IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

DEFENDANT APPLE INC.'S ANSWERING CLAIM CONSTRUCTION BRIEF

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I. INTRODUCTION

Defendant Apple, Inc. ("Apple") hereby submits its Answering Claim Construction Brief regarding the asserted claims of U.S. Patent Nos. 11,107,768 ("the '768 patent"), 11,538,763 ("the '763 patent"), and 11,894,306 ("the '306 patent") (collectively the "Asserted Patents"). Among the claims asserted by Plaintiff MYW Semitech, LLC ("Semitech" or "Plaintiff"), there is one term's plain and ordinary meaning that requires construction.

II. DISPUTED CONSTRUCTION

"semiconductor chip" (all asserted claims)

Semitech's Proposed Construction	Apple's Proposed Construction
Plain and ordinary meaning: semiconductor chip	Plain and ordinary meaning: "a semiconductor device comprising an IC (integrated circuit)"

III. APPLE'S PROPOSED PLAIN AND ORDINARY MEANING IS SUPPORTED BY INTRINSIC AND EXTRINSIC EVIDENCE

Apple and Semitech agree that the term "semiconductor chip" should be given its plain and ordinary meaning. Semitech Opening Brief ("Semitech Br."), 5. Indeed, the evidence presented by Semitech corroborates that a "semiconductor chip" is (1) a "semiconductor" device (2) "comprising an IC (integrated circuit)," as proposed by Apple. Semitech, however, has refused to say what the plain and ordinary meaning is—despite the Court's Scheduling Order requiring an explanation. *See* D.I. 26 at 6 n.1.

First, as demonstrated by the claim language and the specification (further discussed below), a "semiconductor" chip is a "semiconductor device." For example, the specification provides a list of exemplary devices, including memory chips, CPU chips, and CMOS image sensor device, etc., which are undisputedly semiconductor devices. Semitech does not seem to take issue with this. Semitech's brief quotes the same list and characterizes it as "an exemplary list of

semiconductor chips." *See, e.g.*, Semitech Br., 6-7 (citing, *e.g.*, D.I. 90, Ex. A ('768 patent), 13:58-14:9).[1] Indeed, the applicant amended the claims by adding "semiconductor" to modify the term "chip" during prosecution and the applicant apparently believed the plain meaning of "semiconductor" chip was sufficient to differentiate the cited prior art, which discloses medical devices (i.e., a "medical implant device"). D.I. 90, Ex. D ('768 File History ("'768FH"), at 279).[2]

Second, the intrinsic evidence confirms that a semiconductor chip is a semiconductor device comprising an IC (integrated circuit). Throughout the specification, the patentee uses the terms "Integrated Circuit," "IC," "chip," and "IC chip." *See, e.g.,* '768 patent, 1:29-1:66, 15:40-51, 22:24-32. Further, when the claims were amended during prosecution to recite a "semiconductor chip," the applicant relied on the specification's disclosures of "***circuit*** block[s]" as providing support for the term "semiconductor chip" in the claims. *Id.* (citing '768 patent, 13:58-14:9); *see also* Semitech Br., 6-7 (citing same).[3] And the relevant "circuit blocks" disclosure in the specification discusses ICs, including memory, CPU, GPU, etc. The extrinsic evidence also supports Apple's position. For example, Semitech's cited case law further recognizes that "chips" comprise "integrated circuits." *San Disk Corp. v. Round Rock Rsch. LLC***,** No. C-11-5243 RS, 2013 WL 1899790, at *9 (N.D. Cal. May 7, 2013) (the court noted that chips comprised integrated circuits and further addressed a dispute concerning whether "chip" refers to "unpackaged" or "*packaged"* integrated circuits) (emphasis original). Tellingly, Semitech cited a dictionary but did not look up the definition of a "chip." Indeed, the very dictionary cited by Semitech defines a chip

[1] The specifications of the Asserted Patents are substantively the same. The '306 patent is a continuation of the '763 patent, which is a continuation of the '768 patent. Citations herein to the '768 patent are representative of all three Asserted Patents.

[2] File history pagination for Exhibits D-G in D.I. 90 uses the pagination added through ECF.

[3] All emphasis added unless otherwise indicated.

as "a very small **piece of *semiconductor***, especially in a computer, that ***contains*** extremely small electronic ***circuits*** and devices, and can perform particular operations." Ex. A at 3 (Chip, Cambridge Dictionary, https://dictionary.cambridge.org/dictionary/english/chip (last visited April 14, 2026). Additionally, the extrinsic sources provided by Apple repeatedly define a "chip" by referencing an "integrated circuit." *See, e.g.*, Ex. B (Douglas Downing, *Dictionary of Computer and Internet Terms* (Barron's 6th ed. 1998) at 81, 237 ("***integrated circuit (IC) an electronic device consisting of many miniature transistors and other circuit elements on a single silicon chip***").

While Semitech appears to agree that Apple's plain and ordinary meaning would qualify as a "semiconductor chip," Semitech alleges without support that Apple "narrow[s]" the scope of the term. *See, e.g.*, Semitech Br. at 7. Semitech does not identify anything that Apple's proposal would purportedly exclude from what a person of ordinary skill in the art ("POSITA"), in view of the intrinsic and extrinsic evidence, would have considered to be a "semiconductor chip." Nor has Semitech yet "explain[ed]" what the plain and ordinary meaning of "semiconductor chip" is. Without proposing any meaning, Semitech therefore fails to articulate any difference between its position and Apple's proposal.

Consistent with Federal Circuit precedent, the Court's Scheduling Order explicitly directed: "[i]f a party proposes a construction of a term to be its 'plain and ordinary' meaning, the party must explain what that meaning is." D.I. 26 at 6 n.1; *see also O2 Micro Int'l Ltd. v. Beyond Innovation Tech. Co.*, 521 F.3d 1351, 1361 (Fed. Cir. 2008) ("A determination that a claim term …has the 'plain and ordinary meaning' may be inadequate when…reliance on a term's 'ordinary' meaning does not resolve the parties' dispute."). Semitech has thus failed to comply with the Order. Semitech's reliance on *Ironburg* is inapposite. Semitech Br., 1 (citing *Ironburg Inventions Ltd. v.*

Valve Corp., 64 F.4th 1274, 1287 (Fed. Cir. 2023)). The cited passage in *Ironburg* relies on *Summit 6, LLC v. Samsung Elecs. Co.*, which confirms that "the court must resolve actual disputes regarding the proper scope of a claim term." 802 F.3d 1283, 1291 (Fed. Cir. 2015) (citing *O2 Micro*, 521 F.3d at 1360). In fact, the *Ironburg* passage cited by Semitech for the notion that "ordinary meanings are readily apparent and require no further construction" concerns the court's determination of indefiniteness—not a disputed plain and ordinary meaning. *See* Semitech Br., 1 (citing *Ironburg*, 64 F.4th at 1287). And the other cases Semitech cites rejecting a proposed construction of a term's plain meaning merely held that the proposal was unsupported or unnecessary—not that it was improper to construe the plain meaning. Rather, consistent with *O2 Micro*, the cited cases recognize that claim construction disputes need to be resolved. *See, e.g.*, *Helmsderfer v. Bobrick Washroom Equip., Inc.*, 527 F.3d 1379, 1384 (Fed. Cir. 2008) (construing plain meaning of "partially hidden from view").

Apple's proposal provides the plain meaning of this term and should be adopted.

A. A "Semiconductor Chip" Must Be a "Semiconductor" Device Under the Plain Meaning

Semitech does not dispute that "semiconductor chip" under the plain meaning must use "semiconductor" technology. In fact, the applicant agreed with this general understanding. The specification and prosecution history reflect the applicant's understanding that the plain meaning of "semiconductor" chip is sufficient to distinguish from non-semiconductor devices. *See Nystrom v. TREX Co.*, 424 F.3d 1136, 1143-45 (Fed. Cir. 2005) (affirming construction of the plain and ordinary meaning of "board" "in the context of the written description and prosecution history" of the patent at issue). During prosecution of the '768 patent, in response to a prior art rejection including a medical device reference, the applicant amended the claims to change recitations of a "chip" to instead recite a "***semiconductor*** chip" to distinguish a non-semiconductor device. D.I.

90, Ex. D at 277-281 (11/05/2020 Applicant Arguments/Remarks Made in an Amendment at 31-34). The applicant argued that "Tiedtke's [prior art] invention is in a 'medical' field, not in 'chip package' field, however, no any [sic] disclosure, suggest[ion] or intention about 'chip', '***semiconductor***', 'chip package' in Tiedtke's invention." *Id.* The applicant's amendment of the claims to recite "semiconductor" before "chip," together with the applicant's arguments distinguishing non-semiconductor prior art, confirm that the "semiconductor" chip is a "semiconductor" device.

B. A "Semiconductor Chip" Comprises an IC (Integrated Circuit)

Apple's proposed plain and ordinary meaning also clarifies that a semiconductor chip refers to a semiconductor device comprising an IC (integrated circuit), which is consistent with all of the intrinsic and extrinsic evidence—including Semitech's cited evidence.

1. The Intrinsic Evidence Confirms Apple's Plain and Ordinary Meaning

The specification uses the terms "integrated circuit," "IC," "chip," and "IC chip" to refer to a semiconductor device comprising an IC (integrated circuit). For example, the '768 patent uses "Integrated Circuit," "IC," and "IC chip" in discussing the technology field of the alleged invention:

> When the geometric dimensions of the ***Integrated Circuits*** are scaled down, the cost per die is decreased while some aspects of performance are improved. The metal connections which connect the ***Integrated Circuit*** to other circuit or system components become of relative more importance and have, ***with the further miniaturization of the IC***, an increasingly negative impact on the ***circuit performance***. The parasitic capacitance and resistance of the metal interconnections increase, which degrades the ***chip performance*** significantly… Increased Input-Output (IO) combined with increased demands for high performance, and then ***IC's*** has led to the development of flip-chip Packages… Glass can be used as an interposer to bridge between ***one or more IC chips*** and a printed circuit board.

'768 patent, 1:29-1:66. It also uses "chip," "IC chip," and "integrated circuit chips," reflecting that a "chip" comprises an "IC." *Id.* Further supporting Apple's position, the specification recognizes

that it is directed to "the fabrication and design of ***integrated circuit chips*** according to the present disclosure." *Id.*, 22:24-32.

Indeed, as Semitech recognizes in its opening brief, the applicant cited to disclosures of several different "***circuit*** block[s] … from the semiconductor wafer" as written description support for amending the claims to change the term "chip" to the term "semiconductor chip." Semitech Br., 7 (citing D.I. 90, Ex. D, at 271 ('768 FH, 11/5/2020 Applicant Arguments/Remarks Made in an Amendment, at 24)). Semitech does not dispute that the specification's examples of semiconductor chips (including memory chips, processors and multiple examples of "circuit block[s]") each comprise an integrated circuit:

> Next, referring to FIG. *9t*, multiple chips **46** and chips **56** set up over the third dielectric layer **40** through a flip-chip package process or a wire-bonding package process, wherein the ***chip 46 or 56*** comprises ***may be*** a memory chip, such as NAND-Flash memory chip, Flash memory chip, DRAM chip, SRAM chip or SDRAM chip, a central-processing-unit (CPU) chip, a graphics-processing-unit (GPU) chip, a digital-signal-processing (DSP) chip, a baseband chip, a wireless local area network (WLAN) chip, a logic chip, an analog chip, a global-positioning-system (GPS) chip, a "Bluetooth" chip, or a chip including one or more of a CPU circuit block, a GPU circuit block, a DSP circuit block, a memory circuit block (such as DRAM circuit block, SRAM circuit block, SDRAM circuit block, Flash memory circuit block, or NAND-Flash memory circuit block), a baseband circuit block, a Bluetooth circuit block, a GPS circuit block, a MEMS chip, a COMS image sensor device, a WLAN circuit block, and a modem circuit block, from the semiconductor wafer.

'768 patent, 13:58-14:9. This is consistent with Semitech's cited definition of "integrated circuit" because each of the memory chips, processors, and circuit blocks discussed in the specification (see above) comprises: "a very small electronic circuit that consists of a lot of small parts made on a piece of semiconducting material." Semitech Br., 8 (quoting Cambridge Dictionary, https://dictionary.cambridge.org/us/dictionary/english/integrated-circuit (Ex. A)). Indeed, Semitech admitted that some extrinsic evidence indicates that "semiconductor chips" and "integrated circuits" "may be used interchangeably." *Id.* (citing *San Disk*, 2013 WL 1899790, at

*9).

Additionally, as Apple proposes, chips are semiconductor devices that include an IC (integrated circuit). The specification and claims distinctly recite "discrete passive components," such as "a discrete resistor," "a discrete capacitor," and "a discrete inductor," that stand alone and do not comprise an integrated circuit. *E.g.*, '768 patent, 13:55-57, 14:46-51, 15:54-56. For example, when referring to discrete components such as a "capacitor" and "resistor," the specification refers to these discrete components as "passive devices" or "discrete passive components"—not integrated circuits. *E.g., id.*

Semitech argues that Apple adds "device comprising" and "integrated circuit," which would confuse the jury. Semitech, however, only poses hypothetical questions regarding the phrases "device comprising" or "integrated circuit" in Apple's plain meaning, but does not articulate how these phrases could give rise to confusion. Semitech Br., 7.[4] Apple's proposed plain and ordinary meaning stays true to the intrinsic record and provides clear guidance to a jury what a semiconductor chip is: a semiconductor device that "comprises" an IC (integrated circuit) and may (but is not required to) include other components as well. This plain and ordinary meaning is consistent with the specification, which is replete with examples of semiconductor chips "comprising" other components that are not themselves an IC, such as metal bumps and pads. *See, e.g.*, '768 patent, 14:10-13 ("chip 46 comprises multiple metal pads 48 and multiple metal bumps 50…."), 14:35-37, 15:40-50 (similar disclosures of "metal pads" and "metal bumps"), claim 1 ("said first semiconductor chip comprises a fourth metal interconnect"); *see also id.* claims 6, 12, 13, 18, 21, 25; '763 patent, claims 1, 4, 6, 18; '306 patent, claims 1, 6, 10, 13, 14, 18, and 21

[4] Indeed, Semitech's reductionist and rhetorical questions could be posed with respect to the claim language itself: what is meant by "semiconductor chip" in the context of the claim? What "chip" is Semitech referring to? What else is a "chip" in this term?

(similarly reciting chips "comprising" components other than an IC). Apple's proposal conveys the meaning of "semiconductor chip" in the context of the Asserted Patents that would better assist a jury to apply the plain meaning of the term.

Semitech also argues that Apple narrows the term "semiconductor chip." Despite its bold assertion, Semitech does not (indeed, it cannot) identify what would qualify as a "semiconductor chip" that would be excluded under Apple's plain and ordinary meaning. Semitech Br. 4-5, 7. Semitech is wrong. Apple does not narrow the term "semiconductor chip." Indeed, as explained above, Apple's position does not rely on disclaimer or lexicography, nor does it read limitations into the claim. Rather, Apple simply provides the plain meaning of the term in the "specific context" of the specification and the prosecution history. *See UltimatePointer, L.L.C. v. Nintendo Co.*, 816 F.3d 816, 824 (Fed. Cir. 2016) (affirming construction of the ordinary meaning); *see also Nystrom*, 424 F.3d at 1143-45 (holding that, "in the context of the written description and prosecution history," the term "board" should not be "construed . . . more broadly"); *Trs. of Columbia Univ. in City of New York v. Symantec Corp.*, 811 F.3d 1359, 1363 (Fed. Cir. 2016) ("The only meaning that matters in claim construction is the meaning in the context of the patent.").

2. The Extrinsic Evidence Confirms Apple's Plain and Ordinary Meaning

The extrinsic evidence further confirms that "semiconductor chip" refers to a semiconductor device comprising an IC. First, dictionaries define "chip" by referencing an integrated circuit (IC). For example, Barron's Dictionary of Computer and Internet Terms defines a "chip" by cross-referencing to "integrated circuit:" "**chip** *see* INTEGRATED CIRCUIT." Ex. B, Douglas Downing, *Dictionary of Computer and Internet Terms* (Barron's 6th ed. 1998) at 81 (emphasis original). Barron's then further defines an IC to **require** circuit elements on a single silicon chip: "**integrated circuit (IC)** an electronic device consisting of many miniature transistors and other circuit elements on a single silicon chip." Ex. B, at 237 (emphasis original). Similarly,

the textbook "Semiconductor Physics and Devices Basic Principles Fourth Edition" authored by Donald A. Neamen explains that the integrated circuit (IC) "is a direct result of the development of various processing techniques needed to fabricate the transistor and interconnect lines on the single ***chip***." Ex. C, at xx. The textbook describes that "the first IC was fabricated in February 1959" and that the "first integrated circuits incorporated bipolar transistors." *Id.* at xix. The textbook adds that "[p]ractical MOS transistors were then developed in the mid-1960s and 1970s," and that "[t]he MOS technologies, especially CMOS, have become a major focus for IC design and development." *Id.*

Likewise, courts considering the meaning of the terms "chip" or "semiconductor chip"—including the case cited by Semitech—have construed the terms consistent with Apple's plain meaning. For example, in *KT Imaging USA, LLC v. Acer Am. Corp.*, the court construed "chip" to mean "***plain and ordinary meaning, i.e., an integrated circuit*** (e.g., light sensing elements and associated circuitry) ***and associated electrical connections (***e.g., conducting pads, conducting channel, etc.)." Ex. D, at 3 (No. 6:20-cv-00299, D.I. 43 (W.D. Tex. Jan. 21, 2021)).

Semitech's cited extrinsic evidence also supports Apple's plain meaning. *See* Semitech Br., 8 (citing Cambridge Dictionary website). The Cambridge Dictionary defines chip "(COMPUTER PART)" as "a very small **piece of semiconductor**, especially in a computer, that ***contains*** extremely small electronic ***circuits*** and devices, and can perform particular operations." Ex. A at *3*. The Cambridge Dictionary goes on to provide an example of such a chip: "silicon chip: *The image sensor is a tiny silicon chip embedded with millions of pixels tightly packed together*." Ex. E at 1. And Semitech's quotation of the *San Disk* decision importantly omitted the italicized emphasis of "packaged" that was the very dispute in that case: "**In many contexts, however, the term 'chip' is used to refer to *packaged* integrated circuits**." *San Disk*, 2013 WL 1899790, at

*9 (bolded emphasis added, italics original); *compare* Semitech Br. 8. As the *San Disk* court further explained, the dispute was over whether the "chip"/"integrated circuit" needed to be "packaged." *Id.* There was no dispute that a chip comprises an integrated circuit whether packaged or not. Thus, the extrinsic evidence including the case cited by Semitech further confirms Apple's plain and ordinary meaning.

C. Semitech Fails to Identify the Plain and Ordinary Meaning

In contravention of the Court's Scheduling Order, Semitech has failed to state what it contends the plain and ordinary meaning of a "semiconductor chip" is. D.I. 26 at 6 n.1. Apple's plain meaning is the only one offered, in compliance with the Court's order, and should be adopted. *See, e.g., Fujifilm Corp. v. Motorola Mobility LLC*, No. 12–CV–03587–WHO, 2015 WL 1265009, at *10 (N.D. Cal. Mar. 19, 2015) (denying a motion to strike expert's opinion regarding plain and ordinary meaning, where the movant did not proffer its own construction or explain what was wrong with the expert's reading). Instead of explaining the plain and ordinary meaning, Semitech impermissibly parrots a circular construction of "semiconductor chip" referring to "semiconductor chip." *See, e.g.*, Semitech Br., 5 ("A POSITA would therefore understand that the claims simply refer to a semiconductor chip.").

In compliance with the Court's instruction in the Scheduling Order, Apple's proposal confirms the plain meaning of "semiconductor chip" as being "a semiconductor device comprising an IC (integrated circuit)." *See, e.g., O2 Micro Int'l Ltd. v. Beyond Innovation Tech. Co.*, 521 F.3d 1351, 1361 (Fed. Cir. 2008) ("A determination that a claim term . . . has the 'plain and ordinary meaning' may be inadequate when . . . reliance on a term's 'ordinary' meaning does not resolve the parties' dispute").

Semitech's references to Apple's IPR submission similarly fail to raise any issue of import. As Apple pointed out in its IPR briefing before the PTAB and Semitech does not dispute, the prior

art on which Apple relies in the IPRs for "semiconductor chips" meets Apple's proposed plain and ordinary meaning here. *E.g.*, Ex. F, *Taiwan Semiconductor Manufacturing Co. Ltd. & Apple Inc. v. MYW Semitech, LLC,* No. IPR2026-00065, Paper 1 at 20 (P.T.A.B. Nov. 21, 2025) (citing "stacked memory IC devices" for disclosure of the limitation of a "first semiconductor chip"); *see also* Ex. G, *Taiwan Semiconductor Manufacturing Co. Ltd. & Apple Inc. v. MYW Semitech, LLC,* No. IPR2026-00066, Paper 1 at 21 (P.T.A.B. Nov. 21, 2025) (same); Ex. H, *Taiwan Semiconductor Manufacturing Co. Ltd. & Apple Inc. v. MYW Semitech, LLC,* No. IPR2026-00067, Paper 1 at 20 (P.T.A.B. Nov. 21, 2025) (same). Apple has applied this same plain and ordinary meaning both in the litigation and the IPRs.

Left with no valid argument against Apple's proposal, Semitech appears to take issue with the Court's Scheduling Order, which requires the parties to provide "an explanation of why resolution of the [claim construction] dispute makes a difference." D.I. 26, ¶ 5; *see* Semitech Br., 8. Consistent with the requirement, Apple explained in the Joint Claim Construction Chart that construction of this term may be relevant to lack of written description or enablement, and/or non-infringement. D.I. 90, Ex. 1 at 1. Indeed, the Court's Order is consistent with Federal Circuit guidance: "[c]laim construction is a matter of resolution of disputed meanings and technical scope, to clarify and when necessary to explain what the patentee covered by the claims, for use in the determination of infringement." *U.S. Surgical Corp. v. Ethicon, Inc.*, 103 F.3d 1554, 1568 (Fed. Cir. 1997).

IV. CONCLUSION

The intrinsic and extrinsic evidence as well as Semitech's own brief confirm that the plain and ordinary meaning of "semiconductor chip" is "a semiconductor device comprising an IC (integrated circuit)." Apple's plain and ordinary meaning should be adopted.

Respectfully submitted,

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Dated: April 16, 2026

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	)	
Defendant.	)	

CERTIFICATION OF COMPLIANCE AND WORD COUNT

Counsel hereby certifies that this brief complies with the type, font, and word limitations set forth in the Scheduling Order filed in this case on September 5, 2025, D.I. 26. According to the word processing system used to prepare it, the foregoing document contains **3490** words, excluding the case caption, tables, and signature block.

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