

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Plaintiffs,

v.

NVIDIA CORPORATION, OLD MICRO,
INC. F/K/A VELOCITY MICRO, INC., AND
VELOCITY HOLDINGS, LLC,

Defendants.

CIVIL ACTION NO. 3:14CV757-REP

JOINT IDENTIFICATION OF CLAIM TERMS FOR CONSTRUCTION

Pursuant to the requirements set forth in the April 15, 2015 Pretrial Conference and the Parties' Revised Proposed Pretrial Schedule (Dkt. No. 96-1), Plaintiffs Samsung Electronics Co., Ltd. and Samsung Electronics America Inc. ("Samsung") and Defendants NVIDIA Corporation, Old Micro, Inc. f/k/a Velocity Micro, Inc., and Velocity Holdings, LLC ("Defendants") hereby provide the following list of claim terms identified by the parties for construction.

U.S. Patent No. 5,860,158	
request ID value / request ID (applies to all asserted claims ¹)	Samsung: an identifier assigned to each cache request that distinguishes it from other cache requests NVIDIA: numerical value assigned by the cache controller
a [first/second] request ID (Claim 18, 21, 22 ²)	(Agreed) a request ID corresponding to the [first/second] cache request

¹ "Applies to all asserted claims" means that, for each asserted claim, the term appears in that claim or in an independent claim upon that claim depends.

² This term appears in claim 18 upon which claims 21 and 22 depend.

U.S. Patent No. 5,860,158	
a second device (Claim 15, 17)	(Agreed) a device that may be the same as or different than the first device

U.S. Patent No. 6,262,938	
shift register for delaying (Claim 17 ³)	Samsung: a circuit including a register for delaying NVIDIA: register that moves its contents to the left or right for delaying
determin[ed/ing] (applies to all asserted claims)	Samsung: plain and ordinary meaning NVIDIA: comput[ed/ing] by the SDRAM
[preambles of 8 ⁴ , 18, 19, 21, 23, 24]	Samsung: preambles are not limiting NVIDIA: preambles are limiting

U.S. Patent No. 6,287,902	
an insulating layer (applies to all asserted claims)	Samsung: a structure comprising one or more electrically insulating sublayers NVIDIA: plain meaning
forming a trench in said substrate, and wherein said field isolation layer fills said trench (Claim 6)	Samsung: etching a recess into said substrate and subsequently filling said recess with a field isolation layer NVIDIA: plain meaning
insulating spacer along a sidewall of the [second] patterned conductive layer (applies to all asserted claims)	Samsung: an insulating sidewall spacer adjacent to the [second] patterned conductive layer NVIDIA: an insulating spacer, along a sidewall of the [second] patterned conductive layer, that prevents etch damage to the field isolation layer if the contact hole is misaligned

U.S. Patent No. 6,819,602	
reference voltage (applies to all asserted claims)	Samsung: plain and ordinary meaning NVIDIA: constant, known voltage level for comparison
controlling propagation delay time (Claims 26, 27, 28, 29 ⁵)	Samsung: plain and ordinary NVIDIA: selectively delaying a signal as it passes through a circuit

³ This term appears in unasserted claim 8 upon which asserted claim 17 depends.

⁴ Asserted claim 17 depends from unasserted independent claim 8.

⁵ This term appears in claim 26 upon which claims 27-29 depend.

U.S. Patent No. 6,819,602	
[preamble of claim 26]	<p>Samsung: preamble is not limiting</p> <p>NVIDIA: preamble is limiting</p>

U.S. Patent No. 8,252,675	
a gate insulating layer (applies to all asserted claims)	<p>Samsung: a structure comprising one or more dielectric-material sublayers</p> <p>NVIDIA: plain meaning</p>
depositing a third metal gate electrode layer onto the second metal gate electrode layer (applies to all asserted claims)	<p>Samsung: creating a structure comprising one or more metal sublayers each formed by a deposition process onto the second metal gate electrode layer</p> <p>NVIDIA: applying, without using conformal deposition, a metal gate electrode layer to the one conformal metal gate electrode layer</p>
depositing a second metal gate electrode layer onto inner sidewalls of the spacers and onto an upper surface of the patterned first metal gate electrode layer (applies to all asserted claims)	<p>Samsung: creating a structure comprising one or more metal sublayers each formed by a deposition process onto inner sidewalls of the spacers and onto an upper surface of the patterned first metal gate electrode layer</p> <p>NVIDIA: applying, using conformal (i.e., U-shaped) deposition, one metal gate electrode layer to the inner sidewalls of the spacers and to the upper surface of the patterned first metal gate electrode layer</p>

U.S. Patent No. 6,804,724	
sending parallel digital video data (applies to all asserted claims)	<p>Samsung: plain and ordinary meaning</p> <p>NVIDIA: simultaneously transmitting all bits of a given byte of the video data</p>
means for generating a cable sensing signal to be sent to said first external video port over the digital cable, thereby informing the video controller of the digital cable connection state of said first external port (applies to all asserted claims)	<p>Samsung: <i>Function:</i> generating a cable sensing signal <i>Structure:</i> DVCC and resistor R1 depicted in Figure 14</p> <p>NVIDIA: <i>Function:</i> generating a cable sensing signal to be sent to said first external video port over the digital cable, thereby informing the video controller of the digital cable connection state of said first external port <i>Structure:</i> Monitor Cable Sensing Circuit 527 described in Fig. 14 and at 7:31-8:16, and equivalents.</p>

U.S. Patent No. 7,073,054	
None	None

U.S. Patent No. 5,777,854	
contacts (applies to all asserted claims)	<p>Samsung: Plain and ordinary meaning</p> <p>NVIDIA: protrusions from the base that contact the cover, and/or protrusions from the cover that contact the base</p>
sufficient flexibility (Claims 1, 3, 4, 6, ⁶ 15)	<p>Samsung: Plain and ordinary meaning. Not indefinite in context of “having sufficient flexibility to enable more than one contact to contact said other region.”</p> <p>NVIDIA: Indefinite.</p>

⁶ This term appears in claim 1 upon which claims 3, 4, and 6 depend.

Dated: May 29, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2015, a true and correct copy of the foregoing was filed electronically using the CM/ECF system. As such, this document was served on all counsel who have consented to electronic service, including as follows:

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