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7 [ADDITIONAL COUNSEL LISTED
ON SIGNATURE PAGE]

8 Attorneys for Plaintiffs
9 Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA
13
14 OAKLAND DIVISION

15 SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
16 AMERICA, INC.,

17 Plaintiffs,

18 vs.

19 CM HK, LTD. AND CYWEE GROUP
LTD.,

20 Defendants.

CASE NO. 4:24-CV-06567-JST

**PLAINTIFFS' PATENT RULE 4-1(a)
PROPOSED TERMS FOR
CONSTRUCTION**

DEMAND FOR JURY TRIAL

1 Pursuant to Local Patent Rule (“P.R.”) 4-1(a) and the Court’s Scheduling Order (Dkt. 47),
2 Plaintiffs Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Samsung” or
3 “Plaintiffs”), hereby serve on Defendant CM HK Ltd. (“CM HK” or “Defendant”),¹ the following
4 identification of claim terms, phrases, and/or clauses, which Plaintiffs contend should be
5 construed by the Court or found indefinite.

6 Defendant asserts infringement of claims 1, 3, 7, and 9 of U.S. Patent No. 10,852,846 (the
7 “’846 Patent”) and 1, 2, 3, 4, 5, 6, 7, 12, 14, and 25 of U.S. Patent No. 11,698,687 (the “’687
8 Patent”) (collectively, “the Asserted Patents”).

9 Plaintiffs expressly reserve the right to amend this disclosure should Defendant later be
10 permitted to amend its infringement contentions. While it would be improper for Defendant to do
11 so, in the event Defendant later attempts to assert that other claims are infringed, or in the event
12 other claims somehow become relevant, Plaintiffs reserve the right to propose additional terms,
13 phrases, and/or clauses for construction.

14 This list of claim terms, phrases, and/or clauses set forth below is preliminary, and
15 Plaintiffs reserve the right to modify, supplement, or amend the list (including the identification
16 of terms, phrases, and/or clauses that are indefinite or governed by 35 U.S.C. § 112(f)). Any
17 potentially indefinite terms could also be subject to alternative claim constructions or ordinary
18 meaning, as appropriate, and vice versa. Discovery in this action and Plaintiffs’ investigation of
19 Defendants’ claims are ongoing. Plaintiffs may modify, supplement, or amend their identification
20 of proposed terms, phrases, and/or clauses for construction or that are potentially indefinite in the
21 event that they obtain or discern additional information through further investigation, discovery,
22 or disclosure from Defendant or from third parties. Additionally, Plaintiffs reserve the right to
23 separately request construction of portions of the identified claim terms, phrases, and/or clauses.

24 The inclusion of any claim terms, phrases, and/or clauses on this list is not intended, and
25 should not be construed to mean, that any such terms, phrases, and/or clauses have a special or
26 uncommon meaning. Additionally, the inclusion of any claim terms, phrases, and/or clauses on
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28 ¹ Samsung filed a notice to voluntarily dismiss CyWee Group Ltd. from this case. Dkt. 64.

1 this list is not intended to and does not constitute an admission that the term or phrase is capable
2 of construction and not indefinite under 35 U.S.C. § 112, lacking enablement, or lacking adequate
3 written description. Plaintiffs reserve the right to contest any such terms and the validity of any
4 claim of the Asserted Patents.

5 Plaintiffs further reserve the right to add, delete, and/or amend claim terms, phrases,
6 and/or clauses from the list based on, without limitation, Defendant's proposed terms for
7 construction, the conferences called for by the Patent Rules, and any other information learned
8 through the course of discovery. Plaintiffs reserve the right to include Defendant's proposed
9 claim terms, phrases, and/or clauses in their list.

10 To the extent the claim terms, phrases, and/or clauses set forth herein include particular
11 terms, phrases, and/or clauses appropriate to be construed separately, such terms, phrases, and/or
12 clauses are deemed part of this disclosed list. Similarly, to the extent it is appropriate to construe
13 terms, phrases, and/or clauses listed herein in the context of additional claim language, such
14 additional language is deemed part of this disclosure.

15 **I. Terms for Construction or to be Found Indefinite**

No.	Term/Phrase/Clause	Relevant Claims
1.	Spatial reference frame	'846 Patent, claims 1 and 7 '687 Patent, claims 1 and 14
2.	Display reference frame	'846 Patent, claims 1 and 7 '687 Patent, claims 1 and 14
3.	Deviation	'846 Patent, claims 1 and 7 '687 Patent, claims 1 and 14

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2 DATED: March 28, 2025

Respectfully submitted,

By: /s/ Elizabeth L. Brann

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22 Samsung Electronics Co., Ltd. and Samsung
23 Electronics America, Inc.
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1 **CERTIFICATE OF SERVICE**

2 I, Roxanne Hunter-Descheenie, certify and declare as follows:

3 I am over the age of 18 and not a party to the within action. My business address is Paul
4 Hastings LLP, 4655 Executive Drive, Suite 350, San Diego, CA 92121.

5 On March 28, 2025, I caused a copy of the foregoing document to be served electronically
6 via email to the following attorneys representing Defendant CM HK, Ltd.:

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20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct. Executed on March 28, 2025 in San Diego, California.

22 By: /s/ Roxanne Hunter-Descheenie
23 Roxanne Hunter-Descheenie
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