CLAIMS	COMPLAINANTS' CONSTRUCTION	RESPONDENTS' CONSTRUCTION
“gate”	1 and 10	an element that permits or inhibits conduction	a structure that controls current and controls electric field in the semiconductor

TERMS BRIEFED AND ARGUED AT <i>MARKMAN</i> HEARING			
TERM	CLAIMS	COMPLAINANTS' CONSTRUCTION	RESPONDENTS' CONSTRUCTION
“a node in the semiconductor element between the first portion and the second portion of the transistor”	1 and 10	plain and ordinary meaning, e.g., the area or region of the semiconductor element between the first portion and the second portion of the transistor	a region of the semiconductor element that laterally separates the first portion and the second portion of the transistor
“wherein a drain region of the enhancement mode transistor is merged with a source region of the depletion mode transistor at the node”	1 and 10	plain and ordinary meaning, e.g., the area or region of the semiconductor element that is shared between the first portion and the second portion of the transistor includes at least a portion of a drain region of the enhancement mode transistor and at least a portion of the depletion mode transistor	wherein a drain region of the enhancement mode transistor and a source region of the depletion mode transistor are co-located in a region between the first gate and second gate

AGREED-UPON TERM		
TERM	CLAIMS	AGREED-UPON CONSTRUCTION
“III-nitride”	2 and 10	a material that includes nitrogen and at least one Group III element

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Respectfully submitted,

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