UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

RESONANT SYSTEMS, INC., d/b/a RevelHMI, Plaintiff, v. APPLE INC., Defendants.	Case No. 7:23-cv-000077-DC **JURY TRIAL DEMANDED**

PLAINTIFF'S IDENTIFICATION OF PROPOSED CONSTRUCTIONS

Plaintiff Resonant Systems, Inc. ("Plaintiff" or "Resonant") hereby provides the following disclosure of proposed constructions for the claim terms identified by Defendant Apple Inc. ("Defendant" or "Apple") for construction. Plaintiff's disclosure is based on currently available information, and Plaintiff reserves the right to modify this disclosure should additional information become available through discovery. Plaintiff further reserves the right to modify this disclosure once it has reviewed Defendant's proposed constructions.

No.	Term	Claim(s)	Proposed Construction
1	*Preambles*: "linear resonant vibration module"; "linear vibration module"; "vibration module"; "oscillating resonant module[s]"	'767 patent, claim 1; '337 patent, claims 1, 2, 4; '830 patent, claims 1, 19, 20; '882 patent, claims 1, 10	No construction necessary; plain and ordinary meaning
2	"control component . . ."	'767 patent, claims 1, 3, 5; '337 patent, claims 1, 2, 4; '830 patent,	No construction necessary; plain and ordinary meaning

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No.	Term	Claim(s)	Proposed Construction
		claims 1–6, 15, 17, 19, 20; ’882 patent, claims 1, 3–7, 10	
3	“a control component that includes a microprocessor and that controls supply of power from the power supply to the driving component to cause the moveable component to linearly oscillate, the control component including, in addition to the microprocessor, a control program, stored in one of a separated electronic memory or within the processor, that is executed by the microprocessor to control operation of the linear resonant vibration module, and a switch that receives a directional signal d from the processor and that selects a corresponding direction of the two opposite directions in which the driving component drives the moveable component, the control component receiving output signals from sensors within the linear resonant vibration module during operation of the linear resonant vibration module and adjusting one or more operational control outputs of the control component according to the received output signals from the sensors in order that subsequent operation of linear resonant vibration module produces desired outputs from the one or more sensors corresponding to one or more operational control parameters”	’767 patent, claim 1	No construction necessary; plain and ordinary meaning

No.	Term	Claim(s)	Proposed Construction
4	"a control component that controls supply of power from the power supply to the driving component to cause the moveable component to oscillate at a frequency and an amplitude [that are independently] specified by user input received from the user-input features [wherein the control component drives simultaneous oscillation of the moveable component at two or more frequencies to generate complex vibration modes.]"	'337 patent, claims 1, 2, 4	No construction necessary; plain and ordinary meaning
5	"a control component that controls supply of power from the power supply to the driving component to cause the moveable component to oscillate at a frequency and an amplitude specified by one or more stored values [wherein the control component drives simultaneous oscillation of the moveable component at two or more frequencies to generate complex vibration modes.]"	'830 patent, claims 1, 19, 20	No construction necessary; plain and ordinary meaning
6	"a control component that receives control signals input to the oscillating resonant module [by the controller], receives outputs from the one or more sensors, and controls oscillation of the mass to produce a vibration response according to the received control signals by generating, using one or more of the received sensor outputs, control outputs to an actuator that drives the mass to oscillate"		No construction necessary; plain and ordinary meaning

No.	Term	Claim(s)	Proposed Construction
7	"driving component . . ."	'767 patent, claim 1; '337 patent, claims 1, 2, 4; '830 patent, claims 1, 19, 20	No construction necessary; plain and ordinary meaning
8	"a driving component that drives the moveable component in each of two opposite directions"	'767 patent, claim 1	No construction necessary; plain and ordinary meaning
9	"a driving component that drives the moveable component in each of two opposite directions within the housing"	'337 patent, claims 1, 2, 4	No construction necessary; plain and ordinary meaning
10	"a driving component that drives the moveable component to oscillate within the housing"	'830 patent, claims 1, 19, 20	No construction necessary; plain and ordinary meaning
11	"an oscillation path, which represents a segment of a space curve"	'882 patent, claims 1, 10	No construction necessary; plain and ordinary meaning
12	"the one or more sensors"	'767 patent, claim 1; '830 patent, claim 4	No construction necessary; plain and ordinary meaning
13	"the d"	'767 patent, claim 2	No construction necessary; plain and ordinary meaning
14	"desired outputs"	'767 patent, claim 1; '830 patent, claim 4	No construction necessary; plain and ordinary meaning
15	"the one or more operational control outputs"	'830 patent, claim 4	No construction necessary; plain and ordinary meaning
16	"the received output signals"	'830 patent, claim 4	No construction necessary; plain and ordinary meaning
17	"the sensors"	'830 patent, claim 4	No construction necessary; plain and ordinary meaning
18	"the mass"	'882 patent, claims 1, 3–7, 10	No construction necessary; plain and ordinary meaning
19	"the oscillating resonant module[s]" / "the one or more oscillating resonant module[s]"	'882 patent, claims 10, 17, 19, 20	No construction necessary; plain and ordinary meaning
20	"the physical device"	'882 patent, claim 17	No construction necessary; plain and ordinary meaning
21	"is are" (or all of claim 7)	'882 patent, claim 7	"are"
22	"claim 1"	'830 patent, claim 4	"claim 3"

No.	Term	Claim(s)	Proposed Construction
23	"claim 1"	'882 patent, claim 17	"claim 10"

Dated: February 15, 2024

Respectfully submitted,

/s/ *Reza Mirzaie*

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendant on February 15, 2024 via electronic service.

/s/ *Reza Mirzaie*