

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

NEODRON LTD.,

*Plaintiff,*

v.

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

Case No. 1:19-cv-00903-ADA

**DEFENDANT'S DISCLOSURE OF PROPOSED TERMS FOR CONSTRUCTION**

Pursuant to the Scheduling Order (D.I. 53), Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively “Defendant”) hereby serves its proposed terms and claim elements for construction for the currently asserted claims of U.S. Patent Nos. 7,821,502 (“the ’502 patent”), 8,102,286 (“the ’286 patent”), 8,502,547 (“the ’547 patent”), 8,610,009 (“the ’009 patent”), 8,847,898 (“the ’898 patent”), 9,965,106 (“the ’106 patent”), and 10,365,747 (“the ’747 patent”) (collectively the “Asserted Patents”).

Defendant’s disclosure is based on its current knowledge, understanding, and beliefs. As Defendant’s investigation is continuing and discovery is forthcoming, Defendant reserves the right to amend or supplement this disclosure as appropriate, including in response to any amendments to Plaintiff’s Infringement Contentions. Any supplement and/or amendment that adds or removes any proposed claim terms for construction does not constitute an admission that Defendant believes those claim terms have, or do not have, a specialized meaning separate from each term’s plain and ordinary meaning to one of ordinary skill in the art. Defendant further reserves the right to separately request construction of portions of the identified claim terms or phrases. Defendant further reserves the right to separately request construction of the longer phrase in which the identified claim terms or phrases appear. Defendant further reserves the right to also identify and propose for construction any terms Neodron Ltd. (“Neodron”) identifies for construction, even if Neodron later determines to withdraw those terms for construction by the Court. Defendant further reserves the right to amend, revise, and/or supplement this disclosure as additional documents and information become available, and as discovery, investigation, and meet-and-confer with Neodron’s counsel proceed.

Subject to the above reservations of rights, Defendant proposes the following terms:

**A. U.S. Patent No. 7,821,502**

- “a substrate having a surface with an arrangement of electrodes mounted thereon” (Claims 1-2, 5-8, 11-14, 16)
- “sensing area” (Claims 1-2, 5-8, 11-14, 16)
- “wherein row sensing electrodes of sensing cells at opposing ends of at least one of the rows are electrically coupled to one another by respective row wrap-around connections made outside of the sensing area” (Claims 1-2, 5-8, 11-14, 16)
- “electrically coupled” (Claims 1-2, 5-8, 11-14, 16)
- “sensing cell” (Claims 1-2, 5-8, 11-14, 16)
- “substantially synchronously in phase” (Claim 8)

**B. U.S. Patent No. 8,102,286**

- “key” (all claims)
- “biased in favor of” (claims 1, 9, 10, 21)
- “sensor value” (claims 1, 3, 4, 5, 8, 9, 10, 12, 13, 15, 16, 17, 20, 21, 23, 24)
- “active key” (claims 1, 3, 5, 9, 10, 11, 13, 15, 17, 21, 22, 24)
- “inactive key” (claims 1, 3, 9, 10, 15, 21)
- “biased as a function of a currently active key” (claims 11, 22)
- “the sensor values are counted and the selected amount is a predetermined count” (claims 12, 23)

**C. U.S. Patent No. 8,502,547**

- “sensing element” (claim 1)
- “adjust a value of a parameter” (claim 1)

**D. U.S. Patent No. 8,610,009**

- “sensing node” / “sensing nodes” (claims 1-2, 4, 6-9, 11, 13-14, 16)
- “from each of the plurality of [sensing nodes]” (claims 8, 13)

**E. U.S. Patent No. 8,847,898**

- “at a second time” (claims 1, 9, 17)
- “at a time” (claims 2-4, 8, 10-16, 18-20, 24)
- “[two/three/four] of the drive lines” / “lines [i and i+1]/[i and i+1 and i+2]/[i and i+1 and i+2 and i+3]” (claims 2-7, 10-15, 18-23)
- “set of four electrical pulses” (claims 8, 16, 24)

**F. U.S. Patent No. 9,965,106**

- “vertex” (claim 1)
- “coupled to a top layer of the display stack” (claim 3)
- “mesh” (claims 4, 7)

**G. U.S. Patent No. 10,365,747**

- “first variable resistance electrode” (claims 10, 15, 16)
- “to measure a parameter of the first variable resistance electrode” (claims 10, 16)
- “to determine, based on the measured parameter, an amount of force applied to a sensing area of the capacitive touch sensing panel” (claims 10, 16)

Dated: March 6, 2020

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***Attorneys for Defendants Samsung Electronics,  
Co., Ltd. and Samsung Electronics America,  
Inc.***

**CERTIFICATE OF SERVICE**

It is hereby certified that on this 6th day of March 2020, a true and correct copy of the foregoing document, Defendant's Disclosure of Invalidity Contentions, was served by email on Plaintiff Neodron Ltd.'s counsel of record.

/s/ *Brian Treggs*  
Brian Treggs