IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

INTELLECTUAL VENTURES II LLC,	§	
	§	
Plaintiff,	§	
	§	C.A. No. 1:24-cv-00884-ADA
v.	§	
	§	**JURY TRIAL DEMANDED**
TESLA, INC.,	§	
	§	
Defendant.	§	
	§	

JOINT CLAIM CONSTRUCTION STATEMENT

Plaintiff Intellectual Ventures II LLC ("IV") and Defendant Tesla, Inc. ("Tesla") (collectively, the "Parties") hereby provide the following Joint Claim Construction Statement for the terms, phrases, and clauses appearing in the asserted claims of U.S. Patent Nos. 7,336,805 ("the '805 Patent"), 9,706,500 ("the '500 Patent"), 10,292,138 ("the '138 Patent"), 10,952,153 ("the '153 Patent"), 8,898,395 ("the '395 Patent"), 10,136,416 ("the '416 Patent"), 7,916,180 ("the '180 Patent"), 9,232,158 ("the '158 Patent"), 7,181,743 ("the '743 Patent"), 6,894,639 ("the '639 Patent"), 11,206,670 ("the '670 Patent"), and 11,664,889 ("the '889 Patent") (collectively, the "Asserted Patents" or "Patents-in-Suit").

The Parties reserve the right to revise their claim constructions, particularly in response to or in consideration of IV's proposals and positions concerning claim construction, validity, and/or infringement.

I. AGREED CONSTRUCTIONS

Patent	Claim(s)	Terms/Phrases	Agreed Construction
9,706,500	11	"multi-level transmit power control (TPC) command" / "multi-level TPC command"[1]	Plain and ordinary meaning.
10,952,153	1	"multi-level TPC command"[2]	Plain and ordinary meaning.
7,181,743	10	preamble	Limiting
9,232,158	1, 8	"integration time"	"the time the image sensor collects and integrates signal from the scene."[3]
9,232,158	1	"[A]n image capture device"	"a device including a plurality of sensors, where two or more of the plurality of sensors each capture an overlapping portion of the same scene."[4]

II. LIST OF DISPUTED TERMS FOR CONSTRUCTION

The Parties provide the following list of disputed terms for construction, in the order they are addressed in the Parties' claim construction briefing.

U.S. Patent 6,894,639			
Claim(s)	Claim Term	IV's Proposed Construction	Tesla's Proposed Construction
1	"said target feature information"	Plain and ordinary meaning. Not indefinite.	Indefinite
7	"said feature information"	Plain and ordinary meaning. Not indefinite.	Indefinite

[1] After extrinsic evidence of the Parties was disclosed, Tesla withdrew its indefiniteness arguments in its December 5, 2024 Disclosure.
[2] After extrinsic evidence of the Parties was disclosed, Tesla withdrew its indefiniteness arguments in its December 5, 2024 Disclosure.
[3] This construction is based on and adopts the Court's opinion and order in *Intellectual Ventures I LLC, et. al. v. General Motors Company et al.*, 21-cv-1088, Dkt. No. 83 at 2, Dkt. No. 84 at 46–52 (W.D. Tex. Dec. 1, 2022).
[4] This construction is based on and adopts the Court's opinion and order in *Intellectual Ventures I LLC, et. al. v. General Motors Company et al.*, 21-cv-1088, Dkt. No. 83 at 2, Dkt. No. 84 at 46–52 (W.D. Tex. Dec. 1, 2022).

U.S. Patent 7,336,805			
Claim(s)	Claim Term	IV's Proposed Construction	Tesla's Proposed Construction
1	"may at least partially describe a potential destination"	Plain and ordinary meaning. Not indefinite.	Indefinite
1	"potential geometric objects for plausibility using a matching algorithm so as to identify one or more plausible objects"	Plain and ordinary meaning. Not indefinite.	Indefinite

U.S. Patent 8,898,395			
Claim(s)	Claim Term	IV's Proposed Construction	Tesla's Proposed Construction
1	"said processing"	Plain and ordinary meaning. Not indefinite.	Indefinite

U.S. Patent 10,136,416			
Claim(s)	Claim Term	IV's Proposed Construction	Tesla's Proposed Construction
1	"broadcast information"	**Original**: Plain and ordinary meaning. **Revised**: Plain and ordinary meaning, which is "information that is transmitted via a broadcast."	**Original**: Plain and ordinary meaning, which is "information that is received via a broadcast transmission to all UEs within a base station's coverage area." **Revised**: Plain and ordinary meaning, which is "information that is transmitted via a broadcast transmission to all UEs within a base station's coverage area."

Dated: March 28, 2025

Respectfully submitted,

By: */s/ Aamir A. Kazi*
Aamir A. Kazi (admitted to W.D. Tex.)
kazi@fr.com
Fish & Richardson P.C.
1180 Peachtree Street, 21st Floor
Atlanta, GA 30309
T: (404) 892-5005

Daniel R. Gopenko (admitted to W.D. Tex.)
gopenko@fr.com
Fish & Richardson P.C.
1000 Maine Ave SW, Suite 1000
Washington, DC 20024
T: (202) 783-5070

David M. Hoffman (TX Bar No. 24046084)
hoffman@fr.com
Fish & Richardson P.C.
111 Congress Avenue, Suite 2000
Austin, TX 78701
(512) 472-5070

Matt Colvin (TX Bar No. 24087331)
colvin@fr.com
Michael Ellis (TX Bar No. 24102726)
ellis@fr.com
Fish & Richardson P.C.
1717 Main Street, Suite 5000
Dallas, TX 75201
T: (214) 747-5070

Kathryn Quisenberry (TX Bar No. 24105639)
quisenberry@fr.com
Fish & Richardson P.C.
909 Fannin Street, Suite 2100
Houston, TX 77010
T: (713) 654-5300

By: */s/ Jonathan K. Waldrop*
Jonathan K. Waldrop (CA Bar No. 297903)
(Admitted in this District)
jwaldrop@kasowitz.com
Darcy L. Jones (CA Bar No. 309474)
(Admitted in this District)
djones@kasowitz.com
Marcus A. Barber (CA Bar No. 307361)
(Admitted in this District)
mbarber@kasowitz.com
John W. Downing (CA Bar No. 252850)
(Admitted in this District)
jdowning@kasowitz.com
Heather S. Kim (CA Bar No. 277686)
(Admitted in this District)
hkim@kasowitz.com
ThucMinh Nguyen (CA Bar No. 304382)
(Admitted in this District)
tnguyen@kasowitz.com
KASOWITZ BENSON TORRES LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, California 94065
Telephone: (650) 453-5170
Facsimile: (650) 453-5171

Jeceaca An (NY Bar No. 5849898)
KASOWITZ BENSON TORRES LLP
(Admitted in this District)
jan@kasowitz.com
1633 Broadway
New York, NY 10019
Telephone: (212) 506-1700
Facsimile: (212) 506-1800

Mark D. Siegmund (TX Bar No. 24117055)
msiegmund@cjsjlaw.com
CHERRY JOHNSON SIEGMUND JAMES PLLC
Bridgeview Center
7901 Fish Pond Road
Waco, Texas 76710
Telephone: (254) 732-2242

Paul Margulies (DC Bar No. 1000297)
pmargulies@tesla.com
Tesla, Inc.
800 Connecticut Ave, NW
Washington, DC 20006
T: (202) 695-5388

Attorneys for Defendant TESLA, INC.

William Ellerman (TX Bar No. 24007151)
wellerman@cjsjlaw.com
CHERRY JOHNSON SIEGMUND JAMES PLLC
One Glen Lakes Tower
8140 Walnut Hill Lane, Suite 105
Dallas, Texas 75231
Telephone: (254) 732-2242
Facsimile: (866) 627-3509

Attorneys for Plaintiff INTELLECTUAL VENTURES II LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record on this 28th day of March, 2025, via the Court's CM/ECF system.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop