

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

NEODRON LTD.,

Plaintiff,

v.

HP, INC.,

Defendant.

Case No. 1:19-cv-00873-ADA

**DEFENDANT HP, INC.'S
DISCLOSURE OF PROPOSED CLAIM TERMS FOR CONSTRUCTION**

I. INTRODUCTION

Pursuant to the Scheduling Order (D.I. 53), Defendant HP Inc. (“Defendant”) hereby serves its a list of claim terms, phrases, or clauses which it contends should be construed by the Court, and identifies the claim elements which it contends should be governed by 35 U.S.C. § 112(6).

Plaintiff Neodron has asserted the following patents and claims:

1. U.S. Patent No. 8,502,547 (the “’547 patent”), claim 1;
2. U.S. Patent No. 8,946,574 (the “’574 patent”), claims 1-4, 6-11, 13-15;
3. U.S. Patent No. 8,102,286 (the “’286 patent”), claims 1-5, 7-17, 19-24;
4. U.S. Patent No. 9,086,770 (the “’770 patent”), claims 7-9, 12, 14;
5. U.S. Patent No. 10,088,960 (the “’960 patent”), claims 1-17;
6. U.S. Patent No. 8,847,898 (the “’898 patent”), claims 1-24;
7. U.S. Patent No. 8,451,237 (the “’237 patent”), claims 1-14, 16-24; and
8. U.S. Patent No. 7,821,502 (the “’502 patent”), claims 1-2, 5-8, 11-14, 16.

II. GENERAL RESERVATIONS

This list is based on information currently available to Defendant. Defendant has not completed discovery and has not received Plaintiff’s list of terms to be construed or Plaintiff’s proposed constructions for those terms. Defendant therefore reserves the right to revise, amend, supplement, or subtract from this list of terms to be construed based on further discovery and Plaintiff’s proposed terms and constructions. Defendants reserve the right to identify and propose for construction any terms that Plaintiff identifies for construction, even if Plaintiff later withdraw those terms. Nothing in this submission shall be construed as an admission by Defendant.

III. PROPOSED CLAIM TERMS FOR CONSTRUCTION

A. The ’547 patent

1. “sensing element” (claim 1)

2. “adjust a value of a parameter” (claim 1)

B. The '286 patent

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

C. The '770 Patent

1. “generally straight line” (claim 7)
2. “approximately equal” (claims 8, 9, 12)
3. “wherein the plurality of first electrodes are formed from a piece of conductive mesh by creating a plurality of cuts in the piece of conductive mesh” (claim 7)

D. The '960 Patent

1. “one or more of the following being true” (claims 1, 9, 17)
2. “the [first/second] conductive mesh of the [sense/drive] electrodes substantially covers an entire touch-sensitive area of the touch sensor disposed on the [first/second] substrate” (claims 6 and 14)

E. The '237 Patent

1. “slightly smaller center peak” (claims 3, 19)
2. “slightly weaker center peak” (claims 4, 20)

F. The '502 Patent

1. “a surface” (claims 1-2, 5-8, 11-14, 16)
2. “a substrate having a surface with an arrangement of electrodes mounted thereon”

(claims 1-2, 5-8, 11-14, 16)

3. “sensing area” (claims 1-2, 5-8, 11-14, 16)
4. “electrically coupled” (claims 1-2, 5-8, 11-14, 16)
5. “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)
6. “sensing cell” (claims 1-2, 5-8, 11-14, 16)
7. “substantially synchronously in phase” (claim 8)

Dated: March 6, 2020

/s/ John M. Guaragna

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was sent via electronic mail to Plaintiff's counsel of record on March 6, 2020.

/s/ John M. Guaragna

John M. Guaragna