

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

MAXELL, LTD.,

Plaintiff,

v.

CORETRONIC CORP., OPTOMA CORP.,

Defendants.

Civil Action No. 5:24-CV-00088-RWS-JBB

JURY TRIAL DEMANDED

P.R. 4-3 JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

In accordance with P.R. 4-3 and the First Amended Docket Control Order (Dkt. 65), Plaintiff Maxell, Ltd. and Defendants Coretronic Corp. and Optoma Corp. (together, “Defendants”) hereby provide this joint claim construction chart that lists the agreed term (in Section I) and disputed terms (in Section II) to be addressed at the *Markman* Hearing scheduled for May 6, 2025.

The claim terms listed below appear in U.S. Patent Nos. 7,159,988 (“the ‘988 Patent”); 8,593,580 (the “’580 Patent”); 9,547,226 (the “’226 Patent”); and 9,565,388 (the “’388 Patent”).¹

I. The Construction of Those Claim Terms, Phrases, or Clauses on Which the Parties Agree

The Parties agree to the construction of the following term.

TERM / PATENT / CLAIM	AGREED CONSTRUCTION
“almost” (’580 Patent, cl. 11)	Plain and ordinary meaning

¹ The Parties have not proposed any terms for construction from U.S. Patent Nos. 7,850,313 (the “’313 Patent”); 9,322,530 (the “’530 Patent”); and 9,900,569 (the “’569 Patent”).

II. Each Party's Proposed Claim Construction or Indefiniteness Position for Each Disputed Claim Term, Phrase, or Clause

Following are the list of the ten most significant terms according to the Parties' priorities.

Of these terms, the following six may be case or claim dispositive by virtue of Defendants' indefiniteness arguments:

- “separation mirror” – ’580 Patent, cls. 10, 11;
- “an emission side of the excitation light relative to the fluorescent material” – ’226 Patent, cl. 8;
- “the optical member has a curvature that is set such that a light-condensing position of the excitation light is positioned on an emission side of the excitation light relative to the fluorescent material” – ’226 Patent, cl. 8;
- “at least either one of the convex lens and the concave lens has a curvature that is set so as to allow the excitation light to be made incident on the fluorescent material at a front side of the fluorescent material as a light-condensing position” – ’226 Patent, cl. 10;
- “Retinex processing unit” – ’388 Patent, cls. 4, 6, 16, 18; and
- “video composing unit” – ’388 Patent, cls. 4, 6, 10, 16, 18, 22.

No.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
1.	“projection optical unit” “a first projection optical unit” “a second projection optical unit” (’988 Patent, cls. 1, 7, 8)	Plain and ordinary meaning, for example, an assembly of lenses, mirrors, and/or other optical elements to form an enlarged image.	<u>Intrinsic Evidence:</u> ’988 Patent, at Abstract; 1:13-28, 1:32-53, 3:11-48, 6:42-7:45, 7:4-23, 8:34-65, 9:9-27, 10:13-11:8, 11:52-12:57, 13:39-25:43, Figs. 1, 3, 13, 56, 33-44, 56, and corresponding disclosures in the ’988 patent specification; Tables 1-15, and corresponding disclosures in the ’988 patent specification. <u>Extrinsic Evidence:</u> Defendants’ Invalidity Contentions Pursuant to Patent Local Rules 3-3 and 3-4 (and exhibits thereto) U.S. Patent No. 9,677,720; U.S. Patent No. 8,960,980 Pursuant to DCO, Maxell hereby identifies Dr. Michael Lebby as an	Governed by pre-AIA 35 U.S.C. § 112, ¶ 6 <u>Function:</u> to form an enlarged image <u>Structure:</u> a lens group having a positive refractive power	<u>Intrinsic Evidence:</u> ’988 Patent at Abstract; Figs. 3, 13, 23, 33-42 and corresponding disclosures in the ’988 Patent specification; 2:40-54;7:4-14; Claims 1, 7, and 8.

No.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			expert witness who will offer opinion testimony (by declaration) in support of Maxell's proposed constructions of the disputed claim limitations for the '988 Patent. Dr. Lebby will likely testify that this term would be well understood by a person of ordinary skill in the art in view of the '988 Patent's specification.		
2.	"light separation optic system" ('580 Patent, cls. 1, 10, 32)	Plain and ordinary meaning, for example, collection of one or more optic units configured to separate light into different colors.	<u>Intrinsic Evidence:</u> '580 Patent, at Abstract; 3:1-10, 5:3, 5:31-39, Fig 1, and corresponding disclosures in the '580 patent specification. <u>Extrinsic Evidence:</u> Defendants' Invalidity Contentions Pursuant to Patent Local Rules 3-3 and 3-4 (and exhibits thereto) Pursuant to DCO, Maxell hereby identifies	Governed by pre-AIA 35 U.S.C. § 112, ¶ 6 <u>Function:</u> to separate white light from a light source configured to emit white lights including a light emitting from a fluorescent substance into blue-color light, green-color light, and red-color light <u>Structure:</u> two (2) dichroic mirrors and one (1) reflection mirror statically oriented and positioned relative to	<u>Intrinsic Evidence:</u> '580 Patent at Fig. 1 and corresponding disclosures in the '580 Patent specification; 5:31-35; 6:3-23; Claims 1, 10, and 32.

NO.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			Dr. Masud Mansuripur as an expert witness who will offer opinion testimony (by declaration) in support of Maxell's proposed constructions of the disputed claim limitations for the '580 Patent. Dr. Mansuripur will likely testify that this term would be well understood by a person of ordinary skill in the art in view of the '580 Patent's specification.	each other as shown in Fig. 1, wherein dichroic mirror 31 reflects the blue light and transmits the green light and the red light, dichroic mirror 32 receives the separated light from dichroic mirror 31 and reflects the green light and transmits the red light, and reflection mirror 33 reflects the blue light reflected by dichroic mirror 31	
3.	"light modulation means" ('580 Patent, cls. 1, 9, 10, 18, 32)	Governed by pre-AIA 35 U.S.C. § 112, ¶ 6 <u>Function</u> : making light-modulation on a respective one of the lights of the R, G and B separated, depending on a video signal <u>Structure</u> : image display element such as a liquid crystal panel or a digital mirror device, and equivalents thereof	<u>Intrinsic Evidence:</u> '580 Patent, at abstract, 3:8-13, 3:42-49, 6:33-44. <u>Extrinsic Evidence:</u> Defendants' Invalidity Contentions Pursuant to Patent Local Rules 3-3 and 3-4 (and exhibits thereto) U.S. Patent No. 8,029,146	Governed by pre-AIA 35 U.S.C. § 112, ¶ 6 <u>Function</u> : to change the intensity of each of the separated blue-color light, green-color light, and red-color light <u>Structure</u> : a set of three panels, one for each separated color light, each of which is a transmission-type liquid crystal panel, a reflection-type liquid	<u>Intrinsic Evidence:</u> '580 Patent at Fig. 1 and corresponding disclosures in the '580 Patent specification; 3:1-10; 3:42-50; 5:1-19; 7:41-48; Claims 1, 9, 10, 18, 19, and 26, and 32.

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			Pursuant to DCO, Maxell hereby identifies Dr. Masud Mansuripur as an expert witness who will offer opinion testimony (by declaration) in support of Maxell's proposed constructions of the disputed claim limitations for the '580 Patent. Dr. Mansuripur will likely testify that the specification of the '580 Patent discloses structure for performing the proposed functions and that Maxell's proposed structure accurately recites the structure disclosed in the '580 Patent.	crystal panel, or a digital mirror device made by aligning plural number of micro-mirrors	
4.	"separation mirror" ('580 Patent, cls. 10, 11)	Plain and ordinary meaning, for example, a part designed to pass and/or reflect different characteristics of lights in a projector.	<u>Intrinsic Evidence:</u> '580 Patent, at 4:12-14, 7:57-8:8, 8:37-65, 9:66-10:6, 10:28-53, Figs. 2, 4, and corresponding disclosures in the '580 patent specification.	Governed by pre-AIA 35 U.S.C. § 112, ¶ 6 <u>Function:</u> to transmit excitation light from a solid-state light emitting element and to reflect light from the fluorescent substance	<u>Intrinsic Evidence:</u> '580 Patent at Fig. 4 and corresponding disclosures of the '580 Patent specification; 8:37-50; Claims 10, 11 and 29.

No.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			<u>Extrinsic Evidence:</u> Defendants' Invalidity Contentions Pursuant to Patent Local Rules 3-3 and 3-4 (and exhibits thereto) U.S. Patent No. 9,152,031 U.S. Patent No. 8,780,947 U.S. Patent No. 8,018,646 US 2010/0195191 A1 Pursuant to DCO, Maxell hereby identifies Dr. Masud Mansuripur as an expert witness who will offer opinion testimony (by declaration) in support of Maxell's proposed constructions of the disputed claim limitations for the '580 Patent. Dr. Mansuripur will likely testify that this term would be well understood by a person of ordinary skill in the	<u>Structure:</u> None disclosed	

NO.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			art in view of the '580 Patent's specification.		
5.	"light flux capturing means" ('580 Patent, cls. 7, 37)	Governed by pre-AIA 35 U.S.C. § 112, ¶ 6 <u>Function</u>: capturing light flux <u>Structure</u>: a lens, a mirror, or a combination of lenses and/or mirrors that captures at least some portion of light, and equivalents thereof	<u>Intrinsic Evidence:</u> '580 Patent, at 3:17-32, 4:40-67, 5:40-60, 7:57-8:11, Figs. 1-2 and corresponding disclosures in the '580 patent specification. <u>Extrinsic Evidence:</u> Defendants' Invalidity Contentions Pursuant to Patent Local Rules 3-3 and 3-4 (and exhibits thereto) Wiley Electrical and Electronics Engineering Dictionary (2004), p. 293 ("flux") ("The rate of flow of a given quantity across a given area. In the case of light, for instance, the number of photons striking a given surface area perpendicular to its path, per unit time.")	Governed by pre-AIA 35 U.S.C. § 112, ¶ 6 <u>Function</u>: to direct white light emitted from the light source <u>Structure</u>: A reflection surface, such as a mirror, having a focus point	<u>Intrinsic Evidence:</u> '580 Patent at 3:17-31, 8:51-65; Claims 7, 16, and 37.

No.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			<i>Id.</i>, p. 419 (“light flux”) (“same as luminous flux”) (p. 440, (“luminous flux”) (“The luminous energy (2) per unit time. This concept may refer to light produced by a source, or that which is received by a surface. Its SI unit is lumen. Also called light flux.”). Chambers Dictionary of Science and Technology (2007), p.697 (“light flux”) (“The measure of the quantity of light passing through an area, e.g. through a lens system. Light flux is measured in lumens. Illumination is light flux per unit area.”) Pursuant to DCO, Maxell hereby identifies Dr. Masud Mansuripur as an expert witness who will offer opinion testimony (by declaration) in support of Maxell’s proposed		

No.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			constructions of the disputed claim limitations for the '580 Patent. Dr. Mansuripur will likely testify that the specification of the '580 Patent discloses structure for performing the proposed functions and that Maxell's proposed structure accurately recites the structure disclosed in the '580 Patent.		
6.	"an emission side of the excitation light relative to the fluorescent material" ('226 Patent, cl. 8)	Not indefinite. Plain and ordinary meaning, for example, an excitation light's exit side of the fluorescent material that faces away from the excitation light source.	<u>Intrinsic Evidence:</u> '226 Patent, at 3:48-51, 3:24-35, 3:39-59, 4:27-57, 4:65-5:9, 5:41-67, 6:11-15, Figs. 1-4, and corresponding disclosures in the '226 patent specification. <u>Extrinsic Evidence:</u> Defendants' Invalidity Contentions Pursuant to Patent Local Rules 3-3 and 3-4 (and exhibits thereto)	If the Court determines that this term is amenable to construction, then Coretronic and Optoma propose: The surface of the fluorescent material on the side facing the excitation light source.	<u>Intrinsic Evidence:</u> '226 Patent at Fig. 1 and corresponding disclosure of the '226 Patent specification; 3:39-59; Claim 8.

No.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			New Oxford American Dictionary (3rd ed., 2010) at 1473, (“relative to”) (“in terms of a connection to: some stars appear to change their position relative to each other.”) Pursuant to the DCO, Maxell hereby identifies Dr. Michael Lebby as an expert witness who will offer opinion testimony (by declaration) in support of Maxell’s proposed constructions of the disputed claim limitations for the ’226 Patent. Dr. Lebby will likely testify that this term/phrase would be well understood by a person of ordinary skill in the art in view of the ’226 Patent’s specification. Further, Dr. Lebby will testify that the scope of this term would be readily apparent with reasonable certainty to a POSITA.		

NO.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
7.	“the optical member has a curvature that is set such that a light-condensing position of the excitation light is positioned on an emission side of the excitation light relative to the fluorescent material”² (’226 Patent, cl. 8)	Plain and ordinary meaning, for example, the optical member has a curvature that causes a light-condensing position of the excitation light to be positioned on an excitation light’s exit side of the fluorescent material that faces away from the excitation light source.	<u>Intrinsic Evidence:</u> ’226 Patent, at Abstract; 3:45-51, 4:5-24, Figs. 1-4, and corresponding disclosures in the ’226 patent specification. <u>Extrinsic Evidence:</u> Defendants’ Invalidity Contentions Pursuant to Patent Local Rules 3-3 and 3-4 (and exhibits thereto) New Oxford American Dictionary (3rd ed., 2010) at 1364, (“position”) (“the location where someone or something should be” “a particular way in which someone or something is placed or arranged.”) New Oxford American Dictionary (3rd ed., 2010) at 426, (“curvature”) (“the fact of being curved or the degree to which	If the Court determines that this term is amenable to construction, then Coretronic and Optoma propose that “a light-condensing position” be construed to mean: An illumination region formed by converging light rays	<u>Intrinsic Evidence:</u> ’226 Patent at Abstract; Fig. 1 and corresponding disclosure of the ’226 Patent specification; 1:46-55; 3:39-59; 4:5-23; Claim 8.

² It is Defendants’ position that only “a light-condensing position” requires construction should the Court determine that it is amenable to construction.

NO.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			something is curved” “the degree to which a curve deviates from a straight line, or a curved surface deviates from a plane.”)		
8.	“at least either one of the convex lens and the concave lens has a curvature that is set so as to allow the excitation light to be made incident on the fluorescent material at a front side of the fluorescent material as a light-condensing position” ³ (’226 Patent, cl. 10)	Plain and ordinary meaning, for example, either the convex lens or the concave lens (or both) has a curvature that causes the excitation light to be incident on a front side of the fluorescent material as a light- condensing position.	<u>Intrinsic Evidence:</u> ’226 Patent, at 1:51-55, 3:39-59, 4:5-24, Figs. 1-4, and corresponding disclosures in the ’226 patent specification. <u>Extrinsic Evidence:</u> Defendants’ Invalidity Contentions Pursuant to Patent Local Rules 3-3 and 3-4 (and exhibits thereto) New Oxford American Dictionary (3rd ed., 2010) at 426, (“curvature”) (“the fact of being curved or the degree to which	If the Court determines that this term is amenable to construction, then Coretronic and Optoma propose that “a front side of the fluorescent material” be construed to mean: The surface of the fluorescent material on the side facing the excitation light source.	<u>Intrinsic Evidence:</u> ’226 Patent at Fig. 1 and corresponding disclosure of the ’226 Patent specification; 1:46-55; 3:39-59; 4:5-23; Claim 10.

³ It is Defendants’ position that only “a front side of the fluorescent material” requires construction should the Court determine that it is amenable to construction.

No.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			something is curved” “the degree to which a curve deviates from a straight line, or a curved surface deviates from a plane.”) New Oxford American Dictionary (3rd ed., 2010) at 878, (“incident”) (“(esp. of light or other radiation) falling on or striking something: when an ion beam is incident on a surface”) Dictionary of Computer Vision and Image Processing (2005) at 135, (“incident light”) (“a general term referring to the light that strikes or illuminates a surface.”) New Oxford American Dictionary (3rd ed., 2010) at p.1597 (“set”) (“(be set) be situated or fixed in a specific place or position”)		

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			The American Heritage Dictionary of the English Language (5th ed., 2011), at p.48 (“allow”) (“to make provisions for; assign”) Pursuant to the DCO, Maxell hereby identifies Dr. Michael Lebby as an expert witness who will offer opinion testimony (by declaration) in support of Maxell’s proposed constructions of the disputed claim limitations for the ’226 Patent. Dr. Lebby will likely testify that this term/phrase would be well understood by a person of ordinary skill in the art in view of the ’226 Patent’s specification. Further, Dr. Lebby will testify that the scope of this term would be readily apparent with reasonable certainty to a POSITA.		

NO.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
9.	“Retinex processing unit” (’388 Patent, cls. 4, 6, 16, 18)	Not indefinite. Plain and ordinary meaning, for example, one or more processors that are capable of executing a Retinex process or one or more processors that are capable of executing a processing to control definition of a video and/or to control visibility of a video.	<u>Intrinsic Evidence:</u> ’388 Patent, at 1:10-21; 1:58-2:4; 3:60-4:57,5:4-36; 6:46-58; 7:6-8:42; 11: 6-61; 13:59-15:21; Figs. 1, 2, 3, 4A, 4B, 7, 8, 9A, 9B, 13, 14, 15, 17, 18, and corresponding disclosures in the ’388 patent specification. <u>Extrinsic Evidence:</u> Defendants’ Invalidity Contentions Pursuant to Patent Local Rules 3-3 and 3-4 (and exhibits thereto) Dictionary of Theories (1993) p. 463 (“retinex theory”) (“Proposed by the American inventor and physicist Edwin Herbert Land (1909-) (“This postulates three separate visual systems (retinexes), one primarily responsive to long-wavelength light, one to moderate, and the	Governed by 35 U.S.C. § 112(f) <u>Function:</u> perform a Retinex process <u>Structure:</u> None disclosed	<u>Intrinsic Evidence:</u> ’388 Patent at Abstract; 3:60-65; 4:44-57; 7:54-59; Claims 4, 6, 16, and 18; <i>see generally</i> specification of the ’388 Patent.

No.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			third to short-wavelength light. Each one is represented as an analogue to a black-and-white picture taken through a specific filter, each producing maximum activity in response to red, green and blue light for the long, moderate, and short-wavelength retinexes, respectively.”) Fundamentals of Sensory Perception (2011), p. 495 (“retinex theory”) (“The notion that colour constancy requires both low-level(retina-based) and high-level (cortex-based) processing (retina+cortex=retinex)”) Sensation and Perception (5th ed., 2010) p.411(“retinex theory”) (“Retinex theory seeks to explain color perception and color constancy based primarily on perception of the pattern		

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			of reflectances from the stimuli") Dictionary of Science and Technology (2nd ed.; 2007), p. 488 ("processing")("the use of a computer to solve a problem or organise data"); ("process")("a series of actions or changes that achieve a particular result, 4. COMPUT to carry out a number of tasks to produce a result such as sorting data or finding a solution to a problem") U.S. Patent No. 8,711,225 Pursuant to the DCO, Maxell hereby identifies Dr. Vijay Madisetti as an expert witness who will offer opinion testimony (by declaration) in support of Maxell's proposed constructions of the disputed claim limitations for the '388 Patent. Dr. Madisetti will likely testify that this		

NO.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			term/phrase would be well understood by a person of ordinary skill in the art in view of the '388 Patent's specification. Further, Dr. Madisetti will testify that the scope of this term would be readily apparent with reasonable certainty to a POSITA.		
10.	"video composing unit" ('388 Patent, cls. 4, 6, 10, 16, 18, 22)	Not indefinite. Plain and ordinary meaning, for example, a portion of one or more processors that composes a video	<u>Intrinsic Evidence:</u> '388 Patent, at 1: 58-2:4; 4:53-65; 6:46-7:64; 12:39-65; Figs. 1, 2, 3, 13, 14, 15, 17, and corresponding disclosures in the '388 patent specification. <u>Extrinsic Evidence:</u> Defendants' Invalidity Contentions Pursuant to Patent Local Rules 3-3 and 3-4 (and exhibits thereto) Chambers Dictionary of Science and Technology (2007), p. 1279	Governed by 35 U.S.C. § 112(f) <u>Function:</u> compose a video from a video processed by the first Retinex processing unit and a video processed by the second Retinex processing unit in accordance with a feature of the video input from the video input unit <u>Structure:</u> None disclosed	<u>Intrinsic Evidence:</u> '388 Patent at Abstract; 4:44-57; Claims 4, 6, 10, 16, 18, 22; <i>see generally</i> specification of the '388 Patent.

No.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			(“video”) (“Originally, the picture component of a TV signal, but now used generally to describe the electronic handling of visual images.”) Dictionary of Science and Technology (2nd ed.; 2007), p. 133 (“compose”) (“to be made from a number of parts”) Pursuant to the DCO, Maxell hereby identifies Dr. Vijay Madisetti as an expert witness who will offer opinion testimony (by declaration) in support of Maxell’s proposed constructions of the disputed claim limitations for the ’388 Patent. Dr. Madisetti will likely testify that this term/phrase would be well understood by a person of ordinary skill in the art in view of the ’388 Patent’s specification. Further,		

NO.	TERM / PATENT / CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	MAXELL'S EVIDENCE	DEFENDANTS' PROPOSED CONSTRUCTION	DEFENDANTS' EVIDENCE
			Dr. Madisetti will testify that the scope of this term would be readily apparent with reasonable certainty to a POSITA.		

III. The Anticipated Length of Time Necessary for the Claim Construction Hearing

The Parties anticipate three hours as the total length of time necessary for the claim construction hearing, with the time divided equally between Maxell and Coretronic.

IV. Whether Any Party Proposed to Call One or More Witnesses

At this time, the Parties do not expect to call any witnesses.

V. A List of Any Other Issues Which Might Appropriately Be Taken Up at a Prehearing Conference

At this time, the Parties are not aware of any issues that might appropriately be taken up at a prehearing conference.

Date: February 18, 2025

By: /s/ Bryan Nese

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 18th day of February 2025, with a copy of this document via the Court's CM/ECF system.

/s/ Bryan Nese
Bryan Nese