

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

RESONANT SYSTEMS, INC., d/b/a
RevelHMI,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 7:25-cv-000035-DC-DTG

JURY TRIAL DEMANDED

META PLATFORMS, INC.'S PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the Court's scheduling order, Meta hereby provides its proposed constructions. Meta's proposed constructions are based upon its current knowledge, its investigations to date, and its current understanding of Resonant's Preliminary Infringement Contentions and corresponding implied claim constructions. Accordingly, Meta reserves the right to modify this list to add, delete, or alter the identified terms, phrases, and proposed constructions based on, without limitation, Resonant's proposed constructions, any changes to the infringement contentions, or for any other appropriate reason. Meta further reserves the right to separately request construction of (i) portions of any identified term, (ii) the larger context surrounding any identified term, or (iii) one or more of Meta's identified claim terms together as a single term.

Claim	Term	Construction
2	"a driving component that drives the moveable component in each of two opposite directions within the housing"	Subject to 35 U.S.C. § 112(f) Function: driving the moveable component in each of two opposite directions within the housing

Claim	Term	Construction
		Structure: coils 420, 514, 626, 1202, 1204, 1302, 1304, 1412, 1414, 1510 (also shown in Figs. 16–17); stator coils of Figs. 24A, 24B, 25; electromagnets shown in Figs. 10–11; and equivalents thereof.
2	“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 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.”	Subject to 35 U.S.C. § 112(f) Function: controlling 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 user input received from the user-input features; driving simultaneous oscillation of the movable component at two or more frequencies to generate complex vibration modes. Structure: a microcontroller, a processor, a microprocessor, or a CPU that performs the algorithm shown in Steps 706 through 716 in Figure 7A, with reference to the steps shown in Figures 7B and 7C, or the algorithm described in the corresponding text, See, e.g. 7:10–7:24, 7:32–8:30 and/or equivalents thereof.

Dated: August 13, 2025

Respectfully submitted,

By: /s/ Kathi Vidal

Kathi Vidal

(Admitted *Pro Hac Vice*)

KVidal@winston.com

Joseph C. Masullo (Admitted *Pro Hac Vice*)

JMasullo@winston.com

WINSTON & STRAWN LLP

1901 L Street, N.W.

Washington, D.C. 20036-3506

Telephone: (202) 282-5000

Facsimile: (202) 282-5001

Samantha Lerner (Admitted *Pro Hac Vice*)

SLerner@winston.com

Ryan Bradley (Admitted *Pro Hac Vice*)

RBradley@winston.com

WINSTON & STRAWN LLP

35 W. Wacker

Chicago, Illinois 60601

Telephone: (312) 558-5600

Facsimile: (312) 558-5700

Matthew R. McCullough (Admitted *Pro Hac Vice*)

MRMcCullough@winston.com

WINSTON & STRAWN LLP

255 Shoreline Drive, Suite 520

Redwood City, California 94065

Telephone: (650) 858-6500

Facsimile: (650) 858-6550

Daniel Marzagalli (Admitted *Pro Hac Vice*)

DMarzagalli@winston.com

WINSTON & STRAWN LLP

200 Park Avenue

New York, NY 10166-4193

Telephone: (212) 294-6700

Facsimile: (212) 294-4700

Paige Arnette Amstutz

Texas State Bar No. 00796136

SCOTT DOUGLASS & MCCONNICO LLP

303 Colorado Street, Suite 2400

Austin, TX 78701

Telephone: (512) 495-6300

Facsimile: (512) 495-6399

pamstutz@scottdoug.com

Counsel for Defendant Meta Platforms, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document on August 13, 2025.

/s/ Kathi Vidal
Kathi Vidal