

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

MAXELL, LTD.,

Plaintiff,

v.

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

Defendants.

Civil Action No. 5:25-cv-00052-RWS

**DEFENDANTS' PATENT LOCAL RULE 4-2 DISCLOSURE OF
PRELIMINARY CLAIM CONSTRUCTIONS AND EXTRINSIC EVIDENCE**

Pursuant to Rule 4-2 of the Rules of Practice for Patent Cases of the Eastern District of Texas, the Court's Docket Control Order, Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively referred to herein as "Samsung" or "Defendants") hereby provide the following proposed constructions for each claim term, phrase, or clause which the parties collectively have identified for claim construction purposes, including a preliminary identification of extrinsic evidence that supports their preliminary claim constructions.

Defendants reserve the right, consistent with the Federal Rules of Civil Procedure and the Local Rules of this Court, as well as any other applicable rule, to supplement, modify or withdraw its proposed claim terms for construction, or to revise its proposed constructions (including identifying and relying on additional extrinsic evidence) in view of Plaintiff's forthcoming proposed constructions or to reach comprise concerning proposed constructions. Defendants further expressly reserve the right to identify additional extrinsic evidence, including expert testimony from Defendants' experts, Dr. Seth Nielson, Dr. Dan Schonfeld, Dr. Jacob Baker,

Dr. Robert Stevenson, Dr. Benjamin Bederson, Dr. Joseph Paradiso, and others, as claim construction proceeds in view of and in response to any contentions made or information disclosed by Plaintiff, including, for example, in rebuttal to Defendants’ claim construction positions, and/or extrinsic evidence, including expert testimony, Plaintiff may present in support of its proposed claim constructions, including arguments concerning the plain and ordinary meaning of claim terms.

Patent Claims	Terms, Phrases or Clauses	Defendants’ Proposed Constructions
'088 patent: claims 1 and 14	“access point device”	Plain meaning, which is “a network device that allows wireless devices to connect to and communicate with a wired computer network” <u>Extrinsic Evidence</u> Merriam Webster Dictionary https://web.archive.org/web/20191016180015/https://www.merriam-webster.com/dictionary/access%20point (definition of “access point”: “a stand-alone device or computer that allows wireless devices (such as laptop computers) to connect to and communicate with a wired computer network”) Microsoft Computer Dictionary (5th ed. 2002) (definition of “access point”: “In a wireless LAN, a transceiver that connects the LAN to a wired network”) Newton’s Telecom Dictionary (19th ed. 2003) (definition of “access point”: network device that interconnects a wireless radio network to a wired LAN (local area network”) https://web.archive.org/web/20250128162844/https://www.hpe.com/us/en/what-is/access-point.html (“Access points (APs) are network devices that bridge wired and wireless networks.”)

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'088 patent: claims 1 and 14	"terminal"	Plain meaning, which is "a device used for data input and/or output" <u>Extrinsic Evidence</u> Hargrave's Communications Dictionary (2001) (definition of "terminal": "A device used for data input and/or output") McGraw-Hill Dictionary of Electrical & Computer Engineering (2003) (definition of "terminal": "a site or location at which data can leave or enter a system") New IEEE Standard Dictionary of Electrical and Electronics Terms (IEEE Std 100-1992, 1993) (definition of "terminal": "a point in a system or communication network at which data can either enter or leave")
'088 patent: claims 1 and 14	"command to remotely control a display operation"	Plain and ordinary meaning, which is a "command that remotely controls a method or manner in which data is displayed" <u>Extrinsic Evidence</u> Merriam Webster Dictionary (https://web.archive.org/web/20120112000413/https://www.merriam-webster.com/dictionary/operation) (definition of "operation": "a method or manner of functioning") IPR2025-01307, Paper 10, at 29. Maxell's October 20 Amended Infringement Contentions, Appendix 1, at 119-120.
'088 patent: claim 14	"command to control how to display the data"	Plain and ordinary meaning, which is a "command that remotely controls a method or manner in which data is displayed" <u>Extrinsic Evidence</u> Merriam Webster Dictionary (https://web.archive.org/web/20120112000413/https://www.merriam-webster.com/dictionary/operation) (definition of

Patent Claims	Terms, Phrases or Clauses	Defendants' Proposed Constructions
		“operation”: “a method or manner of functioning”) IPR2025-01307, Paper 10, at 29. Maxell’s October 20 Amended Infringement Contentions, Appendix 1, at 119-120.
'088 patent: claim 1	“upon receiving . . . the command from the first communication terminal, the communication device is configured to control how to display the data received from the second communication terminal”	Plain and ordinary meaning, which is that the method or manner used by the communication device to display data received from the second communication terminal becomes configured after, and in response to, the communication device receiving from the first communication terminal the command to remotely control how to display data received from the second communication terminal on the communication device. File History, Final Office Action of 11/30/20, at 71-72.
'650 patent: claims 1 and 4	“terminal”	Plain meaning, which is “a device used for data input and/or output” <u>Extrinsic Evidence</u> Hargrave’s Communications Dictionary (2001) (definition of “terminal”: “A device used for data input and/or output”) McGraw-Hill Dictionary of Electrical & Computer Engineering (2003) (definition of “terminal”: “a site or location at which data can leave or enter a system”) New IEEE Standard Dictionary of Electrical and Electronics Terms (IEEE Std 100-1992, 1993) (definition of “terminal”: “a point in a system or communication network at which data can either enter or leave”)
'650 patent: claims 1 and 4	“a first display displaying the contents”	plain and ordinary meaning, which is: displaying received or generated content
'650 patent: claims 1	“a [second/third] display	plain and ordinary meaning, which is:

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and 4	displaying the content"	displaying content on the second/third display regardless of the timing or relationship to the contents being displayed on the first display
'417 patent: claims 1, 4, 7	"mobile terminal"	Plain and ordinary meaning, i.e., "a portable device used for data input and/or output" <u>Extrinsic Evidence</u> Hargrave's Communications Dictionary (2001) (definition of "terminal": "A device used for data input and/or output. Terminals can be input only (called send only terminals), output only (called receive only terminals or display terminals), or both. A terminal may have some degree of computing power; hence, there are several categories possible. That is, • Dumb terminal – lacks any memory or other components needed for doing computations. All processing for the terminal is done by the host or by the host's front-end processor (FEP). They have limited flexibility for use because they are not addressable. This means they cannot be shared on a bus. • Smart terminal – has some processing capabilities and can be addressed. • Intelligent terminal – has its own processor, can do its own processing, and can run programs. PCs often are used as intelligent terminals." McGraw-Hill Dictionary of Electrical & Computer Engineering (2003) (definition of "terminal": "a site or location at which data can leave or enter a system.") New IEEE Standard Dictionary of Electrical and Electronics Terms (IEEE Std 100-1992, 1993) (definition of "terminal": "a point in a system or communication network at which data can either enter or leave") JP Patent No. 3179054, which published as JPH1173237, ¶¶[0001]-[0068], Figs. 1-10,

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		March 16, 1999.
'417 patent: claim 1	"when the mobile terminal is in the [open/closed] condition"	Plain and ordinary meaning, i.e., "in response to a detection that the mobile terminal is in the [unfolded/folded] condition"
'417 patent: claim 1	"when a specific processing is executed"	Plain and ordinary meaning, i.e., "in response to a specific processing being executed"
'681 patent: claim 1	"by increasing the other of the first number and the second number by an arbitrary number"	Plain and ordinary meaning, i.e., "by adding an arbitrary number to the other of the first number and the second number"
'091 patent: claim 1	"a first operation panel including at least one of linear operation buttons"	Plain and ordinary meaning, which is that the first operation panel includes at least one linear operation button and may also include one or more interactive operation buttons <u>Extrinsic Evidence</u> Maxell's August 12 Infringement Contentions, Appendix 5, at 46-47, 49, 65-66. Maxell's October 20 Amended Infringement Contentions, Appendix 5, at 46-47, 49, 65-66.
'091 patent: claim 1	"a second operation panel including at least one of interactive operation buttons"	Plain and ordinary meaning, which is that the second operation panel includes at least one interactive operation button and may also include one or more linear operation buttons <u>Extrinsic Evidence</u> Maxell's August 12 Infringement Contentions, Appendix 5, at 55-56, 62, 64. Maxell's October 20 Amended Infringement Contentions, Appendix 5, at 55-56, 62, 64.
'091 patent: claims 1 and 14	"display [...] at least one of [the] interactive operation buttons"	Plain and ordinary meaning, which is the display includes at least one of the interactive operation buttons and may also include one or more linear operation buttons <u>Extrinsic Evidence</u> Maxell's August 12 Infringement Contentions, Appendix 5, at 58-60, 61-64, 129, 131, 133,

Patent Claims	Terms, Phrases or Clauses	Defendants' Proposed Constructions
		135, 138, 140-148. Maxell's October 20 Amended Infringement Contentions, Appendix 5, at 58-60, 61-64, 129, 131, 133, 135, 138, 140-148.
'091 patent: claims 1 and 14	"display at least one of linear operation buttons"	Plain and ordinary meaning, which is the display includes at least one of the linear operation buttons and may also include one or more interactive operation buttons <u>Extrinsic Evidence</u> Maxell's August 12 Infringement Contentions, Appendix 5, at 47, 49, 61-62, 64, 121-124, 127-129, 131, 133-135, 140-148. Maxell's October 20 Amended Infringement Contentions, Appendix 5, at 47, 49, 61-62, 64, 121-124, 127-129, 131, 133-135, 140-148.
'646 patent: claim 1	"sleep state"	Plain and ordinary meaning, which is when a device's screen is turned off and dark (1) even if the device is still performing another operation while its screen is turned off and dark, or (2) when the device is in a non-operation state, meaning device inactivity. <u>Extrinsic Evidence:</u> Maxell's August 12 Infringement Contentions, Appendix 9, at 43, 57, 63, 67. Maxell's October 20 Amended Infringement Contentions, Appendix 9, at 43, 57, 63, 67. IPR2025-01316, Paper 10, at 16-18.
'228 patent: claim 1	"unlock operation / unlock" (claim 1)	Samsung adopts its construction from the '228 patent IPR (IPR2025-01313): "[t]he plain meaning of 'unlock[ing]' a device includes allowing the user to access additional functionality on the device." <u>Extrinsic Evidence:</u> Maxell's August 12 Infringement Contentions

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		cover pleading at, <i>e.g.</i> , 73-81. Maxell's August 12 Infringement Contentions, Appendix 8 at, <i>e.g.</i> , 209-223, 223-244, 244-265. IPR2025-01313, Paper 12 (Maxell's Preliminary Response).
'645 patent: claims 1, 3	"whether pattern portions other than contents are contained in the video signal input to the input unit" (claims 1, 3)	Plain and ordinary meaning. <u>Extrinsic Evidence:</u> Maxell's August 12 Infringement Contentions cover pleading at, <i>e.g.</i> , 57-64. Maxell's August 12 Infringement Contentions, Appendix 6 at, <i>e.g.</i> , 38-69, 238-269. IPR2025-01312, Paper 13 (Maxell's Preliminary Response).
'645 patent: claims 1, 3, 5	"when the pattern portions are [contained / not contained / not the no-picture areas]" (claims 1, 3, and 5)	Samsung adopts its construction from the '645 patent IPR (IPR2025-01312): Samsung "construes 'when' in these limitations to be broader than ' <i>whenever</i> ,' and to be satisfied by <i>certain instances</i> in which 'the pattern portions are contained,' 'the pattern portions are not contained,' and 'the pattern portions are not the no-picture areas,' respectively." <u>Extrinsic Evidence:</u> Maxell's August 12 Infringement Contentions cover pleading at, <i>e.g.</i> , 57-64. Maxell's August 12 Infringement Contentions, Appendix 6 at, <i>e.g.</i> , 107-144, 144-181, 338-357, 474-504, 504-523. IPR2025-01312, Paper 13 (Maxell's Preliminary Response).
'645 patent: claim 3	"a result of detection output from the characteristic point detector" (claim 3)	Samsung adopts its construction from the '645 patent IPR (IPR2025-01312): "[t]he plain meaning of this limitation includes a 'result' that is not 'from the

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		characteristic point detector' but still is a result of 'detection output' that is from the characteristic point detector.” <u>Extrinsic Evidence:</u> Maxell's August 12 Infringement Contentions cover pleading at, <i>e.g.</i>, 57-64. Maxell's August 12 Infringement Contentions, Appendix 6 at, <i>e.g.</i>, 291-338. IPR2025-01312, Paper 13 (Maxell's Preliminary Response).
'950 patent: claim 1	“region creation unit” (governed by 35 U.S.C. § 112(6))	Function: Creating a region by removing pixels with the detected features from an evaluated value extraction region. Structure: The overall structure shown as element 6 in Figs. 1, 6, 7 and 10, element 37 in Fig. 11 and element 43 in Fig. 13 is a software algorithm executing on a processor. '950 patent, 2:14-16; 3:60-4:35; 4:53-58. The region creation algorithm manipulates pixel data to define specific regions for evaluation. <i>Id.</i>, 2:60-3:5; 3:60-4:35.
'950 patent: claim 1	“feature detection unit” (governed by 35 U.S.C. § 112(6))	Function: Detecting a position where features of each pixel of an input picture signal have changed. Structure: The overall structure shown at Element 4 in Figs. 1, 6, 7, 10, 11 and 13 is a software algorithm executing on a processor. '950 patent, 2:14-16; 3:22-59; 4:36-58. The specific feature detection algorithm analyzes pixel data to identify changes in image features. <i>Id.</i>, 2:22-47; 3:23-59.
'950 patent: claim 1	“evaluated value extraction unit” (governed by 35 U.S.C. § 112(6))	Function: Extracting an evaluated value in accordance with the created region. Structure: The overall structure shown as Elements 7, 34, and 36 in Figs. 1, 6, 7, 10, 11 and 13 is a software algorithm executing on a

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		processor. '950 Patent, 2:14-16; 4:23-40; 4:53-58. The evaluated value extraction algorithm performs calculations on pixel data within defined regions. <i>Id.</i> , 4:1-10; 4:23-40.
'950 patent: claim 1	"region segmentation unit" (governed by 35 U.S.C. § 112(6))	Function: Segmenting the effective region in advance. Structure: The overall structure shown as Element 38 in Figs. 11 and 13 and is described as a software algorithm executing on a processor. '950 Patent, 2:14-16; 4:53-58; 7:5-44. The region segmentation algorithm divides the image into multiple regions for analysis. <i>Id.</i> , 7:5-44.
'950 patent: claim 1	"overlap detection unit" (governed by 35 U.S.C. § 112(6))	Function: Detecting overlap of position information with segmented blocks. Structure: The overall structure shown as Element 39 in Figs. 11 and 13 and is described as a software algorithm executing on a processor. '950 Patent, 2:14-16; 4:53-58; 7:5-44. The overlap detection algorithm compares pixel positions with predefined regions. <i>Id.</i> , 7:5-44.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 7th day of January, 2026, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document by electronic mail.

/s/ Erik Fuehrer

Erik Fuehrer