

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

MOTIVA PATENTS, LLC,

Plaintiff,

v.

SONY CORPORATION, ET AL.,

Defendants.

CIVIL ACTION NO. 9:18-cv-00180-JRG-KFG

Lead Consolidated Case

JURY TRIAL DEMANDED

MOTIVA PATENTS' PROPOSED CLAIM TERMS FOR CONSTRUCTION

Pursuant to P.R. 4-2, plaintiff Motiva Patents, LLC submits the following proposed claim constructions with respect to the terms and phrases identified herein and the identification of extrinsic evidence as part of the claim construction proceedings related to the above cases.

At this time, Motiva does not intend to rely on any expert testimony. However, Motiva reserves the right to rely on expert testimony to rebut expert testimony relied on by defendant.

	Claim Term	Proposed Construction	Extrinsic Evidence
1	<p>“transmitting signals”</p> <p>(’151 patent at claim 1; ’483 patent at claims 44 and 48; ’354 patent at claims 32, 49, 50, 63, and 72; ’325 patent at claims 1, 2, 32, 49, 50, 63, 72, 85, 89, 94 and 95; ’659 patent at claim 45)</p>	<i>no construction necessary</i>	
2	<p>“remote”</p> <p>(’151 patent at claim 1; ’483 patent at claims 44 and 48; ’354 patent at claims 32, 49, 50, 63, and 72; ’325 patent at claims 1, 32, 49, 50, 63, 72, 85, 89, and 94; ’659 patent at claims 45 and 46)</p>	<i>no construction necessary</i>	
3	<p>“in electrical communication” / “electrically communicate with”</p> <p>(’151 patent at claim 27; ’483 patent at claims 44 and 48; ’354 patent at claims 63 and 72; ’325 patent at claims 2, 63, 72, and 95)</p>	Able to transmit or receive information electrically, including wirelessly	<p>McGraw-Hill Dictionary of Electrical and Computer Engineering 102, 188 (2004)</p> <p>The New IEEE Standard Dictionary Electrical and Electronics Terms 218, 409 (Fifth Ed., 1993)</p>
4	<p>“the output device provides sensory stimuli” / “sensory stimuli delivered through the output device” / “sensory stimuli ... delivered through the output device”</p>	<i>no construction necessary</i>	

	('151 patent at claim 1; '483 patent at claims 44 and 48; '354 patent at claims 32, 49, 50, 63, and 72; '325 patent at claims 1, 32, 49, 50, 63, 72, 85, 89, 94, 96, and 98)		
5	“calculate a displacement vector from said movement information” ('151 patent at claim 28)	Displacement vector: a quantity specifying a magnitude and direction of movement	The American Heritage Dictionary of the English Language 380, 1418 (1981) Modern Dictionary of Electronics 278, 1099 (Sixth Ed. 1984)
6	“reference vector position” ('151 patent at claims 29)	A reference position defined by a quantity specifying a magnitude and direction	The American Heritage Dictionary of the English Language 380, 1418 (1981) Modern Dictionary of Electronics 278, 1099 (Sixth Ed. 1984)
7	“movement information” / “motion information” ('151 patent at claims 1, 27, 28, and 32; '483 patent at claims 44 and 48; '354 patent at claims 32, 49, 50, 63, and 73; '325 patent at claims 1, 2, 5, 6, 18, 20, 49, 50, 58, 64, 73, 85, 93, 94, and 96)	Determine information about changes in position and/or orientation	Merriam-Webster’s Collegiate Dictionary 810, 812 (11th Ed. 2003)
8	“[receive the signals transmitted by the transmitter of the first hand-held communication device,] to determine [movement / position / acceleration] information for each of the respective communication devices”	<i>no construction necessary</i>	

	(’483 patent at claims 44, 45, and 48; ’354 patent at claims 63, 64, and 73; ’325 patent at claims 63, 64, and 73)		
9	“feedback stimuli” (’151 Patent at claim 32)	<i>no construction necessary</i>	
10	“one or more software routines executing on the processing system to ... output control data for communication to the remote processing system” (’659 patent at claim 45)	<i>no construction necessary</i>	
11	“one or more software routines executing on the processing system to ... output data for communication to the remote processing system for controlling motion of a [first / second] virtual object ... where the motion of the [first / second] virtual is in proportion with the motion of the [first / second] hand-held game controller” (’659 patent at claims 45 and 46)	<i>no construction necessary</i>	
12	“user input device” (’483 patent at claims 44 and 48; ’354 patent at claims 56, 57, 63, and 72; ’325 patent at claims 1, 17, 32, 48, 49, 50, 54, 56, 57, 63, 69, 72, 82, 85, 89,	<i>no construction necessary</i>	

	91, 94, and 105; '659 patent at claim 45)		
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Dated: April 18, 2019

/s/ Michael D. Ellis

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of April, 2019, I electronically served the foregoing
by email to all counsel of record.

/s/ Michael D. Ellis
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