

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

In the Matter of

CERTAIN SENSORS WITH PIXELS
AND PRODUCTS CONTAINING THE
SAME

Investigation No. 337-TA-1403

JOINT CLAIM CONSTRUCTION CHART

Complainant SiOnyx, LLC and Respondents Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively, Samsung) respectfully submit this Joint Claim Construction Chart consistent with Ground Rule 7.4. As indicated below, Samsung has agreed to SiOnyx's proposed claim construction of "sidewall." As further indicated below, SiOnyx has modified its proposal for "thereupon from inside the pixel back into the pixel back into the pixel" to mean "plain and ordinary meaning, meaning that light is reflected internally to be effectively maintained inside the pixel."

Joint Claim Construction Chart

#	Term	SiOnyx Construction	Samsung Construction	Claims
1	<i>a textured layer positioned to interact with light proximal to the backside surface</i>	Plain and ordinary meaning. To the extent a construction is required: a layer that includes features that increase the path length of incident light that reaches the backside surface	a textured layer disposed on the backside surface	'764:21
2	<i>light sensitive pixel</i> <i>light sensitive image sensor pixels</i>	Plain and ordinary meaning. To the extent a construction is required: element(s) of an image sensor that converts light into an electrical signal.	photodiode capable of detecting light	'764:1, 8, 17, 21; '599:1, 19; '359:1, 5, 12, 18–19, 23, 67–69, 73–75; '714:1; '359:1, 18, 38–40, 42, 45–47, 49
3	<i>Sidewall</i> (After briefing, Samsung agreed with SiOnyx's proposed claim construction)	Plain and ordinary meaning. To the extent a construction is required: trench wall	Plain and ordinary meaning. To the extent a construction is required: trench wall	'764:1, 8, 14–15, 17–19, 21, 23–24; '599:1, 7–8, 18–19, 26–27, 36; '714:1, 10–11

#	Term	SiOnyx Construction	Samsung Construction	Claims
4	<i>high refractive index material</i>	Material that has a refractive index of greater than 2.1 and/or that has a refractive index that is at least 0.2 greater than the [low refractive index material[s]]	material that have a refractive index of greater than or equal to 2.1	'764:1, 2 '714:1, 5-6
	<i>low refractive index materials</i>	Material that has a refractive index of less than 2.1 and/or has a refractive index that is at least 0.2 less than the [high refractive index material]	material(s) that have a refractive index less than 2.1	'764:1, 2 '714:1-4, 7
5	<i>substantially</i>	to the same overall result as if absolute and total completion were obtained	the complete or nearly complete extent or degree of an action, characteristic, property, state, structure, item, or result so as to have the same overall result as if absolute and total completion were obtained	'764:1, 8, 17, 21; '599:1, 16, 18-19, 34, 36; '359:5; '714:1
6	<i>thereupon from inside the pixel back into the pixel back into the pixel</i> (SiOnyx's proposed construction modified since briefing)	plain and ordinary meaning, meaning "such that the light is reflected internally to be effectively maintained inside the pixel" (Markman Hr'g Tr. at 93:25-94:7)	plain and ordinary meaning, meaning that the light must bounce back into the pixel twice	'599:1, 19
7	<i>imager device</i>	device with multiple pixels arranged to capture an image	Preamble is not limiting	'359:1, 18, 52-83
8	<i>A photosensitive imager device capable of detecting visible and infrared electromagnetic radiation</i>	Plain and ordinary meaning.	Preamble is limiting and means, "An image sensor pixel capable of detecting visible and infrared electromagnetic radiation."	'737:1, 32

#	Term	SiOnyx Construction	Samsung Construction	Claims
9	<i>the textured layer</i>	textured region	indefinite	'737:6, 37
10	<i>substantially</i>	to the same overall result as if absolute and total completion were obtained	the complete or nearly complete extent or degree of an action, characteristic, property, state, structure, item, or result so as to have the same overall result as if absolute and total completion were obtained	'737:12, 24, 43, 54

Dated: November 1, 2024

/s/ Gwendolyn E. Tawresey

Gwendolyn E. Tawresey
William D. Belanger
Gregory D. Len
Pantelis Takos
Brittany Reeves
Troutman Pepper Hamilton Sanders LLP
19th Floor, High Street Tower
125 High Street
Boston, MA 02110 2736
Telephone: (617) 204-5100

Ryan C. Deck
Troutman Pepper Hamilton Sanders LLP
301 Carnegie Center, Suite 400
Princeton, NJ 08540
Telephone: (609) 452-0808

Email: SiOnyxITC@troutman.com

Counsel for Complainant SiOnyx, LLC

/s/ Alice J. Ahn

Brian R. Nester
Peter A. Swanson
Jared Frisch
Jessica C. Hill
Scott C. Burger
Daniel J. Farnoly
Kee Young Lee
Adam W. Mitchell
Natalie M. Ritchie
Covington & Burling LLP
One CityCenter, 850 Tenth Street, N.W.
Washington, DC 20001
Telephone: (202) 662-6000

Nitin Subhedar
Alice J. Ahn
Dale A. Rice
Hyun Byun
Michael Bowlus
Covington & Burling LLP
Salesforce Tower, 415 Mission Street
San Francisco, CA 94105-2533
Telephone: (415) 591-6000

Matthew Phelps
Covington & Burling LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
Telephone: (212) 841 1000

Email: Samsung-SiOnyx-Cov@cov.com

*Counsel for Respondents Samsung Electronics
Co., Ltd., Samsung Electronics America, Inc.
and Samsung Semiconductor, Inc.*

United States International Trade Commission
Investigation No. 337-TA-1403
Certain Sensors with Pixels and Products Containing the Same

CERTIFICATE OF SERVICE

I, Jacob C. Alstadt, hereby certify that on November 1, 2024 a true and correct copy of the foregoing document was served upon the following parties as indicated below:

The Honorable Bryan F. Moore Secretary to the Commission U.S. International Trade Commission 500 E Street, S.W. Washington, D.C. 20436	☒ Via Box.com ☒ Via Electronic Mail Moore337@usitc.gov
Alice J. Ahn COVINGTON & BURLING LLP Salesforce Tower 415 Mission Street San Francisco, CA 94105-2533 <i>Counsel for Respondents Samsung Electronics Co., Ltd.; Samsung Electronics America, Inc.; and Samsung Semiconductor, Inc.</i>	☒ Via Electronic Mail Samsung-SiOnyx-Cov@cov.com

/s/ Jacob C. Alstadt
Jacob C. Alstadt
IP Litigation Paralegal
Troutman Pepper Hamilton Sanders LLP
401 9th Street, NW
Suite 1000
Washington, DC 20004