**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).



Ex.1060 / IPR2025-00222 / Page 2 of 5
TESLA INC. v. INTELLECTUAL VENTURES II LLC

| 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.<br>**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."<br>**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,

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## 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