IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION

PALISADE TECHNOLOGIES, LLP, Plaintiff, v. MICRON TECHNOLOGY, INC. AND MICRON SEMICONDUCTOR PRODUCTS, INC., Defendants.	§ § § § § § § § § § § § § § §	CIV. A. NO. 7:24-cv-00262-DC-DTG **JURY TRIAL DEMANDED**

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Scheduling Order (ECF 38) and the Court's Standing Order Governing Proceedings (OGP) 4.4 – Patent Cases, Sec. IX, Plaintiff Palisade Technologies, LLP ("Palisade") and Defendants Micron Technology, Inc. and Micron Semiconductor Products, Inc. ("Micron") hereby respectfully submit this Joint Claim Construction Statement. The Joint Claim Construction Statement identifies disputed constructions for each of the claim terms at issue concerning U.S. Patent Nos. 8,148,962 (the "'962 patent"), 8,327,051 (the "'051 patent"), 8,996,838 (the "'838 patent"), and 9,524,974 (the "'974 patent").[1] The corresponding tables herein indicate the agreed and disputed terms for each patent, each parties' proposed constructions, and which party proposed the term for construction or whether the parties jointly made the proposal.

[1] There are no disputed terms for the remaining patent-in-suit, U.S. Patent No. 9,281,314.

I. AGREED TERMS

	Patent/Claim	Term	Agreed Construction	Proposing Party
1	'962 Patent, Cl. 1	"A voltage regulator circuit integrated in an integrated circuit (IC) and adapted to provide a voltage from a power supply to a load under varying load conditions"	Preamble is limiting	Micron
2	'962 Patent, Cl. 14	"A voltage regulator circuit integrated in an integrated circuit (IC) and adapted to provide a voltage from a power supply to a load integrated in the IC under selectively variable load conditions"	Preamble is limiting	Micron
3	'962 Patent, Cl. 14	"means for supplying current to said load for receiving a signal based on a magnitude of said first current and a magnitude of said second current and for supplying a load current to said load via said output of said voltage regulator circuit with a magnitude based on a magnitude of said signal"	35 U.S.C. § 112 ¶6 **Function**: supplying current to said load for receiving a signal based on a magnitude of said first current and a magnitude of said second current and for supplying a load current to said load via said output of said voltage regulator circuit with a magnitude based on a magnitude of said signal **Structure**: pass transistor 350 of Fig. 3, pass transistor 450 of Fig. 4, pass transistor 550 of Fig. 5, pass transistor 650 of Fig. 6, and equivalents, as	Micron

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	Patent/Claim	Term	Agreed Construction	Proposing Party
			described and shown at 5:58-67; 6:15-24; 7:27-51; 9:55-63; 10:54-62, Figs. 3, 4, 5, 6.	
4	'051 Patent, Cl. 23	"at least two pins of the USB port are parallel to at least two pins of the I/O port"	Plain and ordinary meaning, wherein the parties agree that "parallel" describes a physical arrangement and not an electrical arrangement	Micron

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II. DISPUTED CONSTRUCTIONS

	Patent/Claim	Term	Palisade's Construction	Micron's Construction	Proposing Party
1	'962 Patent, Cl. 1	"feedback circuit … including a feedback transistor"	Plain and ordinary meaning	"a circuit that generates a voltage at the gate of a transistor by comparing a voltage proportional to the voltage across the drain and source of the transistor and a reference voltage with a differential amplifier"	Micron
2	'962 Patent, Cls. 1, 14	"substantially constant"	Plain and ordinary meaning	Indefinite	Micron
3	'962 Patent, Cl. 14	"feedback means for maintaining a voltage at a gate of a feedback transistor substantially constant"	35 U.S.C. § 112 ¶6 **Function:** maintaining a voltage at a gate of a feedback transistor substantially constant **Structure:** feedback circuit 331 of Fig. 3 (including differential amplifier 333 and transistor 332), feedback circuit of Fig. 4 (including differential amplifier 433 and transistor 432), feedback circuit 531 of Fig. 5 (including differential amplifier 533 and transistor 532), feedback circuit 631 of	35 U.S.C. §112, ¶6 applies. **Function:** maintaining a voltage at a gate of a feedback transistor substantially constant **Structure:** Feedback circuit arranged as shown in Figure 3, element 331 including differential amplifier 333, voltage divider 336, and feedback transistor 332. Feedback circuit arranged as shown in Figure 4, including differential amplifier 433, voltage divider 436,	Micron

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	Patent/Claim	Term	Palisade's Construction	Micron's Construction	Proposing Party
			Fig. 6 (including differential amplifier 633 and transistor 632) and equivalents, as described and shown at 5:52-57, 7:19-21, 8:46-60; 10:13-16, Figs. 3, 4, 5, and 6.	and feedback transistor 432. Feedback circuit arranged as shown in Figure 5, element 531 including differential amplifier 533, voltage divider 536, and feedback transistor 532. Feedback circuit arranged as shown in Figure 6, element 631 including differential amplifier 633, voltage divider 636, and feedback transistor 632.	
4	'962 Patent, Cl. 14	"first current supply means for supplying to a second current path referenced to said input a first current that is substantially constant"	35 U.S.C. § 112 ¶6 **Function:** supplying to a second current path referenced to said input a first current that is substantially constant **Structure:** first current source 322 of Fig. 3, first current source 422 of Fig. 4, first current source 522 of Fig. 5, first current source 622 of Fig. 6, and equivalents, as described and shown at 6:25-41; 7:52-61;	35 U.S.C. §112, ¶6 applies. **Function:** supplying to a second current path referenced to said input a first current that is substantially constant **Structure:** Current source shown in Figure 5 element 522, including master transistor 521 and slave transistor 523. Current source shown in Figure 6 element 622, including transistor 672 whose gate is connected to a bias voltage and whose	Micron

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	Patent/Claim	Term	Palisade's Construction	Micron's Construction	Proposing Party
			8:61-9:8; 10:63-11:3, Figs. 3, 4, 5, 6.	drain is connected to a second current path.	
5	'962 Patent, Cl. 14	"second current supply means . . . for receiving a first voltage reference and a second voltage reference and for supplying a second current to said second current path with a magnitude based on said first voltage reference and said second voltage reference"	35 U.S.C. § 112 ¶6 **Function:** receiving a first voltage reference and a second voltage reference and for supplying a second current to said second current path with a magnitude based on said first voltage reference and said second voltage reference **Structure:** second current source 340 of Fig. 3, second current source 440 of Fig. 4, second current source 540 of Fig. 5, second current source 640 of Fig. 6, and equivalents, as described and shown at 6:42-62; 7:62-8:17; 9:40-54; 10:40-53, Figs. 3, 4, 5, 6.	35 U.S.C. §112, ¶6 applies. **Function:** receiving a first voltage reference and a second voltage reference and for supplying a second current to said second current path with a magnitude based on said first voltage reference and said second voltage reference **Structure:** Variable current source as shown in Figure 5, element 540 including replica transistor 542 whose gate is coupled to the gate of feedback transistor 532 and whose drain is coupled to output node 560. Variable current source as shown in Figure 6 element 640, including replica transistor 642 whose gate is coupled to the gate of feedback transistor 632 and whose	Micron

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	Patent/Claim	Term	Palisade's Construction	Micron's Construction	Proposing Party
				drain is coupled to output node 660.	
6	'051 Patent, Cl. 24	"layout for the USB port is different from layout of the I/O port"	Plain and ordinary meaning	"USB port and I/O port having different physical and electrical arrangements"	Micron
7	'838 Patent, Cls. 1, 12	"information identifying a location associated with a variation of the structure"	Plain and ordinary meaning	"information identifying where a structural variation through tapering begins"	Micron
8	'974 Patent, Cls. 1, 12	"the second shape being different from the first shape" / "the second shape being different to the first shape"	Plain and ordinary meaning	"the second shape having a different geometric profile than the first shape"	Micron
9	'974 Patent, Cls. 1, 12	"alternating pattern"	Plain and ordinary meaning	"[a] sequence wherein the first and the second trenches repeat every other"	Micron

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CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2025, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF filing system, which will generate and send an e-mail notification of said filing to all counsel of record.

/s/ Patrick Conroy

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