UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, DC

Before the Honorable Bryan F. Moore
Administrative Law Judge

In the Matter of **CERTAIN SENSORS WITH PIXELS AND PRODUCTS CONTAINING THE SAME**	**Investigation No. 337-TA-1403**

COMPLAINANT SIONYX, LLC'S PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the July 8, 2024 Order Setting Procedural Schedule, (Order No. 6) Complainant SiOnyx, LLC ("SiOnyx") hereby provides its proposed constructions for the claim terms of U.S. Patent Nos. 9,064,764 (the "'764 patent"), 9,905,599 (the "'599 patent"), 10,224,359 (the "'359 patent"), 11,069,737 (the "'737 patent"), and 11,721,714 (the "'714 patent") identified for construction by SiOnyx and the Respondents.

SiOnyx provides the below constructions without prejudice to any of its rights. Because discovery is still on-going, SiOnyx reserves the right to amend its proposed constructions. Further, because Respondents proposed improperly long terms for construction, it is not clear which part(s) of the terms Respondents intend to construe. Accordingly, to the extent Respondents construe different portions of the terms, SiOnyx reserves all rights to propose constructions for those portions. SiOnyx also reserves the right to revise, supplement, expand, add, change, alter, amend, and/or otherwise modify the below constructions once it has had the opportunity to fully consider Respondents' proposed constructions and as part of the meet and confer process to narrow the disputes between the parties.

#	Claim Term	Patents	SiOnyx's Proposed Constructions
1	substantially	764 599	to the same overall result as if absolute and total completion were obtained.

		359 714 737	
2	a first material sandwiched between two second materials	764	Plain and ordinary meaning. To the extent a construction is required: a first material disposed between two second materials, wherein the two second materials can be different from one another.
3	a high refractive index material sandwiched between two low refractive index materials a first material sandwiched between two second materials said third layer is disposed between said first and second layers	359 714	Plain and ordinary meaning. To the extent a construction is required: a first material between two second materials, wherein the first material has a refractive index that is at least 0.2 higher than the second two materials and wherein the two second materials can be different from one another a first material between two second materials, wherein the two second materials can be different from one another a third layer between the first and second layers, wherein the first and second layers can be different materials from one another.
4	light trapping material	764 359 599 714	Plain and ordinary meaning. To the extent construction is required: material or collection of materials that direct(s) light back into the pixel.
5	light sensitive pixel light sensitive image sensor pixels	764 599 359 714	Plain and ordinary meaning. To the extent construction is required: element(s) of an image sensor that converts light into an electrical signal.
6	sidewall	764 599 714	Plain and ordinary meaning. To the extent construction is required: trench wall.
7	high refractive index materials/low refractive index materials	764 714	“high refractive index materials” is not used in the 764 or 714 Patents Plain and ordinary meaning.

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			To the extent a construction is require *see* Term #3.
8	a peripheral sidewall disposed into at least a portion of the pixel	764 714	Plain and ordinary meaning. To the extent a construction is required: peripheral trench wall that extends at least partially into the pixel.
9	sloped surface at the pixel device interface	764	Plain and ordinary meaning. To the extent a construction is required: sloped trench wall or sloped backside surface.
10	extending at least substantially around the pixel periphery extending at least partially around the pixel periphery extends completely around the pixel periphery	764 599 714	Plain and ordinary meaning. To the extent construction is required: surrounding the pixel to the same overall result as if absolute and total completion were obtained at least partially surrounding the pixel surrounding the pixel.
11	thereupon from inside the pixel back into the pixel back into the pixel	599	thereupon from inside the pixel back into the pixel.
12	textured region textured film layer	599 359	Plain and ordinary meaning. To the extent a construction is required: a region that includes features that increase the path length of incident light. To the extent a construction is required: a layer that includes features that increase the path length of incident light.
13	reflective layer	599 714	Plain and ordinary meaning. To the extent a construction is required: a layer that reflects.
14	imager device	359 737	device with multiple pixels arranged to capture an image.
15	textured layer	737	textured region.
16	A photosensitive imager device capable of detecting visible and	737	Plain and ordinary meaning.

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	infrared electromagnetic radiation		To the extent a construction is required: A device with multiple pixels arranged to capture an image from visible and/or infrared light.
17	shallow trench isolation etching	737	Plain and ordinary meaning.
18	the surface features are arranged according to a pattern	737	Plain and ordinary meaning. To the extent a construction is required: features coincident with at least one surface that are arranged in a repeating manner.
19	a textured region comprising a plurality of surface features configured to interact with incident electromagnetic radiation so as to increase the quantum efficiency of the device	737	Plain and ordinary meaning. To the extent a construction is required: a region on the imager device that includes features that increase the path length of incident light.
20	processing the region of the semiconductor layer or support substrate comprising the surface features with CMP after depositing the oxide material	737	Plain and ordinary meaning. To the extent a construction is required: a polishing step or series of polishing steps in the fabrication of the imager device performed after the deposition of the oxide material.

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Date: August 27, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2024, a true and correct copy of the foregoing document was delivered to all counsel of record via electronic mail.

/s/ Pantelis A. Takos
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