

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

COLLABO INNOVATIONS, INC., a
Delaware Corporation,

Plaintiff

v.

QUALCOMM INCORPORATED and
QUALCOMM TECHNOLOGIES, INC.,
both Delaware Corporations,

Defendants

CIVIL ACTION NO. 6:24-cv-00472-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Scheduling Order (ECF 29) and the Court's Standing Order Governing Proceedings (OGP) 4.4 – Patent Cases, Sec. IX, Plaintiff Collabo Innovations, Inc. and Defendants Qualcomm Incorporated and Qualcomm Technologies, Inc. submit this Joint Claim Construction Statement for U.S. Pat. No. 7,930,575, indicating both agreed and disputed terms, the parties' proposed constructions, and which party or side proposed the term or if it was a joint proposal.

I. Agreed Terms:

	Term	Agreed Construction	Proposing Party
1	Whether the preamble of claim 1 (“a microcontroller”) is limiting. (claim 1)	The preamble of claim 1 is limiting.	Joint
2	“CPU” (claim 1)	Plain and ordinary meaning	Qualcomm
3	“a power shutdown range” (Cls. 11 and 12)	“circuit for which power supply will be shutdown”	Qualcomm
4	“power supply device” (claim 1)	“power supply”	Qualcomm
5	“power supply control unit” (claim 1)	Plain and ordinary meaning	Qualcomm
6	“information holding unit” (claim 1)	Plain and ordinary meaning	Qualcomm
7	“restores the information necessary in proceeding with the program and evacuated in the information holding unit in time of power shutdown” (claim 1)	“Restores the information necessary to proceed with the program, the information was evacuated from the CPU in the information holding unit in the power shut down process”	Qualcomm
8	“the power supply control unit limits a period in which shutdown is possible” (claim 3)	Plain and ordinary meaning	Qualcomm

II. Disputed Terms:

	Term	Collabo's Construction	Qualcomm's Construction	Proposing Party
1	"microcontroller" (claim 1)	Plain and ordinary meaning	"a single integrated chip as opposed to a set of multiple chips (a "chipset")"	Joint
2	"microprogram" (claim 1)	Plain and ordinary meaning	"a control program (or a microcode) that runs at the lowest level of the hardware to control internal source of the CPU to execute command, interrupt processing, and the like, and is held entirely within the CPU as opposed to a program that is held in main memory until executed"	Qualcomm
3	"power shutdown microprogram" (claim 1)	Plain and ordinary meaning	"a microprogram that evacuates the information necessary in proceeding with the program to the information holding unit, and then outputs the evacuation completed signal to the power supply control unit"	Qualcomm
4	"power supply restoration microprogram" (claim 1)	Plain and ordinary meaning	"a microprogram that restores the information necessary in proceeding with the program and evacuated in the information holding unit to the CPU, and then branches the processes to the addresses indicated by the program counter to continue the program execution from the shutdown state"	Qualcomm
5	"The microcontroller according to claim 1, wherein the clock generator selects one of operation performed after stopping	Plain and ordinary meaning	Indefinite	Qualcomm

	Term	Collabo's Construction	Qualcomm's Construction	Proposing Party
	supply of an operation clock and operation stop performed without stopping the supply of the operation clock as operation to be performed upon receiving the clock stop control signal from the power supply control unit.” (claim 2)			
6	“The microcontroller according to claim 1, wherein one of the power shutdown microprogram and the power supply restoration microprogram is selectively executed in an alternative way, according to the generated power shutdown factor or a type of the selected power shutdown factor.” (claim 8)	Plain and ordinary meaning	Indefinite	Qualcomm
7	“power supply unit” (claim 1)	Plain and ordinary meaning [neither requiring nor excluding the power switch]	Plain and ordinary meaning	Collabo

Date: May 12, 2025

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CERTIFICATE OF SERVICE

The foregoing document was filed using the Court's CM/ECF filing system, which will generate and send an e-mail notification providing service to counsel of record.

/s/ Edward R. Nelson III