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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

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

Plaintiffs,

vs.

CM HK, LTD. AND CYWEE GROUP
LTD.,

Defendants.

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

**JOINT CLAIM CONSTRUCTION AND
PREHEARING STATEMENT**

Date: August 4, 2025
Time: 1:30 p.m.
Place: 6, 2nd Floor
Judge: Hon. Jon S. Tigar

Pursuant to N.D. Cal. Patent Local Rule 4-3 and the Scheduling Order (ECF No. 47), Plaintiffs Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. and Defendant CM HK, LTD.¹ hereby provide their Joint Claim Construction and Prehearing Statement.

LOCAL PATENT RULE 4-3(A) – AGREED CONSTRUCTIONS

There are no agreed constructions.

LOCAL PATENT RULE 4-3(B) – DISPUTED CONSTRUCTIONS

The table below provides a full list of all disputed terms and the parties' proposed constructions. A table providing the citations to the evidence relied upon by the parties is attached as Exhibit A.

Patent Claims	Term	Plaintiffs' Proposed Construction	Defendant's Proposed Construction
'846 Patent, claims 1 and 7 '687 Patent, claims 1 and 14	Spatial reference frame	frame of reference associated with a 3D pointing device, which always has its origin at the same point in the device and in which the axes are always fixed with respect to the device	frame of reference associated with the electronic device, which always has its origin at the same point in the device and in which the axes are always fixed with respect to the device
'846 Patent, claims 1 and 7 '687 Patent, claims 1 and 14	Display reference frame	the coordinate system in which the display device is defined, with an origin located on the display device and a set of three coordinate axes fixed with respect to the display device	frame of reference associated with the display device, which always has its origin at the same point in the device and in which the axes are always fixed with respect to the device
'846 Patent, claims 1 and 7 '687 Patent, claims 1 and 14	Deviation / resultant deviation	angles in a spatial reference frame of the electronic device	Information representing the device's orientation change
'846 Patent, Claims 1, 7	Resultant angles	angles in a spatial reference frame of the electronic device	Angles that describe the device's rotation around one or more axes

¹ Plaintiffs filed a notice voluntarily dismissing CyWee Group Ltd. from this case. ECF No. 64.

Patent Claims	Term	Plaintiffs' Proposed Construction	Defendant's Proposed Construction
'846 Patent, Claims 1, 7 '687 Patent, Claims 1, 4, 14	Predicted axial acceleration	plain and ordinary meaning	Acceleration along the device's axes derived from the current quaternion
'846 Patent, Claims 1, 3, 7, 9 '687 Patent, Claims 1, 2, 3, 4, 5, 12, 14, 25	Measured axial acceleration	plain and ordinary meaning	Acceleration along the device's axes derived from accelerometer data
'846 Patent, Claims 3, 9 '687 Patent, Claims 12, 25	First data association model	plain and ordinary meaning	logic or algorithm that compares the measured axial accelerations with predicted axial accelerations

LOCAL PATENT RULE 4-3(C) – MOST SIGNIFICANT TERMS

Pursuant to Local Patent Rule 4-3(c), the parties identify all seven of the above-identified disputed terms for construction by the Court. None of the disputed terms are case or claim dispositive. There are no terms that either side contends are case dispositive.

LOCAL PATENT RULE 4-3(D) – ANTICIPATED HEARING LENGTH

The claim construction hearing is scheduled on August 4, 2025 at 1:30 p.m. ECF No. 47. Both parties anticipate that the claim construction hearing will take approximately 3 hours, with the time split equally between Plaintiffs and Defendant.

LOCAL PATENT RULE 4-3(E) – WITNESSES

The parties do not expect to present live testimony of witnesses at the claim construction hearing.

LOCAL PATENT RULE 4-3(F) – FACTUAL FINDINGS

The parties do not presently believe that there are any issues that need to be taken up at a prehearing conference prior to the claim construction hearing. However, please note that a tutorial is scheduled on July 21, 2025 at 1:30 p.m.

1 DATED: May 13, 2025

Respectfully submitted,

2 By: /s/ Elizabeth L. Brann

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ATTESTATION

Pursuant to Local Rule 5-1(i)(3), the undersigned hereby attests that concurrence in the filing of this document has been obtained from all other signatories.

/s/ Elizabeth L. Brann
Elizabeth L. Brann

Exhibit A – Plaintiffs’ and Defendant’s Disputed Constructions and Supporting Evidence

Patent Claims	Term / Phrase	Plaintiffs’ Proposed Construction and Supporting Evidence	Defendant’s Proposed Construction and Supporting Evidence
’846 Patent, claims 1 and 7 ’687 Patent, claims 1, 2, 7, and 14	Spatial reference frame	“frame of reference associated with a 3D pointing device, which always has its origin at the same point in the device and in which the axes are always fixed with respect to the device” <u>Supporting Evidence:</u> ’846 Patent, cols. 1:28-33, 1:45-51, 5:46-61, 6:6-13, 6:26-34, 6:64-7:3, 9:5-17, 9:25-29, 9:60-10:4, 10:52-59, 11:27-32, 11:41-44, 12:61-13:3, 13:4-16, 13:49-58, 13:62-14:2, 14:55-59, Figs. 1, 2, 7, 8; ’687 Patent, cols. 1:27-37, 1:51-57, 6:15-22, 6:35-43, 7:6-12, 9:16-28, 9:36-40, 10:4-15, 10:63-11:3, 11:38-43, 11:52-55, 13:5-14, 13:15-27, 13:60-14:2, 14:6-13, 14:66-15:3, Figs. 1, 2, 7, 8; and ’687 File History (CMHK_SAMSUNG0000484, CMHK_SAMSUNG0000485; CMHK_SAMSUNG0000490). <i>CyWee Group Ltd. v. Samsung Elecs. Co.</i>, No. 2:17-cv-00140-WCB-RSP, Dkt. 57 at 2 (E.D. Tex. Jan. 12, 2018); <i>CyWee Group Ltd. v. Samsung Elecs. Co.</i>, No. 2:17-cv-00140-WCB-RSP, LaViola Opening Expert Report ¶ 24; <i>Google LLC et al. v. CyWee Grp. Ltd.</i>, IPR2018-01258, Dkt. 1025 at 127:16-22 (PTAB Jun. 19, 2019);	“frame of reference associated with the electronic device, which always has its origin at the same point in the device and in which the axes are always fixed with respect to the device” <u>Supporting Evidence:</u> ’846 Patent, Figs. 1, 2, 5, 6, 8, 11, Col. 1:35-58, 2:49-3:28, 5:15-61, 6:64-8:8, 9:5-37; 9:56-10:22; 11:27-40; 12:39-15:4, 18:34-64, 20:5-21:22, 23:26-24:37, 26:4-36, 30:12-31:6, Claims 1, 7. ’687 Patent, Figs. 1, 2, 5, 6, 8, 11, Col. 1:39-64, 2:55-3:35, 5:12-6:3, 6:54-8:18, 9:16-48; 10:1-10:34; 11:38-51; 12:50-15:15, 18:39-19:2, 20:10-21:31, 23:32-24:41, 26:9-42, 30:18-31:13, Claims 7, 8, 20, 21. <i>CyWee Group Ltd. v. Samsung Electronics Co. Ltd. et al</i>, No. 2:17-CV-00140-RWS-RSP, Dkts. 57, 117 (E.D. Tex.).

Exhibit A – Plaintiffs’ and Defendant’s Disputed Constructions and Supporting Evidence

Patent Claims	Term / Phrase	Plaintiffs’ Proposed Construction and Supporting Evidence	Defendant’s Proposed Construction and Supporting Evidence
		<i>ZTE (USA), Inc. et al. v. CyWee Grp. Ltd.</i>, IPR2019-00143, Dkt. 87 at 6, 7, 12 (PTAB Feb. 17, 2021); <i>Google LLC et al. v. CyWee Grp. Ltd.</i>, IPR2018-01258, Dkt. 7 at 9-10 (PTAB Dec. 11, 2018); <i>Google LLC et al. v. CyWee Grp. Ltd.</i>, IPR2018-01257, Dkt. 87 at 46-47 (PTAB Jan. 9, 2020); Paul D. Groves, <u>Principles of GNSS, Inertial and Multisensor Integrated Navigation Systems</u> 21–22 (2008); and Elizabeth J. Jewell & Frank Abate, <u>The New Oxford American Dictionary</u> 672, 1636 (2001).	
’846 Patent, claims 1 and 7 ’687 Patent, claims 1 and 14	Display reference frame	“the coordinate system in which the display device is defined, with an origin located on the display device and a set of three coordinate axes fixed with respect to the display device” <u>Supporting Evidence:</u> ’846 Patent, cols. 1:45-48, 1:51-58, 11:27-40, 12:61-13:3, 13:4-16, 13:49-61, 20:20-29, Figs. 1, 2, 7, 8; ’687 Patent, cols. 1:51-54, 1:57-64, 11:38-47, 13:5-14, 13:15-27, 13:60-14:5; ’846 File History (CMHK_SAMSUNG0000207); and	“frame of reference associated with the display device, which always has its origin at the same point in the device and in which the axes are always fixed with respect to the device” <u>Supporting Evidence:</u> ’846 Patent, Figs. 1, 2, 5, 6, 8, 11, Col. 1:35-58, 2:49-3:28, 5:15-61, 6:64-8:8, 9:5-37; 9:56-10:22; 11:27-40; 12:39-15:4, 18:34-64, 20:5-21:22, 23:26-24:37, 26:4-36, 30:12-31:6, Claims 1, 7. ’687 Patent, Figs. 1, 2, 5, 6, 8, 11, Col. 1:39-64, 2:55-3:35, 5:12-6:3, 6:54-8:18, 9:16-48; 10:1-10:34; 11:38-51; 12:50-15:15, 18:39-19:2, 20:10-21:31,

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Patent Claims	Term / Phrase	Plaintiffs’ Proposed Construction and Supporting Evidence	Defendant’s Proposed Construction and Supporting Evidence
		’687 File History (CMHK_SAMSUNG0000484). <i>ZTE (USA), Inc. et al. v. CyWee Grp. Ltd.</i>, IPR2019-00143, Dkt. 87 at 6 (PTAB Feb. 17, 2021); and Elizabeth J. Jewell & Frank Abate, <u>The New Oxford American Dictionary</u> 492, 672 (2001).	23:32-24:41, 26:9-42, 30:18-31:13, Claims 7, 8, 20, 21. <i>CyWee Group Ltd. v. Samsung Electronics Co. Ltd. et al</i>, No. 2:17-CV-00140-RWS-RSP, Dkts. 57, 117 (E.D. Tex.).
’846 Patent, claims 1 and 7 ’687 Patent, claims 1 and 14	Deviation / resultant deviation	“angles in a spatial reference frame of the electronic device” <u>Supporting Evidence:</u> ’846, cols. 1:28-33, 2:2-14, 4:32-40, 10:52-11:7, 11:27-40, 12:61-13:1, 13:49-58, 14:55-59, 29:33-36, 31:23-24, 32:47-48, Figs. 1, 2, 7, 8; ’687 Patent, cols. 1:32-37, 2:8-20, 4:39-47, 10:63-11:18, 11:38-51, 13:5-12, 13:60-14:2, 14:66-15:3, 29:39-42, Figs. 1, 2, 7, 8; ’846 File History (CMHK_SAMSUNG0000207); and ’687 File History (CMHK_SAMSUNG0000484; CMHK_SAMSUNG0000490; CMHK_SAMSUNG0000509). <i>CyWee Group Ltd. v. Samsung Elecs. Co.</i>, No. 2:17-cv-00140-WCB-RSP, LaViola Opening Expert Report ¶ 44;	“Information representing the device’s orientation change” <u>Supporting Evidence:</u> ’846 Patent Abstract, Figs. 1-12, Col. 1:28-33, 1:59-2:14, 2:37-66, 3:66-4:25, 4:29-5:4, 5:15-61, 6:45-8:9, 10:44-11:40, 12:39-13:3, 13:49-16:7, 17:29-51, 18:34-64, 19:16-21:22, 22:25-24:37, 25:21-58, 26:4-36, 26:65-27:58, 29:33-31:6, Claims 1, 2, 3, 4, 6, 7, 8, 9, 10, 12. ’687 Patent Abstract, Figs. 1-12, Col. 1:28-37, 1:56-3:35, 4:6-32, 4:36-5:35, 6:64-8:17, 10:55-11:51, 12:50-13:14, 13:60-16:18, 17:37-60, 18:39-21:27, 22:30-24:42, 25:26-63, 26:9-42, 27:3-64, 29:39-31:13, Claims 1, 7, 9, 11, 12, 13, 14, 20, 22, 24, 25, 26.

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Patent Claims	Term / Phrase	Plaintiffs’ Proposed Construction and Supporting Evidence	Defendant’s Proposed Construction and Supporting Evidence
		<i>CyWee Group Ltd. v. Samsung Elecs. Co.</i>, No. 2:17-cv-00140-WCB-RSP, LaViola Rebuttal Expert Report ¶ 30; <i>ZTE (USA), Inc. et al. v. CyWee Grp. Ltd.</i>, IPR2019-00143, Dkt. 87 at 6, 12, 31 (PTAB Feb. 17, 2021); Paul D. Groves, <u>Principles of GNSS, Inertial and Multisensor Integrated Navigation Systems</u> 21–22 (2008); and Elizabeth J. Jewell & Frank Abate, <u>The New Oxford American Dictionary</u> 468 (2001).	
'846 Patent, Claims 1, 7	Resultant angles	“angles in a spatial reference frame of the electronic device” <u>Supporting Evidence:</u> '846, cols. 1:28-33, 2:2-14, 4:32-40, 10:52-11:7, 11:27-40, 12:61-13:1, 13:49-58, 14:55-59, 29:33-36, 31:23-24, 32:47-48, Figs. 1, 2, 7, 8; and '687 Patent, cols. 1:32-37, 2:8-20, 4:39-47, 10:63-11:18, 11:38-51, 13:5-12, 13:60-14:2, 14:66-15:3, 29:39-42, Figs. 1, 2, 7, 8; and '687 File History (CMHK_SAMSUNG0000484; CMHK_SAMSUNG0000490; CMHK_SAMSUNG0000509).	“Angles that describe the device’s rotation around one or more axes” <u>Supporting Evidence:</u> '846 Patent Abstract, Figs. 1-12, Col. 1:28-33, 1:59-2:14, 2:37-66, 3:66-4:25, 4:29-5:4, 5:15-61, 6:45-8:9, 10:44-11:40, 12:39-13:3, 13:49-16:7, 17:29-51, 18:34-64, 19:16-21:22, 22:25-24:37, 25:21-58, 26:4-36, 26:65-27:58, 29:33-31:6, Claims 1, 2, 3, 4, 6, 7, 8, 9, 10, 12. '687 Patent Abstract, Figs. 1-12, Col. 1:28-37, 1:56-3:35, 4:6-32, 4:36-5:35, 6:64-8:17, 10:55-11:51, 12:50-13:14, 13:60-16:18, 17:37-60, 18:39-21:27, 22:30-24:42, 25:26-63, 26:9-42, 27:3-64, 29:39-

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Patent Claims	Term / Phrase	Plaintiffs’ Proposed Construction and Supporting Evidence	Defendant’s Proposed Construction and Supporting Evidence
		<i>ZTE (USA), Inc. et al. v. CyWee Grp. Ltd.</i>, IPR2019-00143, Dkt. 87 at 6, 12, 31 (PTAB Feb. 17, 2021); Paul D. Groves, <u>Principles of GNSS, Inertial and Multisensor Integrated Navigation Systems</u> 21–22 (2008); and Elizabeth J. Jewell & Frank Abate, <u>The New Oxford American Dictionary</u> 60, 1453 (2001).	31:13, Claims 1, 7, 9, 11, 12, 13, 14, 20, 22, 24, 25, 26.
’846 Patent, Claims 1, 7 ’687 Patent, Claims 1, 4, 14	Predicted axial acceleration	Plain and ordinary meaning <u>Supporting Evidence:</u> ’846 Patent, cols. 7:10-16, 14:48-51, 17:14-28, 17:37-43, Figs. 7, 8; ’687 Patent, cols. 7:19-25, 14:59-62, 17:24:37, 17:45-52, Figs. 7, 8; ’846 File History (CMHK_SAMSUNG0000078); and ’687 File History (CMHK_SAMSUNG0000488; CMHK_SAMSUNG0000616; CMHK_SAMSUNG0000617). <i>ZTE (USA), Inc. et al. v. CyWee Grp. Ltd.</i>, IPR2019-00143, Dkt. 87 at 10, 138, 139 (PTAB Feb. 17, 2021); and Elizabeth J. Jewell & Frank Abate,	“Acceleration along the device’s axes derived from the current quaternion” <u>Supporting Evidence:</u> ’846 Patent, Figs. 7, 8, 9, 10, 11, 12, Col. 6:64-7:23, 7:38-8:11, 14:7-15:4, 16:62-17:51, 18:9-15, 18:34-64, 23:27-53, 24:64-25:11, 25:21-58, 26:65-27:58, 320:33-31:6, Claims 1, 7. ’687 Patent, Figs. 7, 8, 10, 11, 12, 7:3-23, 7:44-8:8, 9:38-48, 11:14-26, 12:56-60, 15:15-19, 15:55-16:8, 16:31-45, 16:62-17:51, 18:34-64, 19:1-7, 19:16-31, 22:25-23:26, 24:30-64, 26:65-27:34, 28:25-33, Claims 1, 4, 14, 17, 27, 28.

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Patent Claims	Term / Phrase	Plaintiffs’ Proposed Construction and Supporting Evidence	Defendant’s Proposed Construction and Supporting Evidence
		<u>The New Oxford American Dictionary</u> 8, 112, 1343 (2001).	
’846 Patent, Claims 1, 3, 7, 9 ’687 Patent, Claims 1, 2, 3, 4, 5, 12, 14, 25	Measured axial acceleration	Plain and ordinary meaning <u>Supporting Evidence:</u> ’846 Patent, cols. 7:10-16, 14:44-48, 16:62-17:2, 17:37-43, Figs. 7, 8; ’687 Patent, cols. 7:19-25, 14:55-59, 17:5-12, 17:45-52, Figs. 7, 8; and ’687 File History (CMHK_SAMSUNG0000488; CMHK_SAMSUNG0000616; CMHK_SAMSUNG0000617). <i>ZTE (USA), Inc. et al. v. CyWee Grp. Ltd.</i>, IPR2019-00143, Dkt. 87 at 10, 138, 139 (PTAB Feb. 17, 2021); and Elizabeth J. Jewell & Frank Abate, <u>The New Oxford American Dictionary</u> 8, 112, 1060 (2001).	“Acceleration along the device’s axes derived from accelerometer data” <u>Supporting Evidence:</u> ’846 Patent, Figs. 7, 8, 9, 10, 11, 12, Col. 6:64-7:23, 7:38-8:11, 14:7-15:4, 16:62-17:51, 18:9-15, 18:34-64, 23:27-53, 24:64-25:11, 25:21-58, 26:65-27:58, 320:33-31:6, Claims 1, 7. ’687 Patent, Figs. 7, 8, 10, 11, 12, 7:3-23, 7:44-8:8, 9:38-48, 11:14-26, 12:56-60, 15:15-19, 15:55-16:8, 16:31-45, 16:62-17:51, 18:34-64, 19:1-7, 19:16-31, 22:25-23:26, 24:30-64, 26:65-27:34, 28:25-33, Claims 1, 4, 14, 17, 27, 28.
’846 Patent, Claims 3, 9 ’687 Patent, Claims 12, 25	First data association model	Plain and ordinary meaning <u>Supporting Evidence:</u> ’846 Patent, col. 5:5-14, 17:29-51, 18:27-64, 19:1-7, 26:37-64, Fig. 12; and ’687 Patent, col. 5:12:22, 17:37-65; 18:31-19:2, 19:6-12, 26:43-27:3, Fig. 12; and	“logic or algorithm that compares the measured axial accelerations with predicted axial accelerations” <u>Supporting Evidence:</u> ’846 Patent, Figs. 7-12, Col. 5:5-14, 18:65-19:15, 26:37-64, Claims 3, 4, 9, 10.

Exhibit A – Plaintiffs’ and Defendant’s Disputed Constructions and Supporting Evidence

Patent Claims	Term / Phrase	Plaintiffs’ Proposed Construction and Supporting Evidence	Defendant’s Proposed Construction and Supporting Evidence
		'687 File History (CMHK_SAMSUNG0000489; CMHK_SAMSUNG0000490). <i>ZTE (USA), Inc. et al. v. CyWee Grp. Ltd.</i>, IPR2019-00143, Dkt. 87 at 11, 12 (PTAB Feb. 17, 2021); US 2005/0188349, ¶ [0013]; Elizabeth J. Jewell & Frank Abate, <u>The New Oxford American Dictionary</u> 97, 278, 1096 (2001); and <u>Newton’s Telecom Dictionary</u> 278 (22d ed. 2001).	'687 Patent, Figs. 7-12, Col. 5:17-22, 19:3-19:21, 26:43-27:3, Claims 12, 13, 25, 26.