

**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> <i>low refractive index materials</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 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 that have a refractive index of greater than or equal to 2.1 material(s) that have a refractive index less than 2.1	'764:1, 2 '714:1, 5–6 '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

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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:

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