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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LS CABLE & SYSTEM LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 3:24-cv-09194-JD

**JOINT CLAIM CONSTRUCTION AND
PREHEARING STATEMENT**

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Plaintiff LS Cable & System Ltd. (“LS Cable” or “Plaintiff”) and Defendant Apple Inc. (“Apple” or “Defendant”) (collectively, the “Parties”), by and through their respective undersigned counsel, submit this Joint Claim Construction and Prehearing Statement pursuant to Patent Local Rule 4-3 for U.S. Patent No. 8,013,568 (the “’568 Patent”). The asserted claims of the ’568 Patent are claims 1, 3, 7–9, 11–12, 30–34, 48–50, and 52–53.

The Parties’ agreed and disputed claim constructions are below.

I. AGREED CONSTRUCTIONS (PATENT L.R. 4-3(a))

Pursuant to Patent Local Rule 4-3(a), the Parties agree that any term not specifically identified below as disputed is presumed undisputed.

II. DISPUTED CONSTRUCTIONS (PATENT L.R. 4-3(b) – (c))

Pursuant to Patent L.R. 4-3(b), the Parties have been unable to come to an agreement as to the meaning of the terms in the list and table below. Further, pursuant to Patent L.R. 4-3(c), the Parties identify the two disputed claim terms, totaling three disputed constructions, as the terms whose construction will be most significant to the resolution of the case:

- Term No. 1: “at both ends”
- Term No. 2: “a microprocessor” — construction 2A (for cls. 1 and 48) and 2B (for cl. 7)

Construction No.	Claim Language (Disputed Terms in Bold) ’568 Patent	Plaintiff’s Proposed Construction and Evidence in Support	Defendant’s Proposed Construction and Evidence in Support
1	“at both ends” Found in claim numbers: ’568 Patent: claims 1, 7, and 48 and claims depending from them	PROPOSED CONSTRUCTION: plain and ordinary meaning INTRINSIC EVIDENCE:	PROPOSED CONSTRUCTION: “at the front end and at the rear end” INTRINSIC EVIDENCE: <i>See, e.g., ’568 patent – 1:19-28, 2:42-53, 3:4-11,</i>

1			<i>See, e.g., '568 patent –</i>	<i>3:43-62, 4:17-4:37, 5:8-</i>
2			<i>Abstract, 1:19-28, 2:13-</i>	<i>28, 5:30-54, 6:7-7:49,</i>
3			<i>20, 2:33-53, 3:4-11,</i>	<i>7:50-8:8, 8:29-53, 8:54-</i>
4			<i>3:27-40, 3:43-62, 4:17-</i>	<i>9:47, 10:55-11:12,</i>
5			<i>4:37, 5:8-28, 5:30-54,</i>	<i>11:32-12:35, 12:36-42,</i>
6			<i>6:7-7:49, 7:50-8:8, 8:29-</i>	<i>12:46- 52, FIGs. 1, 3, 5;</i>
7			<i>53, 8:54-9:47, 10:303-</i>	<i>claims 1-24 (as</i>
8			<i>38; 10:55-11:12, 11:32-</i>	<i>originally issued) and</i>
9			<i>12:35, 12:36-42, 12:46-</i>	<i>claims 1, 2-58;</i>
10			<i>52, FIGs. 1, 3, 5; claims</i>	<i>Applicants'</i>
11			<i>1-24 (as originally</i>	<i>amendments, arguments,</i>
12			<i>issued) and claims 1, 3-</i>	<i>and statements in '568</i>
13			<i>58;</i>	<i>File History (and</i>
14			<i>Applicants'</i>	<i>corresponding examiner</i>
15			<i>amendments, arguments,</i>	<i>rejections), including</i>
16			<i>and statements in '568</i>	<i>without limitation the</i>
17			<i>File History (and</i>	<i>file history of the</i>
18			<i>corresponding examiner</i>	<i>reexamination in its</i>
19			<i>rejections), including</i>	<i>entirety, including</i>
20			<i>without limitation the</i>	<i>without limitation</i>
21			<i>file history of the</i>	<i>Request for</i>
22			<i>reexamination in its</i>	<i>Supplemental</i>
23			<i>entirety, including</i>	<i>Examination (March 21,</i>
24			<i>without limitation</i>	<i>2021) at 5, 10, 13, 19-20,</i>
25			<i>Request for</i>	<i>23-25; Response to Non-</i>
26			<i>Supplemental</i>	<i>Final Office Action</i>
27			<i>Examination (March 21,</i>	<i>(August 30, 2021) at 16-</i>
28			<i>2021) at 5, 10, 13, 19-20,</i>	<i>20; Response to Non-</i>
			<i>23-25; Response to Non-</i>	<i>Final Office Action at</i>
			<i>Final Office Action</i>	<i>23-28; After Final</i>
			<i>(August 30, 2021) at 16-</i>	<i>Response to Final Office</i>
			<i>20; Response to Non-</i>	<i>Action (May 2, 2022) at</i>
			<i>Final Office Action at</i>	<i>27-29, 32-51; After Final</i>
			<i>23-28; After Final</i>	<i>Response to Final Office</i>
			<i>Response to Final Office</i>	<i>Action (May 23, 2022)</i>
			<i>Action (May 2, 2022) at</i>	<i>at 27-29, 32-51; Second</i>
			<i>27-29, 32-51; After Final</i>	<i>After Final Response to</i>
			<i>Response to Final Office</i>	<i>Final Office Action</i>
			<i>Action (May 23, 2022)</i>	<i>(August 16, 2022) at 23-</i>
			<i>at 27-29, 32-51; Second</i>	<i>58; and Appeal Brief</i>
			<i>After Final Response to</i>	<i>(October 26, 2022) at 1-</i>
			<i>Final Office Action</i>	<i>82.</i>
			<i>(August 16, 2022) at 23-</i>	
			<i>58; and Appeal Brief</i>	
			<i>(October 26, 2022) at 1-</i>	
			<i>82.</i>	
				<i>For all claim terms,</i>
				<i>Apple may rely on the</i>
				<i>claim language as a</i>
				<i>whole as evidence of its</i>
				<i>proposed constructions,</i>

		EXTRINSIC EVIDENCE: The Parties mutually have agreed to not present expert testimony or rely on expert reports at the claim construction phase.	whether or not explicitly stated. EXTRINSIC EVIDENCE: The Parties mutually have agreed to not present expert testimony or rely on expert reports at the claim construction phase.
2A	“a microprocessor” Found in claim numbers: ’568 Patent: claims 1 and 48 and claims depending from them	PROPOSED CONSTRUCTION: plain and ordinary meaning INTRINSIC EVIDENCE: <i>See, e.g., ’568 patent – 4:28-63, 6:28-39, 7:17-22, 7:33-63, 8:32-53, 8:60-9:44, 10:1-13, 10:39-11:18, 11:32-51, 11:52-12:17, 12:36-42, 12:46-52, FIGs. 1, 3, 5; claims 1-24 (as originally issued) and claims 1, 3-58 of the reexamination certificate; Applicants’ amendments, arguments, and statements in ’568 File History (and corresponding examiner rejections), including without limitation the file history of the reexamination in its entirety, including without limitation Request for</i>	PROPOSED CONSTRUCTION: “one microprocessor that performs both the monitoring of both the detected voltages and also the transmitting a monitoring result” INTRINSIC EVIDENCE: <i>See, e.g., ’568 patent – 7:17-22, 7:33-63, 8:32-53, 8:60-9:44, 10:1-13, 10:39-11:18, 11:32-51, 11:52-12:17, 12:36-42, 12:46-52, FIGs. 1, 3, 5; claims 1-24 (as originally issued) and claims 1, 2-58; Applicants’ amendments, arguments, and statements in ’568 File History (and corresponding examiner rejections), including without limitation the file history of the reexamination in its entirety, including without limitation Request for Supplemental Examination (March 21, 2021); Response to Non-Final Office Action</i>

1			Supplemental Examination (March 21, 2021); Response to Non-Final Office Action (August 30, 2021) at 16-20; Response to Non-Final Office Action at 23- 28; After Final Response to Final Office Action (May 2, 2022) at 24-25, 27-29, 32- 33; After Final Response to Final Office Action (May 23, 2022) at 25-26, 27-29, 32- 33; Second After Final Response to Final Office Action (August 16, 2022) at 23-58; and Appeal Brief (October 26, 2022) at 1-82.	(August 30, 2021) at 16-20; Response to Non-Final Office Action at 23- 28; After Final Response to Final Office Action (May 2, 2022) at 24-25, 27-29, 32- 33; After Final Response to Final Office Action (May 23, 2022) at 25-26, 27-29, 32- 33; Second After Final Response to Final Office Action (August 16, 2022) at 23-58; and Appeal Brief (October 26, 2022) at 1-82.
2			EXTRINSIC EVIDENCE: The Parties mutually have agreed to not present expert testimony or rely on expert reports at the claim construction phase.	EXTRINSIC EVIDENCE: The Parties mutually have agreed to not present expert testimony or rely on expert reports at the claim construction phase.
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19	2B	“a microprocessor”	PROPOSED CONSTRUCTION: plain and ordinary meaning	PROPOSED CONSTRUCTION: “one microprocessor that performs both the monitoring of both voltages and also the wirelessly transmitting a monitoring result”
20		Found in claim numbers:		
21		’568 Patent: claim 7 and claims depending from them		
22				
23				
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25			INTRINSIC EVIDENCE: See, e.g., ’568 patent – 4:28-63, 6:28-39, 7:17-22, 7:33-63, 8:32-53, 8:60-9:44, 10:1-13, 10:39-11:18, 11:32-51,	INTRINSIC EVIDENCE: See, e.g., ’568 patent – 7:17-22, 7:33-63, 8:32-53, 8:60-9:44, 10:1-13, 10:39-11:18, 11:32-51, 11:52-12:17, 12:36-42,
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1		11:52-12:17, 12:36-42,	12:46-52, FIGs. 1, 3, 5;
2		12:46-52, FIGs. 1, 3, 5;	claims 1-24 (as
3		claims 1-24 (as	originally issued) and
4		claims 1, 3-58 of the	claims 1, 2-58;
5		reexamination	Applicants'
6		certificate;	amendments, arguments,
7		Applicants'	and statements in '568
8		amendments, arguments,	File History (and
9		and statements in '568	corresponding examiner
10		File History (and	rejections), including
11		corresponding examiner	without limitation the
12		rejections), including	file history of the
13		without limitation the	reexamination in its
14		file history of the	entirety, including
15		reexamination in its	without limitation
16		entirety, including	Request for
17		without limitation	Supplemental
18		Request for	Examination (March 21,
19		Supplemental	2021); Response to Non-
20		Examination (March 21,	Final Office Action
21		2021); Response to Non-	(August 30, 2021) at 16-
22		Final Office Action	20; Response to Non-
23		(August 30, 2021) at 16-	Final Office Action at
24		20; Response to Non-	23- 28; After Final
25		Final Office Action at	Response to Final Office
26		23- 28; After Final	Action (May 2, 2022) at
27		Response to Final Office	24-25, 27-29, 32- 33;
28		Action (May 2, 2022) at	After Final Response to
		24-25, 27-29, 32- 33;	Final Office Action
		After Final Response to	(May 23, 2022) at 25-26,
		Final Office Action	27-29, 32- 33; Second
		(May 23, 2022) at 25-26,	After Final Response to
		27-29, 32- 33; Second	Final Office Action
		After Final Response to	(August 16, 2022) at 23-
		Final Office Action	58; and Appeal Brief
		(August 16, 2022) at 23-	(October 26, 2022) at 1-
		58; and Appeal Brief	82.
		(October 26, 2022) at 1-	
		82.	
		EXTRINSIC	EXTRINSIC
		EVIDENCE:	EVIDENCE:
		The Parties mutually	The Parties mutually
		have agreed to not	have agreed to not
		present expert testimony	present expert testimony
		or rely on expert reports	or rely on expert reports
			at the claim construction
			phase.

		at the claim construction phase.	
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III. ANTICIPATED LENGTH OF CLAIM CONSTRUCTION HEARING (PATENT L.R. 4-3(d))

Pursuant to Patent L.R. 4-3(d), the Parties provide their respective anticipated length of time necessary for the Claim Construction Hearing:

- LS Cable anticipates that no more than thirty (30) minutes will be required for the Claim Construction Hearing, with each side being allotted fifteen (15) minutes.
- Apple anticipates that no more than sixty (60) minutes will be required for the Claim Construction Hearing, with each side being allotted thirty (30) minutes.

IV. PARTIES' USE OF WITNESSES FOR CLAIM CONSTRUCTION (PATENT L.R. 4-3(e))

Pursuant to Patent L.R. 4-3(e), the Parties have mutually agreed to forego the use of experts or witnesses for claim construction. Accordingly, neither LS Cable nor Apple proposes calling a witness at the Claim Construction Hearing. If the Court requests a technology tutorial, the Parties may ask one or more experts or other witnesses to make the presentation, in view of the Court's strong preference for individuals other than counsel to present at the tutorial.

V. IDENTIFICATION OF FACTUAL FINDINGS (PATENT L.R. 4-3(f))

Neither party requests that the Court make any factual findings related to claim construction.

1 Dated: July 31, 2025

Respectfully submitted,

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14 Dated: July 31, 2025

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-9-

PREHEARING STATEMENT

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