

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MYW SEMITECH, LLC,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 25-504-RGA-EGT
v.	)	
	)	JURY TRIAL DEMANDED
APPLE INC.,	)	
	)	
Defendant.	)	

JOINT CLAIM CONSTRUCTION CHART

Pursuant to the September 5, 2025 Scheduling Order (C.A. No. 25-504-RGA-EGT, D.I. 26), Plaintiff MYW Semitech, LLC (“Plaintiff” or “Semitech”) and Defendant Apple Inc. (“Defendant” or “Apple”); hereby submit the following Joint Claim Construction Chart (Exhibit 1) for United States Patent Nos. 11,107,768 (“’768 patent”); 11,538,763 (“’763 patent”); and 11,894,306 (“’306 patent”) along with a copies of the patent and portions of the intrinsic record relied upon in support of the parties’ proposed constructions (Exhibits A-H).

In addition to the materials disclosed in the Joint Claim Chart, each party reserves the right to rely on additional intrinsic evidence to rebut arguments made by the other party during claim construction briefing, any evidence cited by the opposing party, as well as extrinsic evidence and/or expert testimony.

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EXHIBIT 1

PROPOSED CONSTRUCTIONS OF DISPUTED CLAIM TERMS¹

Claim Term (claims at issue in which it appears)	Semitech's Proposed Construction	Semitech's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
“semiconductor chip” (’768 patent claims 1, 4, 5, 16, 25; ’763 patent claims 1, 4, 5, 14; ’306 patent claims 10, 13, 14, 17) <i>Apple believes this dispute may be relevant to lack of written description or enablement, and/or non-infringement.</i>	Plain and ordinary meaning: semiconductor chip .	’768 patent (Ex. A), claims 1, 3, 4, 5, 11, 16, 17, 23, 25, 26, 27. ’768 patent (Ex. A), 1:18-20, 1:29-41, 1:46-2:10, 3:20-37, 3:44-65, 11:39-15:56, 17:66-20:44, 22:24-37, 22:52-26:31, Figs. 9, 12, 13, 14, 15, 16, 17a, and 17b. File History of ’768 patent (Ex. D): • WO 2013/138452, ¶ 73 • 11/05/2020 Applicant Arguments/Remarks Made in an Amendment, p. 22-28 • 11/06/2020 Supplemental Amendment, p. 9-10	Plain and ordinary meaning: “a semiconductor device comprising an IC (integrated circuit)”	’768 patent (Ex. A) at, e.g.: 1:18-20, 1:29-2:10, 3:20-37, 3:44-65, 11:39-15:56, 22:24-37, 22:52-26:31, Figs. 9a-9y, 12-17b, Claims 1, 3-6, 11-13, 16, 17, 18, 21, 23-27. ’768 Patent File History (Ex. D) at, e.g.: • 11/5/2020 Remarks/Arguments, 22-34 • 11/6/2020 Supplemental Amendment, 9-10 • 04/26/2021 Notice of Allowance and Notice of Allowability • 5/25/2021 Amendment, 11-14 • 6/24/2021 Remarks/Arguments, 10-11

¹ The ’768 patent shares the same substantive specification with the other patents-in-suit. Therefore citations in this Exhibit to the ’768 patent’s specification should be understood to reference the same disclosures from the ’763 patent and the ’306 patent.

Citations to a figure should be understood to also refer to specification disclosures relating to that figure, and vice versa.

Claim Term (claims at issue in which it appears)	Semitech's Proposed Construction	Semitech's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
		• 04/26/2021 Notice of Allowance and Notice of Allowability • 05/25/2021 Applicant Arguments/Remarks Made in an Amendment, p. 11-14 • 06/24/2021 Applicant Arguments/Remarks Made in an Amendment, p. 10-11 '763 patent (Ex. B), claims 1, 3, 4, 5, 11, 16, 17, 23, 25, 26, 27. '763 patent (Ex. B), 22:52-25:29. '306 patent (Ex. C), claims 10, 13, 14, 17. '306 patent (Ex. C), 22:57-26:47.		'763 patent (Ex. B) at, e.g.: 22:52-25:29, Claims 1, 3-6, 14, 16, 18, 21 '306 patent (Ex. C) at, e.g.: 22:57-26:48, Claims 1, 2, 6, 9, 10, 13, 14, 17, 18, 21-27 U.S. Patent No. 9,615,453 File History (Ex. F) at, e.g., 11/16/2016 Notice of Allowance U.S. Patent No. 10,622,310 File History (Ex. G) at, e.g., 3/9/2020 Notice of Allowance U.S. Patent Pub. No. 2010/0246152 (Ex. H) at, e.g.: ¶¶ Abstract, 3, 5-7, 10-11, 116, 163, 168, 210, 286, 290-293, 633, 635, 637, 639, 641, 648, 653, 676, 684, 686, 688, 690, 706, 754, 756, 758, 760, 774, 776, 778, 780, 783, 786, 793, 794, 795, 810, 811, 812, 828, 829, 833, 834, 852, 853, 856, 857, 879-881, 892, 893, 895-897, 911, 913, 929, 931-933, 936, 937, 944, 945, 952, 953, 985, 986, 992.

Claim Term (claims at issue in which it appears)	Semitech's Proposed Construction	Semitech's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
		File History of '306 patent (Ex. E): 11/08/2023 Amendment, p. 1-2		