

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

MYSCRIPT SAS,

Plaintiff,

v.

GOODNOTES LIMITED,

Defendant.

Civil Action No. 2:25-CV-00532-JRG-RSP

JURY TRIAL DEMANDED

DEFENDANT'S RESPONSIVE CLAIM CONSTRUCTION BRIEF

I. INTRODUCTION

Goodnotes’ proposed constructions reflect the plain and ordinary meaning of the disputed claim terms as understood by a person of ordinary skill in the art, consistent with the claim language and specifications of the Asserted Patents. MyScript’s proposed constructions, by contrast, follow a consistent pattern: they strip away the very requirements that the specification and claim language impose on the disputed terms, in an effort to broaden the Asserted Patents beyond what was disclosed. As explained below, the intrinsic record confirms that Goodnotes’ constructions are correct, and the Court should adopt them.

II. LEVEL OF ORDINARY SKILL IN THE ART

MyScript proposes that a person of ordinary skill in the art relevant to the Asserted Patents “would have a bachelor’s degree in computer science or electrical engineering, or a related field, and approximately 2-3 years of experience in pen-based computing, handwriting recognition technology on computing systems, and related pattern recognition techniques.” (Br. at 6-7.) Goodnotes does not dispute this proposed definition, as none of the disputes addressed herein turns on the level of ordinary skill in the art.

III. AGREED CLAIM CONSTRUCTIONS

As set forth in the joint P.R. 4-3 statement (Dkt. 40), the parties have agreed to the following constructions to narrow the issues before the Court:

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