

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

**Before The Honorable Monica Bhattacharyya
Administrative Law Judge**

In the Matter of

**CERTAIN ELECTRONIC COMPUTING
DEVICES, AND COMPONENTS AND
MODULES THEREOF**

Investigation No. 337-TA-1387

UPDATED JOINT CLAIM CONSTRUCTION CHART

Pursuant to Ground Rule 6.1 and Order No. 7, Complainant Telefonaktiebolaget LM Ericsson (“Ericsson” or “Complainant”), Respondents Lenovo (United States) Inc., Lenovo (Shanghai) Electronics Technology Co., Ltd., Lenovo Beijing Co., Ltd., Lenovo PC HK Limited, and Lenovo Information Products (Shenzhen) Co., Ltd. (collectively, “Lenovo”), (collectively, “The Parties”) hereby submit this Updated Joint Claim Construction Chart.

Further, pursuant to Ground Rule 6.1, the Parties identify the following six (6) terms that the Parties believe are amenable to resolution in the Markman hearing process and likely to be significant to resolving the Parties’ dispute. The Parties’ respective proposed constructions for these terms are set forth below in Section III.

No.	Patent	Term	Claim(s)
1	U.S. Patent No. 10,708,618	“circuit [configured to]” Proposed by: Respondents	12-16
2	U.S. Patent No. 9,641,841	determin[ing] how many pixels in [a/said] first line of pixels in said block to fil[t]er relative to said block boundary based on [a comparison of] said first filter decision value to a first threshold value	1, 5, 16

No.	Patent	Term	Claim(s)
		Proposed by: Respondents	
3	U.S. Patent No. 9,641,841	determin[ing] how many pixels in [a/said] corresponding first line of pixels in said neighboring block to filter relative to said block boundary based on [a comparison of] said second filter decision value to a second threshold value Proposed by: Respondents	1, 5, 16
4	U.S. Patent No. 9,641,841	calculat[ing] said first decision value as: $ p_{20}-2p_{10}+p_{00} + p_{23}-2p_{13}+p_{03} $ Proposed by: Respondents	2, 6
5	U.S. Patent No. 9,641,841	“calculat[ing] said second filter decision value as: $ q_{20}-2q_{10}+q_{00} + q_{23}-2q_{13}+q_{03} $ ” Proposed by: Respondents	2, 6
6	U.S. Patent No. 10,142,659	“A user equipment comprising a deblocking filter unit for reducing blocking artifacts at a block boundary between a block of multiple pixels and a neighboring block of multiple pixels in a video frame, wherein the deblocking filter unit comprises:” Proposed by: Complainant	10

I. Agreed Terms

a. U.S. Patent No. 10,708,618

Term/Phrase	Claim(s)	Agreed Construction
“configured to” Proposed by: Respondents	8, 12, 14, 15	Plain and ordinary meaning, which requires more than mere capability
“A decoder configured to decode an encoded representation of a picture in a video stream of multiple pictures, the decoder comprising” Proposed by: Complainant	8, 12	Preamble is limiting, plain and ordinary meaning

b. U.S. Patent No. 10,708,613

Term/Phrase	Claim(s)	Agreed Construction
“configured to” Proposed by: Respondents	1-3	Plain and ordinary meaning, which requires more than mere capability
“A decoder for managing reference pictures to be used for decoding an encoded representation of a picture of a video sequence, the decoder configured to.” Proposed by: Complainant	1	Preamble is limiting

c. U.S. Patent No. 9,641,841

Term/Phrase	Claim(s)	Agreed Construction
“configured to” Proposed by: Respondents	5-13	Plain and ordinary meaning, which requires more than mere capability
“A non-transitory computer-readable medium comprising, stored thereupon, a computer program for filtering control of a block of multiple pixels in a video frame, each pixel having a respective pixel value, said computer program comprising code means which when run on a computer causes the computer to:” Proposed by: Respondents	16	Preamble is limiting

d. U.S. Patent No. 10,142,659

Term/Phrase	Claim(s)	Agreed Construction
“configured to” Proposed by: Respondents	10-16	Plain and ordinary meaning, which requires more than mere capability
“calculating a second offset to be based on $(p2+p0-2xpl+2x\Delta)/4$ ” Proposed by: Complainant	4	“calculating a second offset to be based on $(p2+p0-2xpl+2x\Delta)/4$ ”

II. No Dispute

a. U.S. Patent No. 10,708,613

There are no claim construction disputes concerning the '613 Patent.

III. Disputed Terms

a. U.S. Patent No. 10,708,618

No.	Term	Claim(s)	Complainant's Proposed Construction	Respondents' Proposed Construction
1	“circuit [configured to]” Proposed by: Respondents	12-16	Plain and ordinary meaning of “arrangement of electrical components [configured to].”	“arrangement of electrical components implemented in hardware, and not effectuated by a processor, [configured to].”

b. U.S. Patent No. 9,641,841

No.	Term	Claim(s)	Complainant's Proposed Construction	Respondents' Proposed Construction
2	determin[ing] how many pixels in [a/said] first line of pixels in said block to fill[t]er relative to said block boundary based on [a comparison of] said first filter decision value to a first threshold value Proposed by: Respondents	1, 5, 16	Plain and ordinary meaning	“determin[ing] how many pixels in [a/said] first line of pixels in said block to fill[t]er relative to said block boundary based on [a comparison of] said first filter decision value [to a first threshold value], wherein determining how many pixels in said first line of pixels in said block has no mathematical basis in (no relationship with) the pixel values of pixels in said neighboring block . . .”

No.	Term	Claim(s)	Complainant's Proposed Construction	Respondents' Proposed Construction
3	determin[ing] how many pixels in [a/said] corresponding first line of pixels in said neighboring block to filter relative to said block boundary based on [a comparison of] said second filter decision value to a second threshold value Proposed by: Respondents	1, 5, 16	Plain and ordinary meaning	“determin[ing] how many pixels in said corresponding first line of pixels in said neighboring block to filter relative to said block boundary based on [a comparison of] said second filter decision value [to a second threshold value], wherein determining how many pixels in said corresponding first line of pixels in said neighboring block has no mathematical basis in (no relationship with) the pixel values of pixels in said block”
4	calculat[ing] said first decision value as: $ p_{20}-2p_{10}+p_{00} + p_{23}-2p_{13}+p_{03} $, Proposed by: Respondents	2, 6	Not indefinite, plain and ordinary meaning	Indefinite
5	“calculat[ing] said second filter decision value as: $ q_{20}-2q_{10}+q_{00} + q_{23}-2q_{13}+q_{03} $ Proposed by: Respondents	2, 6	Not indefinite, plain and ordinary meaning	Indefinite

c. U.S. Patent No. 10,142,659

No.	Term	Claim(s)	Complainant's Proposed Construction	Respondents' Proposed Construction
6	“A user equipment comprising a deblocking filter unit for reducing blocking artifacts at a block boundary between a block of multiple pixels and a neighboring block of multiple pixels in a video frame, wherein the deblocking filter unit comprises;” Proposed by: Complainant	10	Preamble is limiting, plain and ordinary meaning	Preamble is limiting as to “a deblocking filter unit for reducing blocking artifacts at a block boundary between a block of multiple pixels and a neighboring block of multiple pixels in a video frame, wherein the deblocking filter unit comprises;”

Date: June 6, 2024

Respectfully submitted,

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Inv. No. 337-TA-1387

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2024, copies of the foregoing were filed with and served upon the following as indicated:

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