

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C. 20436**

**Before the Honorable MaryJoan McNamara
Administrative Law Judge**

In the Matter of

**CERTAIN CELLULAR BASE STATION
COMMUNICATION EQUIPMENT,
COMPONENTS THEREOF, AND
PRODUCTS CONTAINING SAME**

Investigation No. 337-TA-1388

UPDATED JOINT CLAIM CONSTRUCTION CHART

Ericsson has agreed to adopt Motorola and the Staff's proposed construction for the claim term "the demodulation reference signal" of U.S. Patent No. 11,184,130. Therefore, six (6) claim terms remain to be argued during the *Markman* hearing scheduled for July 25, 2024.

Additionally, Motorola has agreed to drop certain Asserted and Domestic Industry Claims, and will promptly file a Motion for Partial Terminal to that effect. The remaining Asserted and Domestic Industry Claims are listed below:

Patent	Asserted Claims	Domestic Industry Claims
11,184,130	11, 15, 16, 17	1, 5, 6, 7
11,601,896	15, 16, 17, 18, 20	5, 6, 7, 8, 10
11,284,466	3, 8, 14	18, 19
10,869,234	16, 17, 19	7, 8, 10, 11

JOINT CLAIM CONSTRUCTION CHART
INV. No. 337-TA-1388

In view of these development, the Complainant Motorola Mobility LLC,
Respondents Ericsson AB, Telefonaktiebolaget LM Ericsson, and Ericsson Inc. (collectively,
“Ericsson”), and the Commission Investigative Staff (“Staff”) respectfully submit this
Updated Joint Claim Construction Chart.

I. U.S. Patent No. 11,184,130

A. Agreed Terms

Claim Term	Agreed Construction
“a first configuration” Claims 1, 11	Plain and ordinary meaning, that is, a first configuration that is different from a second configuration
“a second configuration” Claims 1, 11	Plain and ordinary meaning, that is, a second configuration that is different from a first configuration
“the demodulation reference signal” Claims 1, 11	a demodulation reference signal

B. Disputed Terms

Claim Term	Complainant’s Construction	Respondents’ Construction	Staff’s Construction
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“the demodulation reference signal configuration comprises a first configuration, a second configuration, a mapping order, a frequency domain density, a time domain subframe level density, a time domain symbol level density, or some combination thereof” Claims 1, 11	the demodulation reference signal configuration comprises at least two of: a first configuration, a second configuration, a mapping order, a frequency domain density, a time domain subframe level density, or a time domain symbol level density	Indefinite	the demodulation reference signal configuration comprises at least one of a first configuration, a second configuration, a mapping order, a frequency domain density, a time domain subframe level density, or a time domain symbol level density
“the remaining minimum system information channel demodulation reference signal configuration” Claims 5-7, 15-17	the demodulation reference signal configuration for the physical downlink shared channel carrying remaining minimum system information	Indefinite	Indefinite

II. U.S. Patent No. 11,601,896

A. Agreed Terms

Claim Term	Agreed Construction
“the predetermined time” Claims 5, 6, 15, 16	the physical uplink shared channel preparation procedure time determined ($T_{\text{proc},2}$)

B. Disputed Terms

Claim Term	Complainant's Construction	Respondents' Construction	Staff's Construction
“the power headroom report for the activated serving cell is determined based on a real transmission or a reference format based on signaling for configured grants and downlink control information received until a first uplink symbol of the physical uplink shared channel resource minus a physical uplink shared channel preparation procedure time determined ($T_{proc,2}$) for the configured grant” Claims 11, 18	No construction necessary, or, in the alternative, same as Staff's Construction	Indefinite	the power headroom report for the activated serving cell is determined based on a real transmission or a reference format wherein the determination to use a real transmission or reference format is based on signaling for configured grants and downlink control information received until a first uplink symbol of the physical uplink shared channel resource minus a physical uplink shared channel preparation procedure time determined ($T_{proc,2}$) for the configured grant

III. U.S. Patent No. 11,284,466

A. Agreed Terms

Claim Term	Agreed Construction
“A method of a current base unit, the method comprising:” Claim 1	The preamble is limiting
“A current base unit comprising:” Claim 12	The preamble is limiting

B. Disputed Terms

Claim Term	Complainant's Construction	Respondents' Construction	Staff's Construction
“a transceiver that:” Claims 12, 16	one or more transceivers that	One or more transceivers, at least one of which must perform all of the claimed “receiv[ing]” and	one or more transceivers that

		“send[ing]” functions	
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IV. U.S. Patent No. 10,869,234

A. Disputed Terms

Claim Term	Complainant's Construction	Respondents' Construction	Staff's Construction
“wherein the target CN is used to execute one of: inter-RAT redirection and inter-system redirection” Claim 16	wherein the target CN type is used to execute an inter-RAT redirection or an inter-system redirection	Indefinite	wherein the target CN type is used to determine whether to execute an inter-RAT redirection or an inter-system redirection
“wherein inter-system redirection is triggered if the target CN is different than a current CN of the remote unit” Claim 16	wherein inter-system redirection is triggered if the target CN type is different from a current CN type of the remote unit	Indefinite	Same as Complainants’

Date: July 15, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing document:

JOINT CLAIM CONSTRUCTION CHART

have been served on this 15th day of July, 2024, on the following:

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