

**U.S. Pat. No. 6,982,742 Galaxy S5 – Collect’s Preliminary Infringement Contentions**

| '742 Patent Claim 58  | Front Camera | Rear Camera  |
|---|--------------|--|
|   | [REDACTED]   |  |
| 58a. In a PDA having capability to transmit and receive data in a communications network, |              | b. the PDA including a video view screen for viewing the video images, the improvement comprising: |

| '742 Patent Claim 58 | Front Camera | Rear Camera  |
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|                      |              | <p>c. a camera module for taking video images,</p> |

| '742 Patent Claim 58 | d. said camera module<br>communicating with<br>circuitry within said<br>PDA |
|----------------------|---|
| Front Camera         |   |
| Rear Camera          |   |

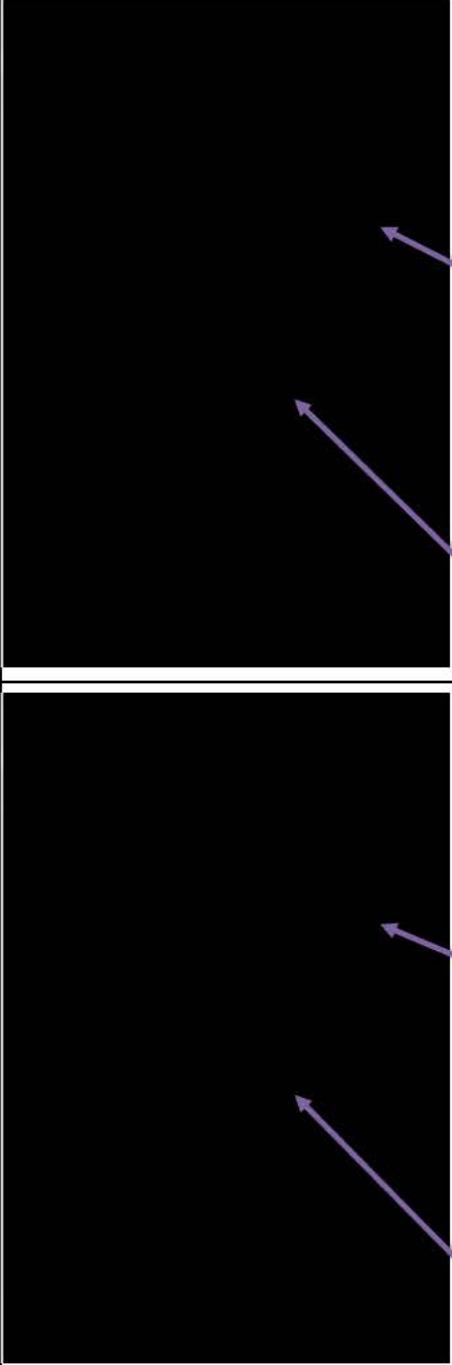
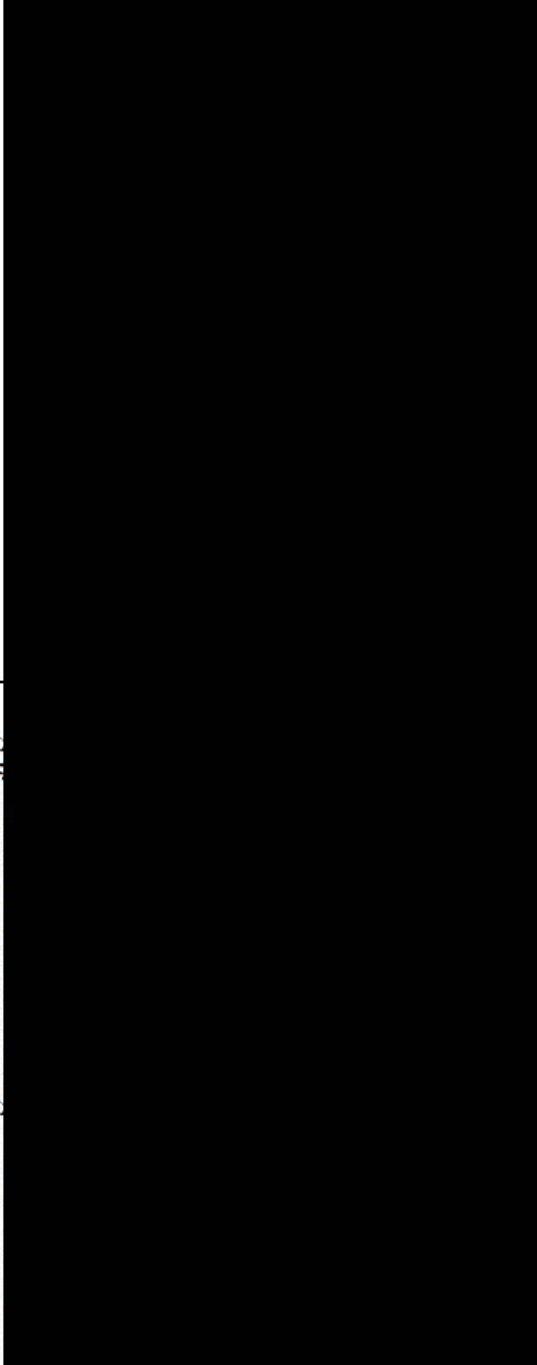
| '742 Patent Claim 58 | Front Camera | Rear Camera   |
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|                      |              | <p>e. enabling viewing of<br/>said video images on<br/>said PDA and</p> |

| '742 Patent Claim 58 | Front Camera | Rear Camera  |
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|                      |              | <p>f. enabling video signals to be transmitted from said camera module to the personal computer,</p> |

f. said camera module including an image

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| <p>sensor housed therein,<br/>           said image sensor lying<br/>           in a first plane and<br/>           including an array of<br/>           pixels for receiving<br/>           images thereon,</p> |  |   |
| <p>g. said image sensor<br/>           further including</p>   | <p>The Galaxy S5 front image sensor includes a complex integrated circuit. “The sensor is the part</p> | <p>The Galaxy S5 rear image sensor includes a complex integrated circuit. “The sensor is the part of the integrated circuit. “The sensor is the part of the</p> |

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| circuitry means electrically coupled to said array of said pixels for timing and control of said array of pixels, | <p>of the camera that actually ‘captures’ the image. It includes a complex integrated circuit that typically includes photodetectors – the key component that captures light – plus amplifiers, transistors, and often some form of processing hardware and power management.”</p> <p>Tim Schiesser, <i>Know Your Smartphone: A Guide to Camera Hardware</i>, TECHSPOT (July 28, 2014), <a href="https://www.techspot.com/guides/850-smartphone-camera-hardware/">https://www.techspot.com/guides/850-smartphone-camera-hardware/</a>.</p> |  <p>camera that actually ‘captures’ the image. It’s a complex integrated circuit that typically includes photodetectors – the key component that captures light – plus amplifiers, transistors, and often some form of processing hardware and power management.”</p> <p>Tim Schiesser, <i>Know Your Smartphone: A Guide to Camera Hardware</i>, TECHSPOT (July 28, 2014), <a href="https://www.techspot.com/guides/850-smartphone-camera-hardware/">https://www.techspot.com/guides/850-smartphone-camera-hardware/</a>.</p> <p><i>Galaxy S5 Rear Camera, iFixit (emphasis added), https://www.ifixit.com/Store/Android/Galaxy-S5-Rear-Camera/IF236-009 (last accessed Oct. 24, 2019).</i></p>  <p><i>Galaxy S5 Front Camera, iFixit (emphasis added), https://www.ifixit.com/Store/Android/Galaxy-S5-Front-Camera/IF236-007 (last accessed Oct. 24, 2019).</i></p> |

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| '742 Patent Claim 58 | <p>Front Camera</p>  <p>CMOS Pixels<br/>Sensor</p> <p>Circuit Within the Image<br/>Sensor</p> | <p>Rear Camera</p>  <p>CMOS Pixels</p> <p>Circuit Within the Image Sensor</p> <p>ISOCELL_Samsung NewsRoom Screenshot.jpg</p> <p>ISOCELL_Samsung NewsRoom Screenshot.jpg</p> |
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| '742 Patent Claim 58 | Front Camera  | Rear Camera  |
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|                      | <p>The integrated circuit within the image sensor is coupled to CMOS pixels for the purpose of timing and control. The Samsung Galaxy S5 includes latches, counters and decoders on the circuit of the image sensor to control the release of the image signals from pixels of the image sensor as illustrated above.</p> <p><b><u>Doctrine of Equivalents:</u></b></p> <p>To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs substantially the same function in substantially the same way to achieve substantially the same result.</p> <p><b><u>Doctrine of Equivalents:</u></b></p> <p>To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs substantially the same function in substantially the same way to achieve substantially the same result.</p> | <p>Galaxy S5 performs the same function because its electronic components control the release of image data from the CMOS pixel array. For example, photodetectors corresponding to each of the pixels in the image sensor capture analog information about the incident photons (light packets) and this analog information is then released for further processing, such as being amplified and converted into a digital signal.</p> <p>Galaxy S5 performs the function in the same way because components performing the function of</p> <p>Galaxy S5 performs the same function because its electronic components control the release of image</p> |

| '742 Patent Claim 58 | Front Camera   | Rear Camera   |
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|                      | <p>data from the CMOS pixel array. For example, photodetectors corresponding to each of the pixels in the image sensor capture analog information about the incident photons (light packets) and this analog information is then released for further processing, such as being amplified and converted into a digital signal.</p> <p>Galaxy S5 performs the function in the same way because components performing the function of latches, decoder and counter are used to control the release of the image signal from the pixel array.</p> <p>Galaxy S5 achieves the same result because electronic components in the device control the release of the image signal from the pixel array.</p> | <p>latches, decoder and counter are used to control the release of the image signal from the pixel array.</p> <p>Galaxy S5 achieves the same result because electronic components in the device control the release of the image signal from the pixel array.</p> |

| '742 Patent Claim 58   | Front Camera | Rear Camera |
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| <p>h. said circuitry means for timing and control placed remote from said array of pixels on a second plane,</p> <p>i. said image sensor producing a pre-video signal,</p> |              |             |

| '742 Patent Claim 58 | Front Camera | Rear Camera |
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| '742 Patent Claim 58   | Front Camera | Rear Camera |
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| j. a first circuit board electrically connected to said image sensor and lying in a third plane, |              |             |

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| '742 Patent Claim 58 | Front Camera | Rear Camera |
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| '742 Patent Claim 58 | Front Camera | Rear Camera  |  |
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|                      |              | <p>k. said first circuit board including circuitry means for processing and converting said pre-video signal to a desired video format, and</p> <p>The pre-video signal received from the image sensor is sent to a processor on the first circuit board, which converts the pre-video signal to a post-video signal that can be viewed on the Galaxy S5 LCD screen.</p> |  |

| '742 Patent Claim 58 | Front Camera | Rear Camera |
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| '742 Patent Claim 58 | Front Camera   | Rear Camera  |   |
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|                      | <p>The circuitry means for converting a pre-video signal to a post-video signal on the Galaxy S5 are the electronic components which condition the pre-video signal to place it in a form that may be viewed on a standard video device and include video processing board including low pass filters, band pass filter, detector, white balance circuit, gain control and processor as illustrated above.</p> | <p>The circuitry means for converting a pre-video signal to a post-video signal on the Galaxy S5 are the electronic components which condition the pre-video signal to place it in a form that may be viewed on a standard video device and include video processing board including low pass filters, band pass filter, detector, white balance circuit, gain control and processor as illustrated above.</p> | <p><b><u>Doctrine of Equivalents:</u></b></p> <p>To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed</p> |

| '742 Patent Claim 58 | Front Camera   | Rear Camera  |
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|                      | <p>functionality and performs substantially the same function in substantially the same way to achieve substantially the same result. Galaxy S5 performs the same function because its processor(s) convert the pre-video signal into a signal that can be accepted by a standard video device (for example accepted by its display). Galaxy S5 performs this function in the same way because algorithms embedded in a memory of the Galaxy S5, upon receiving an instruction such as an user input (for example, pressing a button, touching screen), will be executed and cause the processor to convert the pre-video signal into a signal that can be accepted by a standard video device (for example accepted by its display). The memory and processor are part of the motherboard and within the same circuit. Galaxy S5 achieves the same result because a signal that can be accepted by a standard video device (for example accepted by its display), is created and displayed to the user.</p> | <p>functionality and performs substantially the same function in substantially the same way to achieve substantially the same result. Galaxy S5 performs the same function because its processor(s) convert the pre-video signal into a signal that can be accepted by a standard video device (for example accepted by its display). Galaxy S5 performs this function in the same way because algorithms embedded in a memory of the Galaxy S5, upon receiving an instruction such as an user input (for example, pressing a button, touching screen), will be executed and cause the processor to convert the pre-video signal into a signal that can be accepted by a standard video device (for example accepted by its display). The memory and processor are part of the motherboard and within the same circuit. Galaxy S5 achieves the same result because a signal that can be accepted by a standard video device (for example accepted by its display), is created and displayed to the user.</p> |

1. a radio transceiver element communicating with said first circuit board for wirelessly transmitting said converted pre-video signal.

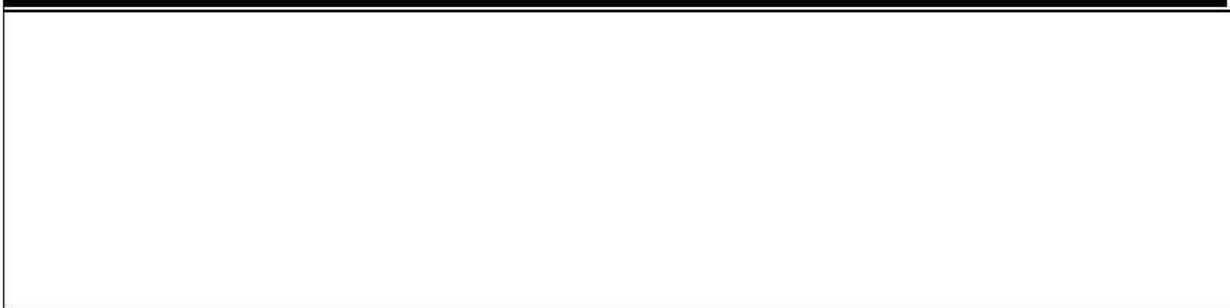
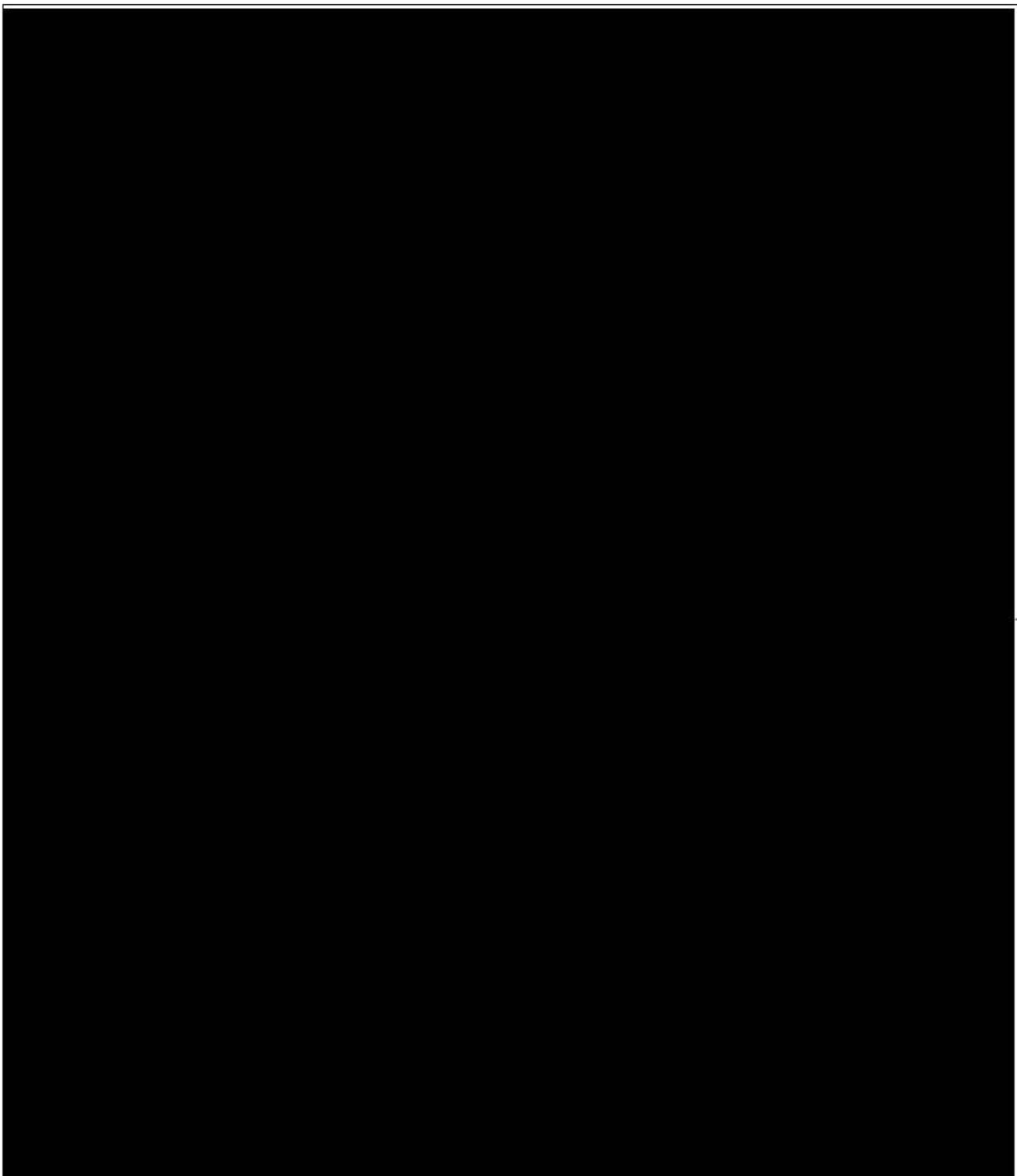
| '742 Patent Claim 58 | Front Camera | Rear Camera |
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| '742 Patent Claim 58 | Front Camera | Rear Camera |
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| '742 Patent Claim<br>22   | Front Camera | Rear Camera                      |
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| 22a. In a PDA having capability to transmit and receive data in a communications network, |              | b. the PDA having a housing, and |

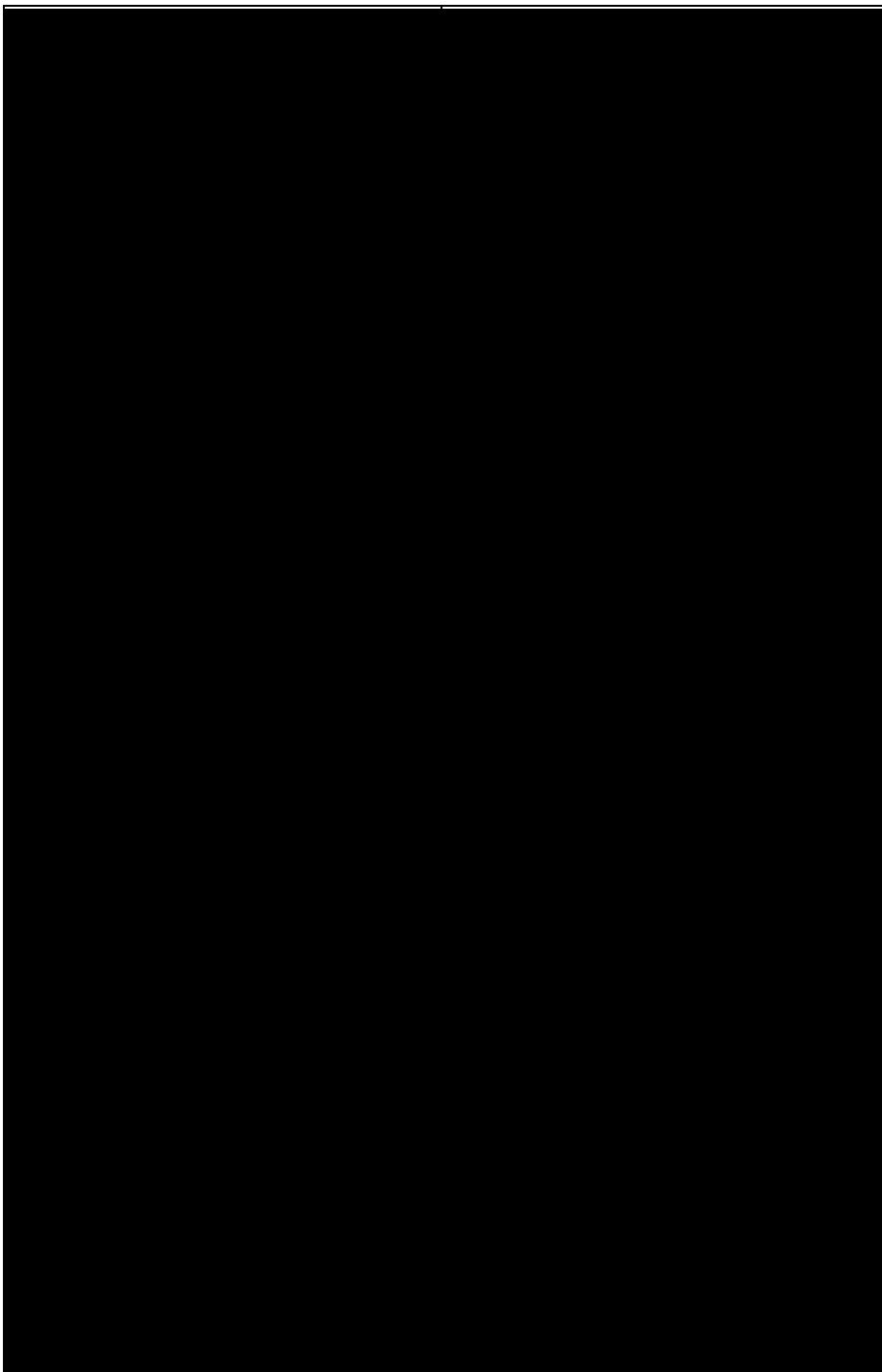
c. a video view screen for viewing the data which includes video signals, the improvement comprising:

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| d. a camera module for taking video images, |  |
|   | e. said camera module communicating with circuitry within said PDA |



f. enabling viewing  
on said video view  
screen and

g. enabling video  
signals to be  
transmitted from  
said camera module  
to said computer,



h. said camera module including an image sensor housed therein, said image sensor lying in a first plane and including an array of pixels for receiving images thereon,

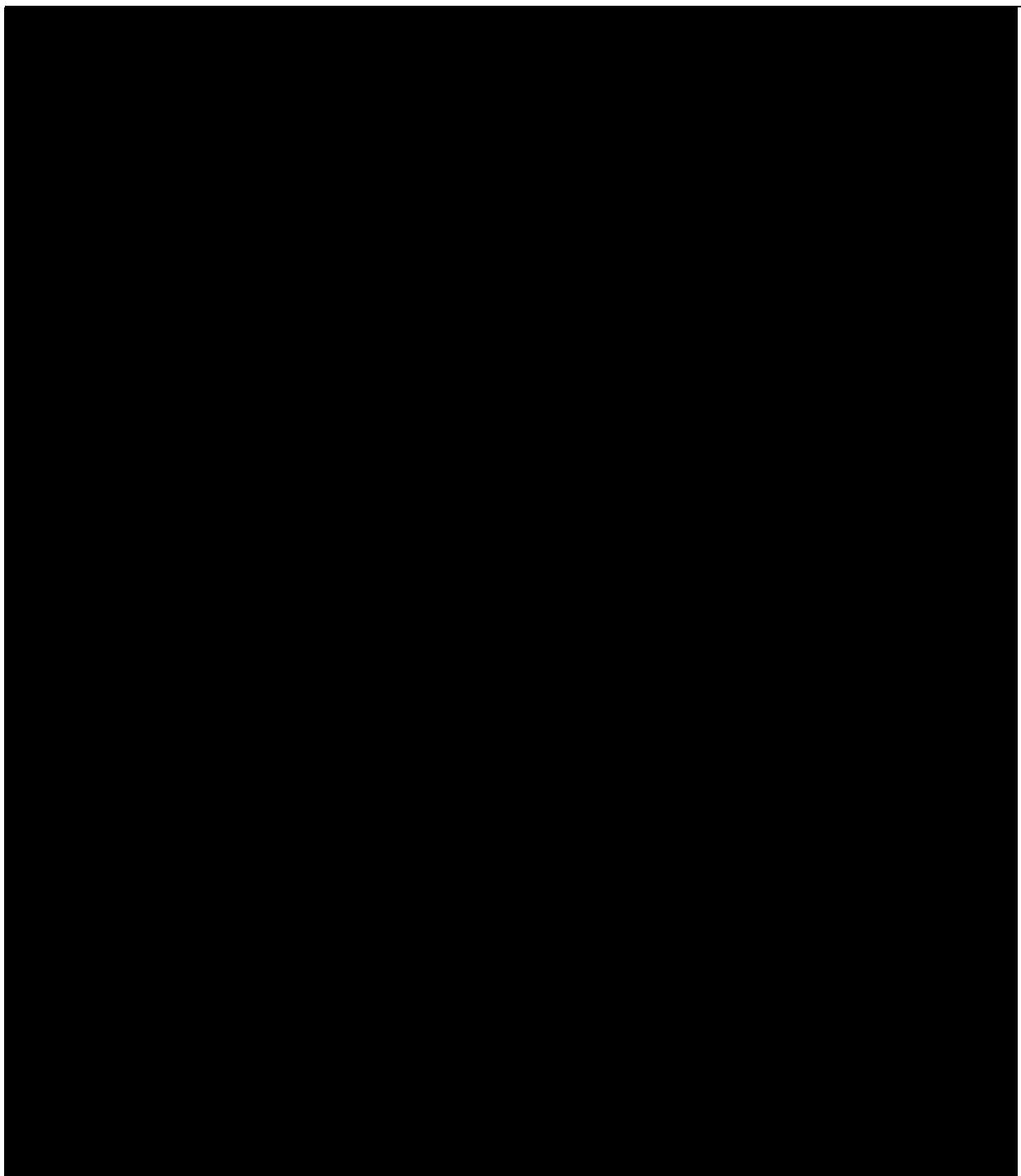
|  |   |  |
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|  | <p>i. said image sensor further including circuitry means on said first plane and coupled to said array of pixels for timing and control of said array of pixels,</p> | <p>The Galaxy S5 front image sensor includes a complex integrated circuit. “The sensor is the part of the camera that actually ‘captures’ the image. It includes a complex integrated circuit that typically includes photodetectors – the key component that captures light – plus amplifiers, transistors, and often some form of processing hardware and power management.”</p> <p>Tim Schiesser, <i>Know Your Smartphone: A Guide to Camera Hardware</i>, TECHSPOT (July 28, 2014), <a href="https://www.techspot.com/guides/850-smartphone-camera-hardware/">https://www.techspot.com/guides/850-smartphone-camera-hardware/</a>.</p> |
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|  | <p><i>Galaxy S5 Front Camera, iFixit (emphasis added),</i><br/> <a href="https://www.ifixit.com/Store/Android/Galaxy-S5-Front-Camera/IF236-009">https://www.ifixit.com/Store/Android/Galaxy-S5-Front-Camera/IF236-009</a> (last accessed Oct. 24, 2019).</p>  |  <p><i>Galaxy S5 Rear Camera, iFixit (emphasis added),</i><br/> <a href="https://www.ifixit.com/Store/Android/Galaxy-S5-Rear-Camera/IF236-007">https://www.ifixit.com/Store/Android/Galaxy-S5-Rear-Camera/IF236-007</a> (last accessed Oct. 24, 2019).</p> |
|  |  <p><i>Galaxy S5 Front Camera, iFixit (emphasis added),</i><br/> <a href="https://www.ifixit.com/Store/Android/Galaxy-S5-Front-Camera/IF236-009">https://www.ifixit.com/Store/Android/Galaxy-S5-Front-Camera/IF236-009</a> (last accessed Oct. 24, 2019).</p> |  <p><i>Galaxy S5 Rear Camera, iFixit (emphasis added),</i><br/> <a href="https://www.ifixit.com/Store/Android/Galaxy-S5-Rear-Camera/IF236-007">https://www.ifixit.com/Store/Android/Galaxy-S5-Rear-Camera/IF236-007</a> (last accessed Oct. 24, 2019).</p> |

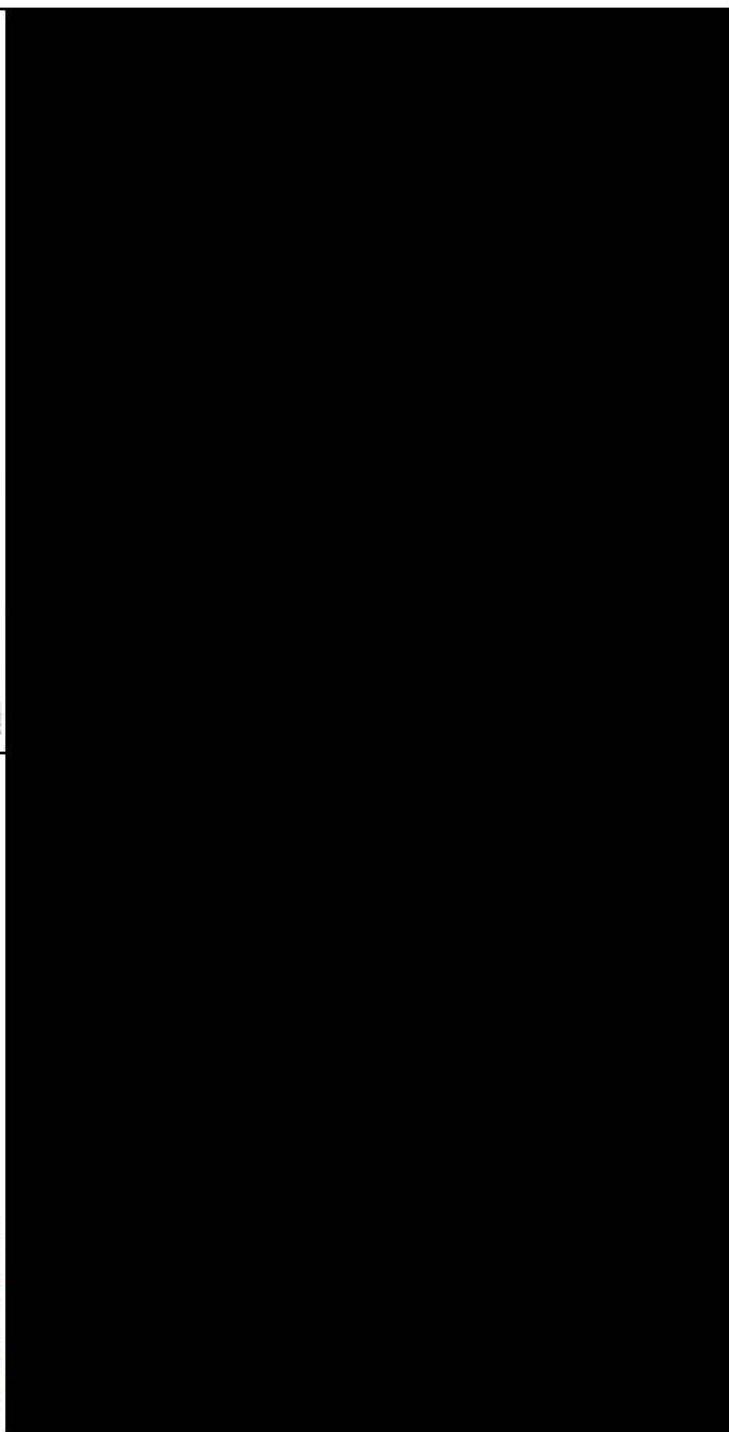
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|  | ISOCELL_Samsung NewsRoom Screenshot.jpg | ISOCELL_Samsung NewsRoom Screenshot.jpg  |
|  |   | <p>The integrated circuit within the image sensor is coupled to CMOS pixels for the purpose of timing and control. The Samsung Galaxy S5 includes latches, counters and decoders on the circuit of the image sensor to control the release of the image signals from pixels of the image sensor as illustrated above.</p> <p><b><u>Doctrine of Equivalents:</u></b></p> <p>To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs</p> |
|  |   | <p>The integrated circuit within the image sensor is coupled to CMOS pixels for the purpose of timing and control. The Samsung Galaxy S5 includes latches, counters and decoders on the circuit of the image sensor to control the release of the image signals from pixels of the image sensor as illustrated above.</p> <p><b><u>Doctrine of Equivalents:</u></b></p>  |

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|  | <p>To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs substantially the same function in substantially the same way to achieve substantially the same result.</p> <p>Galaxy S5 performs the same function because its electronic components control the release of image data from the CMOS pixel array. For example, photodetectors corresponding to each of the pixels in the image sensor capture analog information about the incident photons (light packets) and this analog information is then released for further processing, such as being amplified and converted into a digital signal.</p> | <p>substantially the same function in substantially the same way to achieve substantially the same result.</p> <p>Galaxy S5 performs the same function because its electronic components control the release of image data from the CMOS pixel array. For example, photodetectors corresponding to each of the pixels in the image sensor capture analog information about the incident photons (light packets) and this analog information is then released for further processing, such as being amplified and converted into a digital signal.</p> | <p>Galaxy S5 performs the function in the same way because components performing the function of latches, decoder and counter are used to control the release of the image signal from the pixel array.</p> | <p>Galaxy S5 achieves the same result because electronic components in the device control the release of the image signal from the pixel array.</p> |
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j. said image sensor  
producing a pre-  
video signal,



k. a first circuit board electrically connected to said image sensor,

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| <p>1. said first circuit board including circuitry means for converting said pre-video signal to a desired video format,</p> | <p>The pre-video signal received from the image sensor is sent to a processor on the first circuit board, which converts the pre-video signal to a post-video signal that can be viewed on the Galaxy S5 LCD screen.</p>  | <p>The pre-video signal received from the image sensor is sent to a processor on the first circuit board, which converts the pre-video signal to a post-video signal that can be viewed on the Galaxy S5 LCD screen.</p> |
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The circuitry means for converting a pre-video signal to a post-video signal on the Galaxy S5 are the electronic components which condition the pre-video signal to place it in a form that may be viewed on a standard video device and include video processing board including low pass filters, band pass filter, detector, white balance circuit, gain control and processor as illustrated above.

The circuitry means for converting a pre-video signal to a post-video signal on the Galaxy S5 are the electronic components which condition the pre-video signal to place it in a form that may be viewed on a standard video device and include video processing board including low pass filters, band pass filter, detector, white balance circuit, gain control and processor as illustrated above.

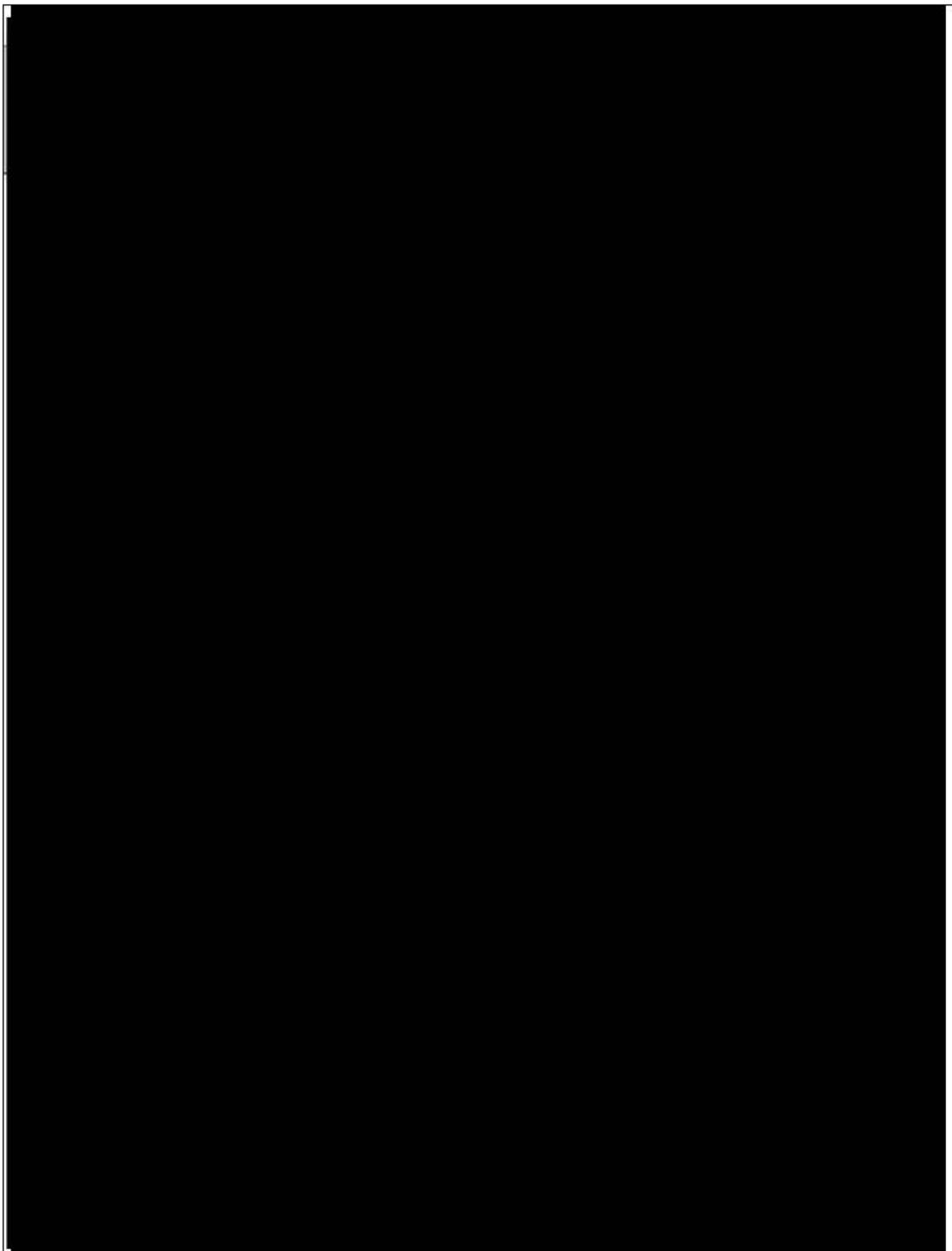
## Doctrine of Equivalents:

To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs substantially the same function in substantially the same way to achieve

### **Doctrine of Equivalents:**

To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs substantially the same function in substantially the same way to achieve substantially the

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|  | <p>same result. Galaxy S5 performs the same function because its processor(s) convert the pre-video signal into a signal that can be accepted by a standard video device (for example accepted by its display). Galaxy S5 performs this function in the same way because algorithms embedded in a memory of the Galaxy S5, upon receiving an instruction such as an user input (for example, pressing a button, touching screen), will be executed and cause the processor to convert the pre-video signal into a signal that can be accepted by a standard video device (for example accepted by its display). The memory and processor are part of the motherboard and within the same circuit. Galaxy S5 achieves the same result because a signal that can be accepted by a standard video device (for example accepted by its display), is created and displayed to the user.</p> |
| m. a transceiver radio element housed within said camera module and electrically coupled to said first circuit board for transmitting said converted pre-video signal; and |  |

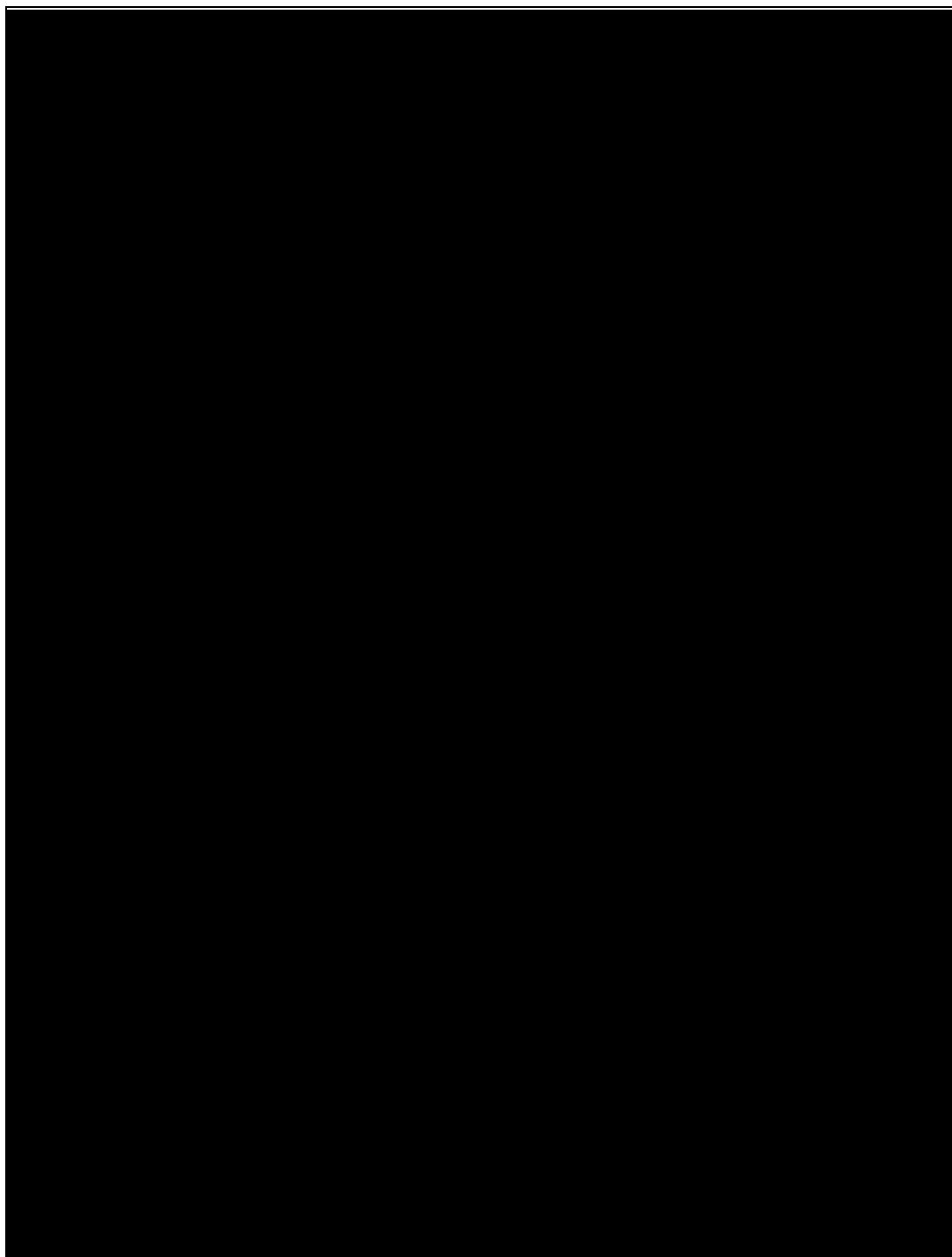


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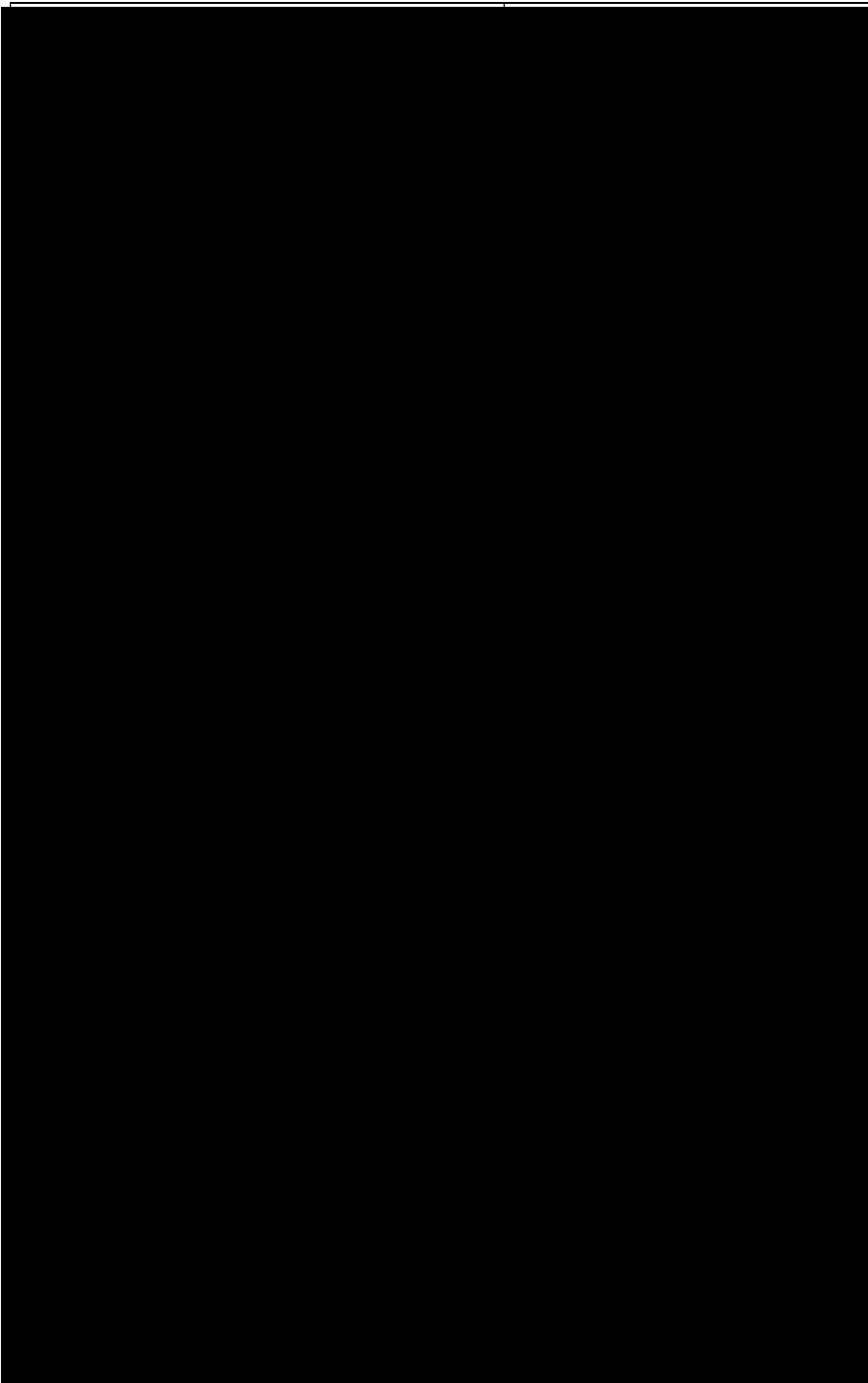
n. a transceiver radio module housed in the PDA and wirelessly communicating with said transceiver

radio element for  
receiving said  
converted pre-video  
signal, and





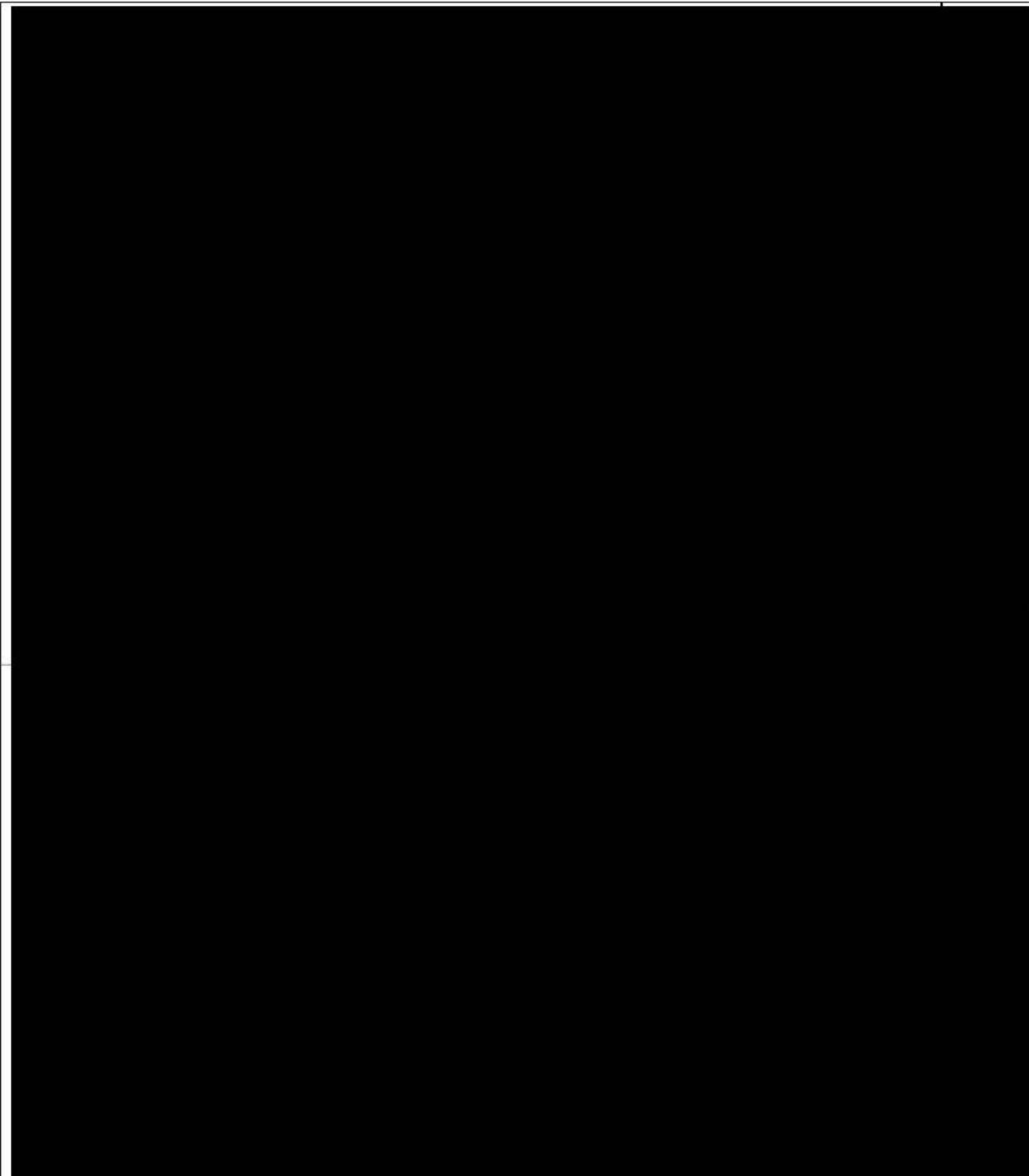
p. enabling viewing  
of the converted pre-  
video signals.



| '742 Patent Claim<br>42   | Front Camera   | Rear Camera   |
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| 42a. In a PDA having capability to transmit and receive data in a communications network, the improvement comprising:<br><br>a video system integral with said PDA for receiving and transmitting video images, and | for viewing said video images, said video system comprising; | c. a camera module housing an image sensor therein, |

d. said image sensor  
lying in a first plane  
and including an  
array of pixels for  
receiving images  
thereon,

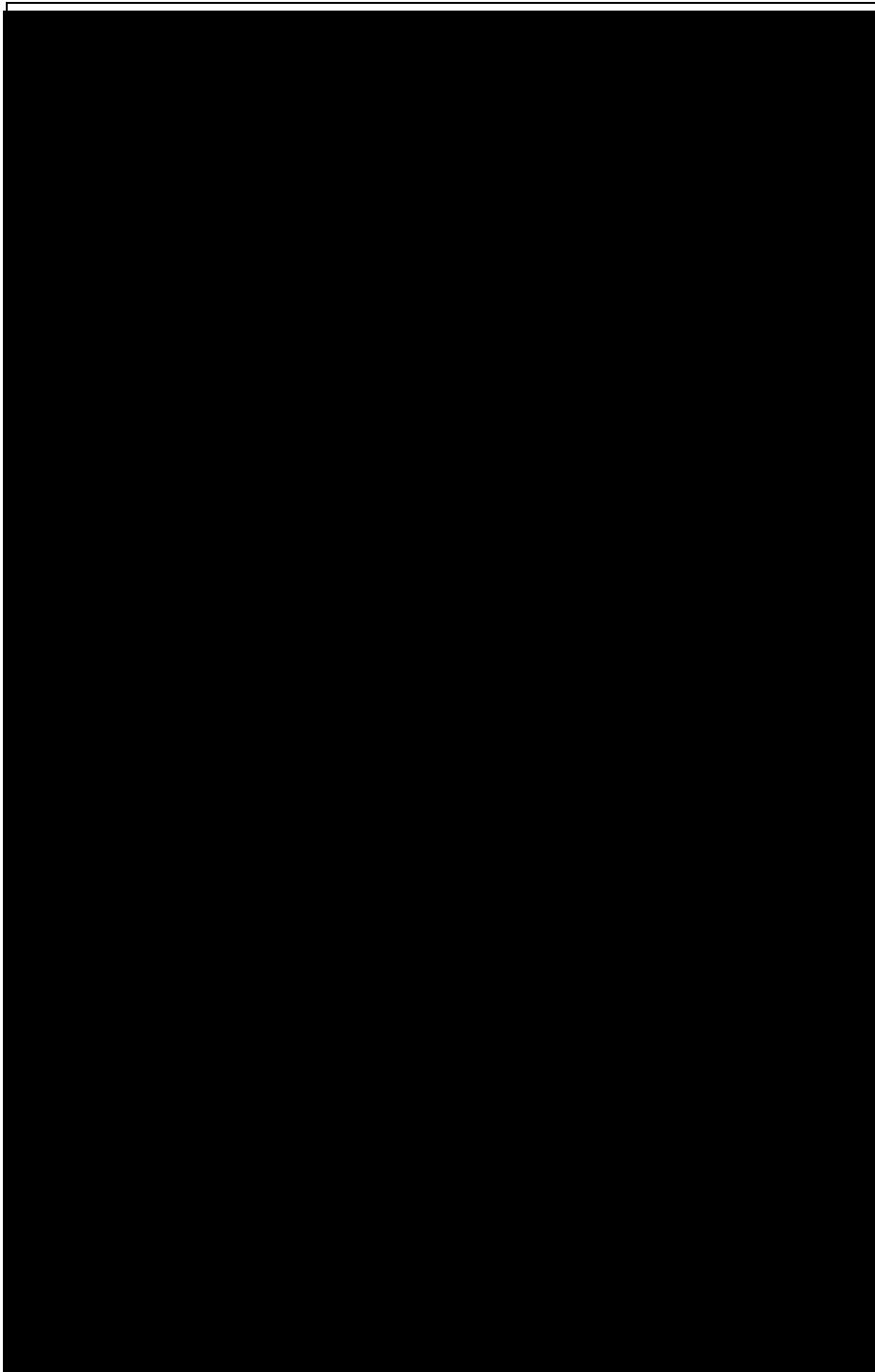
|  |  |
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|  | e. said image sensor producing a pre-video signal, |
|  |  |



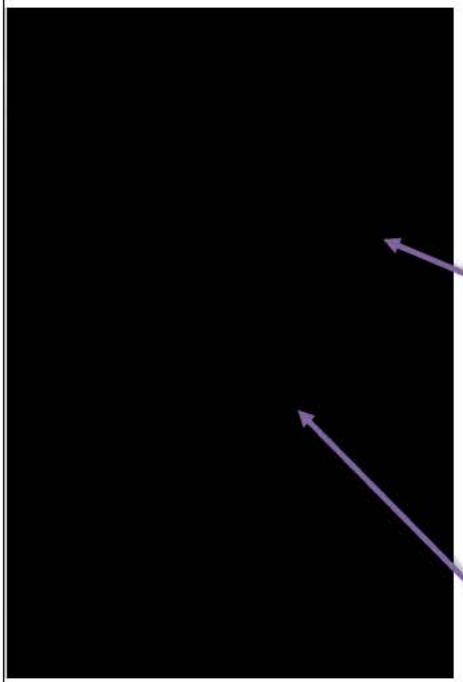
f. a first circuit  
board lying in a  
second plane and

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electrically coupled  
to said image sensor,



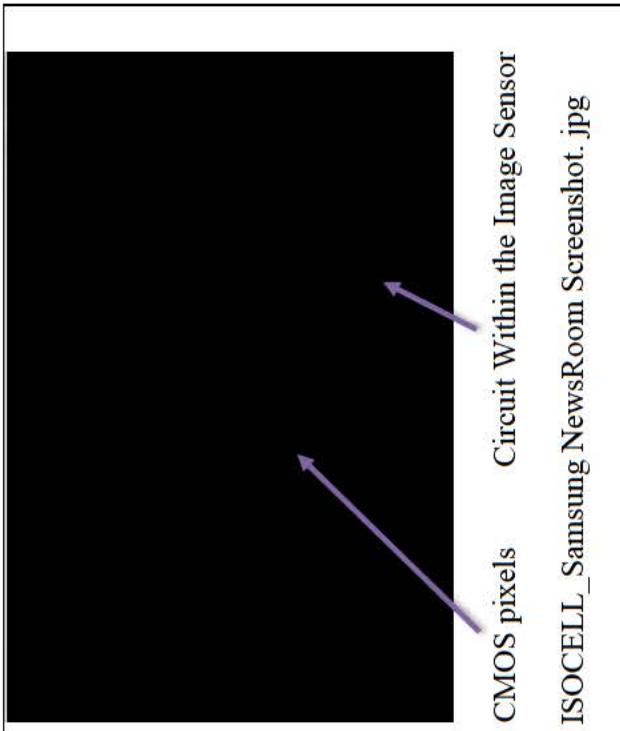
g. said first circuit board including circuitry means for timing and control of said array of pixels and



CMOS Pixels  
Sensor

Circuit Within the Image  
Sensor

ISOCELL\_Samsung NewsRoom Screenshot.jpg



CMOS pixels

Circuit Within the Image Sensor

ISOCELL\_Samsung NewsRoom Screenshot.jpg

The integrated circuit on the mother board which is electrically connected to integrated circuit within the image sensor is thus coupled to CMOS pixels as part of the timing and control circuitry. The Samsung Galaxy S5 includes latches, counters and decoders on the mother board circuit of the image sensor to control the release of the image signals from pixels of the image sensor as illustrated above.

**Doctrine of Equivalents:**

To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs substantially the same function in substantially the same way to achieve substantially the same result.

Galaxy S5 performs the same function because its electronic components control the release of image data from the CMOS pixel array. For example, photodetectors corresponding to each of the pixels in the image sensor capture analog information about the incident photons (light packets) and this analog information is then released for further processing.

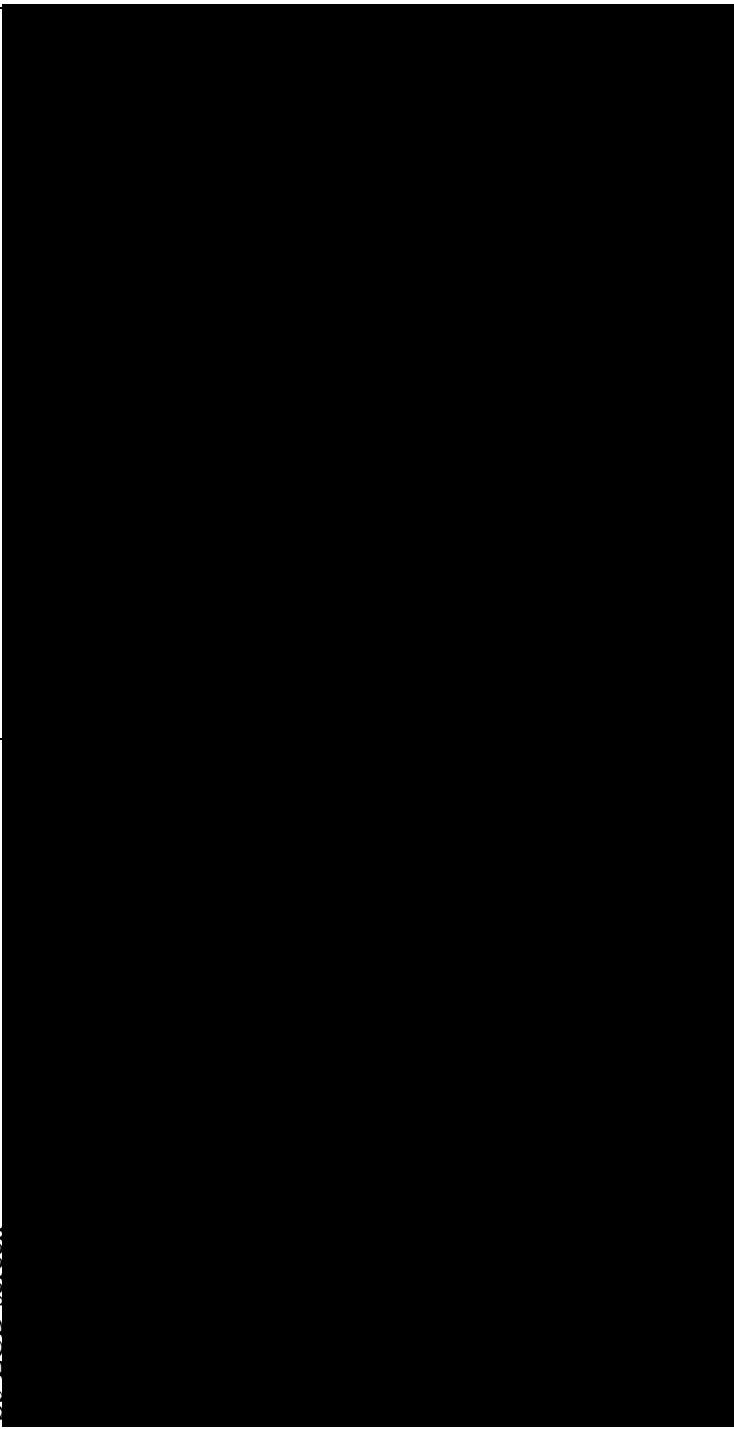
The integrated circuit on the mother board which is electrically connected to integrated circuit within the image sensor is thus coupled to CMOS pixels as part of the timing and control circuitry. The Samsung Galaxy S5 includes latches, counters and decoders on the mother board circuit of the image sensor to control the release of the image signals from pixels of the image sensor as illustrated above.

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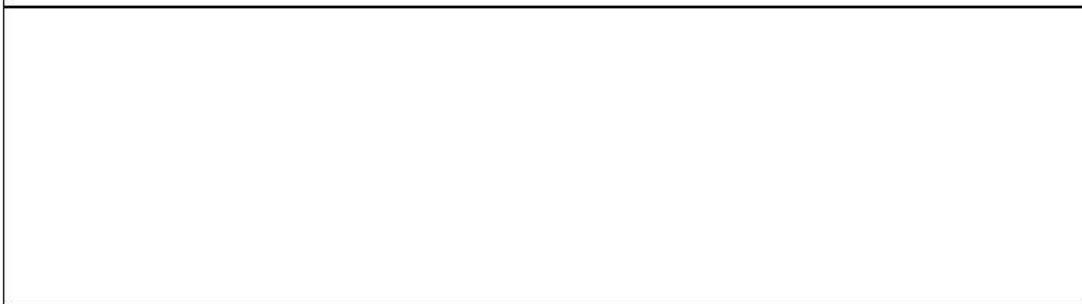
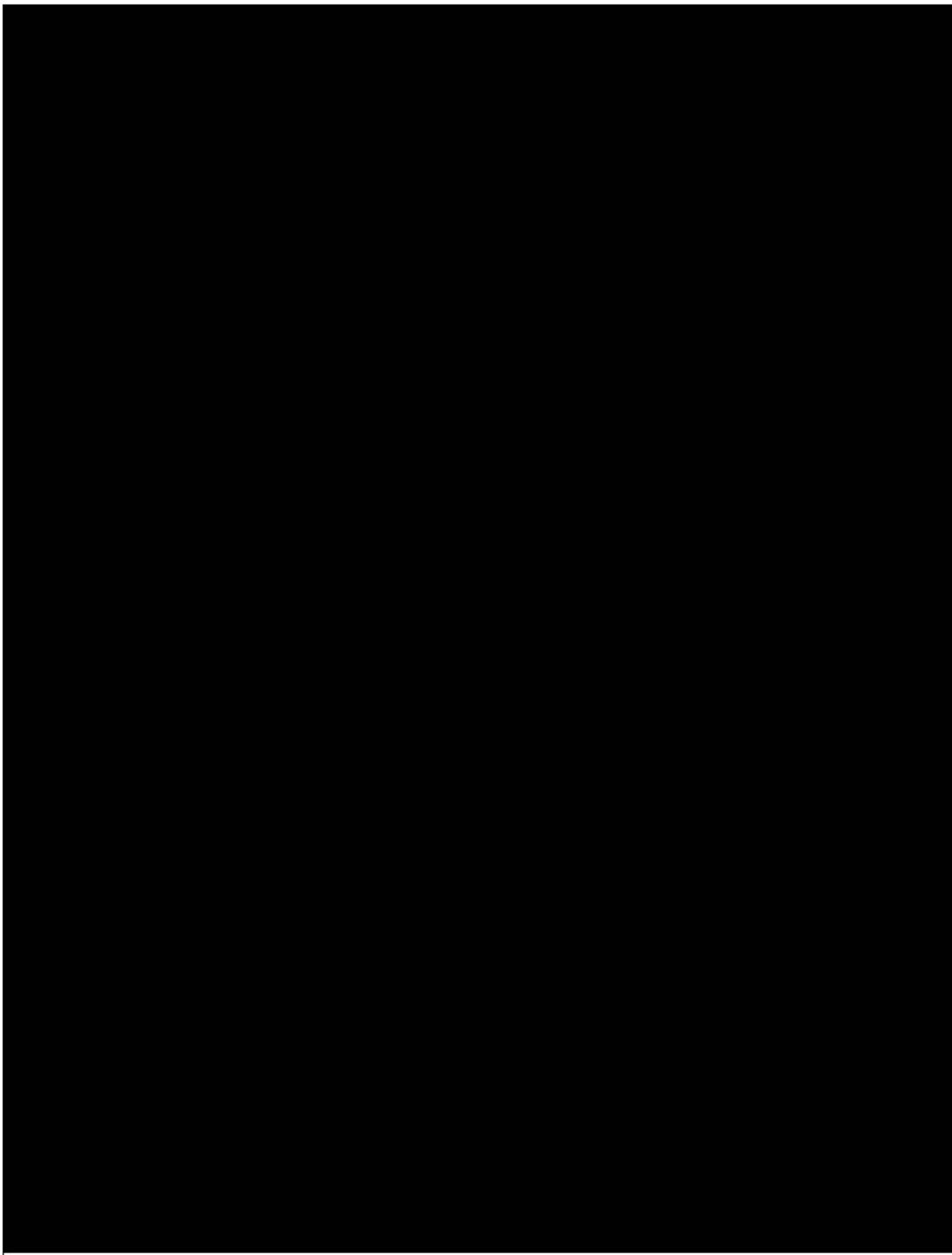
Galaxy S5 performs the same function because its electronic components control the release of image data from the CMOS pixel array. For example, photodetectors corresponding to each of the pixels in the image sensor capture analog information about the incident photons (light packets) and this analog information is then released for further processing.

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|  | <p>data from the CMOS pixel array. For example, photodetectors corresponding to each of the pixels in the image sensor capture analog information about the incident photons (light packets) and this analog information is then released for further processing, such as being amplified and converted into a digital signal.</p> <p>Galaxy S5 performs the function in the same way because components performing the function of latches, decoder and counter are used to control the release of the image signal from the pixel array.</p> <p>Galaxy S5 achieves the same result because electronic components in the device control the release of the image signal from the pixel array.</p> | <p>such as being amplified and converted into a digital signal.</p> | <p>Galaxy S5 performs the function in the same way because components performing the function of latches, decoder and counter are used to control the release of the image signal from the pixel array.</p> |
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| h. circuitry means for processing and converting said pre-video signal to a desired video format, | <p>The pre-video signal received from the image sensor is sent to a processor on the first circuit board, which converts the pre-video signal to a post-video signal that can be viewed on the Galaxy S5 LCD screen.</p>  | <p>The pre-video signal received from the image sensor is sent to a processor on the first circuit board, which converts the pre-video signal to a post-video signal that can be viewed on the Galaxy S5 LCD screen.</p> |
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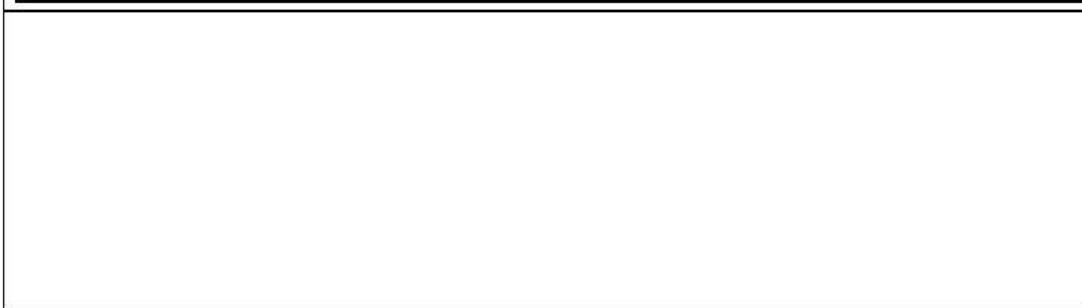
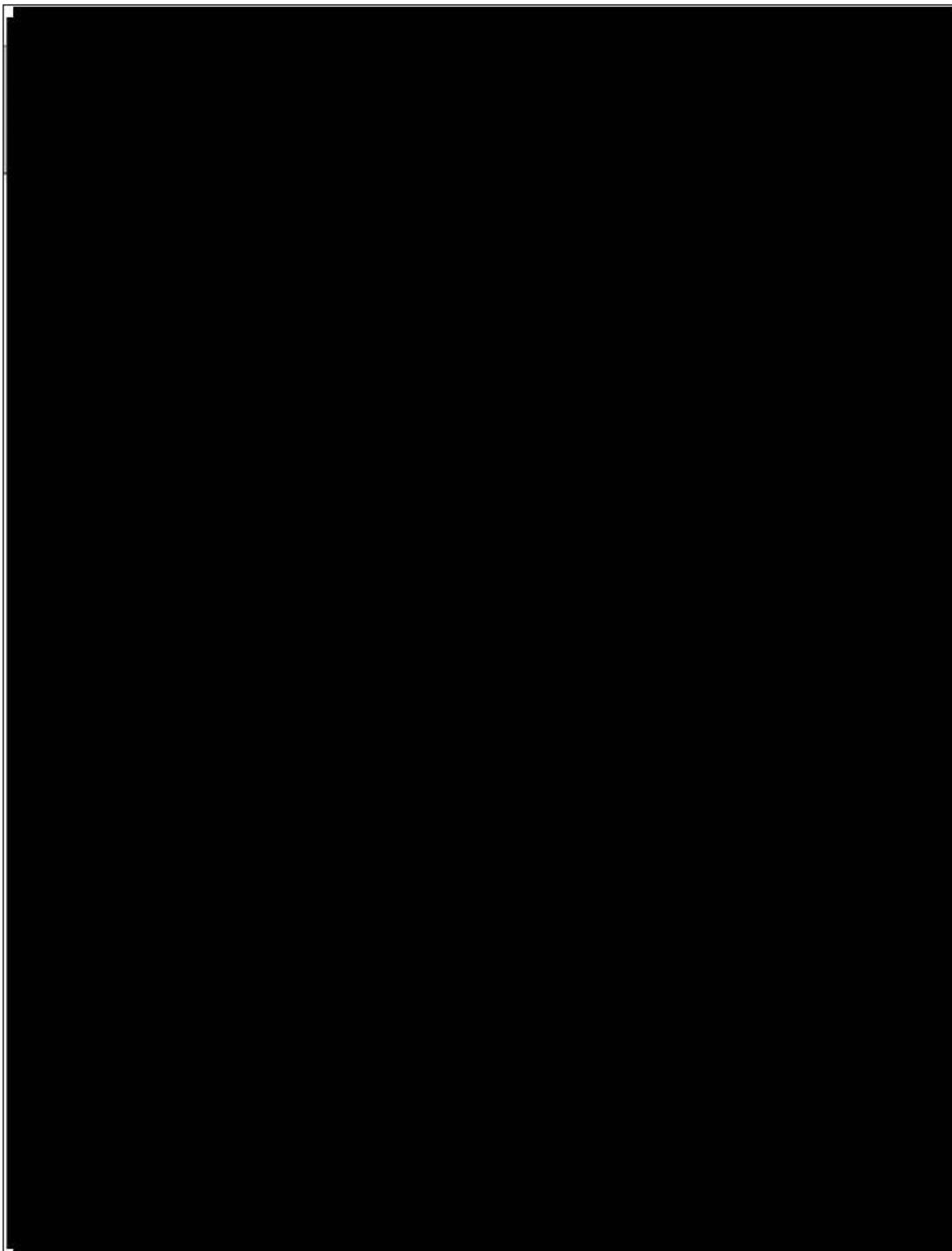
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|  | <p>The circuitry means for converting a pre-video signal to a post-video signal on the Galaxy S5 are the electronic components which condition the pre-video signal to place it in a form that may be viewed on a standard video device and include video processing board including low pass filters, band pass filter, detector, white balance circuit, gain control and processor as illustrated above.</p> <p><b><u>Doctrine of Equivalents:</u></b></p> <p>The circuitry means for converting a pre-video signal to a post-video signal on the Galaxy S5 are the electronic components which condition the pre-video signal to place it in a form that may be viewed on a standard video device and include video processing board including low pass filters, band pass filter, detector, white balance circuit, gain control and processor as illustrated above.</p> |
|  | <p>To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs substantially the same function in substantially the same way to achieve</p>   |

|  |  |  |
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|  | <p>substantially the same result. Galaxy S5 performs the same function because its processor(s) convert the pre-video signal into a signal that can be accepted by a standard video device (for example accepted by its display). Galaxy S5 performs this function in the same way because algorithms embedded in a memory of the Galaxy S5, upon receiving an instruction such as an user input (for example, pressing a button, touching screen), will be executed and cause the processor to convert the pre-video signal into a signal that can be accepted by a standard video device (for example accepted by its display). The memory and processor are part of the motherboard and within the same circuit. Galaxy S5 achieves the same result because a signal that can be accepted by a standard video device (for example accepted by its display), is created and displayed to the user.</p> | <p>substantially the same result. Galaxy S5 performs the same function because its processor(s) convert the pre-video signal into a signal that can be accepted by a standard video device (for example accepted by its display). Galaxy S5 performs this function in the same way because algorithms embedded in a memory of the Galaxy S5, upon receiving an instruction such as an user input (for example, pressing a button, touching screen), will be executed and cause the processor to convert the pre-video signal into a signal that can be accepted by a standard video device (for example accepted by its display). The memory and processor are part of the motherboard and within the same circuit. Galaxy S5 achieves the same result because a signal that can be accepted by a standard video device (for example accepted by its display), is created and displayed to the user.</p> |
|  | <p>i. a transceiver radio element communicating with said first circuit board for transmitting said converted pre-video signal;</p>  |  |



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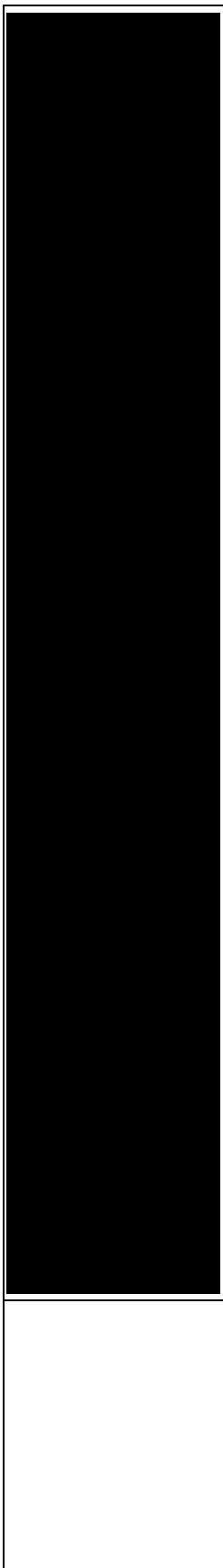
j. a transceiver radio module mounted in said PDA for wirelessly receiving said converted pre-video signal; and



k. a video view screen attached to said PDA for viewing said video images, said video view screen

communicating with  
said transceiver  
radio module, and

1. displaying video  
images processed by  
said first circuit  
board.

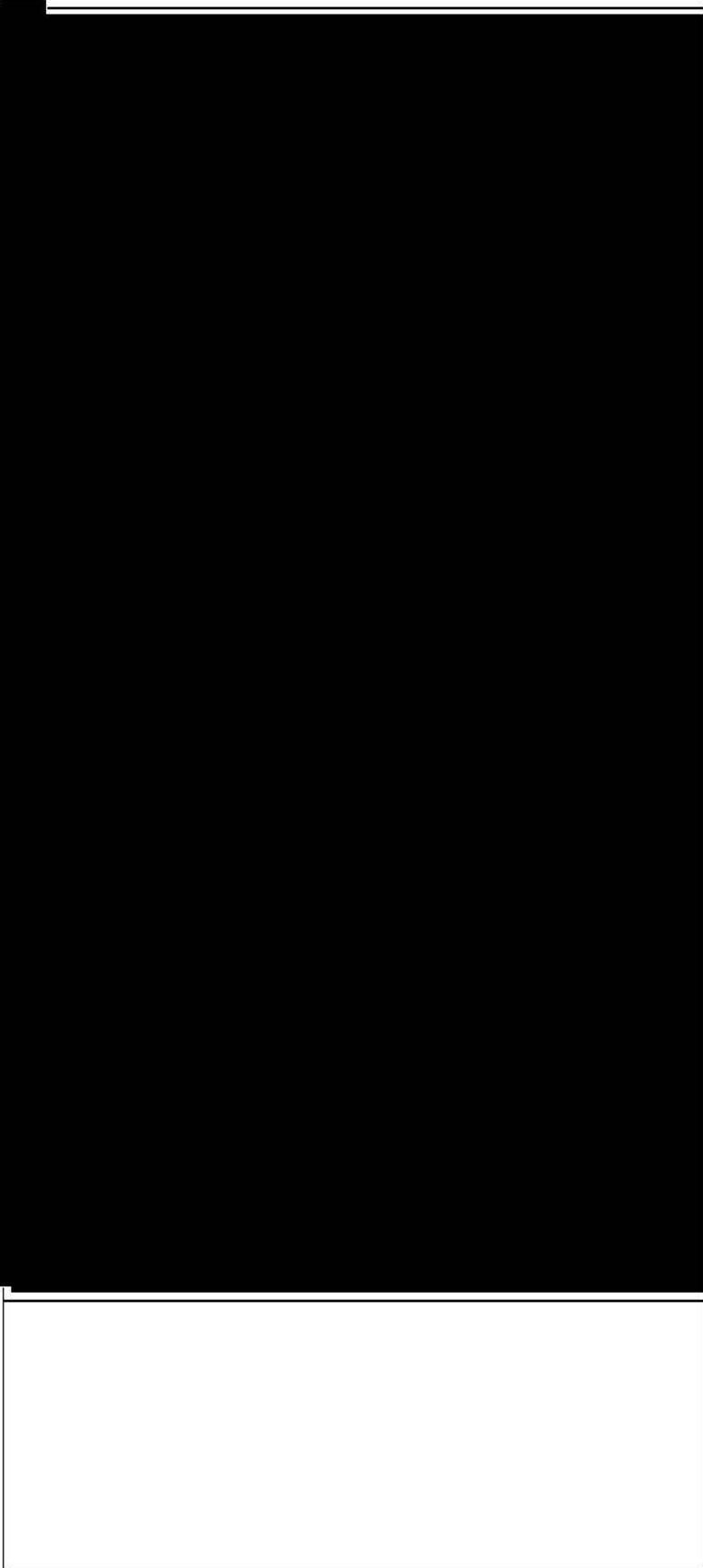


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| <p><b>'742 Patent Claim<br/>66</b></p> | <p>front camera</p>  | <p>rear camera</p>  |
|  | <p>66a. A PDA having capability to transmit and receive data in a communications network, said PDA comprising:</p> | <p>b. an image sensor lying in a first plane including an array of pixels for receiving images thereon,</p> |

c. said image sensor  
producing a pre-  
video signal;



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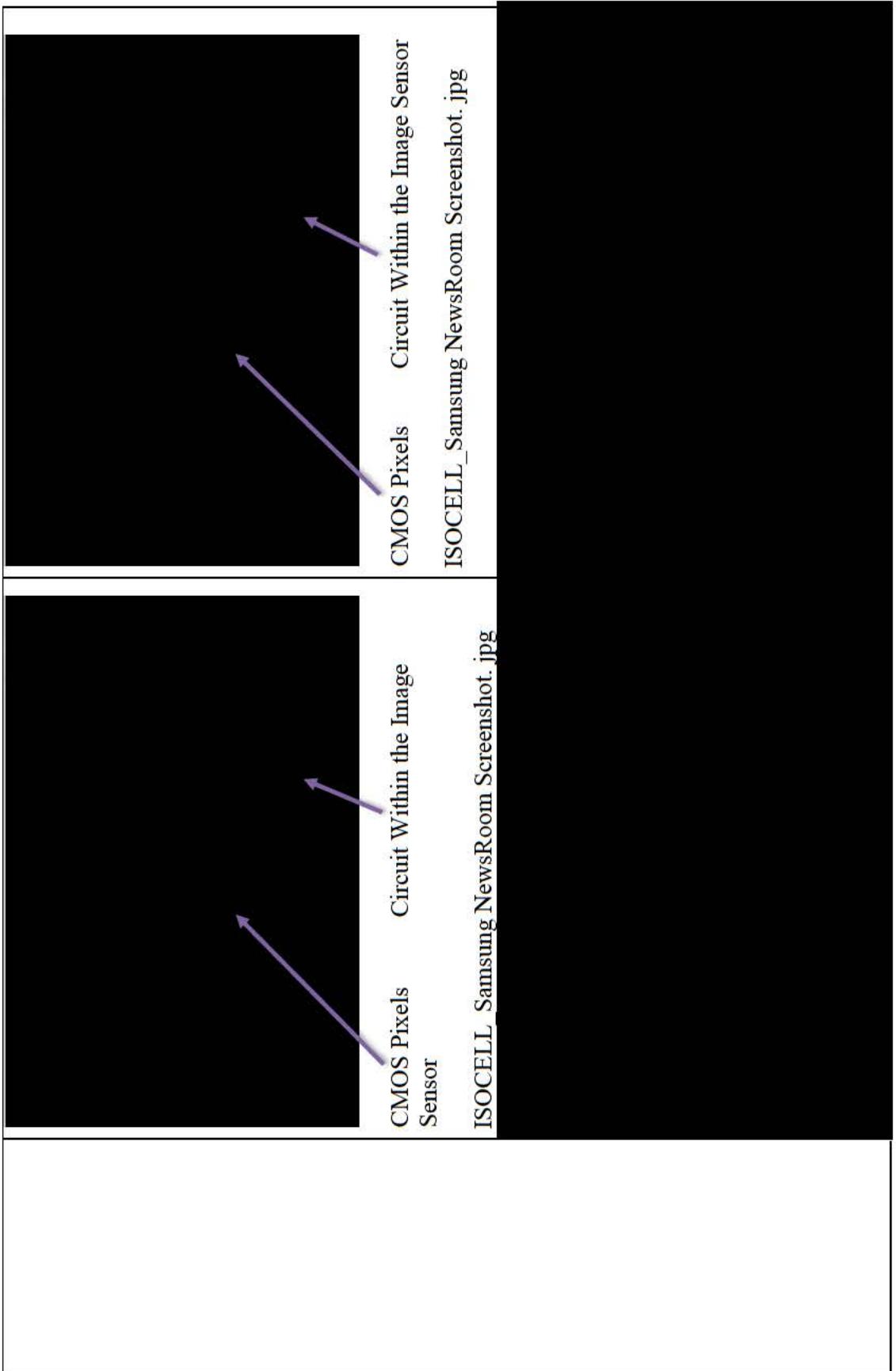
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d. a first circuit board electrically communicating with said image sensor,

e. said first circuit board including circuitry means for timing and control

The Galaxy S5 rear image sensor includes a complex integrated circuit. "The sensor is the part of the camera that actually 'captures' the image. It includes a complex integrated circuit that typically includes

|                                    |  |   |  |
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| <p>of said array of pixels and</p> | <p>includes photodetectors – the key component that captures light – plus amplifiers, transistors, and often some form of processing hardware and power management.”</p> | <p>Tim Schiesser, <i>Know Your Smartphone: A Guide to Camera Hardware</i>, TECHSPOT (July 28, 2014), <a href="https://www.techspot.com/guides/850-smartphone-camera-hardware/">https://www.techspot.com/guides/850-smartphone-camera-hardware/</a>.</p> |  <p>Tim Schiesser, <i>Know Your Smartphone: A Guide to Camera Hardware</i>, TECHSPOT (July 28, 2014), <a href="https://www.techspot.com/guides/850-smartphone-camera-hardware/">https://www.techspot.com/guides/850-smartphone-camera-hardware/</a>.</p>   |
|                                    |  |   |  <p>Galaxy S5 Front Camera, iFixit (emphasis added), <a href="https://www.ifixit.com/Store/Android/Galaxy-S5-Front-Camera/IF236-009">https://www.ifixit.com/Store/Android/Galaxy-S5-Front-Camera/IF236-009</a> (last accessed Oct. 24, 2019).</p> <p>Galaxy S5 Rear Camera, iFixit (emphasis added), <a href="https://www.ifixit.com/Store/Android/Galaxy-S5-Rear-Camera/IF236-007">https://www.ifixit.com/Store/Android/Galaxy-S5-Rear-Camera/IF236-007</a> (last accessed Oct. 24, 2019).</p> |



The integrated circuit on the mother board which is electrically connected to integrated circuit within the image sensor is thus coupled to CMOS pixels as part of the timing and control circuitry. The Samsung Galaxy S5 includes latches, counters and decoders on the circuit of the image sensor to control the release of the image signals from pixels of the image sensor as illustrated above.

**Doctrine of Equivalents:**

To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs substantially the same function in substantially the same way to achieve substantially the same result.

Galaxy S5 performs the same function because its electronic components control the release of image data from the CMOS pixel array. For example, photodetectors corresponding to each of the pixels in the image sensor capture analog information about the incident photons (light packets) and this analog

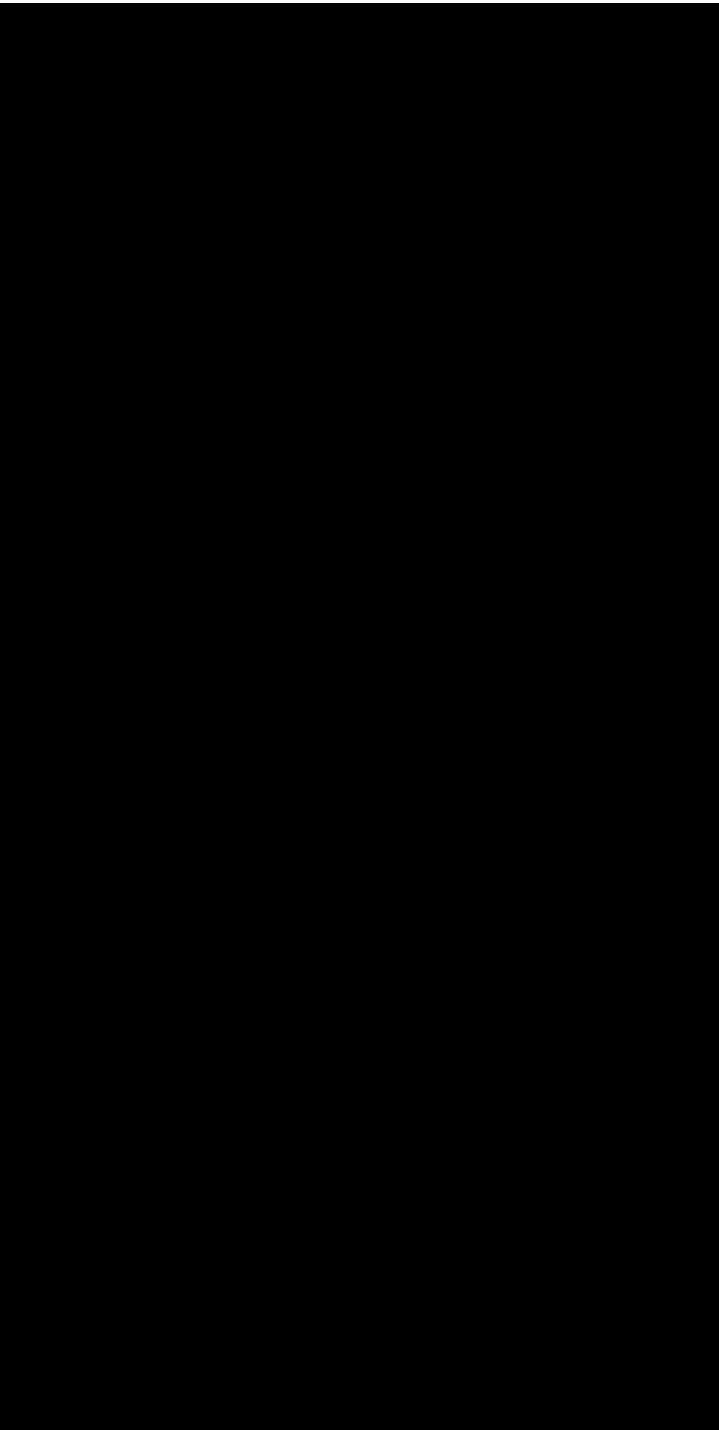
The integrated circuit on the mother board which is electrically connected to integrated circuit within the image sensor is thus coupled to CMOS pixels as part of the timing and control circuitry. The Samsung Galaxy S5 includes latches, counters and decoders on the circuit of the image sensor to control the release of the image signals from pixels of the image sensor as illustrated above.

**Doctrine of Equivalents:**

To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs substantially the same function in substantially the same way to achieve substantially the same result.

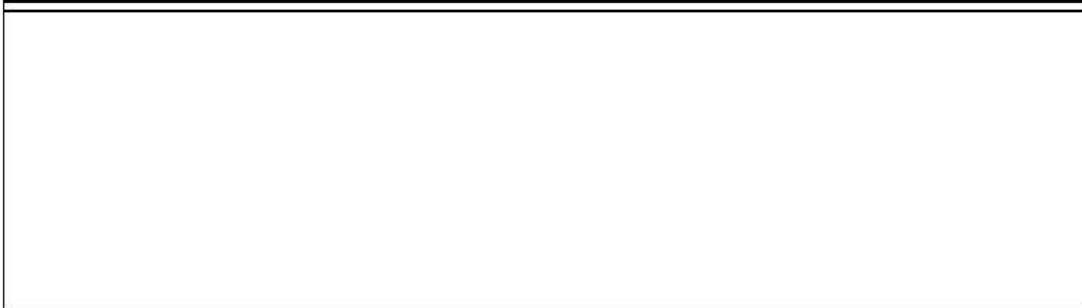
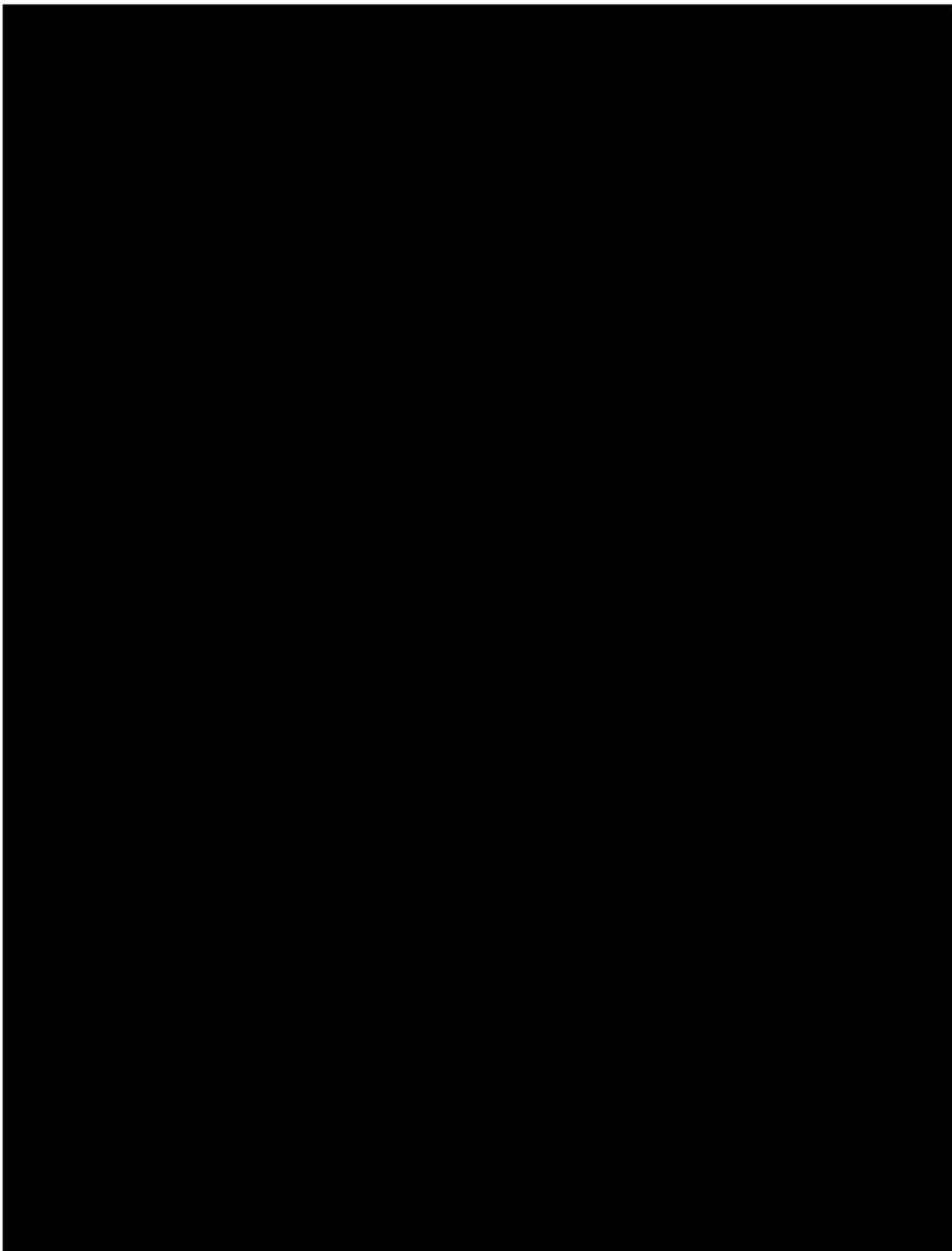
Galaxy S5 performs the same function because its electronic components control the release of image

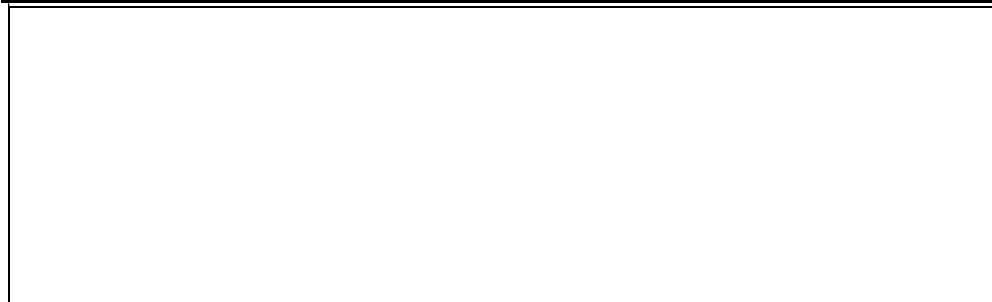
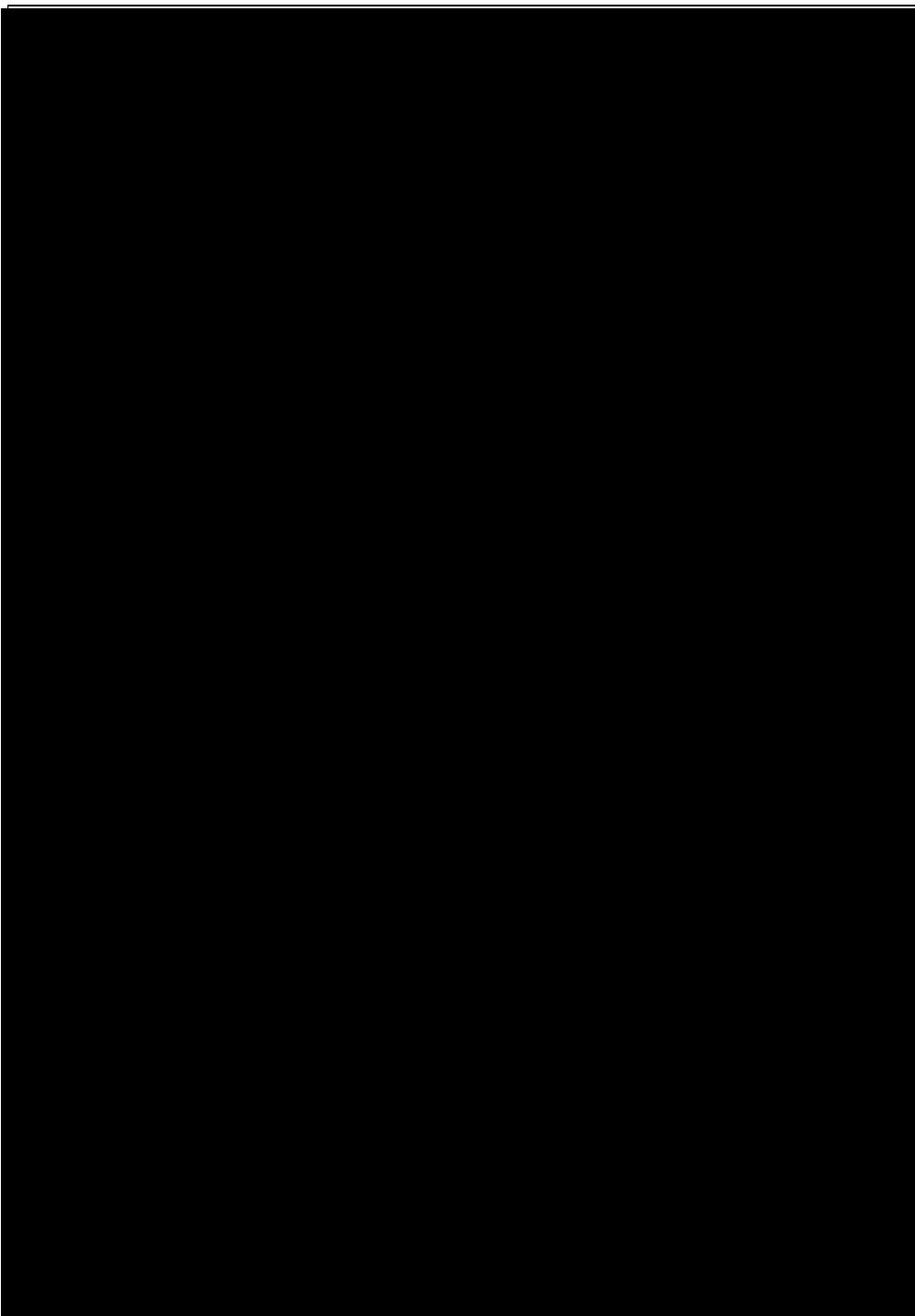
|  |  |
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| <p>data from the CMOS pixel array. For example, photodetectors corresponding to each of the pixels in the image sensor capture analog information about the incident photons (light packets) and this analog information is then released for further processing, such as being amplified and converted into a digital signal.</p> | <p>information is then released for further processing, such as being amplified and converted into a digital signal.</p> <p>Galaxy S5 performs the function in the same way because components performing the function of latches, decoder and counter are used to control the release of the image signal from the pixel array.</p> |
| <p>Galaxy S5 performs the function in the same way because components performing the function of latches, decoder and counter are used to control the release of the image signal from the pixel array.</p>  | <p>Galaxy S5 achieves the same result because electronic components in the device control the release of the image signal from the pixel array.</p>  |
|  |  |

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| f. circuitry means for processing and converting said pre-video signal to a desired video format; | <p>The pre-video signal received from the image sensor is sent to a processor on the first circuit board, which converts the pre-video signal to a post-video signal that can be viewed on the Galaxy S5 LCD screen.</p>  |
|---|--|

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|  | <p>The circuitry means for converting a pre-video signal to a post-video signal on the Galaxy S5 are the electronic components which condition the pre-video signal to place it in a form that may be viewed on a standard video device and include video processing board including low pass filters, band pass filter, detector, white balance circuit, gain control and processor as illustrated above.</p> | <p>The circuitry means for converting a pre-video signal to a post-video signal on the Galaxy S5 are the electronic components which condition the pre-video signal to place it in a form that may be viewed on a standard video device and include video processing board including low pass filters, band pass filter, detector, white balance circuit, gain control and processor as illustrated above.</p> |
|  | <p><b><u>Doctrine of Equivalents:</u></b></p> <p>To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs substantially the same function in substantially the same way to achieve</p>              | <p><b><u>Doctrine of Equivalents:</u></b></p> <p>To the extent that Galaxy S5 does not literally infringe this claim element, Defendant infringes under the doctrine of equivalents. The above described functionality of Galaxy S5 is at most insubstantially different from the claimed functionality and performs substantially the same function in substantially the same way to achieve</p>              |

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| g. a radio transceiver element communicating with said first circuit board for wirelessly transmitting said converted pre-video signal; |  |





h. a camera module housing said image sensor, said first circuit board, and said transceiver radio element therein;

g. a radio transceiver module housed within the PDA for wirelessly communicating with said radio

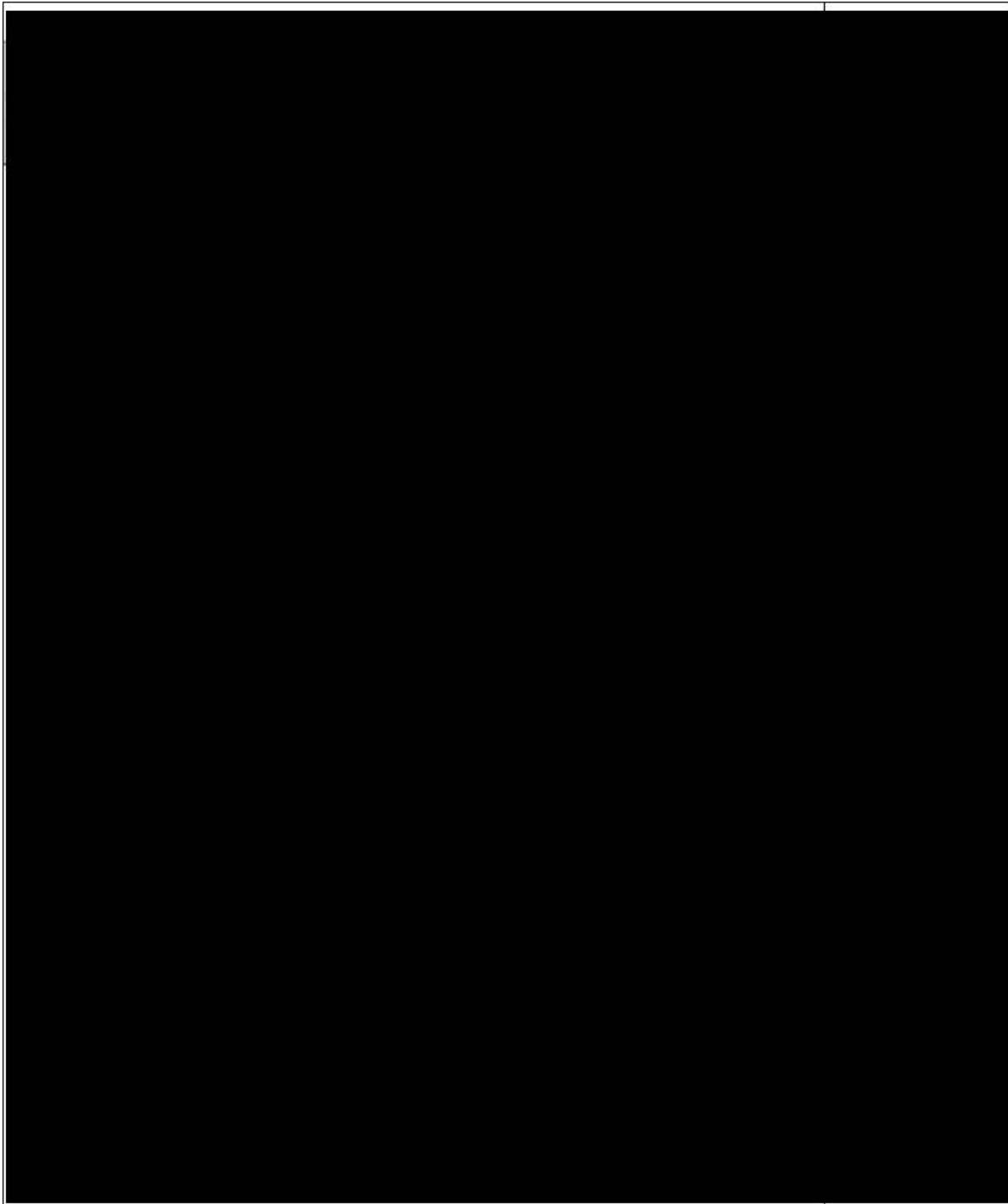
transceiver element  
and receiving said  
converted pre-video  
signal;



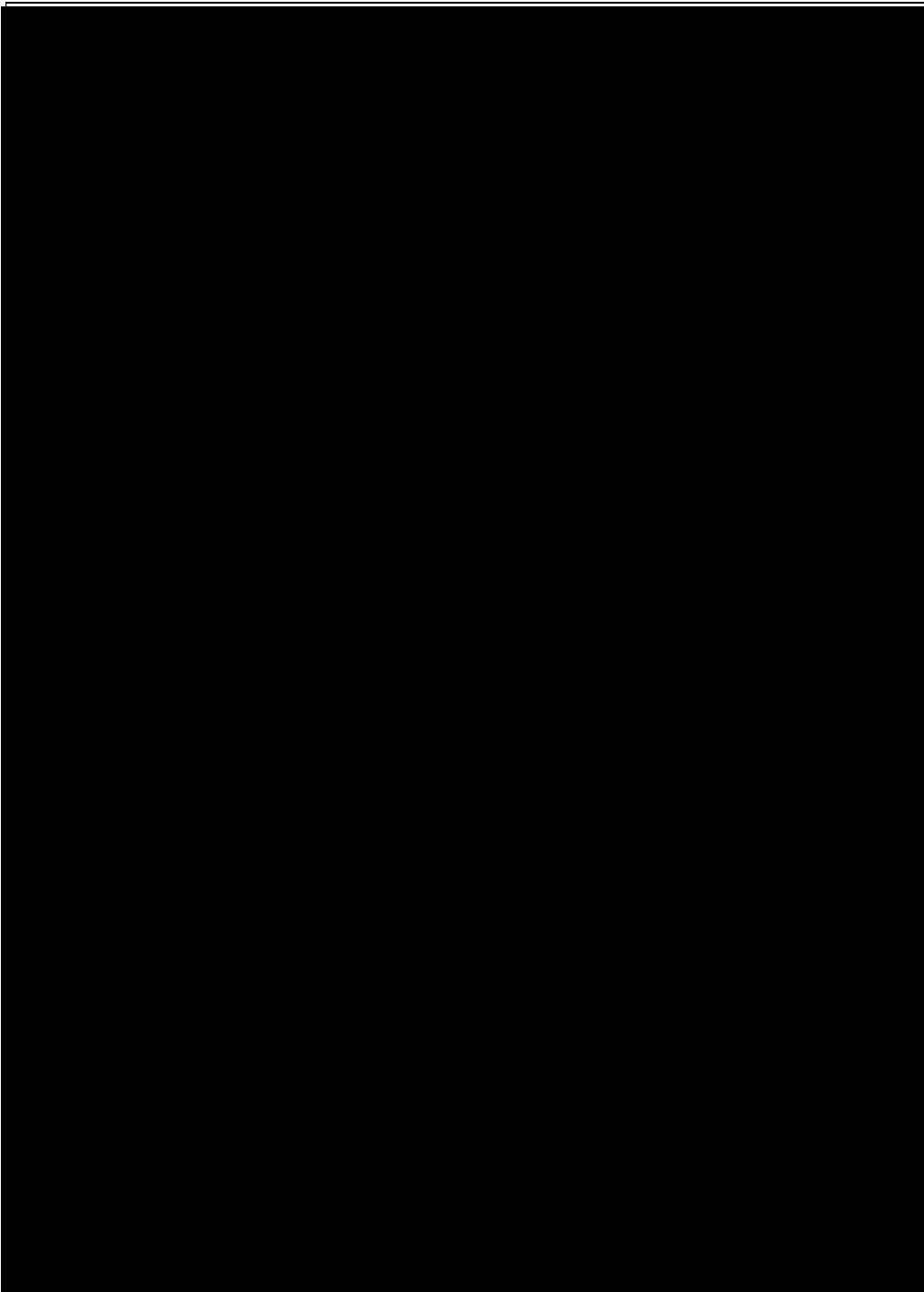
i. a transceiver/  
amplifier section  
electrically coupled  
to said transceiver  
radio module for  
amplifying and

further transmitting  
the converted pre-  
video signal,  
and for receiving  
and amplifying  
video and audio  
signals transmitted  
by another party;

j. a digital signal  
processor  
electrically coupled  
to said transceiver  
radio module and  
said

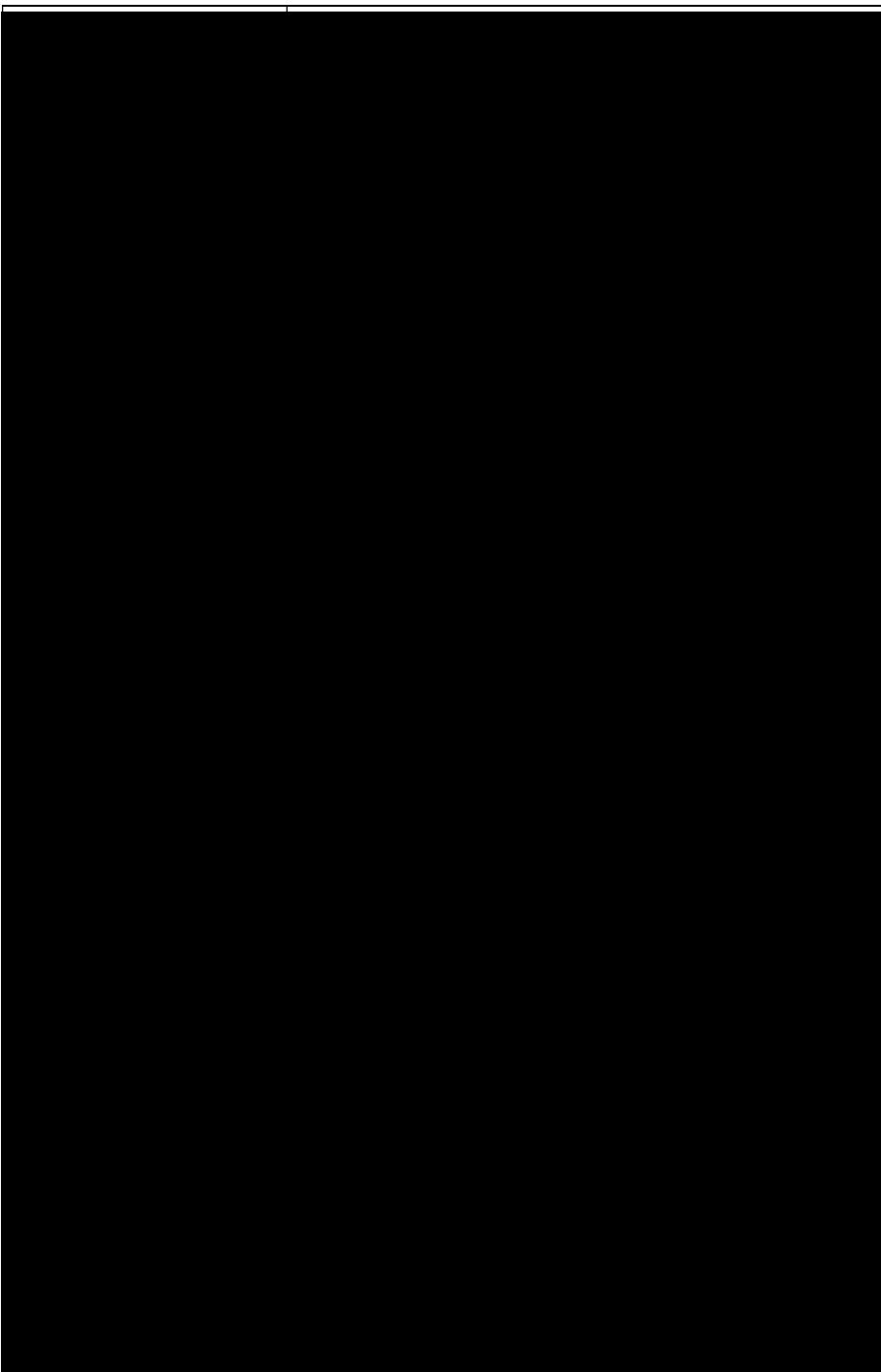


transceiver/amplifier  
section,



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k. said digital signal processor further conditioning said converted pre-video signal which is first conditioned by said



first circuit board,  
and also for  
conditioning video  
and audio signals  
received by said  
transceiver/  
amplifier section  
from the other party

k. a microphone  
electrically  
communicating with  
said digital signal  
processor for  
recording sound and  
converting the sound  
to audio signals;

1. a speaker  
electrically  
communicating with  
said digital signal  
processor for  
broadcasting audio  
signals;

m. a video view screen attached to said PDA, said video view screen for selectively displaying selectively displaying video images from said image device, and for selectively displaying video images received by said transceiver/amplifier section from the other party;

n. a video switch communicating with said first circuit board and said digital signal processor for switching video images to be viewed on said video view screen; and

o. a power supply mounted to said

PDA for providing  
power thereto.

