

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DAEDALUS PRIME LLC,

Plaintiff,

v.

MEDIATEK INC.,

Defendant.

Civil Action No. 2:24-cv-235-JRG

**PLAINTIFF DAEDALUS PRIME LLC’S P.R. 4-2 DISCLOSURE OF
PRELIMINARY CLAIM CONSTRUCTIONS AND EXTRINSIC EVIDENCE**

Pursuant to Patent Local Rule (“P.R.”) 4-2(a) and the Court’s Docket Control Order (Dkt. 33), and further to the parties’ P.R. 4-1(c) meet-and-confer on April 14, 2025, Plaintiff Daedalus Prime LLC (“Daedalus Prime”) makes the following disclosure of preliminary claim constructions.

To the extent claim construction of additional terms or phrases may be appropriate as these proceedings further evolve, Daedalus Prime will raise those issues at an appropriate time using the appropriate means recognized under the law. To the extent Defendant MediaTek Inc. (“MediaTek”) contends that additional claim terms are indefinite beyond those it identified as indefinite in its view during the parties’ April 14, 2025 meet and confer, Daedalus Prime reserves the right to address such contentions at an appropriate time.

Pursuant to P.R. 4-2(b) and the Court’s Docket Control Order (Dkt. 33), Daedalus Prime provides the following preliminary identification of extrinsic evidence which supports its preliminary positions below regarding U.S. Patent Nos. 9,887,838, 10,725,919, and 10,705,960: PUB0000262 - PUB0000464.

Pursuant to P.R. 4-2(b) and the Court's Docket Control Order (Dkt. 33), Daedalus Prime provides the following preliminary identification of testimony of expert witnesses that supports its claim construction positions and positions that none of the proposed terms are indefinite. Daedalus Prime may rely on the testimony of Dr. Steven Przybylski to explain the relevant technologies, the state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant arts, how those of ordinary skill in the art at the time of each invention would have understood statements made by the patentee during prosecution of the applications that led to the Asserted Patents, and the meaning of the relevant claim elements to a person of ordinary skill in the art at the time of the inventions, including whether a person of ordinary skill in the art could discern the boundaries of each relevant claim element with reasonable certainty. Daedalus Prime may also rely on the testimony of Dr. Przybylski regarding the parties' proposed constructions, the plain and ordinary meaning of the terms proposed for construction, to respond to any expert opinions offered in support of MediaTek Inc.'s proposed constructions, to explain why a person of ordinary skill in the art would not understand the terms proposed for construction to be indefinite, and to respond to any contentions or expert opinions offered by MediaTek Inc., or for the Court's benefit. Daedalus Prime reserves the right to introduce expert declarations or testimony to rebut MediaTek's claim construction positions and any expert declarations or testimony introduced or offered by MediaTek.

Pursuant to P.R. 4-2(c), Daedalus Prime is available to meet and confer for the purposes of finalizing the list of claim terms for construction, narrowing or resolving differences, discussing MediaTek's contention that some of the terms below lack antecedent basis or include typographical errors and related proposals, and facilitating the ultimate preparation of a Joint Claim Construction and Prehearing Statement under P.R. 4-3.

U.S. Patent No. 8,769,316		
Claim 8	“determining, in a power controller of a multi-domain processor, a power budget for the multi-domain processor for a current time interval”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term.
Claims 8-11	“minimum reservation value”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term.
Claim 9	“allocating the power budget to the second domain and not to the first domain if the power budget is less than the minimum reservation value for the second domain” (Based on the parties’ P.R. 4-1(c) meet-and-confer, MediaTek, Inc. contends that this term is indefinite)	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not indefinite Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term.
Claim 11	“allocating a remaining portion of the power budget to the first domain when the power budget is greater than the minimum reservation value for the second domain but less than a sum of the minimum reservation value for the second domain and the minimum reservation value for the first domain” (Based on the parties’ P.R. 4-1(c) meet-and-confer, MediaTek, Inc. contends that this term is indefinite)	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not indefinite Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term.

U.S. Patent No. 9,887,838		
Claim 1 Claim 9 Claim 17	“encrypt the symmetric session key based on the security key” “encrypting the session key based on a security key” “encrypt the session key based on a security key”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of these terms. Extrinsic support: PUB0000262-PUB0000442

U.S. Patent No. 11,507,167		
Claim 1	“wherein each core comprises a processor” (Based on the parties’ P.R. 4-1(c) meet-and-confer, MediaTek, Inc. contends that this term is indefinite)	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not indefinite Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term.
Claims 1, 12, 15	“power control unit” (MediaTek, Inc. contends that this is a means-plus-function term.)	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not a means-plus-function term Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term.
Claims 14, 15	“system agent” (MediaTek, Inc. contends that this is a means-plus-function term.)	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not a means-plus-function term Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term.

U.S. Patent No. 10,372,197		
Claims 1, 2 Claim 15	“workload configuration input” “workload configuration value”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of these terms.
Claims 1-6, 8, 11-13, 15, 16, 18	“energy performance bias (EPB) value”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term.
Claim 4 Claim 5 Claim 8	“the EPB value from the plurality of cores” “the EPB value from the plurality of threads” “the EPB value”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of these terms.

U.S. Patent No. 10,740,281		
Claims 4, 11	“some of, but not all of, the first plurality of cores and the second plurality of cores are enabled” (Based on the parties’ P.R. 4-1(c) meet-and-confer, MediaTek, Inc. contends that this term is indefinite)	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not indefinite Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term.

U.S. Patent No. 10,705,960		
Claims 1, 15, 20	“the plurality of cores comprising symmetric multi-threaded cores”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term. Extrinsic support: PUB0000443-PUB0000464
Claims 1, 20	“cache management circuitry” (MediaTek, Inc. contends that this is a means-plus-function term.) (Based on the parties’ P.R. 4-1(c) meet-and-confer, MediaTek, Inc. contends that this term is indefinite)	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not a means-plus-function term; not indefinite Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term. Extrinsic support: PUB0000443-PUB0000464
Claim 1	“power management circuitry” (MediaTek, Inc. contends that this is a means-plus-function term.) (Based on the parties’ P.R. 4-1(c) meet-and-confer, MediaTek, Inc. contends that this term is indefinite)	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not a means-plus-function term; not indefinite Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term. Extrinsic support: PUB0000443-PUB0000464
Claims 1, 15, 20	“wherein an average distance between cores in the first cluster is less than an average distance between the plurality of cores” (Based on the parties’ P.R. 4-1(c) meet-and-confer, MediaTek, Inc. contends that this term is indefinite)	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not indefinite Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term. Extrinsic support: PUB0000443-

		PUB0000464
Claims 1, 20 Claim 15	“selectively gate power” “selectively gating power”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of these terms. Extrinsic support: PUB0000443-PUB0000464
Claim 10	“the execution circuit”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term. Extrinsic support: PUB0000443-PUB0000464

U.S. Patent No. 10,725,919

Claims 1, 16, 21	“the plurality of cores comprising symmetric multi-threaded cores”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term. Extrinsic support: PUB0000443-PUB0000464
Claims 1, 21	“cache management circuitry” (MediaTek, Inc. contends that this is a means-plus-function term.) (Based on the parties’ P.R. 4-1(c) meet-and-confer, MediaTek, Inc.	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not a means-plus-function term; not indefinite Daedalus Prime may rely on the

	contends that this term is indefinite)	expert testimony of Dr. Steven Przybylski regarding the proper construction of this term. Extrinsic support: PUB0000443-PUB0000464
Claim 1	“power management circuitry” (MediaTek, Inc. contends that this is a means-plus-function term.) (Based on the parties’ P.R. 4-1(c) meet-and-confer, MediaTek, Inc. contends that this term is indefinite)	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not a means-plus-function term; not indefinite Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term. Extrinsic support: PUB0000443-PUB0000464
Claims 1, 16, 21	“wherein an average distance between cores in the first cluster is less than an average distance between all of the cores” (Based on the parties’ P.R. 4-1(c) meet-and-confer, MediaTek, Inc. contends that this term is indefinite)	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning; not indefinite Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term. Extrinsic support: PUB0000443-PUB0000464
Claims 1, 21 Claim 16	“selectively gate power” “selectively gating power”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of these terms. Extrinsic support: PUB0000443-PUB0000464

U.S. Patent No. 8,984,228		
Claim 13	“the cache line”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the

		expert testimony of Dr. Steven Przybylski regarding the proper construction of this term.
Claim 1	“caching agent a single caching agent”	Daedalus Prime’s Preliminary Claim Construction: plain and ordinary meaning Daedalus Prime may rely on the expert testimony of Dr. Steven Przybylski regarding the proper construction of this term.

Dated: April 17, 2025

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CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing document, *Plaintiff Daedalus Prime's P.R. 4-2*

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