

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

MYSCRIPT SAS,

Plaintiff,

v.

GOODNOTES LIMITED

Defendant.

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Case No. 2:25-CV-00532-JRG-RSP

JOINT CLAIM CONSTRUCTION STATEMENT PURSUANT TO P.R. 4-3

Pursuant to Local Patent Rule 4-3, Plaintiff MyScript SAS and Defendant Goodnotes Limited hereby submit the Parties' Joint Claim Construction Statement.

I. P.R. 4-3(a)(1) Agreed Claim Construction

The parties have attempted to narrow the issues before the Court and have agreed to the following constructions:

Patent No.	Claim Term	Agreed Construction
'951	"ink objects including the spatial or temporal references" (claims 1, 7, 13)	"data objects for the digital ink that include the spatial or temporal references"
'991	"determining characteristics of the handwriting input" (claims 1, 7, 13)	"determining one or more properties or features of the handwriting input"
'603	"geometrical relationship between a plurality of recognized elements" (claims 1, 7, 13)	Plain and ordinary meaning

II. P.R. 4-3(a)(2) Disputed Claim Construction

The parties attach hereto as Appendix A, each party's proposed construction of the disputed claim terms and each party's identification of all references from the specification or prosecution history that supports that proposed construction, and an identification of any extrinsic evidence on which the party intends to rely on to either support its proposed construction or oppose the other party's proposed construction.

III. P.R. 4-3(a)(3) Length of Claim Construction Hearing

The parties request 3 hours for the Claim Construction Hearing, with approximately 1.5 hours for the Plaintiff and 1.5 hours for the Defendant.

IV. P.R. 4-3(a)(4) Witnesses at Claim Construction Hearing

At the present time, no party proposes to call witnesses for live testimony at the Claim Construction Hearing.

V. P.R. 4-3(a)(5) Other Issues

At the present time, the parties do not believe that a prehearing conference prior to the Claim Construction Hearing is necessary.

VI. P.R. 4-3(b) Exchange of Expert Testimony

In accordance with P.R. 4-3(b), the parties will serve a disclosure of expert testimony consistent with Fed. R. Civ. P. 26(a)(2)(B)(i)-(ii) or 26(a)(2)(C) for any expert on which it intends to rely to support its proposed claim construction or oppose any other party's proposed claim construction.

Dated: June 26, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2026, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a).

/s/ Amol A. Parikh
Amol A. Parikh

Appendix A

A. U.S. Patent No. 9,965,175

Term No.	Disputed Claim Term	Plaintiff's Proposed Construction & Support	Defendant's Proposed Construction & Support
1	“block layout in accordance with a layout of geometric blocks of the handwriting input and a configuration of the computing device display interface” (claims 1, 7, 13)	“block layout”: Plain and ordinary meaning, “an arrangement of blocks”¹ “accordance with a layout of geometric blocks of the handwriting input and a configuration of the computing device display interface”: Plain and ordinary meaning, which is “based on an arrangement of geometric blocks of the handwriting input and a configuration of the display interface on the computing device” ’175 patent at col. 15:7-10 and 17:50-28:30, and accompanying figures; Figs. 15, 16A-B, 17A-B, 18A-E, 19A-C, 20A-B, 21A-B, 22A-B, 23A-F and 24 and accompanying text.	Plain and ordinary meaning, which is “positioning of geometric blocks relative to an alignment pattern for an orientation of the display interface” ’175 patent at 15:7-16:42, 17:50-28:42; Figs. 15, 16A, 16B, 17A, 17B, 18A, 18B, 18C, 18D, 18E, 19A, 19B, 19C, 20A, 20B, 21A, 21B, 22A, 22B, 23A, 23B, 23C, 23D, 23E, 23F, 24, and accompanying text.
2	“computing device display interface changes from a configuration ... to another configuration” (claims 1, 7, 13)	Plain and ordinary meaning, which is “the display interface changes from one set of dimensions to another set of dimensions” ’175 patent at col. 15:7-10 and 17:50-28:30, and accompanying figures; Figs. 15, 16A-B, 17A-B, 18A-E, 19A-C, 20A-B, 21A-B, 22A-B, 23A-F and 24 and accompanying text.	Plain and ordinary meaning, which is “the display interface changes from one orientation and associated set of dimensions to another orientation and associated set of dimensions” ’175 patent at 15:7-16:42, 17:50-28:42; Figs. 15, 16A, 16B, 17A, 17B, 18A, 18B, 18C, 18D, 18E, 19A, 19B, 19C, 20A, 20B, 21A, 21B, 22A, 22B, 23A, 23B, 23C, 23D, 23E, 23F, 24, and accompanying text.

¹ Defendant Goodnotes’s P.R. 4-2 Disclosures identified “block layout” and “accordance with a layout of geometric blocks of the handwriting input and a configuration of the computing device display interface” as separate disputed terms. On the day before the P.R. 4-3 deadline, Goodnotes revised its proposed constructions by combining those terms into a single disputed claim term. Because of the timing of Goodnotes's revision, Plaintiff MyScript did not have a sufficient opportunity to evaluate the revised term or amend its corresponding P.R. 4-2 proposed constructions before filing this Joint Claim Construction and Prehearing Statement.

3	“cumulative horizontal geometric block dimension” (claims 1, 7, 13)	Plain and ordinary meaning, which is “total width of the geometric blocks” '175 patent at col. 15:7-10 and 17:50-28:30, and accompanying figures; Figs. 15, 16A-B, 17A-B, 18A-E, 19A-C, 20A-B, 21A-B, 22A-B, 23A-F and 24 and accompanying text.	Plain and ordinary meaning, which is “total width of the geometric blocks in the horizontal orientation of the display interface” '175 patent at 15:7-16:42, 17:50-28:42; Figs. 15, 16A, 16B, 17A, 17B, 18A, 18B, 18C, 18D, 18E, 19A, 19B, 19C, 20A, 20B, 21A, 21B, 22A, 22B, 23A, 23B, 23C, 23D, 23E, 23F, 24, and accompanying text.
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B. U.S. Patent No. 10,082,951

Term No.	Disputed Claim Term	Plaintiff's Proposed Construction & Support	Defendant's Proposed Construction & Support
4	“[allocate/allocating spatial or temporal] references to ink elements” (claims 1, 7, 13)	Plain and ordinary meaning, which is “assign location or time to aspects of the digital ink” '951 patent at col. 11:60-12:5 and 12:6-18:29, and accompanying figures; Figs. 5, 7-10, 11A-B and 12A-B, and accompanying text.	Plain and ordinary meaning, which is “create/creating spatial or temporal links to ink elements” '951 patent at 11:60-18:29; Figs. 5, 7-10, 11A, 11B, 12A, 12B, 13A, 13B, 13C, 14A, 14B, 14C, 14D, and accompanying text.
5	“map the spatial or temporal references to corresponding recognized elements” (claims 1, 7, 13)	Plain and ordinary meaning, which is “link the spatial or temporal references to recognized strokes” '951 patent at col. 11:60-13:3, 15:22-45, and 20:18-27, and accompanying figures; Figs. 5 and 7-10, 11A-B, 12A-B, 13A-C and 14A-D and accompanying text.	Plain and ordinary meaning, which is “link the spatial or temporal references to recognized ink elements” '951 patent at 11:60-15:46; Figs. 5, 7-10, 11A, 11B, 12A, 12B, 13A, 13B, 13C, 14A, 14B, 14C, 14D, and accompanying text.

C. U.S. Patent No. 10,410,316

Term No.	Disputed Claim Term	Plaintiff's Proposed Construction & Support	Defendant's Proposed Construction & Support
6	“recognizing handwriting input” (claims 1, 4, 7)	Plain and ordinary meaning, which is “recognition of the creation of digital content by users through use of their hands either directly onto a digital or digitally connected medium or via an input tool” '316 patent at col. 6:33-46, 8:58-9:30, 10:4-16 and 11:23-51, and	Plain and ordinary meaning, which is “detecting handwriting input to derive segmented units for subsequent display and editing operations.” '316 patent at Abstract, 2:31-4:59, 6:21-46, 8:6-10:44, 11:23-51, 16:22-38, 18:20-35; Figs. 2-16, 17A, 17B,

		accompanying figures; Figs. 2, 3, 5, and 6, and accompanying text.	17C, 18A, 18B, and accompanying text.
7	“a region of overlap of ranges of elements” (claim 1, 4, 7)	Plain and ordinary meaning, which is “an area where the determined ranges of elements overlap” '316 patent at col. 16:39-18:35, and accompanying figures; Figs. 12-16, 17A-C and 18A-B, and accompanying text.	Plain and ordinary meaning, which is “an area where adjacent segmented elements overlap” '316 patent at 3:62-4:59, 16:39-18:35; Figs. 12-16, 17A, 17B, 17C, 18A, 18B, and accompanying text.

D. U.S. Patent No. 10,181,076

Term No.	Disputed Claim Term	Plaintiff's Proposed Construction & Support	Defendant's Proposed Construction & Support
8	“constraint” (claims 1, 3, 4, 5, 7, 10, 12, 13, 14, 16, 19, 21, 22, 23, 25)	Plain and ordinary meaning, which is “rule” '076 patent at col. 2:26-46, 7:57-10:7 and 10:18-22, and accompanying figures; Figs. 3A-G, 4A-F and 5A-C, and accompanying text.	Plain and ordinary meaning, which is “a defined geometric limitation that must be satisfied for either a primitive (implicit) or based on a gesture (explicit).” '076 patent at Abstract, 2:12-62, 3:5-47, 4:49-56, 6:54-11:2; Figs. 2, 3A, 3B, 3C, 3D, 3E, 3F, 3G, 4A, 4B, 4C, 4D, 4E, 4F, 5A, 5B, 5C, and accompanying text.

E. U.S. Patent No. 9,489,572

Term No.	Disputed Claim Term	Plaintiff's Proposed Construction & Support	Defendant's Proposed Construction & Support
9	“constraint” (claims 1, 6, 7, 8, 11, 12, 14, 19, 20, 21, 24, 25, 27, 30, 31, 35, 36)	Plain and ordinary meaning, which is “rule” '572 patent at col. 2:19-42, 7:50-9:67 and 10:10-14, and accompanying figures; Figs. 3A-G, 4A-F and 5A-C, and accompanying text.	Plain and ordinary meaning, which is “a defined geometric limitation that must be satisfied for either a primitive (implicit) or based on a gesture (explicit).” '572 patent at Abstract, 2:4-56, 2:66-3:41, 4:42-49, 6:47-10:61; Figs. 2, 3A, 3B, 3C, 3D, 3E, 3F, 3G, 4A, 4B, 4C, 4D, 4E, 4F, 5A, 5B, 5C, and accompanying text.
10	“maintaining the at least one primitive's integrity” (claims 1, 14, 27)	Plain and ordinary meaning, which is “keeping consistent the primitive's integrity”	Plain and ordinary meaning, which is “ensuring the at least one primitive does not change its inherent shape”

		'572 patent at col. 9:46-63, and accompanying figures; Figs. 3A-G, 4A-F and 5A-C, and accompanying text.	'572 patent at 9:46-67; Figs. 2, 3A, 3B, 3C, 3D, 3E, 3F, 3G, 4A, 4B, 4C, 4D, 4E, 4F, 5A, 5B, 5C, and accompanying text.
11	“implicit in the at least one primitive” (claims 1, 14, 27)	Plain and ordinary meaning, which is “inferred based on user input of the at least one primitive” '572 patent at col. 2:19-35 and 7:59-8:37, and accompanying figures; Figs. 3A-G, 4A-F and 5A-C, and accompanying text.	Plain and ordinary meaning, which is “a defined geometric rule that is inherently associated with the particular recognized shape primitive.” '572 patent at 2:19-50, 7:25-9:9, 9:46-67; Figs. 2, 3A, 3B, 3C, 3D, 3E, 3F, 3G, 4A, 4B, 4C, 4D, 4E, 4F, 5A, 5B, 5C, and accompanying text.