

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

PHENIX LONGHORN LLC,

Plaintiff,

v.

AU OPTRONICS CORPORATION,
HISENSE ELECTRONICA MEXICO,
S.A. DE C.V., HISENSE USA
CORPORATION, HISENSE VISUAL
TECHNOLOGY CO., LTD., and DOES 1–10,

Defendants.

CIVIL CASE NO. 2:23-cv-00477-RWS-RSP

JURY TRIAL DEMANDED

PHENIX LONGHORN LLC,

Plaintiff,

v.

INNOLUX CORPORATION and
DOES 1–10,

Defendants.

CIVIL CASE NO. 2:23-cv-00478-RWS-RSP

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Local Patent Rule 4-3 and the Court’s Docket Control Order (Dkt. 67 in Case No. 2:23-cv-00477 and Dkt. 34 in Case No. 2:23-cv-00478), Plaintiff Phenix Longhorn, LLC (“Phenix” or “Plaintiff”) and Defendants AUO Corporation (“AUO”), Hisense Electronica Mexico, S.A. de C.V. (“Hisense Mexico”), Hisense USA Corporation (“Hisense USA”), Hisense Visual Technology Co., Ltd. (“Hisense Visual”), and Innolux Corporation (“Innolux”) (collectively, “Defendants”) hereby submit the parties’ Joint Claim Construction Statement.

I. AGREED CLAIM CONSTRUCTION (P.R. 4-3(a)(1))

The parties have agreed to the following construction for U.S. Patent No. 7,233,305 (“the ’305 Patent”):

Term	Claims	Agreed Construction
“An integrated circuit for producing voltage signals on a plurality of outputs comprising”	1	The preamble of claim 1 is a limitation reciting one integrated circuit.
“circuits for programming”	1 and 5	Plain and ordinary meaning
“programming said storage cells”	1	Writing data to a storage cell
“drivers”	1	Buffers or amplifiers
“predetermined gamma reference voltage signal display condition”	1	A display condition established by the predetermined gamma reference voltage signals based on the application that is being displayed, external environment such as temperature and ambient light, or the personal preference of the user
“means to switch between the banks based on one or more external signals”	1	Function: switching between the banks based on one or more external signals. Structure: ’305 Patent, 5:50-6:21; Figure. 4A (B0 B2); Figure. 4B (pins 20, 22, 23); Figure. 5 (Tdamp); Figure. 6 (Bank Select, B0, B1, B2).
“high voltage programming means”	5	Function: programming the non-volatile storage cells using a high voltage signal. Structure: (1) (a) a Program Interface, (b) a Vpp input that is used to select the programming mode, (c) the Vpp input also providing the high voltage pulses used during programming of an individual cell, and (d) address inputs A0 and A1 / bank inputs B0, B1, B2 used to select the location being programmed; as described at ’305 Patent 6:22-36, Figure 4A, Figure 4B, Figure 5 and Figure 6. and/or (2) (a) a Program interface, (b) a Vpp input, address inputs A0 and A1, and bank inputs B0, B1, B2 that are used to select the programming mode, (c) the Vpp

		input also providing the high voltage pulses used during programming of an the individual cell, and (d) address inputs A0 and A1 and bank inputs B0, B1, B2 used to select the location being programmed; as described at '305 Patent 6:37-53, Figure 4A, Figure 4B, Figure 5 and Figure 6
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The parties have agreed to the following construction for U.S. Patent No. 7,557,788 (“the ’788 Patent”):

Term	Claims	Agreed Construction
“A method of calibrating a liquid crystal display to a desired gamma curve to compensate for panel to panel manufacturing variations comprising the steps”	1	The preamble is limiting.

II. DISPUTED CLAIM CONSTRUCTIONS (P.R. 4-3(a)(2))

Attached hereto as Exhibit A and Exhibit B are charts setting forth each disputed patent claim term, phrase, or clause for which Plaintiff and Defendants propose different constructions and provides Plaintiff’s and Defendants’ identification of extrinsic and intrinsic evidence supporting their proposed constructions.

III. ESTIMATED CLAIM CONSTRUCTION HEARING LENGTH (P.R. 4-3(a)(3))

The parties anticipate no more than 5 hours for the claim construction hearing, with the time to be allocated equally between Plaintiff and Defendants (*i.e.*, Plaintiff – 2 hours; collective Defendants – 3 hours).

IV. LIVE WITNESSES (P.R. 4-3(a)(4))

The parties do not intend to offer live witness testimony at the claim construction hearing.

V. OTHER ISSUES TO BE ADDRESSED (P.R. 4-3(a)(5))

The parties do not anticipate any other issues that need to be taken up at a prehearing conference prior to the claim construction hearing.

Dated: May 8, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on May 8, 2025, a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service.

By: Eric H. Findlay
Eric H. Findlay

Exhibit A – Phenix v. AUO et al. Disputed Patent Claim Terms

The following chart lists the disputed patent claim terms, phrases, or clauses of the '305 Patent for which Plaintiff and Defendants AUO Corporation (“AUO”), Hisense Electronica Mexico, S.A. de C.V. (“Hisense Mexico”), Hisense USA Corporation (“Hisense USA”), Hisense Visual Technology Co., Ltd. (“Hisense Visual”) (collectively “AUO/Hisense”)¹ propose different constructions.

Term No.	Claims	Terms	Phenix’s Proposed Construction	Plaintiff’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
1	1 and 2	“non-volatile storage cells”	memory cells which retain stored data even when power is removed	<i>Intrinsic Evidence:</i> ² '305 Patent, at 2:16-28; 3:13-29; 3:38-47; 5:38-49; FIG. 2; FIG. 3; and FIG. 6. <i>File History, Phenix_AUO_Hisense_0000093/Phenix_In</i>	analog memory cells which retain stored data even when power is removed	<i>Intrinsic Evidence:</i> '305 Patent at 1:39-45, 2:4-12, 2:16-35, 3:7-29, 3:48-4:32, 5:30-59, 6:22-67, Figs. 2, 3, 4A-B, 5, 6, Tables 1-2, claims of the '305 patent '305 FH at September 6, 2006 Non-Final Rejection

¹ Defendants AUO/Hisense reserve the right to rely on any supporting evidence identified by Defendant Innolux Corporation. Defendants hereby expressly reserve the right to rely upon any document that is relied upon in any district court or PTAB filing identified in this chart, and further reserve the right to rely on any documents yet to be filed in such identified district court or PTAB proceedings, including but not limited to any institution decisions to issue in IPR2025-00043 and -00044. Defendants further reserve the right to cite and rely on any evidence obtained during claim construction discovery, including but not limited to, any deposition testimony of the inventors. Defendant further reserves the right to cite to anything else in the intrinsic record and to rely on supplemental expert testimony and evidence in rebuttal to any argument that Plaintiff presents in its claim construction briefs or expert testimony.

² In each instance, Plaintiff reserves the right to rely on the Board’s pending decision regarding institution of Innolux’s Petition for *Inter Partes* Review. See *Innolux v. Phenix Longhorn, LLC*, IPR2025-00043 (P.T.A.B.). Plaintiff further opposes AUO/Hisense’s purported reservation of right to rely on any supporting evidence identified by Defendant Innolux Corporation, as such evidence is “known to” AUO/Hisense as of the filing of the Joint Claim Construction Statement. See P.R. 4-3(a)(2).

Exhibit A – Phenix v. AUO et al. Disputed Patent Claim Terms

Term No.	Claims	Terms	Phenix's Proposed Construction	Plaintiff's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
				<i>nolux_0000093</i> including: • 4-16-2025 Patent Owner's Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255)		• '305 FH at December 26, 2006 Response to Non-Final Office Action • '305 FH at February 21, 2007 Notice of Allowance • '788 FH at July 22, 2008 Non-Final Office Action • '788 FH at October 22, 2008 Response to Non-Final Office Action • IPR2025-0043, including Petition for <i>Inter Partes</i> Review and Accompanying Exhibits; Patent Owner's Preliminary Response and Accompanying Exhibits; Petitioner's Reply; Patent Owner's Sur-Reply • IPR2018-01255, including Petition for <i>Inter Partes</i> Review; Patent Owner's Preliminary Response; Institution Decision <i>Extrinsic Evidence:</i> • IEEE 100 The Authoritative Dictionary of IEEE Standard Terms (7th Edition, 2000)

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Term No.	Claims	Terms	Phenix's Proposed Construction	Plaintiff's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
				• 10-29-2018 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 6-19-2018 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 3-14-2016 Certificate of Correction • 12-2-2015 Request for Certificate of Correction • 6-19-2007 Issue Notification • 2-21-2007 Notice of Allowance • 12-14-2006 Amendment and Response to OA • 9-6-2006 Office Action • 12-23-2003 Application		• McGraw-Hill Dictionary of Scientific and Technical Terms (5th Edition, 1994) • Testimony from expert witness Aris Silzars <i>Phenix Longhorn LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247 (E.D. Tex. Jun. 21, 2019); <i>see also id.</i> at Dkt. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23.

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Term No.	Claims	Terms	Phenix’s Proposed Construction	Plaintiff’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
				6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> - Testimony of expert witness, including but not limited to Joseph McAlexander <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 (E.D. Tex. Jun. 21, 2019)		
2	1	“coupled to”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> ’305 Patent, at 3:48-4:20; FIG. 2; FIG. 3; and FIG. 6. <i>File History, Phenix_AUO_Hisense_0000093/Phenix_Innolux_0000093 including:</i>	Indirectly or directly linked or joined	<i>Intrinsic Evidence:</i> ’305 Patent at 2:64-3:13, 3:49-4:20, 6:22-53, 6:67-7:6, 7:13-19, Figs. 2, 3, 6, claims of the ’305 patent. ’305 FH at September 6, 2006 Non-Final Rejection ’305 FH at December 26, 2006 Response to Non-Final Office Action

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				• 4-16-2025 Patent Owner's Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255) • 10-29-2018 Patent Owner's Preliminary		• '305 FH at February 21, 2007 Notice of Allowance • IPR2025-0043, including Petition for <i>Inter Partes</i> Review and Accompanying Exhibits; Patent Owner's Preliminary Response and Accompanying Exhibits; Petitioner's Reply; Patent Owner's Sur-Reply • IPR2018-01255, including Petition for <i>Inter Partes</i> Review; Patent Owner's Preliminary Response; Institution Decision <i>Extrinsic Evidence:</i> • IEEE 100 The Authoritative Dictionary of IEEE Standard Terms (7th Edition, 2000) • Webster's Ninth New Collegiate Dictionary (1998) • <i>Phenix Longhorn LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247 (E.D. Tex. Jun. 21, 2019); <i>see also id.</i> at Dkt. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23.

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Term No.	Claims	Terms	Phenix's Proposed Construction	Plaintiff's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
				Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 6-19-2018 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 3-14-2016 Certificate of Correction • 12-2-2015 Request for Certificate of Correction • 6-19-2007 Issue Notification • 2-21-2007 Notice of Allowance • 12-14-2006 Amendment and Response to OA • 9-6-2006 Office Action • 12-23-2003 Application • 6-11-2004 US 60/477,680		

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Term No.	Claims	Terms	Phenix’s Proposed Construction	Plaintiff’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
				Provisional Application <i>Extrinsic Evidence:</i> • Testimony of expert witness, including but not limited to Jospeh McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		
3	1	“multiplexer”	one or more circuits that selectively couple (1) one input (or one set of inputs) to one of many outputs (or one set of many sets of outputs) or (2) one of many inputs (or one set of many sets of inputs) to one	<i>Intrinsic Evidence:</i> • ’305 Patent, at 3:48-4:20; FIG. 2; FIG. 3; and FIG. 6. • <i>File History, Phenix_AUO_Hisense_0000093/Phenix_Involux_0000093 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter</i>	one or more circuits, excluding an I2C serial bus, that couple (1) one input (or one set of inputs) to one of many outputs (or one set of many sets of outputs) or (2) one of many inputs (or one set of many sets of inputs) to one	<i>Intrinsic Evidence:</i> • ’305 Patent at 1:39-45, 2:4-12, 3:7-29, 3:48-4:3, 4:21-32, 5:50-6:53, Figs. 2, 3, 4A-B, 6, Table 1, claims of the ’305 patent. • ’305 FH at September 6, 2006 Non-Final Rejection • ’305 FH at December 26, 2006 Response to Non-Final Office Action • ’305 FH at February 21, 2007 Notice of Allowance

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Term No.	Claims	Terms	Phenix's Proposed Construction	Plaintiff's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
			output (or one set of outputs)	<i>Partes</i> Review (IPR2025-00043) 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00043) 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255) 10-29-2018 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter</i>	output (or one set of outputs)	- IPR2025-0043, including Petition for <i>Inter Partes</i> Review and Accompanying Exhibits; Patent Owner's Preliminary Response and Accompanying Exhibits; Petitioner's Reply; Patent Owner's Sur-Reply - IPR2018-01255, including Petition for <i>Inter Partes</i> Review; Patent Owner's Preliminary Response; Institution Decision <i>Extrinsic Evidence:</i> - IEEE 100 The Authoritative Dictionary of IEEE Standard Terms (7th Edition, 2000) - McGraw-Hill Dictionary of Scientific and Technical Terms (5th Edition, 1994) <i>Phenix Longhorn LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247 (E.D. Tex. Jun. 21, 2019); <i>see also id.</i> at Dkt. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23.

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				• Testimony of expert witness, including but not limited to Jospeh McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247, at 13; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 (E.D. Tex Jun. 21, 2019)		
4	1	“connected to”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • ’305 Patent, at 3:48-4:20; FIG. 2; FIG. 3; and FIG. 6. • <i>File History, Phenix_AUO_Hisense_0000093/Phenix_Innolux_0000093 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 4-2-2025 Petitioner’s Reply in Support of	directly and/or physically linked or joined	<i>Intrinsic Evidence:</i> • ’305 Patent at 1:53-57, 3:1-13, 3:17-19, 3:25-29, 3:48-4:6, 4:11-20, 5:38-49, 6:22-7:19, Figs. 1, 2, 3, 4A-B, 5, 6, Tables 1-2, claims of the ’305 patent. • ’305 FH at September 6, 2006 Non-Final Rejection • ’305 FH at December 26, 2006 Response to Non-Final Office Action • ’305 FH at February 21, 2007 Notice of Allowance • IPR2025-0043, including Petition for <i>Inter Partes</i>

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Term No.	Claims	Terms	Phenix's Proposed Construction	Plaintiff's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
				its Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255) • 10-29-2018 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 6-19-2018 Petition and Accompanying		Review and Accompanying Exhibits; Patent Owner's Preliminary Response and Accompanying Exhibits; Petitioner's Reply; Patent Owner's Sur-Reply • IPR2018-01255, including Petition for <i>Inter Partes</i> Review; Patent Owner's Preliminary Response; Institution Decision <i>Extrinsic Evidence:</i> • IEEE 100 The Authoritative Dictionary of IEEE Standard Terms (7th Edition, 2000) • Webster's Ninth New Collegiate Dictionary (1998) • Merriam-Webster's Collegiate Dictionary (10th Edition, 2000) <i>Phenix Longhorn LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247 (E.D. Tex. Jun. 21, 2019); <i>see also id.</i> at Dkt. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23.

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Term No.	Claims	Terms	Phenix’s Proposed Construction	Plaintiff’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
				<i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		
5	1	“bank(s)”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> ’305 Patent, at 5:50-6:21; 6:37-53; 7:6-19; FIG. 2; FIG. 3; and FIG. 6. <i>File History, Phenix_AUO_Hisense_0000093/Phenix_Innolux_0000093 including:</i> 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00043) 4-2-2025 Petitioner’s Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00043)	contiguous sections of addressable computer memory arranged in n by m matrix format	<i>Intrinsic Evidence:</i> ’305 Patent at Abstract, 3:48-4:3, 4:11-20, 5:50-6:53, 7:9-12, 7:20-32, Figs. 3, 4A-B, 5, 6, claims of the ’305 patent. ’305 FH at September 6, 2006 Non-Final Rejection ’305 FH at December 26, 2006 Response to Non-Final Office Action ’305 FH at February 21, 2007 Notice of Allowance - IPR2025-0043, including Petition for <i>Inter Partes</i> Review and Accompanying Exhibits; Patent Owner’s Preliminary Response and Accompanying Exhibits; Petitioner’s Reply; Patent Owner’s Sur-Reply

Exhibit A – Phenix v. AUO et al. Disputed Patent Claim Terms

Term No.	Claims	Terms	Phenix's Proposed Construction	Plaintiff's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
				• 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255) • 10-29-2018 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 6-19-2018 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255)		• IPR2018-01255, including Petition for <i>Inter Partes</i> Review; Patent Owner's Preliminary Response; Institution Decision <i>Extrinsic Evidence:</i> • IEEE 100 The Authoritative Dictionary of IEEE Standard Terms (7th Edition, 2000) • <i>Phenix Longhorn LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247 (E.D. Tex. Jun. 21, 2019); <i>see also id.</i> at Dkt. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23.

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Term No.	Claims	Terms	Phenix's Proposed Construction	Plaintiff's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
				• 3-14-2016 Certificate of Correction • 12-2-2015 Request for Certificate of Correction • 6-19-2007 Issue Notification • 2-21-2007 Notice of Allowance • 12-14-2006 Amendment and Response to OA • 9-6-2006 Office Action • 12-23-2003 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-		

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Term No.	Claims	Terms	Phenix’s Proposed Construction	Plaintiff’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
				cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		
6	5	“external source for the high voltage programming means”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • ’305 Patent, at 6:22-53; FIG. 2; FIG. 3; FIG. 4A; FIG. 4B; FIG. 5 and FIG. 6. • <i>File History, Phenix_AUO_Hisense_0000093/Phenix_Innolux_0000093 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 4-2-2025 Petitioner’s Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 3-12-2025 Patent Owner’s Preliminary Response and Accompanying	N/A	N/A

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Term No.	Claims	Terms	Phenix's Proposed Construction	Plaintiff's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
				Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255) • 10-29-2018 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 6-19-2018 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 3-14-2016 Certificate of Correction		

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				• 12-2-2015 Request for Certificate of Correction • 6-19-2007 Issue Notification • 2-21-2007 Notice of Allowance • 12-14-2006 Amendment and Response to OA • 9-6-2006 Office Action • 12-23-2003 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony of expert witness, including but not limited to Jospeh McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247, at 46-53; Dkts. 52,		

Exhibit A – Phenix v. AUO et al. Disputed Patent Claim Terms

Term No.	Claims	Terms	Phenix’s Proposed Construction	Plaintiff’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
				73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 (E.D. Tex Jun. 21, 2019)		

The following chart lists the disputed patent claim terms, phrases, or clauses of the ’788 Patent³ for which Plaintiff and Defendants AUO/Hisense⁴ propose different constructions.

Term No.	Terms	Phenix’s Proposed Construction	Phenix’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
7	“Gamma reference	plain and ordinary meaning	<i>Intrinsic Evidence:</i> ⁵ ’788 Patent, at 2:17-28; 2:61-3:12; 3:24-	Indefinite. Alternatively, to the extent the Court decides	<i>Intrinsic Evidence:</i> ’788 Patent at Figs. 2, 3, 4A-B, 5 and 6, 2:17-28,

³ All disputed terms for the ’788 Patent are directed to claim 1. Thus, the column indicating the claim number has been removed.

⁴ Defendants AUO/Hisense reserve the right to rely on any supporting evidence identified by Defendant Innolux Corporation. Defendants hereby expressly reserve the right to rely upon any document that is relied upon in any district court or PTAB filing identified in this chart, and further reserve the right to rely on any documents yet to be filed in such identified district court or PTAB proceedings, including but not limited to any institution decisions to issue in IPR2025-00043 and -00044. Defendants further reserve the right to cite and rely on any evidence obtained during claim construction discovery, including but not limited to, any deposition testimony of the inventors. Defendant further reserves the right to cite to anything else in the intrinsic record and to rely on supplemental expert testimony and evidence in rebuttal to any argument that Plaintiff presents in its claim construction briefs or expert testimony.

⁵ In each instance, Plaintiff reserves the right to rely on the Board’s pending decision regarding institution of Innolux’s Petition for *Inter Partes* Review. See *Innolux v. Phenix Longhorn, LLC*, IPR2025-00044 (P.T.A.B.). Plaintiff further opposes AUO/Hisense’s purported reservation of right to rely on any supporting evidence identified by Defendant Innolux Corporation, as such evidence is “known to” AUO/Hisense as of the filing of the Joint Claim Construction Statement. See P.R. 4-3(a)(2).

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Term No.	Terms	Phenix's Proposed Construction	Phenix's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
	control capability”		30; 3:36-58; 5:28-47; 6:32-51; FIG 2; FIG 3; and FIG 6. • <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner's Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter</i>	the term is not indefinite, the term should be construed as: Function: programming and storing gamma reference voltage values in storage cells that are used to generate gamma reference voltage outputs and switching between different gamma settings to implement dynamic gamma correction Structure: Fig. 2 (programming interface 230, gamma reference controller 210, and gamma reference controller 220) AND Fig. 3 (programming engine 310, Analog Input, R/W, MUX 320, A0, A1, A2, and floating gate memory cells 330-337) AND Fig. 5 (Tdamp)	2:45-48, 2:61-3:12, 3:24-58, 5:28-57, 6:1-14, 6:52-64, claims of the '788 patent. • '788 FH at July 22, 2008 Non-Final Office Action • '788 FH at October 22, 2008 Response to Non-Final Office Action • '788 FH at November 12, 2008 Notice of Non-Compliant Amendment • '788 FH at December 8, 2008 Amendment and Response to Notice of Non-Compliant Amendment • '788 FH at March 5, 2009 Notice of Allowance • IPR2025-0044, including Petition for <i>Inter Partes</i> Review and Accompanying Exhibits; Patent Owner's Preliminary Response and Accompanying Exhibits; Petitioner's Reply; Patent Owner's Sur-Reply <i>Extrinsic Evidence:</i> Testimony from expert witness Aris Silzars

Exhibit A – Phenix v. AUO et al. Disputed Patent Claim Terms

Term No.	Terms	Phenix's Proposed Construction	Phenix's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
			<i>Partes Review</i> (IPR2025-00044) • 7-07-2009 Issue Notification • 3-5-2009 Notice of Allowance • 12-8-2008 Amendment and Response to OA • 11-12-2008 Notice of Non-Complaint Amendment • 10-22-2008 Amendment and Response to OA • 7-22-2008 Office Action • 5-1-2007 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony and the expert declaration of expert witness, including but not	OR Fig. 6 (programming interface, Vpp, MUX, A0, A1, Bank Select, B0, B1, B2, floating gate memory cells) AND Fig. 5 (Tdamp) and equivalents thereof.	

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Term No.	Terms	Phenix’s Proposed Construction	Phenix’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
			limited to Josphe McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		
8	“control circuit”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • ’788 Patent, at 2:17-28; 2:61-3:12; 5:28-35; Table 1; Table 2; FIG 2; FIG 3; and FIG 6. • <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner’s Reply in Support of	Indefinite. Alternatively, to the extent the Court decides the term is not indefinite, the term should be construed as: Function: varying gamma reference voltage levels on columns of a display Structure: Fig. 2 (gamma reference controller 210 AND gamma reference controller 220) AND Fig. 3 (programming engine 310, Analog Input, R/W, MUX 320,	<i>Intrinsic Evidence:</i> • ’788 patent at Figs. 2-3, 4A-B, 5, and 6, 2:17-28, 2:45-48, 2:61-3:12, 3:24-58, 4:8-19, 5:28-36, 5:48-57 6:1-58, claims of the ’788 patent • ’788 FH at July 22, 2008 Non-Final Office Action • ’788 FH at October 22, 2008 Response to Non-Final Office Action • ’788 FH at November 12, 2008 Notice of Non-Compliant Amendment • ’788 FH at December 8, 2008 Amendment and Response to Notice of Non-Compliant Amendment

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Term No.	Terms	Phenix's Proposed Construction	Phenix's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
			its Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 7-07-2009 Issue Notification • 3-5-2009 Notice of Allowance • 12-8-2008 Amendment and Response to OA • 11-12-2008 Notice of Non-Complaint Amendment • 10-22-2008 Amendment and Response to OA	A0, A1, A2, and drivers 340-347) OR Fig. 6 (programming interface, Vpp, MUX, A0, A1, Bank Select, B0, B1, B2, and drivers (not numbered))	• '788 FH at March 5, 2009 Notice of Allowance • IPR2025-0044, including Petition for <i>Inter Partes</i> Review and Accompanying Exhibits; Patent Owner's Preliminary Response and Accompanying Exhibits; Petitioner's Reply; Patent Owner's Sur-Reply <i>Extrinsic Evidence:</i> Testimony from expert witness Aris Silzars

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Term No.	Terms	Phenix’s Proposed Construction	Phenix’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
			• 7-22-2008 Office Action • 5-1-2007 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony and the expert declaration of expert witness, including but not limited to Jospeh McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		
9	“means for executing a predetermined algorithm”	Function: executing a predetermined algorithm.	<i>Intrinsic Evidence:</i> • ’788 Patent, at Abstract; 2:17-29; 2:61-3:12; 6:1-14; 6:32-7:10; and FIG. 2.		

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Term No.	Terms	Phenix’s Proposed Construction	Phenix’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
		Structure: programming interface	• <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner’s Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 3-12-2025 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 7-07-2009 Issue Notification		

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Term No.	Terms	Phenix's Proposed Construction	Phenix's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
			• 3-5-2009 Notice of Allowance • 12-8-2008 Amendment and Response to OA • 11-12-2008 Notice of Non-Complaint Amendment • 10-22-2008 Amendment and Response to OA • 7-22-2008 Office Action • 5-1-2007 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony and the expert declaration of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-		

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Term No.	Terms	Phenix's Proposed Construction	Phenix's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
			00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		
10	"means for executing a predetermined algorithm according to a predetermined criteria and data sensed by said at least one sensor / means for executing said predetermined algorithm"	Subject to Plaintiff's Proposed construction of Term 10, any additional language of Term 11 should be given its plain and ordinary meaning.	<i>Intrinsic Evidence:</i> • '788 Patent, at Abstract; 2:17-29; 2:61-3:12; 6:1-14; 6:32-7:10; and FIG. 2. • <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner's Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 3-12-2025 Patent Owner's Preliminary Response and	Indefinite. Alternatively, to the extent the Court decides the term is not indefinite, the term should be construed as: Function: execution of an algorithm that optimizes gamma reference voltage levels based on (1) data sensed by at least one sensor and (2) the application that is being displayed, external environment such as temperature and ambient light, or the personal preference of the user Structure: Fig. 2 (programming interface	<i>Intrinsic Evidence:</i> • '788 Patent at Abstract, Figs. 2, 3, 4A-B, 5, and 6, 2:61-3:12-58, 5:21-36, 5:48-57, 6:1-7:10, claims of the '788 patent • '788 FH at July 22, 2008 Non-Final Office Action • '788 FH at October 22, 2008 Response to Non-Final Office Action • '788 FH at November 12, 2008 Notice of Non-Compliant Amendment • '788 FH at December 8, 2008 Amendment and Response to Notice of Non-Compliant Amendment • '788 FH at March 5, 2009 Notice of Allowance • IPR2025-0044, including Petition for <i>Inter Partes</i> Review and Accompanying

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			Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 7-07-2009 Issue Notification • 3-5-2009 Notice of Allowance • 12-8-2008 Amendment and Response to OA • 11-12-2008 Notice of Non-Complaint Amendment • 10-22-2008 Amendment and Response to OA • 7-22-2008 Office Action • 5-1-2007 Application • 6-11-2004 US 60/477,680 Provisional Application	230), Ain, A0, A1, A2, R/W control signal or Fig. 6 (programming interface, Vpp, Aout, A0, A1), 6:1-14 or 6:57-64 (PC programming interface connected to monitors feeding back data from the display during optimization tuning at a time of manufacturing) and equivalents thereof	Exhibits; Patent Owner's Preliminary Response and Accompanying Exhibits; Petitioner's Reply; Patent Owner's Sur-Reply <i>Extrinsic Evidence:</i> Testimony from expert witness Aris Silzars

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			<i>Extrinsic Evidence:</i> • Testimony and the expert declaration of expert witness, including but not limited to Jospeh McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		
11	“predetermined algorithm”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • ’788 Patent, at Abstract; 2:17-29; 2:61-3:12; 6:1-14; 6:52-7:10; and FIG. 2. • <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter</i>	AUO’s and Indefinite. Alternatively, to the extent the Court decides the term is not indefinite, the term should be construed as: “an algorithm for optimizing gamma reference voltage levels for an LCD including following steps: [1] drive the R/W signal low or Vpp signal	<i>Intrinsic Evidence:</i> • ’788 patent at Figs 2, 3, 4A-B, 5, and 6, 2:17-29, 2:45-48, 2:61-3:58, 4:8-19, 5:48-57, 6:1-31, 6:48-49, 6:52-67, claims of the ’788 patent. • ’788 FH at October 22, 2008 Response to Non-Final Office Action • ’788 FH at November 12, 2008 Notice of Non-Compliant Amendment

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Term No.	Terms	Phenix's Proposed Construction	Phenix's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
			<i>Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 7-07-2009 Issue Notification • 3-5-2009 Notice of Allowance • 12-8-2008 Amendment and Response to OA • 11-12-2008 Notice of Non-Complaint Amendment	(and/or placing A0, A1, A2, B0, B1, B2 signals in 1, 1, 1, 1, 1, 1 configuration) high for said LCD; [2] selecting output or channel of an integrated circuit to program using A0-A2 and/or B0-B2 for said LCD; [3] determining a desired voltage for selected output using at least one optical sensor on said LCD, which provides data sensed for said LCD; [4] comparing optical data corresponding to an optimum gamma curve or predetermined criteria with the data sensed by said at least one sensor for said LCD; [5] based on a result of the foregoing comparison, determining if the predetermined criteria are met for each	• '788 FH at December 8, 2008 Amendment and Response to Notice of Non-Compliant Amendment • '788 FH at March 5, 2009 Notice of Allowance • IPR2025-0044, including Petition for <i>Inter Partes</i> Review and Accompanying Exhibits; Patent Owner's Preliminary Response and Accompanying Exhibits; Petitioner's Reply; Patent Owner's Sur-Reply <i>AUO's and Hisense's Extrinsic Evidence:</i> Testimony from expert witness Aris Silzars

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			10-22-2008 Amendment and Response to OA 7-22-2008 Office Action 5-1-2007 Application 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> - Testimony and the expert declaration of expert witness, including but not limited to Jospeh McAlexander <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)	selected output/channel of said LCD; if so, continue to step [7] for said LCD; [6] in an event that the “predetermined criteria” are not met, varying gamma reference voltage levels and repeating Steps [3]-[5] for said LCD until the predetermined criteria are met for said LCD; [7] drive the R/W signal high or pulse the Vpp signal (and/or placing A0, A1, A2, B0, B1, B2 signals in 1, 1, 1, 1, 1, 1 configuration) for said LCD, and write the value on the analog input into memory for the output/channel selected by A0-A2 and/or B0-B2 for said LCD. OR	

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				an algorithm for optimizing gamma reference voltage levels for an LCD, including following steps: [1] preloading the integrated circuit of said LCD with a default configuration, which is close to the historical values for the majority of displays for said LCD; [2] drive the R/W signal low or Vpp signal (and/or placing A0, A1, A2, B0, B1, B2 signals in 1, 1, 1, 1, 1, 1 configuration) high for said LCD; [3] determining which parameter needs to be changed during testing for said LCD; [4] testing said LCD using at least one sensor for said LCD; [5] comparing optical data corresponding to an optimum gamma curve	

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Term No.	Terms	Phenix’s Proposed Construction	Phenix’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
				or predetermined criteria with the data sensed by said at least one sensor for said LCD; [6] based on a result of the foregoing comparison, determining if the predetermined criteria are met for each selected output/channel of said LCD; if so, continue to step [8] for said LCD; [7] in an event that the “predetermined criteria” are not met for said LCD, varying gamma reference voltage levels and repeating Steps [4]-[6] for said LCD until the predetermined criteria are met for said LCD; [8] drive the R/W signal high or pulse the Vpp signal (and/or placing A0, A1, A2, B0, B1, B2 signals in 1, 1, 1, 1, 1	

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Term No.	Terms	Phenix’s Proposed Construction	Phenix’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
				configuration) of said LCD, and write the value on the analog input into memory for the output/channel selected by A0-A2 and/or B0-B2 for said LCD	
12	“optimizing said gamma reference voltage levels”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • ’788 Patent, at Abstract; 2:17-29; 2:61-3:12; 6:1-14; 6:52-7:10; Table 1; Table 2; and FIG. 2. • <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner’s Reply in Support of its Petition for <i>Inter</i>		

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			<i>Partes Review (IPR2025-00044)</i> • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes Review (IPR2025-00044)</i> • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes Review (IPR2025-00044)</i> • 7-07-2009 Issue Notification • 3-5-2009 Notice of Allowance • 12-8-2008 Amendment and Response to OA • 11-12-2008 Notice of Non-Complaint Amendment • 10-22-2008 Amendment and Response to OA • 7-22-2008 Office Action		

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Term No.	Terms	Phenix’s Proposed Construction	Phenix’s Supporting Evidence	AUO/Hisense’s Proposed Construction	AUO/Hisense’s Supporting Evidence
			• 5-1-2007 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony and the expert declaration of expert witness, including but not limited to Jospeh McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		
13	“gamma reference voltage levels”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • ’788 Patent, at 1:21-46; 3:6-12; 3:46-58; 6:65-7:10; Table 1; Table 2; FIG. 2; FIG. 3; and FIG. 6.	An analog voltage(s) stored in an analog storage cell	<i>Intrinsic Evidence:</i> ’788 patent at Figs. 2-3, 4A-B, 5 and 6, 1:30-46, 2:3-21, 2:61-3:30, 3:46-4:7, 5:36-47, 6:1-7:10, claims of the ’788 patent. • ’788 FH at July 22, 2008 Non-Final Office Action

Exhibit A – Phenix v. AUO et al. Disputed Patent Claim Terms

Term No.	Terms	Phenix's Proposed Construction	Phenix's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
			• <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner's Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 7-07-2009 Issue Notification		• '788 FH at October 22, 2008 Response to Non-Final Office Action • '788 FH at November 12, 2008 Notice of Non-Compliant Amendment • '788 FH at December 8, 2008 Amendment and Response to Notice of Non-Compliant Amendment • '788 FH at March 5, 2009 Notice of Allowance IPR2025-0044, including Petition for <i>Inter Partes</i> Review and Accompanying Exhibits; Patent Owner's Preliminary Response and Accompanying Exhibits; Petitioner's Reply; Patent Owner's Sur-Reply <i>Extrinsic Evidence:</i> • IEEE 100 The Authoritative Dictionary of IEEE Standard Terms (7th Edition, 2000) • <i>Phenix Longhorn LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247 (E.D. Tex. Jun. 21, 2019);

Exhibit A – Phenix v. AUO et al. Disputed Patent Claim Terms

Term No.	Terms	Phenix's Proposed Construction	Phenix's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
			• 3-5-2009 Notice of Allowance • 12-8-2008 Amendment and Response to OA • 11-12-2008 Notice of Non-Complaint Amendment • 10-22-2008 Amendment and Response to OA • 7-22-2008 Office Action • 5-1-2007 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony and the expert declaration of expert witness, including but not limited to Jospeh McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-		<i>see also id.</i> at Dkt. 52, 73-75, 78, 97, 100, 104. 106, 110, 113, 122-23. • Testimony from expert witness Aris Silzars

Exhibit A – Phenix v. AUO et al. Disputed Patent Claim Terms

Term No.	Terms	Phenix's Proposed Construction	Phenix's Supporting Evidence	AUO/Hisense's Proposed Construction	AUO/Hisense's Supporting Evidence
			00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

The following chart lists the disputed patent claim terms, phrases, or clauses of the '305 Patent for which Plaintiff and Defendant Innolux Corporation (“Innolux”) proposed different constructions.

Term No.	Claims	Terms	Phenix’s Proposed Construction	Phenix’s Supporting Evidence	Innolux’s Proposed Construction	Innolux’s Supporting Evidence ⁶
1	1 and 2	“non-volatile storage cells”	memory cells which retain stored data even when power is removed	<i>Intrinsic Evidence:</i> ⁷ ’305 Patent, at 2:16-28; 3:13-29; 3:38-47; 5:38-49; FIG. 2; FIG. 3; and FIG. 6. <i>File History, Phenix_AUO_Hisense_0000093/Phenix_Innolux_0000093 including:</i> 4-16-2025 Patent Owner’s Sur-Reply to the Petition for	Analog memory cells which retain stored data even when power is removed	<i>Intrinsic Evidence:</i> ’305 Patent, at 1:39-45, 2:4-35, 3:7-29, 3:48-67, 4:1-32, 5:30-59, 6:22-67, 8:1-4, 8:18-21, figs. 2, 3, 4A, 4B, 5, 6, Tables 1-2, Claims ’305 Patent, Prosecution History, including:

⁶ Defendant Innolux reserves the right to rely on any Supporting Evidence identified by Defendant AU Optronics, Inc. Defendant hereby expressly reserves the right to rely upon any document that is relied upon in any district court or PTAB filing identified in this chart, and further reserves the right to rely on any documents yet to be filed in such identified district court or PTAB proceedings, including but not limited to any institution decisions to issue in IPR2025-00043 and -00044. Defendant further reserves the right to cite and rely on any evidence obtained during claim construction discovery, including but not limited to, any deposition testimony of the inventors. Defendants further reserve the right to cite to anything else in the intrinsic record and to rely on supplemental expert testimony and evidence in rebuttal to any argument that Phenix presents in its claim construction briefs or expert testimony.

⁷ In each instance, Plaintiff reserves the right to rely on the Board’s pending decision regarding institution of Innolux’s Petition for *Inter Partes* Review. See *Innolux v. Phenix Longhorn, LLC*, IPR2025-00043 (P.T.A.B.). Plaintiff further opposes Innolux’s purported reservation of right to rely on any supporting evidence identified by Defendant AU Optronics Inc., as such evidence is “known to” AUO/Hisense as of the filing of the Joint Claim Construction Statement. See P.R. 4-3(a)(2).

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

				<i>Inter Partes</i> Review (IPR2025-00043) • 4-2-2025 Petitioner’s Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 3-12-2025 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255) • 10-29-2018 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 6-19-2018 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 3-14-2016 Certificate of Correction • 12-2-2015 Request for Certificate of Correction • 6-19-2007 Issue Notification		- o 3-14-2016 Certificate of Correction - o 12-2-2015 Request for Certificate of Correction - o 5-30-2007 Issue Notification - o 2-21-2007 Notice of Allowance - o 12-26-2006 Amendment and Response to OA - o 9-6-2006 Office Action - o 12-23-2003 Application • US 60/477,680 Provisional Application • Prosecution History of the ‘788 Patent, including: - o 6-17-2009 Issue Notification - o 3-5-2009 Notice of Allowance - o 12-8-2008 Amendment and Response to OA - o 11-12-2008 Notice of Non-Complaint Amendment
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Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

				• 2-21-2007 Notice of Allowance • 12-14-2006 Amendment and Response to OA • 9-6-2006 Office Action • 12-23-2003 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, (E.D. Tex. Jun. 21, 2019)		- o 10-22-2008 Amendment and Response to OA - o 7-22-2008 Office Action - o 5-1-2007 Application • US 60/477,680 Provisional Application • <i>Wistron v. Phenix</i>, IPR2018-01255, <i>e.g.</i>, Papers 1, 10, 14. • <i>Innolux v. Phenix</i>, IPR2025-00043, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Innolux v. Phenix</i>, IPR2025-00044, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, <i>e.g.</i>, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 <i>Extrinsic Evidence</i> • Testimony of expert witnesses, including but not limited to Dr. Paul Min.
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Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

						• William D. Brown et al. eds., <i>Nonvolatile Semiconductor Memory Technology: A Comprehensive Guide to Understanding and Using NVSM Devices</i> (Wiley-IEEE Press 1997). • IEEE 100 The Authoritative Dictionary of IEEE Standard Terms (7th Edition, 2000). • McGraw-Hill Dictionary of Scientific and Technical Terms (5th Edition, 1994).
2	1	“coupled to”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • ’305 Patent, at 3:48-4:20; FIG. 2; FIG. 3; and FIG. 6. • <i>File History, Phenix_AUO_Hisense_0000093/Phenix_Innolux_0000093 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00043)	Indirectly or directly linked or joined.	<i>Intrinsic Evidence:</i> • ’305 Patent, at 2:64-67, 3:1-13, 3:48-67, 4:1-20, 5:40-43, 6:22-53, 6:67, 7:1-6, 7:13-19, figs. 2, 3, 6, Claims • ’305 Patent, Prosecution History, including: - o 3-14-2016 Certificate of Correction

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

				• 4-2-2025 Petitioner’s Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 3-12-2025 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255) • 10-29-2018 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 6-19-2018 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 3-14-2016 Certificate of Correction • 12-2-2015 Request for Certificate of Correction • 6-19-2007 Issue Notification • 2-21-2007 Notice of Allowance		- o 12-2-2015 Request for Certificate of Correction - o 5-30-2007 Issue Notification - o 2-21-2007 Notice of Allowance - o 12-26-2006 Amendment and Response to OA - o 9-6-2006 Office Action - o 12-23-2003 Application • US 60/477,680 Provisional Application • <i>Wistron v. Phenix</i>, IPR2018-01255, <i>e.g.</i>, Papers 1, 10, 14. • <i>Innolux v. Phenix</i>, IPR2025-00043, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Innolux v. Phenix</i>, IPR2025-00044, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, <i>e.g.</i>, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23
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Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

				12-14-2006 Amendment and Response to OA 9-6-2006 Office Action 12-23-2003 Application 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> - Testimony of expert witness, including but not limited to Joseph McAlexander <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		<i>Extrinsic Evidence</i> - Testimony of expert witnesses, including but not limited to Dr. Paul Min. - The American Heritage College Dictionary (3d ed. 1997). - IEEE 100 The Authoritative Dictionary of IEEE Standard Terms (7th Edition, 2000). - Webster’s Ninth New Collegiate Dictionary (1998).
3	1	“multiplexer”	one or more circuits that selectively couple (1) one input (or one set of inputs) to one of many outputs (or one set of many sets of outputs) or (2) one of many inputs (or one set of many sets of inputs) to one	<i>Intrinsic Evidence:</i> ’305 Patent, at 3:48-4:20; FIG. 2; FIG. 3; and FIG. 6. <i>File History, Phenix_AUO_Hisense_0000093/Phenix_Innolux_0000093 including:</i> 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00043) 4-2-2025 Petitioner’s Reply in Support of its Petition for	one or more circuits that couple (1) one input (or one set of inputs) to one of many outputs (or one set of many sets of outputs) or (2) one of many inputs (or one set of many sets of inputs) to one	<i>Intrinsic Evidence:</i> ’305 Patent, at 1:39-45, 2:4-12, 3:7-29, 3:48-67, 4:1-3, 4:21-32, 5:50-67, 6:1-53, figs. 2, 3, 4A, 4B, 6, Claims ’305 Patent, Prosecution History, including: 3-14-2016 Certificate of Correction

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

			output (or one set of outputs)	<i>Inter Partes</i> Review (IPR2025-00043) • 3-12-2025 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255) • 10-29-2018 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 6-19-2018 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 3-14-2016 Certificate of Correction • 12-2-2015 Request for Certificate of Correction • 6-19-2007 Issue Notification • 2-21-2007 Notice of Allowance • 12-14-2006 Amendment and Response to OA	output (or one set of outputs)	- o 12-2-2015 Request for Certificate of Correction - o 5-30-2007 Issue Notification - o 2-21-2007 Notice of Allowance - o 12-26-2006 Amendment and Response to OA - o 9-6-2006 Office Action - o 12-23-2003 Application • US 60/477,680 Provisional Application • <i>Wistron v. Phenix</i>, IPR2018-01255, <i>e.g.</i>, Papers 1, 10, 14. • <i>Innolux v. Phenix</i>, IPR2025-00043, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Innolux v. Phenix</i>, IPR2025-00044, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, <i>e.g.</i>, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23
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Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

				• 9-6-2006 Office Action • 12-23-2003 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247, at 13; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 (E.D. Tex. Jun. 21, 2019)		<i>Extrinsic Evidence</i> • Testimony of expert witnesses, including but not limited to Dr. Paul Min. • <i>The IEEE Standard Dictionary of Electrical and Electronics Terms</i>, IEEE Std 100-2000 (7th ed. 2000) • McGraw-Hill Dictionary of Scientific and Technical Terms (5th Edition, 1994).
4	1	“connected to”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • ‘305 Patent, at 3:48-4:20; FIG. 2; FIG. 3; and FIG. 6. • <i>File History, Phenix_AUO_Hisense_0000093/Phenix_Innolux_0000093 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 4-2-2025 Petitioner’s Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00043)	directly linked or joined	<i>Intrinsic Evidence:</i> • ‘305 Patent, at 1:53-57, 2:64-67, 3:1-19, 3:25-29, 3:49-67, 4:1-20, 5:38-49, 6:22-7:19, figs. 2, 3, 6, Claims • ‘305 Patent, Prosecution History, including: - o 3-14-2016 Certificate of Correction - o 12-2-2015 Request for Certificate of Correction - o 5-30-2007 Issue Notification

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

				• 3-12-2025 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255) • 10-29-2018 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 6-19-2018 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 3-14-2016 Certificate of Correction • 12-2-2015 Request for Certificate of Correction • 6-19-2007 Issue Notification • 2-21-2007 Notice of Allowance • 12-14-2006 Amendment and Response to OA • 9-6-2006 Office Action	- o 2-21-2007 Notice of Allowance - o 12-26-2006 Amendment and Response to OA - o 9-6-2006 Office Action - o 12-23-2003 Application • US 60/477,680 Provisional Application • <i>Wistron v. Phenix</i>, IPR2018-01255, <i>e.g.</i>, Papers 1, 10, 14. • <i>Innolux v. Phenix</i>, IPR2025-00043, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Innolux v. Phenix</i>, IPR2025-00044, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, <i>e.g.</i>, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 <i>Extrinsic Evidence</i> • Testimony of expert witnesses, including
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Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

				• 12-23-2003 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		but not limited to Dr. Paul Min. • IEEE 100 The Authoritative Dictionary of IEEE Standard Terms (7th Edition, 2000) • Webster’s Ninth New Collegiate Dictionary (1998) • Merriam-Webster's Collegiate Dictionary (10th Edition, 2000)
5	1	“bank(s)”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • ’305 Patent, at 5:50-6:21; 6:37-53; 7:6-19; FIG. 2; FIG. 3; and FIG. 6. • <i>File History, Phenix_AUO_Hisense_0000093/Phenix_Innolux_0000093 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 4-2-2025 Petitioner’s Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00043)	[N/A]	[N/A]

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

				• 3-12-2025 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255) • 10-29-2018 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 6-19-2018 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 3-14-2016 Certificate of Correction • 12-2-2015 Request for Certificate of Correction • 6-19-2007 Issue Notification • 2-21-2007 Notice of Allowance • 12-14-2006 Amendment and Response to OA • 9-6-2006 Office Action		
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Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

				• 12-23-2003 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		
6	5	“external source for the high voltage programming means”	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • ‘305 Patent, at 6:22-53; FIG. 2; FIG. 3; FIG. 4A; FIG. 4B; FIG. 5 and FIG. 6. • <i>File History, Phenix_AUO_Hisense_0000093/Phenix_Innolux_0000093 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 4-2-2025 Petitioner’s Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00043) • 3-12-2025 Patent Owner’s Preliminary Response and	a voltage source for the high voltage programming means that is not inside or a part of the claimed integrated circuit.	<i>Intrinsic Evidence:</i> • ‘305 Patent, at 3:7-29, 4:28-32, 5:30-49, 6:22-53, 7:12-14, figs. 3, 4A, 4B, 5, 6, Claims • ‘305 Patent, Prosecution History, including: - o 3-14-2016 Certificate of Correction - o 12-2-2015 Request for Certificate of Correction - o 5-30-2007 Issue Notification - o 2-21-2007 Notice of Allowance

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

				Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00043) • 1-24-2019 Board Decision Denying Institution of Petition for <i>Inter Partes</i> Review (IPR2018-01255) • 10-29-2018 Patent Owner’s Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 6-19-2018 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2018-01255) • 3-14-2016 Certificate of Correction • 12-2-2015 Request for Certificate of Correction • 6-19-2007 Issue Notification • 2-21-2007 Notice of Allowance • 12-14-2006 Amendment and Response to OA • 9-6-2006 Office Action • 12-23-2003 Application	- o 12-26-2006 Amendment and Response to OA - o 9-6-2006 Office Action - o 12-23-2003 Application • US 60/477,680 Provisional Application • <i>Wistron v. Phenix</i>, IPR2018-01255, <i>e.g.</i>, Papers 1, 10, 14. • <i>Innolux v. Phenix</i>, IPR2025-00043, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Innolux v. Phenix</i>, IPR2025-00044, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, <i>e.g.</i>, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 <i>Extrinsic Evidence</i> • Testimony of expert witnesses, including but not limited to Dr. Paul Min.
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Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

		6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> - Testimony of expert witness, including but not limited to Jospeh McAlexander <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkt. 247, at 46-53; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 (E.D. Tex Jun. 21, 2019)		- Intel, <i>2816A EEPROM Data Sheet</i> (1983) - Microchip Techs., <i>PS40X-02XX Programming Guide</i> (2002). - U.S. Patent No. 5,175,706. - U.S. Patent No. 5,889,720. - U.S. Patent No. 5,677,869.
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chart lists the disputed patent claim terms, phrases, or clauses of the '788 Patent⁸ for which Plaintiff and
pose different constructions.

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
plain and ordinary meaning	<i>Intrinsic Evidence:</i>¹⁰ '788 Patent, at 2:17-28; 2:61-3:12; 3:24-30; 3:36-58; 5:28-47; 6:32-51; FIG 2; FIG 3; and FIG 6. <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> 4-16-2025 Patent Owner's Sur-Reply to the Petition for	Indefinite under § 112 To the extent the court decides the term is not indefinite, the term should be construed as: "a stand-alone, non-volatile device that is electrically reprogrammable, the device	<i>Intrinsic Evidence:</i> '788 Patent, at 2:17-28, 2:45-48, 2:61-67, 3:1-58, 5:28-57, 7:27-29, 7:33, 7:35-36, 7:41-42, figs. 2, 3, 4A, 4B, 5, 6, Claims - Prosecution History of the '788 Patent, including: 6-17-2009 Issue Notification 3-5-2009 Notice of Allowance 12-8-2008 Amendment and Response to OA

Plaintiff reserves the right to rely on any Supporting Evidence identified by Defendant AU Optronics, Inc. Defendant hereby reserves the right to rely upon any document that is relied upon in any district court or PTAB filing identified in this chart, and the right to rely on any documents yet to be filed in such identified district court or PTAB proceedings, including institution decisions to issue in IPR2025-00043 and -00044. Defendant further reserves the right to cite and rely on any evidence identified during claim construction discovery, including but not limited to, any deposition testimony of the inventors. Plaintiff reserves the right to cite to anything else in the intrinsic record and to rely on supplemental expert testimony and any argument that Phenix presents in its claim construction briefs or expert testimony.

Plaintiff reserves the right to rely on the Board's pending decision regarding institution of Innolux's Petition for Review. See *Innolux v. Phenix Longhorn, LLC*, IPR2025-00044 (P.T.A.B.). Plaintiff further opposes Innolux's purported reliance on any supporting evidence identified by Defendant AU Optronics, Inc. as such evidence is "known to"

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
			<i>Inter Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 7-07-2009 Issue Notification • 3-5-2009 Notice of Allowance • 12-8-2008 Amendment and Response to OA • 11-12-2008 Notice of Non-Complaint Amendment	including a programing interface and two gamma reference controllers physically connected to the programming interface, the two gamma reference controllers being physically connected to source drivers connected to a panel.”	- o 11-12-2008 Notice of Non-Complaint Amendment - o 10-22-2008 Amendment and Response to OA - o 7-22-2008 Office Action - o 5-1-2007 Application • US 60/477,680 Provisional Application • <i>Wistron v. Phenix</i>, IPR2018-01255, <i>e.g.</i>, Papers 1, 10, 14. • <i>Innolux v. Phenix</i>, IPR2025-00043, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Innolux v. Phenix</i>, IPR2025-00044, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, <i>e.g.</i>, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 <i>Extrinsic Evidence</i> • Testimony of expert witnesses, including but not limited to Dr. Paul Min.

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Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
			• 10-22-2008 Amendment and Response to OA • 7-22-2008 Office Action • 5-1-2007 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony and the expert declaration of expert witness, including but not limited to Jospeh McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		

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Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
8	“control circuit” (Claim 1)	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • '788 Patent, at 2:17-28; 2:61-3:12; 5:28-35; Table 1; Table 2; FIG 2; FIG 3; and FIG 6. • <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner's Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044)	Indefinite under § 112 To the extent the court decides the term is not indefinite, the term should be construed as: “a stand-alone integrated circuit attached to and separate from a liquid crystal display, the integrated circuit including a programming interface and two gamma reference controllers physically connected to the programming interface, the two gamma reference controllers being physically	<i>Intrinsic Evidence:</i> • '788 Patent, at 2:10-28, 2:45-48, 2:61-67, 3:1-12, 3:24-58, 4:8-19, 5:28-36, 5:48-57, 6:1-58, 7:32-34, 7:38-39, Abstract, figs. 2, 3, 4A, 4B, 5 and 6, Claims • Prosecution History of the '788 Patent, including: - o 6-17-2009 Issue Notification - o 3-5-2009 Notice of Allowance - o 12-8-2008 Amendment and Response to OA - o 11-12-2008 Notice of Non-Complaint Amendment - o 10-22-2008 Amendment and Response to OA - o 7-22-2008 Office Action - o 5-1-2007 Application • US 60/477,680 Provisional Application • <i>Wistron v. Phenix</i>, IPR2018-01255, <i>e.g.</i>, Papers 1, 10, 14.

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Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
			10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) 7-07-2009 Issue Notification 3-5-2009 Notice of Allowance 12-8-2008 Amendment and Response to OA 11-12-2008 Notice of Non-Complaint Amendment 10-22-2008 Amendment and Response to OA 7-22-2008 Office Action 5-1-2007 Application 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i>	connected to source drivers connected to a panel of the liquid crystal display.”	<i>Innolux v. Phenix</i>, IPR2025-00043, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. <i>Innolux v. Phenix</i>, IPR2025-00044, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, <i>e.g.</i>, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 <i>Extrinsic Evidence</i> - Testimony of expert witnesses, including but not limited to Dr. Paul Min.

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
			• Testimony and the expert declaration of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex. Jun. 21, 2019)		
9	“means for executing a predetermined algorithm” (Claim 1)	Function: executing a predetermined algorithm. Structure: programming interface	<i>Intrinsic Evidence:</i> • '788 Patent, at Abstract; 2:17-29; 2:61-3:12; 6:1-14; 6:32-7:10; and FIG. 2. • <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner's Sur-Reply to the Petition for	The “means for executing” is a general purpose processor. The term “predetermined algorithm” is Term 11 and is indefinite for the reasons stated as to Term 11. If the term is a Means-Plus-	<i>Intrinsic Evidence:</i> • '788 Patent, at 2:10-13, 2:61-67, 3:1-18, 3:24-58, 5:21-36, 5:48-57, 6:1-10, 7:35, 7:38-39, Abstract, figs. 2, 3, 4A, 4B, 5, Claims • Prosecution History of the '788 Patent, including: - o 6-17-2009 Issue Notification - o 3-5-2009 Notice of Allowance - o 12-8-2008 Amendment and Response to OA

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Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
			<i>Inter Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 7-07-2009 Issue Notification • 3-5-2009 Notice of Allowance • 12-8-2008 Amendment and Response to OA • 11-12-2008 Notice of Non-Complaint Amendment	Function term, it is indefinite for failure to clearly define the claimed function, and for lack of corresponding structure or algorithm in the specification.	- o 11-12-2008 Notice of Non-Complaint Amendment - o 10-22-2008 Amendment and Response to OA - o 7-22-2008 Office Action - o 5-1-2007 Application • US 60/477,680 Provisional Application • <i>Wistron v. Phenix</i>, IPR2018-01255, <i>e.g.</i>, Papers 1, 10, 14. • <i>Innolux v. Phenix</i>, IPR2025-00043, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Innolux v. Phenix</i>, IPR2025-00044, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, <i>e.g.</i>, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 <i>Extrinsic Evidence</i> • Testimony of expert witnesses, including but not limited to Dr. Paul Min.

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
			• 10-22-2008 Amendment and Response to OA • 7-22-2008 Office Action • 5-1-2007 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony and the expert declaration of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
10	"means for executing a predetermined algorithm according to a predetermined criteria and data sensed by said at least one sensor / means for executing said predetermined algorithm" (Claim 1)	Subject to Plaintiff's Proposed construction of Term 10, any additional language of Term 11 should be given its plain and ordinary meaning.	<i>Intrinsic Evidence:</i> '788 Patent, at Abstract; 2:17-29; 2:61-3:12; 6:1-14; 6:32-7:10; and FIG. 2. <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> 4-16-2025 Patent Owner's Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00044) 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00044) 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044)	The "means for executing" is a general purpose processor. The term "predetermined algorithm" is Term 11 and is indefinite for the reasons stated as to Term 11. The rest of the clause should be given its plain and ordinary meaning. If the term is a Means-Plus-Function term, it is indefinite for failure to clearly define the claimed function, and for lack of corresponding structure or algorithm in the specification.	<i>Intrinsic Evidence:</i> '788 Patent, at 2:10-13, 2:61-67, 3:1-18, 3:24-58, 5:28-32, 5:21-36, 5:48-57, 6:1-7:10, 7:35, 7:38-39, Abstract, figs. 2, 3, 4A, 4B, 5, Claims - Prosecution History of the '788 Patent, including: 6-17-2009 Issue Notification 3-5-2009 Notice of Allowance 12-8-2008 Amendment and Response to OA 11-12-2008 Notice of Non-Complaint Amendment 10-22-2008 Amendment and Response to OA 7-22-2008 Office Action 5-1-2007 Application - US 60/477,680 Provisional Application <i>Wistron v. Phenix</i>, IPR2018-01255, <i>e.g.</i>, Papers 1, 10, 14.

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
			• 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 7-07-2009 Issue Notification • 3-5-2009 Notice of Allowance • 12-8-2008 Amendment and Response to OA • 11-12-2008 Notice of Non-Complaint Amendment • 10-22-2008 Amendment and Response to OA • 7-22-2008 Office Action • 5-1-2007 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i>		• <i>Innolux v. Phenix</i>, IPR2025-00043, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Innolux v. Phenix</i>, IPR2025-00044, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, <i>e.g.</i>, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 <i>Extrinsic Evidence</i> • Testimony of expert witnesses, including but not limited to Dr. Paul Min.

Exhibit B – Phenix v. Innolux Disputed Patent Claim Terms

Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
			• Testimony and the expert declaration of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex. Jun. 21, 2019)		
11	“predetermined algorithm” (Claim 1)	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • '788 Patent, at Abstract; 2:17-29; 2:61-3:12; 6:1-14; 6:52-7:10; and FIG. 2. • <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner's Sur-Reply to the Petition for	Indefinite under 35 U.S.C. § 112	<i>Intrinsic Evidence:</i> • '788 Patent, at 2:7-29, 2:45-48, 2:61-3:58, 4:8-19, 5:48-57, 6:1-31, 6:48-49, 6:52-67, 7:1-10, 7:35-40, 8:10-12, figs. 2, 3, 4A-B, 5 and 6, Claims • Prosecution History of the '788 Patent, including: - o 6-17-2009 Issue Notification - o 3-5-2009 Notice of Allowance

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Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
			<i>Inter Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 10-15-2024 Petition and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044) • 7-07-2009 Issue Notification • 3-5-2009 Notice of Allowance • 12-8-2008 Amendment and Response to OA • 11-12-2008 Notice of Non-Complaint Amendment		- o 12-8-2008 Amendment and Response to OA - o 11-12-2008 Notice of Non-Complaint Amendment - o 10-22-2008 Amendment and Response to OA - o 7-22-2008 Office Action - o 5-1-2007 Application • US 60/477,680 Provisional Application • <i>Wistron v. Phenix</i>, IPR2018-01255, <i>e.g.</i>, Papers 1, 10, 14. • <i>Innolux v. Phenix</i>, IPR2025-00043, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Innolux v. Phenix</i>, IPR2025-00044, <i>e.g.</i>, Papers 1, 6, 7, 8, 9. • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, <i>e.g.</i>, Dkt. 247, at 18-25; Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23 <i>Extrinsic Evidence</i>

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Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence ⁹
			• 10-22-2008 Amendment and Response to OA • 7-22-2008 Office Action • 5-1-2007 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony and the expert declaration of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		• Testimony of expert witnesses, including but not limited to Dr. Paul Min.

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Term No.	Terms	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Innolux's Proposed Construction	Innolux's Supporting Evidence⁹
12	“optimizing said gamma reference voltage levels” (Claim 1)	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • '788 Patent, at Abstract; 2:17-29; 2:61-3:12; 6:1-14; 6:52-7:10; Table 1; Table 2; and FIG. 2. • <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner's Sur-Reply to the Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 4-2-2025 Petitioner's Reply in Support of its Petition for <i>Inter Partes</i> Review (IPR2025-00044) • 3-12-2025 Patent Owner's Preliminary Response and Accompanying Exhibits for <i>Inter Partes</i> Review (IPR2025-00044)	Indefinite under 35 U.S.C. § 112	<i>Intrinsic Evidence:</i> • '788 Patent, at 1:40-46, 2:5-13, 3:6-18, 3:20-30, 3:59-61, 5:36-46, 6:20-67, 7:1-10, 7:35-40, 8:10-8:23, figs. 2, 3, Claims • Prosecution History of the '788 Patent, including: - o 6-17-2009 Issue Notification - o 3-5-2009 Notice of Allowance - o 12-8-2008 Amendment and Response to OA - o 11-12-2008 Notice of Non-Complaint Amendment - o 10-22-2008 Amendment and Response to OA - o 7-22-2008 Office Action - o 5-1-2007 Application • US 60/477,680 Provisional Application • <i>Wistron v. Phenix</i>, IPR2018-01255, <i>e.g.</i>, Papers 1, 10, 14. • <i>Innolux v. Phenix</i>, IPR2025-00043, <i>e.g.</i>, Papers 1, 6, 7, 8, 9.

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			• Testimony and the expert declaration of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex. Jun. 21, 2019)		
13	“gamma reference voltage levels” (Claim 1)	plain and ordinary meaning	<i>Intrinsic Evidence:</i> • ’788 Patent, at 1:21-46; 3:6-12; 3:46-58; 6:65-7:10; Table 1; Table 2; FIG. 2; FIG. 3; and FIG. 6. • <i>File History, Phenix_AUO_Hisense_0000411/Phenix_Innolux_0000411 including:</i> • 4-16-2025 Patent Owner’s Sur-Reply to the Petition for	Analog voltage(s) stored in an analog storage cell(s)	<i>Intrinsic Evidence:</i> • ’788 Patent, at Abstract, 1:30-46, 2:3-21, 2:61-3:30, 3:46-4:7, 5:36-47, 6:1-7:10, figs. 2, 3, 4A-B, 5 and 6, Claims • Prosecution History of the ’788 Patent, including: - o 6-17-2009 Issue Notification - o 3-5-2009 Notice of Allowance - o 12-8-2008 Amendment and Response to OA

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			• 10-22-2008 Amendment and Response to OA • 7-22-2008 Office Action • 5-1-2007 Application • 6-11-2004 US 60/477,680 Provisional Application <i>Extrinsic Evidence:</i> • Testimony and the expert declaration of expert witness, including but not limited to Joseph McAlexander • <i>Phenix Longhorn, LLC v. Wistron Corp.</i>, Case No. 2:17-cv-00711, Dkts. 52, 73-75, 78, 97, 100, 104, 106, 110, 113, 122-23, 247 (E.D. Tex Jun. 21, 2019)		• Charles Poynton, A Technical Introduction to Digital Video (John Wiley & Sons 1996) • McGraw-Hill Dictionary of Scientific & Technical Terms, 6th Ed. (2003)