

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

W&WSENS DEVICES INC.,	)	
	)	
Plaintiff,	)	Case No. 2:24-cv-00854-JRG
	)	
v.	)	
	)	
SAMSUNG ELECTRONICS CO., LTD, and	)	
SAMSUNG ELECTRONICS AMERICA,	)	
INC.	)	
	)	
Defendants.	)	
	)	

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Patent L.R. 4.3 and the Court’s Docket Control Order (Dkt. No. 54), W&Wsens Devices Inc. and Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. file this Joint Claim Construction and Prehearing Statement regarding claim construction for U.S. Patent Nos. 11,621,360 (the “’360 Patent”), 12,087,871 (the “’871 Patent”), 12,243,948 (the “’948 Patent”), 10,468,543 (the “’543 Patent”), and 10,446,700 (the “’700 Patent”) (collectively the “Asserted Patents”).

I. Terms on which the Parties Agree

The parties have agreed to the following construction for the below identified claim terms:

Term for Construction	Patent(s) and Claim(s)	Agreed Construction
“pillar”	<u>'360 Patent</u> : asserted claims 1, 3, 5, 6, 8, and 9. <u>'871 Patent</u> : asserted claim 1. <u>'948 Patent</u> : asserted claims 1, 3, 4, 5, 13, 14, and 15.	Plain and ordinary meaning
“base dielectric region”	<u>'360 Patent</u> : asserted claim 1. <u>'871 Patent</u> : asserted claim 1. <u>'948 Patent</u> : asserted claims 1 and 13.	Plain and ordinary meaning

II. Proposed Constructions for Terms on Which the Parties Do Not Agree

The parties' proposed constructions of each disputed claim term, phrase, or clause of the Asserted Patents are set forth below.

Claim Term(s), Phrase(s), or Clause(s)	W&Wsens's Proposed Construction	Samsung's Proposed Construction
“holes” '360 patent, asserted claims 1, 3, 5, 6, and 8. '871 patent, asserted claims 1, 3, 4, 7, 8, and 15. '948 patent, asserted claims 1, 3, 4, 5, 6, 13, 14, 15, and 16. '700 patent, asserted claims 1, 7, 9, 10, 16, and 20. '543 patent, asserted claims 1, 7, 9, 10, 16, and 20.	plain and ordinary meaning	plain and ordinary meaning (<i>e.g.</i> , not isolation trenches)

Claim Term(s), Phrase(s), or Clause(s)	W&Wsens's Proposed Construction	Samsung's Proposed Construction
<p>“Deliberately formed in-pillar holes ... wherein said photodetector device is configured to respond to light photons incident on said array of pillars”</p> <p>'360 patent, asserted claim 1.</p> <p>“holes that are deliberately formed into the light-receiving surfaces ... extend into the photodetectors”</p> <p>'871 patent, asserted claim 1.</p> <p>“holes that are fabricated as recesses at or under the light-receiving surface of each of at least some of the pillars ... extend[s] into the pillar[s]”</p> <p>'948 patent, asserted claims 1 and 13.</p>	plain and ordinary meaning	holes deliberately formed in a pillar of a photodetector for absorbing light that is converted to electricity
<p>“holes intentionally formed therein ... to concurrently receive ... optical input ... [that generates] electrical charges”</p> <p>'543 patent, asserted claim 1.</p> <p>'700 patent, asserted claim 1.</p>	plain and ordinary meaning	holes designed to absorb an optical input that is converted into an electrical output
<p>“intermediate semiconductor material”</p> <p>'360 patent, asserted claims 1 and 6.</p> <p>“region[] therebetween”</p> <p>'871 patent, asserted claim 1.</p> <p>“intermediate region”</p> <p>'543 patent, asserted claims 1, 9, and 10.</p>	plain and ordinary meaning	a region fabricated between the first region and the second region
<p>“intermediate layer”</p> <p>'700 patent, asserted claims 1, 9, and 10.</p>	plain and ordinary meaning	a layer fabricated between the first layer and the second layer

Exhibits A and B respectively set forth W&Wsens' and Samsung's identification of extrinsic and intrinsic evidence, as required by P.R. 4-3(a)(2).

For intrinsic evidence supporting their proposed constructions, the parties have made a good faith effort to identify intrinsic evidence they intend to rely on but reserve the right to identify additional intrinsic evidence relating to the Asserted Patents, any application they claim priority to or otherwise in their family, and their respective prosecution history. The parties reserve the right to rely upon the evidence identified by the opposing side. Furthermore, the grouping of individual claim terms is not an admission that these terms do not have any meaningful distinctions based on their differing language. The parties reserve the right to argue differences and distinctions between each claim term.

III. Length of Claim Construction Hearing

Given the limited number of terms in dispute, W&Wsens proposes one and a half hours for the claim construction hearing, which should be more than sufficient. Samsung proposes three hours for the claim construction hearing. The parties agree that the time should be divided equally between the parties.

IV. Witness and/or Expert Testimony

The parties agreed to not to present live testimony of witnesses at the claim construction hearing and agreed to not rely upon expert declarations.

V. Issues for a Pre-Hearing Conference

The parties do not currently have any issues that need to be taken up with the Court at a pre-hearing conference, and believe that a pre-hearing conference before the claim construction hearing is unnecessary.

Respectfully submitted,

Dated: November 12, 2025

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