JJTHE UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

Before The Honorable MaryJoan McNamara
Administrative Law Judge

In the Matter of **CERTAIN ELECTRONIC DEVICES, INCLUDING SMARTPHONES, COMPUTERS, TABLET COMPUTERS, AND COMPONENTS THEREOF**	**Inv. No. 337-TA-1373**

JOINT CHART SETTING FORTH PARTIES' POST-HEARING CLAIM CONSTRUCTIONS

Pursuant to Ground Rule 1.14 and Order No. 18 (Amended Procedural Schedule), Complainants InterDigital, Inc., InterDigital VC Holdings, Inc., InterDigital Patent Holdings, Inc., and InterDigital Madison Patent Holdings SAS (collectively, "Complainants" or "InterDigital"), Respondents Lenovo PC HK Limited, Lenovo (United States) Inc., and Motorola Mobility LLC (collectively, "Respondents"), and the Commission Investigative Staff ("Staff") hereby submit this Joint Chart Setting Forth the Parties' Post-Hearing Claim Constructions.

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AMAZON-1012
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U.S. Patent No. 10,250,877

1. Agreed Terms

Claim(s)	Term (Party Proposing)	Agreed Construction
7, 8	"circuit configured to" Proposed by: Lenovo & Staff	Plain and ordinary meaning (i.e., requires pre-existing programming of hardware and software to perform the cited functionality)

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U.S. Patent No. 9,674,556

No.	Claim(s)	Term (Party Proposing)	Complainants' Proposed Constructions	Respondents' Proposed Constructions	Staff's Proposed Constructions
2	1, 5	"sparse denoising filter" Proposed by: Lenovo	Plain and ordinary meaning (i.e., a filter that reduces noise based on a sparse representation of the signal)	sparse de-noising filter for performing a second pass to reduce noise, which is not a deringing filter Alternatively, a filter which exploits a sparse image model using an over complete set of linear transforms and hard thresh-holding, which is not a deringing filter	A filter that reduces noise based on a sparse representation of the signal
3	1, 5	"adaptive sparse de-noising filter" Proposed by: Staff	Plain and ordinary meaning (i.e., a sparse denoising filter (a filter that reduces noise based on a sparse representation of the signal) that can adjust its own parameters according to the image region)	sparse de-noising filter for performing a second pass to reduce noise, which is not a deringing filter, that can adjust its own parameters automatically; Alternatively, a filter which exploits a sparse image model using an over complete set of linear transforms and hard thresh-holding, which is not a deringing filter, that can adjust its own parameters automatically.	A sparse denoising filter (a filter that reduces noise based on a sparse representation of the signal) that can adjust its own parameters automatically

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U.S. Patent No. 8,674,859

1. Agreed Terms

Claim(s)	Term (Party Proposing)	Agreed Construction
15	"wherein subset comprises" Proposed by: InterDigital	"wherein said subset comprises"

2. Disputed Terms

No.	Claim(s)	Term (Party Proposing)	Complainants' Proposed Constructions	Respondents' Proposed Constructions	Staff's Proposed Constructions
4	10	"arithmetic decoding method for symbols coded in the form of a stream, comprising the following steps applied at switching points distributed in said stream to decode a current symbol" Proposed by: Lenovo & Staff	The terms "stream" and "current symbol" are limiting at least to the extent that they provide antecedent basis for those terms as they appear elsewhere in the claim. <u>stream</u>: stream of data. <u>current symbol</u>: a symbol that is currently being decoded. "Switching points" is not limiting, but to the extent it is found limiting, a switching point is a point in the stream at the level of which the probability model	The portion of this claim term following "comprising" is not part of the preamble and therefore is limiting. Regardless, the entire term is limiting. The preamble is limiting. To the extent construction is necessary, <u>stream</u>: "stream of data" <u>current symbol</u>: "a symbol that is currently being decoded" <u>switching point</u>: "a point in the stream at the level of which the probability model used to code the current symbol can be	The portion of this claim term following "comprising" is not part of the preamble and therefore is limiting. Regardless, the terms "stream" and "current symbol" are limiting at least to the extent that they provide antecedent basis for those terms as they appear elsewhere in the claim. <u>Stream</u>: stream of data. <u>Current symbol</u>: a symbol that is currently being decoded. The term "switching points" is also limiting, regardless of

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			used to code the current symbol can be modified.	modified—i.e., a probability model can be selected"	whether it is considered to be part of the preamble. Switching point: a point in the stream at the level of which the probability used to code the current symbol can be modified.

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No.	Claim(s)	Term (Party Proposing)	Complainants' Proposed Constructions	Respondents' Proposed Constructions	Staff's Proposed Constructions
5	15	"means for decoding from the stream, at switching points distributed in said stream to decode a current symbol, for said current symbol, a probability model identifier" Proposed by: Lenovo & Staff	Subject to § 112, ¶ 6 Function: decoding from the stream . . . a probability model identifier Structure: an arithmetic decoder and equivalents thereof. See FIG. 13 and 13:25-52. Alternatively, the structure is an arithmetic decoder operable to perform the claimed function, as described in the specification in connection with step 202 and equivalents thereof, step 202 being described in the specification, for example at the following figures and passages: FIG. 13 and 13:25-52 and FIGS. 10, 11 and 10:1-14, 11:12-34.	Subject to § 112, ¶ 6. Function: decoding a probability model identifier for the current symbol from the stream, at switching points distributed in the stream Structure: indefinite for lack of sufficient corresponding structure.	Subject to § 112, ¶ 6 Function: at switching points in the stream, decoding a probability model identifier for the current symbol Structure: Fig. 13 and col. 13, ll. 25-52 disclose the structure of a decoding device and, more specifically, an entropy decoding module that implements this step/function. Additionally, an algorithm corresponding to this limitation (step 202) is disclosed at least at Fig. 11 and 11:13-17. (Not indefinite based on the current record)

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6	15	"means for selecting using said probability model identifier a probability model in a set comprising a current probability model defined from symbols coded previous to the current symbol and a subset of probability models wherein subset comprises at least one probability model defined by default" Proposed by: Lenovo & Staff	Subject to § 112, ¶ 6 Function: selecting . . . a probability model Structure: an arithmetic decoder and equivalents thereof. See FIG. 13 and 13:25-52. Alternatively, the structure is an arithmetic decoder operable to perform the claimed function, as described in the specification in connection with step 204 and equivalents thereof, step 204 being described in the specification, for example at the following figures and passages: FIG. 13 and 13:25-52 and FIGS. 10, 11 and 5:36-43, 10:1-17, 11:12-36.	Subject to § 112, ¶6 Function: using the probability model identifier to select a probability model in a set comprising a current probability model defined from symbols coded previous to the current symbol and a subset of probability models wherein said subset comprises at least one probability model defined by default Structure: indefinite for lack of sufficient corresponding structure.	Subject to § 112, ¶ 6 Function: selecting a probability model using the probability model identifier, where the probability model is selected from a current probability model and a subset of probability models, including a default probability model Structure: Fig. 13 and col. 13, ll. 25-52 disclose the structure of a decoding device and, more specifically, an entropy decoding module that implements this step/function. Additionally, an algorithm corresponding to this limitation (step 204) is disclosed at least at 10:14-15, and 11:35-36. (Not indefinite based on the current record)

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No.	Claim(s)	Term (Party Proposing)	Complainants' Proposed Constructions	Respondents' Proposed Constructions	Staff's Proposed Constructions
7	15	"means for adding in said subset said current probability model, the selected probability model becoming the current probability model" Proposed by: Lenovo & Staff	Subject to § 112, ¶ 6 Function: adding in said subset said current probability model Structure: an arithmetic decoder and equivalents thereof. See FIG. 13 and 13:25-52. Alternatively, the structure is an arithmetic decoder operable to perform the claimed function, as described in the specification in connection with step 205 and equivalents thereof, step 205 being described in the specification, for example at the following figures and passages: FIG. 13 and 13:25-52 and FIGS. 8, 10, 11 and 11:37-43 (describing 205 and additionally that step 205 can be identical to step 105), FIG. 7 and 8:8-37 (describing step 105).	Subject to § 112, ¶ 6 Function: adding the current probability model into the subset of probability models Structure: indefinite for lack of sufficient corresponding structure.	Subject to § 112, ¶ 6 Function: adding the current probability model into the subset of probability models Structure: Fig. 13 and col. 13, ll. 25-52 disclose the structure of a decoding device and, more specifically, an entropy decoding module that possibly implements this Step/function. Additionally, an algorithm corresponding to this limitation (step 205) is disclosed at least at Fig. 8 and 11:38-41. (Not indefinite based on the current record)

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No.	Claim(s)	Term (Party Proposing)	Complainants' Proposed Constructions	Respondents' Proposed Constructions	Staff's Proposed Constructions
8	15	"means for decoding said current symbol with said current probability model" Proposed by: Lenovo & Staff	Subject to § 112, ¶ 6 Function: decoding said current symbol Structure: an arithmetic decoder and equivalents thereof. See FIG. 13 and 13:25-52. Alternatively, the structure is an arithmetic decoder operable to perform the claimed function, as described in the specification in connection with step 206 and equivalents thereof, step 206 being described in the specification, for example at the following figures and passages: FIG. 13 and 13:25-52 and FIGS. 10, 11 and 10:18-19, 11:55-57.	Subject to § 112, ¶ 6 Function: decoding the current symbol with the current probability model Structure: indefinite for lack of sufficient corresponding structure.	Subject to § 112, ¶ 6 Function: decoding the current symbol with the current probability model Structure: Fig. 13 and col. 13, ll. 25-52 disclose the structure of a decoding device and, more specifically, an entropy decoding module that implements this step/function. Additionally, an algorithm corresponding to this limitation (step 206) is disclosed at least at 10:18-19. (Not indefinite based on the current record)
9	15	"means for updating said current probability model according to the decoding of said current symbol" Proposed by: Lenovo & Staff	Subject to § 112, ¶ 6 Function: updating said current probability model Structure: an arithmetic decoder and equivalents thereof. See FIG. Figure 13 and 13:25-52. Alternatively, the structure is an arithmetic decoder operable to	Subject to § 112, ¶ 6 Function: updating the current probability model according to the decoding of the current symbol Structure: an algorithm wherein an occurrence number for the current symbol is increased by 1	Subject to § 112, ¶ 6 Function: updating the current probability model according to the decoding of the current symbol Structure: Fig. 13 and col. 13, ll. 25-52 disclose the structure of a decoding device and,

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			perform the claimed function, as described in the specification in connection with step 208 and equivalents thereof, step 208 being described in the specification, for example at the following figures and passages: FIG. 13 and 13:25-52 and FIGS. 10, 11, 4:33-54, 10:20-22, 11:57-61.		more specifically, an entropy decoding module that implements this step/function. Additionally, an algorithm corresponding to this limitation (step 208) is disclosed at least at 4:33-40, 10:20-22. (Not indefinite based on the current record)

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Dated: February 21, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, a true and correct copy of the foregoing document was served by the indicated means to the persons at the addresses below:

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