

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:19-cv-00438-CMA-MEH

CELLECT, LLC, a Colorado Limited Liability Company,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., a Korean corporation, and  
SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation,

Defendants.

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**PARTIES' JOINT CLAIM CONSTRUCTION CHART**

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Pursuant to the Court's June 10, 2019 Scheduling Order, Plaintiff Cellect, LLC and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively "Defendants") submit their Joint Claim Construction Chart, attached as Exhibit 1, identifying for the Court the terms and phrases of the claims in issue, agreed constructions for certain terms, and each party's proposed construction of the disputed claim language with citations to the intrinsic and extrinsic evidence in support of their respective proposed constructions.

The Asserted Patents are attached as Exhibits A-2–A-11: U.S. Patent Nos.: 6,043,839 (the '839 Patent"), 6,275,255 ("the '255 Patent"), 6,424,369 ("the '369 Patent"), 6,452,626 ("the '626 Patent"), 6,862,036 ("the '036 Patent"), 6,982,740 ("the '740 Patent"), 6,982,742 ("the '742 Patent"), 7,002,621 ("the '621 Patent"), ("the '052 Patent"), 9,198,565 ("the '565 Patent"), and 9,667,896 ("the '896 Patent").

The following table is an index of the exhibits for the patents and file histories:

<b>Ex.</b>	<b>Evidence</b>
<b>Asserted Patents and Related Patents</b>	
A-1	U.S. Pat. No. 5,929,901
A-2	U.S. Pat. No. 6,043,839
A-3	U.S. Pat. No. 6,275,255
A-4	U.S. Pat. No. 6,424,369
A-5	U.S. Pat. No. 6,452,626
A-6	U.S. Pat. No. 6,862,036
A-7	U.S. Pat. No. 6,982,740
A-8	U.S. Pat. No. 6,982,742
A-9	U.S. Pat. No. 7,002,621
A-10	U.S. Pat. No. 9,186,052
A-11	U.S. Pat. No. 9,198,565
A-12	U.S. Pat. No. 9,667,896
A-13	U.S. Pat. No. 5,986,693
<b>File Histories of the Asserted Patents and Related Patents</b>	
B-1	File History for U.S. Pat. No. 5,929,901
B-2	File History for U.S. Pat. No. 6,043,839
B-3	File History for U.S. Pat. No. 6,275,255
B-4	File History for U.S. Pat. No. 6,424,369
B-5	File History for U.S. Pat. No. 6,452,626
B-6	File History for U.S. Pat. No. 6,862,036
B-7	File History for U.S. Pat. No. 6,982,740
B-8	File History for U.S. Pat. No. 6,982,742

<b>Ex.</b>	<b>Evidence</b>
B-9	File History for U.S. Pat. No. 7,002,621
B-10	File History for U.S. Pat. No. 9,186,052
B-11	File History for U.S. Pat. No. 9,198,565
B-12	File History for U.S. Pat. No. 9,667,896

The parties' identification of intrinsic and extrinsic evidence is preliminary. The parties base this disclosure on information currently known by and available to them. The parties reserve the right to amend, modify, and/or supplement their identification of intrinsic and extrinsic evidence to take into account additional information that comes to light, including without limitation as additional contentions are made, facts are ascertained, analyses are made, and proposed constructions are provided. Further, the parties reserve the right to rely on the intrinsic and extrinsic evidence identified by opposing parties to support their constructions. .

Additionally, the parties reserve the right to rely on expert testimony regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '839, '255, '565, '052, '896, '740, '742, '621, '626, '036, and '369 Patents, in view of the claim language, the drawings, the written description, the specifications of the '839, '255, '565, '052, '896, '740, '742, '621, '626, '036, and '369 Patents as a whole, the file histories of the '839, '255, '565, '052, '896, '740, '742, '621, '626, '036, and '369 Patents, and the extrinsic evidence. Plaintiff will rely on the Expert Testimony of Dr. Michael Lebby. Defendants will rely on the Expert Testimony of Dr. Dean Neikirk.

Respectfully submitted this 8<sup>th</sup> day of May 2020.

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2020, a true and correct copy of the foregoing document was filed with the Clerk of the Court using CM/ECF system.

By: /s/ Jonathan S. Caplan  
Jonathan S. Caplan

Attorneys for Plaintiff  
Collect, LLC

**Exhibit 1**

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
1	<p>"a pre-video signal"</p> <p>('839 Patent: Claims 1, 28; '255 Patent: Claims 1, 8; '565 Patent: Claims 1, 31; '052 Patent: Claims 1, 2, 3; '896 Patent: Claims 1, 21; '740 Patent: Claims 1, 13; '369 Patent: Claims 1, 17, 49, 55, 61; '626 Patent: Claims 1, 33, 58, 64; '036 Patent: Claims 1, 33; '742 Patent: Claims 22, 42, 58, 66; '621 Patent: Claims 25, 29, 33)</p>	<p>"An image signal electrically transmitted from the image sensor"</p> <p><u>Intrinsic Evidence</u></p> <p><b>A-1:</b> '901 Col. 2: ll. 60-64; Col. 9: ll. 52-57; Claims 1 and 5</p> <p><b>A-2:</b> '839 Col. 3: ll. 62-67; Col. 11: ll. 1-7</p> <p><b>A-3:</b> '255 Col. 3: ll. 66 – Col. 4: ll. 4; Col. 11: ll. 6-12</p> <p><b>A-4:</b> '369 Col. 4: 46-51; Col. 13: 53-59</p> <p><b>A-5:</b> '626 Col. 4: ll. 26-31; Col. 12: ll. 38-44</p> <p><b>A-6:</b> '036 Col. 4: ll. 33-38; Col. 12: ll. 43-49</p> <p><b>A-7:</b> '740 Col. 4: ll. 52-57;</p>	<p>"an analog image signal transmitted by the image sensor"</p> <p><u>Evidence</u></p> <p><b>'839 Patent:</b></p> <p><b><u>2:34-61;</u></b></p> <p>See also '255 patent, at 2:38-65; '565 patent, 2:57-3:17; '052 Patent, 2:57-3:17; '896 Patent, 2:60-3:21; '740 Patent, 2:45-3:5; '742 patent, 2:46-3:6; '621 patent, 2:44-3:5; '626 patent, 2:39-67; '036 patent, 2:45-3:6; '369 patent, 2:40-67.</p> <p><b><u>2:62-3:7;</u></b></p> <p>See also '255 patent, 2:66-3:11; '565 patent, 3:18-30; '052 patent, 3:18-30; '896 Patent, 3:22-34; '740 Patent, 3:6-18; '742 patent, 3:36-45; '621 patent, 3:35-44; '626 patent, 3:29-39; '036 patent, 3:36-45; '369 patent, 3:30-39.</p> <p><b><u>6:61-66;</u></b></p>

<sup>1</sup> The parties' citation in a patent includes the same portion in any related patent. The parties reserve the right to rely on any figure referenced in the identified portions of the specifications.

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
		<p>Col. 14: ll. 4-10</p> <p><b>A-8:</b> '742 Col. 4: ll. 52-57; Col. 14: ll. 4-10</p> <p><b>A-9:</b> '621 Col. 4: ll. 42-46; Col. 15: ll. 43-47</p> <p><b>A-10:</b> '052 Col. 4: ll. 11-15; Col. 13: ll. 33-39</p> <p><b>A-11:</b> '565 Col. 4: ll. 11-15; Col. 13: ll. 33-39</p> <p><b>A-12:</b> '896 Col. 4: ll. 23-28; Col. 4: ll. 48-54</p> <p><b>B-1:</b> '901 7/27/1998 Office Action and Response 12/09/1998 Office Action and Response</p> <p><b>B-2:</b> '839 3/8/1999 Office Action and Response</p>	<p>See also '839 Patent, Fig 4; ' 255 patent, 6:66:-7:7, Fig. 4; '565 patent, 9:25-31, Fig. 4; '052 Patent, 9:25-31, Fig. 4; '896 Patent, 9:35-40, Fig. 4; '740 Patent, 9:64-10:2, Fig. 4; '742 patent, 9:53-58, Fig. 9; '621 patent, 9:21-26, Fig. 9; 626 patent, 7:66-8:4, Fig. 7; '036 patent, 8:4-9, Fig. 7; '369 patent, 8:32-37, Fig. 7.</p> <p><b><u>Figs. 1a and 1b:</u></b></p> <p>See also 839 Patent, Figs. 1a and 1b; '255 patent, Figs. 1a and 1b; '565 patent, Figs. 1a and 1b; '052 Patent, Figs. 1a and 1b; '896 Patent, Figs. 1a and 1b; '740 Patent, Figs. 1a and 1b; '742 patent, Figs. 1 and 1a; '621 patent, Figs. 1 and 1a; 626 patent, Figs. 1 and 1a; '036 patent, Figs. 1 and 1a; '369 patent, Figs. 1 and 1a.</p> <p><b><u>Fig. 4a:</u></b></p> <p>See also '839 Patent, Fig 4a; ' 255 patent, Fig. 4a; '565 patent, Fig. 4a; '052 Patent, Fig. 4a; '896 Patent, Fig. 4a; '740 Patent, Fig. 4a; '742 patent, Fig. 9a; '621 patent, Fig. 9a; 626 patent, Fig. 7a; '036 patent, Fig. 7a; '369 patent, Fig. 7a.</p>



#	Terms (Claims)	Cellec's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p><b><u>12:5-13;</u></b></p> <p>See also '255 Patent, 12:10-18; '565 Patent, 14:35-43; '052 patent, 14:35-43; '896 patent, 14:52-60; '740 Patent, 15:8-16.</p> <p><b><u>12:47-64:</u></b></p> <p>See also '839 Patent, Figs. 5a-5e; '255 patent, 12:52-63, Fig. 5a-5e; '565 patent, 15:7-19, Figs. 5a-5e; '052 Patent, 15:7-19, Figs. 5a-5e; '896 Patent, 15:26-37, Figs. 5a-5e; '740 Patent, 15:50-61, Figs. 5a-5e; 742 patent, 18:11-23, Figs. 10a-10e; '621 patent, 17:7-20, Figs. 10a-103; '626 patent, 14:1-12, Figs. 8a-8e; '036 patent, 14:6-17, Figs. 8a-8e; '369 patent, 15:18-29, Figs. 8a-8e.</p> <p><b><u>13:9-13;</u></b></p> <p>See also '255 patent, 13:14-18; '565 patent, 15:36-40; '052 patent, 15:36-40; '896 patent, 15:55-59; '740 Patent, 16:13-16; '742 patent, 18:42-48; '621 patent, 17:39-46; '626 patent, 14:30-37; '036 patent, 14:35-43; '369 patent, 15:48-53.</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p><b><u>Fig. 5b:</u></b></p> <p><i>See also</i> Fig. 4b, 5:23-29, 8:65-9:35, 9:45-47, 11:1-37, 11:65-12:5, '740 Patent, Fig. 5b.</p> <p><b><u>'369 Patent:</u></b></p> <p><b><u>9:47-65:</u></b></p> <p><i>See also</i> '742 Patent, 11:2-20; '621 Patent, 10:35-57; '626 Patent, 9:9:27; '036 Patent, 9:15-33.</p>
2	<p>"a first signal produced by said image sensor"</p> <p>('036 Patent: Claim 17)</p>	<p>"An image signal electrically transmitted from the image sensor"</p> <p><u>Intrinsic Evidence</u></p> <p><b>A-1:</b> '901 Col. 2: ll. 60-64; Col. 9: ll. 52-57; Claims 1 and 5</p> <p><b>A-6:</b> '036 Col. 4: ll. 33-38; Col. 12: ll. 43-49</p> <p><b>B-1:</b> '901 7/27/1998 Office Action and Response 12/09/1998 Office Action and Response</p> <p><b>B-2:</b> '839 3/8/1999 Office Action and Response</p>	<p>"an analog image signal produced by the image sensor"</p> <p><u>Evidence</u></p> <p><b><u>'036 Patent:</u></b></p> <p><b><u>6:20-23; 6:46-47; 7:54-8:6.</u></b></p> <p><i>See also</i> the evidence cited for term 1 ("pre-video signal"), above.</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
3	<p>"a first circuit board lying in a second plane" ('839 Patent: Claim 1; '255 Patent: Claim 1; '740 Patent: Claim 1; '742 Patent: Claim 42; '626 Patent: Claim 1; '369 Patent: Claims 1, 49, 55; '036 Patent: Claim 1)</p> <p>"said circuit board lying in a second plane" ('839 Patent: Claim 28)</p> <p>"a first circuit board residing on a second plane" ('626 Patent: Claim 33)</p> <p>"a first circuit board ... residing on a second plane" ('036 Patent: Claim 17)</p> <p>"wherein said length and width of said second circuit board define a second plane" ('565 Patent: Claim 1; '052 Patent: Claims 1, 2; '896 Patent: Claim 1)</p> <p>"wherein said length and width of said first circuit board define a second plane" ('052 Patent: Claim 3)</p> <p>"wherein said length and width of said circuit board define a second plane" ('565 Patent: Claim 31; '896 Patent: Claim 21)</p>	<p>Plain and ordinary meaning: The term "plane" should be given its plain and ordinary meaning. The words preceding "plane" require no construction and those claim phrases should also be given their plain and ordinary meaning.</p> <p><u>Intrinsic Evidence</u></p> <p><b>A-1:</b> '901 Abstract; Figs. 2b, 3b; Col. 2: ll. 3-8; Col. 3: ll. 11-21; Col. 6: ll. 22-50 Col. 7: ll. 33-40;</p> <p><b>A-2:</b> '839 Abstract; Fig. 2b; Claims 4 and 28; Col. 7: ll. 26-54</p> <p><b>A-3:</b> '255 Abstract; Fig. 2b; Claim 4; Col. 7: ll. 31-59</p> <p><b>A-4:</b> '369 Col. 9: ll. 12-23</p> <p><b>A-6:</b> '036 Col. 8: ll. 49-60</p>	<p>"a first circuit board placed in a stacked arrangement with the image sensor," or in the alternative, this term is indefinite ('839 Patent: Claim 1; '255 Patent: Claim 1; '740 Patent: Claim 1; '742 Patent: Claim 42; '626 Patent: Claim 1; '369 Patent: Claims 1, 49, 55; '036 Patent: Claim 1)</p> <p>"said circuit board placed in a stacked arrangement with the array of CMOS pixels," or in the alternative, this term is indefinite ('839 Patent: Claim 28)</p> <p>"a first circuit board placed in a stacked arrangement with the image sensor," or in the alternative, this term is indefinite ('626 Patent: Claim 33)</p> <p>"a first circuit board placed in a stacked arrangement with the image sensor," or in the alternative, this term is indefinite ('036 Patent: Claim 17)</p> <p>"said second circuit board placed in a stacked arrangement with the image sensor," or in the alternative, this term is indefinite ('565 Patent: Claim 1; '052 Patent: Claims 1, 2; '896 Patent: Claim 1)</p> <p>"said first circuit board placed in a stacked arrangement with the planar substrate," or in the alternative, this term is indefinite ('052 Patent: Claim 3)</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
	<p>"said circuitry means for timing and control placed ... on a second plane" ('742 Patent: Claim 58; '621 Patent: Claim 25)</p> <p>"said circuitry means for timing and control placed ... on a second plane" ('626 Patent: Claims 58 )</p> <p>"said circuitry means for timing and control being placed ... on a second plane" ('626 Patent: Claims 64; '036 Patent: Claim 33)</p> <p>"wherein said length and width of said second circuit board define a third plane" (052 Patent: Claim 3)</p> <p>"a first circuit board ... lying in a third plane" ('742 Patent: Claim 58; '626 Patent: Claims 58, 64)</p> <p>"a first circuit board lying in a third plane" ('621 Patent: Claim 25; '036 Patent: Claim 33)</p>	<p><b>A-10:</b> '052 Fig. 2b; Col. 5: ll. 26-36; Col. 9: ll. 65- Col. 10: ll. 13 Col. 11: ll. 2-8;</p> <p><b>A-11:</b> '565 Fig. 2b; Col. 5: ll. 26-36; Col. 9: ll. 65- Col. 10: ll. 13 Col. 11: ll. 2-8;</p> <p><b>A-12:</b> '896 Col. 10: ll. 12-18</p>	<p>"said circuit board placed in a stacked arrangement with the image sensor," or in the alternative, this term is indefinite ('565 Patent: Claim 31; '896 Patent: Claim 21)</p> <p>"said circuitry means for timing and control placed in a stacked arrangement with the image sensor," or in the alternative, this term is indefinite ('742 Patent: Claim 58; '621 Patent: Claim 25)</p> <p>"said circuitry means for timing and control placed in a stacked arrangement with the image sensor," or in the alternative, this term is indefinite ('626 Patent: Claims 58, 64; '036 Patent: Claim 33)</p> <p>"said second circuit board placed in a stacked arrangement with the planar substrate and the first circuit board," or in the alternative, this term is indefinite (052 Patent: Claim 3)</p> <p>"a first circuit board placed in a stacked arrangement with the image sensor and the circuitry means for timing and control," or in the alternative, this term is indefinite ('742 Patent: Claim 58; '626 Patent: Claims 58, 64)</p> <p>"a first circuit board placed in a stacked arrangement with the image sensor and</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>the circuitry means for timing and control," or in the alternative, this term is indefinite ('621 Patent: Claim 25; '036 Patent: Claim 33)</p> <p><u>Evidence</u></p> <p><b><u>'839 Patent:</u></b></p> <p><b><u>Abstract:</u></b></p> <p>See also '255 Patent, Abstract.</p> <p><b><u>3:8-13;</u></b></p> <p>See also '255 Patent, 3:12-17; '052 Patent, 3:31-37; '565 Patent, 3:31-37; '896 Patent, 3:27-4:54; '740 Patent, 3:19-24.</p> <p><b><u>4:14-17;</u></b></p> <p>See also '255 Patent, 4:18-21; '052 Patent, 5:26-29; '565 Patent, 5:26-29; '896 Patent, 5:27-57, 6:5-17; 8:59-9:1, '740 Patent, 5:4-7.</p> <p><b><u>7:26-27;</u></b></p> <p>See also '255 Patent, 7:31-32, Fig. 2b; '052 Patent, 9:58-59, Fig. 2b; '565 Patent,</p>

#	Terms (Claims)	Cellekt's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>9:58-59, Fig. 2b; '896 Patent, 10:1-29, Fig. 2b; '740 Patent, 10:29-30, Fig. 2b.</p> <p><b><u>Fig. 2b:</u></b></p> <p><b><u>8:37-40;</u></b></p> <p>See also '255 Patent, 8:42-45, Fig. 3b; '052 Patent, 11:1-5, Fig. 3b; '565 Patent, 11:2-5, Fig. 3b; '896 Patent, 11:1-19, 12:12-35, 13:1-13, Fig. 3b; '740 Patent, 11:40-43, Fig. 3b.</p> <p><b><u>Fig. 3b:</u></b></p> <p>See also 3:1-4:54, 5:36-6:37, 7:26-54, 8:21-44; '896 Patent, 16:34-44, 17:39-54.</p> <p><b><u>'742 Patent:</u></b></p> <p><b><u>4:12-17;</u></b></p> <p>See also '621 Patent, 3:40-62, 4:14-21; '626 Patent, 3:52-57; '036 Patent, 3:59-63; '369 Patent, 4:6-11.</p> <p><b><u>5:60-63:</u></b></p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>See <i>also</i> '621 Patent, 5:36-61; '626 Patent, 4:46-49; '036 Patent, 4:52-55; '369 Patent, 4:6-11.</p> <p><b><u>7:26-29;</u></b></p> <p>See <i>also</i> '621 Patent, 6:42-45; '626 Patent, 5:39-42; '036 Patent, 5:45-48; '369 Patent, 6:24-27.</p> <p><b><u>10:5-11;</u></b></p> <p>See <i>also</i> '621 Patent, 9:39-45; '626 Patent, 8:16-22; '036 Patent, 8:21-27; '369 Patent, 8:51-57.</p> <p><b><u>10:17-21;</u></b></p> <p>See <i>also</i> '621 Patent, 9:51-55; '626 Patent, 8:28-32; '036 Patent, 8:33-37; '369 Patent, 8:63-67.</p> <p><b><u>10:28-33;</u></b></p> <p>See <i>also</i> '621 Patent, 9:61-67; '626 Patent, 8:38-43; '036 Patent, 8:43-48; '369 Patent, 9:6-11.</p> <p><b><u>10:34-45;</u></b></p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>See <i>also</i> '621 Patent, 10:1-12; '626 Patent, 8:44-55; '036 Patent, 8:49-60; '369 Patent, 9:12-22.</p> <p><b><u>15:56-6;</u></b></p> <p>See <i>also</i> '621 Patent, 14:55-62; 626 Patent, 11:50-57; '036 Patent, 11:55-62; '369 Patent, 12:65-13:5.</p> <p><b><u>16:1-8;</u></b></p> <p>See <i>also</i> '621 Patent, 14:32-15:6, Figs. 1 and 1a; '626 Patent, 11:62-12:2, Figs. 1 and 1a; '036 Patent, 11:67-12:7, Figs. 1 and 1a; '369 Patent, 13:10-16, Figs. 1 and 1a.</p> <p><b><u>Figs. 1 and 1a:</u></b></p> <p>See <i>also</i> 3:42-4:4, 4:17-40, 5:52-6-9, 10:7-48, 14:14-15:4, 15:46-16:8; '621 Patent, 5:36-60, 6:41-45, 9:39-10:15, 13:10-15:7,</p> <p><b><u>'626 Patent:</u></b></p> <p><b><u>Abstract:</u></b></p>



#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>See <i>also</i> '036 Patent, Abstract; '369 Patent, Abstract.</p> <p>Complaint (ECF. No. 1), ¶¶ 15, 18, 21, 24, 27, 49.</p> <p><i>Collect LLC v. HTC America, Inc.</i>, 13-cv-02604-CMA-KLM, ECF No. 1, ¶¶ 8, 11, 14 (D. Colo. Sep. 23, 2013)</p>
4	<p>"stacked arrangement"</p> <p>('565 Patent: Claim 31; '052 Patent: Claims 2, 3)</p>	<p>"Placed directly or indirectly above or below"</p> <p><u>Intrinsic Evidence</u></p> <p><b>A-1:</b> '901 Abstract; Fig. 3b; Col. 2: ll. 3-8; Col. 3: ll. 11-21; Col. 7: ll. 33-40;</p> <p><b>A-10:</b> '052 Fig. 2b; Col. 5: ll. 26-36; Col. 9: ll. 65- Col. 10: ll. 13 Col. 11: ll. 2-8;</p> <p><b>A-11:</b> '565 Fig. 2b; Col. 5: ll. 26-36; Col. 9: ll. 65- Col. 10: ll. 13</p>	<p>Plain and ordinary meaning</p> <p><u>Evidence</u></p> <p><b>'839 Patent:</b></p> <p><b><u>Abstract:</u></b></p> <p>See <i>also</i> '255 Patent, Abstract.</p> <p><b><u>3:8-13;</u></b></p> <p>See <i>also</i> '255 Patent, 3:12-17; '052 Patent, 3:31-37; '565 Patent, 3:31-37; '896 Patent, 3:35-40; '740 Patent, 3:19-24.</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
		Col. 11: ll. 2-8;	<p><b><u>4:14-17;</u></b>  <i>See also</i> 3:47-4:55.</p> <p><i>See also</i> '255 Patent, 4:18-21; '052 Patent, 5:26-29; '565 Patent, 5:26-29; '896 Patent, 5:32-35; '740 Patent, 5:4-7.</p> <p><b><u>7:26-27;</u></b></p> <p><i>See also</i> '255 Patent, 7:31-32, Fig. 2b; '052 Patent, 9:58-59, Fig. 2b; '565 Patent, 9:58-59, Fig. 2b; '896 Patent, 10:1-2, Fig. 2b; '740 Patent, 10:29-30, Fig. 2b.</p> <p><b><u>Fig. 2b:</u></b></p> <p><b><u>8:37-40;</u></b></p> <p><i>See also</i> '255 Patent, 8:42-45, Fig. 3b; '052 Patent, 11:1-5, Fig. 3b; '565 Patent, 11:2-5, Fig. 3b; '896 Patent, 11:12-15, Fig. 3b; '740 Patent, 11:40-43, Fig. 3b.</p> <p><b><u>Fig. 3b:</u></b></p> <p><i>See also:</i></p> <p><b><u>'742 Patent:</u></b></p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p><b><u>4:12-17;</u></b></p> <p>See <i>also</i> '621 Patent, 3:57-62; '626 Patent, 3:52-57; '036 Patent, 3:59-63; '369 Patent, 4:6-11.</p> <p><b><u>5:60-63;</u></b></p> <p>See <i>also</i> '621 Patent, 5:44-47; '626 Patent, 4:46-49; '036 Patent, 4:52-55; '369 Patent, 4:6-11.</p> <p><b><u>7:26-29;</u></b></p> <p>See <i>also</i> '621 Patent, 6:42-45; '626 Patent, 5:39-42; '036 Patent, 5:45-48; '369 Patent, 6:24-27.</p> <p><b><u>10:5-11;</u></b></p> <p>See <i>also</i> '621 Patent, 9:39-45; '626 Patent, 8:16-22; '036 Patent, 8:21-27; '369 Patent, 8:51-57.</p> <p><b><u>10:17-21;</u></b></p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>See <i>also</i> '621 Patent, 9:51-55; '626 Patent, 8:28-32; '036 Patent, 8:33-37; '369 Patent, 8:63-67.</p> <p><b><u>10:28-33;</u></b></p> <p>See <i>also</i> '621 Patent, 9:61-67; '626 Patent, 8:38-43; '036 Patent, 8:43-48; '369 Patent, 9:6-11.</p> <p><b><u>10:34-45;</u></b></p> <p>See <i>also</i> '621 Patent, 10:1-12; '626 Patent, 8:44-55; '036 Patent, 8:49-60; '369 Patent, 9:12-22.</p> <p><b><u>15:56-63;</u></b></p> <p>See <i>also</i> '621 Patent, 14:55-62; 626 Patent, 11:50-57; '036 Patent, 11:55-62; '369 Patent, 12:65-13:5.</p> <p><b><u>16:1-8;</u></b></p> <p>See <i>also</i> '621 Patent, 14:67-15:6, Figs. 1 and 1a; '626 Patent, 11:62-12:2, Figs. 1 and 1a; '036 Patent, 11:67-12:7, Figs. 1 and 1a; '369 Patent, 13:10-16, Figs. 1 and 1a.</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p><b><u>Figs. 1 and 1a:</u></b></p> <p><i>See also:</i></p> <p><b><u>'626 Patent:</u></b></p> <p><b><u>Abstract:</u></b></p> <p><i>See also</i> '036 Patent, Abstract; '369 Patent, Abstract.</p> <p><i>See also</i> the evidence cited for terms 3, above.</p> <p>U.S. Patent No. 4,592,029 ("Altmann")</p> <p>"Stack" The American Heritage College Dictionary 1322 (3d ed. 1997)</p> <p>"Stack" Merriam Webster's Collegiate Dictionary 1143 (10th ed. 1997)</p>
5	<p>"longitudinally aligned with"</p> <p>('839 Patent: Claims 1, 28; '255 Patent: Claims 1)</p>	<p>"Being substantially parallel and directly or indirectly above or below"</p> <p><u>Intrinsic Evidence</u></p> <p><b>A-1:</b> '901 Abstract; Fig. 2b; Col. 6: ll. 22-50</p> <p><b>A-2:</b> '839</p>	<p>"centered with"</p> <p><u>Evidence</u></p> <p><b><u>'839 Patent:</u></b></p> <p><b><u>Abstract:</u></b></p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
		<p>Abstract; Fig. 2b; Claims 4 and 28; Col. 7: ll. 26-54</p> <p><b>A-3:</b> '255 Abstract; Fig. 2b; Claim 4; Col. 7: ll. 31-59</p>	<p><b><u>7:26-27:</u></b></p> <p><i>See also</i> '255 Patent, 7:31-32, Fig. 2b.</p> <p><b><u>7:33-51:</u></b></p> <p><b><u>Fig. 2b:</u></b></p> <p><i>See also</i> '255 Patent, 7:38-56, Fig. 2b; '565 Patent: 9:65-10:16, Fig. 2b; '052 Patent: 9:65-10:16, Fig. 2b; '896 Patent: 10:8-26, Fig. 2b.</p> <p>U.S. Patent No.6,526,653 ("Glenn")</p> <p><i>See also</i> the evidence cited for terms 3 and 4, above.</p>
6	<p>"offset from"</p> <p>('839 Patent: Claims 4, 28; '255 Patent: Claim 4; '565 Patent: Claim 1; '052 Patent: Claims 1, 3; '896 Patent: Claims 1, 21; '052 Patent: Claim 3)</p>	<p>"Not exactly aligned with"</p> <p><u>Intrinsic Evidence</u></p> <p><b>A-1:</b> '901 Col. 6: ll. 33-44</p> <p><b>A-2:</b> '839 Claims 4 and 28; Col. 7: ll. 37-48</p> <p><b>A-3:</b> '255 Claim 4; Col. 7: ll. 42-53</p> <p><b>A-4:</b> '369</p>	<p>"not centered with"</p> <p><u>Evidence</u></p> <p><b><u>'839 Patent:</u></b></p> <p><b><u>7:33-51:</u></b></p> <p><b><u>Fig. 2b:</u></b></p> <p><i>See also</i> '255 Patent, 7:38-56, Fig. 2b; '565 Patent: 9:65-10:16, Fig. 2b; '052</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
		<p>Col. 9: Il. 12-23</p> <p><b>A-6:</b> '036 Col. 8: Il. 49-60</p> <p><b>A-10:</b> '052 Col. 10: Il. 2-8</p> <p><b>A-11:</b> '565 Col. 10: Il. 2-8</p> <p><b>A-12:</b> '896 Col. 10: Il. 12-18</p>	<p>Patent: 9:65-10:16, Fig. 2b; '896 Patent: 10:8-26, Fig. 2b.</p> <p>See also the evidence cited for terms 3, 4 and 5, above.</p>
7	<p>"planar substrate"</p> <p>('565 Patent: Claim 31; '052 Patent: Claim 3; '896 Patent: Claim 21;</p>	<p>Agreed construction: "a substrate having a flat or level surface"</p>	
8	<p>"a desired video format"</p> <p>('742 Patent: Claim 22, 42, 58, 66; '621 Patent: Claims 25, 29; '626 Patent: Claims 1, 33, 58, 64; '036 Patent: Claims 1, 17, 33; '369 Patent: Claims 1, 17, 49, 55, 61)</p>	<p>"A format that may be viewed on a standard or desired video device" (applies to all claims)</p> <p><u>Intrinsic Evidence</u></p> <p><b>A-1:</b> '901 Figs. 4, 4b, 5a-5e; Col. 2: Il. 60- Col. 3: Il. 1; Col. 5: Il. 62-Col. 6: Il. 1; Col. 10: Il. 49- Col. 11: Il. 12; Col. 11: Il. 30-42</p> <p><b>A-4:</b> '369 Figs. 7, 7b, 8a-8e; Col. 4: Il. 46-55; Col. 8: Il. 35-50; Col. 14: Il. 52- Col. 15: Il. 10;</p>	<p>"a format for a video signal that is ready for directly viewing on the claimed video view screen"</p> <p>('742 Patent: claims 22, 42, 58, 66; '369 Patent: Claims 1, 17, 49, 55, 61)</p> <p>"a format for a video signal that is ready for directly viewing on the claimed video monitor"</p> <p>('621 Patent: claims 25, 29; '626 Patent: Claims 1, 33, 58, 64; '036 Patent: Claims 1, 17, 33)</p> <p><u>Evidence</u></p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
		<p>Col. 15: ll. 18-29</p> <p><b>A-5:</b> '626 Figs. 7, 7b, 8a-8e; Col. 4: ll. 26-34; Col. 8: ll. 2-15; Col. 13: ll. 34-60; Col. 14: ll. 1-12</p> <p><b>A-6:</b> '036 Figs. 7, 7b, 8a-8e; Col. 4: ll. 33-41; Col. 8: ll. 7-20; Col. 13: ll. 40-65; Col. 14: ll. 6-17</p> <p><b>A-8:</b> '742 Figs. 9, 9b, 10a-10e; Col. 4: ll. 60- Col. 5: ll. 2; Col. 9: ll. 56-Col. 10: ll. 4; Col. 17: ll. 45- Col. 18: ll. 3; Col. 18: ll. 11-23</p> <p><b>A-9:</b> '621 Figs. 9, 9b, 10a-10e; Col. 4: ll. 42-50; Col. 9: ll. 24-37; Col. 16: ll. 6-41; Col. 17: ll. 8-20</p>	<p><b>'839 Patent:</b></p> <p><b><u>3:49-53;</u></b></p> <p><b><u>3:67-4:4;</u></b></p> <p><b><u>5:23-28;</u></b></p> <p><b><u>6:66-7:5;</u></b></p> <p><b><u>8:49-53;</u></b></p> <p>See also '255 Patent, 8:54-57; '565 Patent, 11:12-15; '052 Patent, 11:12-15, '896 Patent, 11:24- 27; '740 Patent, 11:52-55.</p> <p><b><u>9:1-7:</u></b></p> <p>See also '255 Patent, 9:6-12;'565 Patent, 11:36-42; '052 Patent, 11:36-42; '896 Patent, 11:48-54; '740 Patent, 12:3-10.</p> <p><b><u>11:31-64;</u></b></p> <p><b><u>12:47-58;</u></b></p> <p><b><u>Fig. 4b:</u></b></p>



#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>See also '839 Patent, 3:49-53, 3:67-4:4, 5:23-28, 6:66-7:5, 8:49-53, 9:1-7, 11:31-64, 12:47-58, Figs. 4, 4b, 5a-5e; '255 Patent, 3:53-57, 4:4-8, 5:26-31, 7:4-10, 11:37-12:2, 12:52-63, Figs. 4, 4b, 5a-5e; '565 Patent, 4:7-11;4:24-28; 7:9-14, 9:31-37, 13:62-14:27, 15:7-19, Figs. 4, 4b, 5a-5e; '052 Patent, 4:7-11, 4:24-28; 7:9-14, 9:31-37, 13:62-14:27, 15:7-19, Figs. 4, 4b, 5a-5e; '896 Patent, 4:10-14, 4:28-32, 7:15-20, 10:40-47, 14:11-44. 15:26-37, Figs. 4, 4b, 5a-5e; '740 Patent, 4:39-43, 4:57-61, 7:65-8:3, 10:2-8, 14:35-67, 15:50-61, Figs.4, 4b, 5a-5e; '742 Patent, 4:46-51, 4:65-5:2, 8:7-12, 9:58-63, 17:8-44, 18:11-23, Figs. 1a, 9, 9b, 10a-10e; '621 Patent, 4:27-33, 4:47-50, 7:21-26, 9:26-31, 16:6-41, 17:7-20, Figs. 1a, 9, 9b, 10a-10e; '626 Patent, 4:11-17, 4:31-34, 6:1-6, 8:4-8, 13:1-34, 14:1-12, Figs. 1a, 7, 7b, 8a-8e; 036 Patent, 4:18-24, 4:38-41, 6:7:13, 8:9-14, 13:6-39, 14:6-17, Figs. 1a, 7, 7b, 8a-8e; '369 Patent, 4:32-37, 4:51-55, 6:54-59, 8:37-42, 14:16-51, 15:18-29, Figs. 1a, 7, 7b, 8a-8e.</p> <p><b><u>'742 Patent:</u></b></p> <p><b><u>6:24-31;</u></b></p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>See <i>also</i> '621 Patent, 6:10-17; '626 Patent, 5:11-18; '036 Patent, 5:17-24; '369 Patent, 5:29-36.</p> <p><b><u>6:37-43;</u></b></p> <p>See <i>also</i> '621 Patent, 6:22-29; '626 Patent, 5:19-26; '036 Patent, 5:25-32; '369 Patent, 5:38-44.</p> <p><b><u>8:7-12;</u></b></p> <p><b><u>9:58-9:63;</u></b></p> <p><b><u>9:63-10:4;</u></b></p> <p>See <i>also</i> '621 Patent, 9:31-37; '626 Patent 8:9-15; '036 Patent, 8:14-20; '369 Patent, 8:42-50.</p> <p><b><u>10:21-27;</u></b></p> <p>See <i>also</i> '621 Patent, 9:55-61; '626 Patent, 8:32-38; '036 Patent, 8:37-43; '369 Patent, 8:67-9:6.</p> <p><b><u>10:28-33;</u></b></p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>See <i>also</i> '621 Patent, 9:61-67; '626 Patent, 8:38-43; '036 Patent, 8:43-48; '369 Patent, 9:6-11.</p> <p><b><u>11:5-16;</u></b></p> <p>See <i>also</i> '621 Patent, 10:38-52; '626 Patent, 9:13-28; '036 Patent, 9:18-29; '369 Patent, 9:50-61.</p> <p><b><u>14:8-13;</u></b></p> <p>See <i>also</i> '621 Patent, 13:3-9.</p> <p><b><u>14:14-25;</u></b></p> <p>See <i>also</i> '621 Patent, 13:10-21.</p> <p><b><u>14:37-43;</u></b></p> <p>See <i>also</i> '621 Patent, 13:34-40; '626 Patent, 10:39-45; '036 Patent, 10:33-39; '369 Patent, 11:49-55.</p> <p><b><u>17:36-43;</u></b></p> <p><b><u>17: 53-18:3;</u></b></p>

#	Terms (Claims)	Cellest's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>See <i>also</i> '621 Patent, 16:50-67; '626 Patent, 13:46-60; '036 Patent, 13:48-65; '369 Patent, 12:60-15:10.</p> <p><b><u>18:11-17:</u></b></p> <p><b><u>18:17-23:</u></b></p> <p><b><u>19:6-9:</u></b></p> <p>'621 Patent, 18:4-7; '626 Patent, 14:62-65; '036 Patent, 15:1-6; '369 Patent, 16:12-15.</p> <p><b><u>Fig. 1a:</u></b></p> <p>See <i>also</i> '742 Patent, Figs. 1 and 1a; '621 Patent, Figs. 1 and 1a; '626 Patent, Figs. 1 and 1a; '036 Patent, Figs. 1 and 1a; '369 Patent, Figs. 1 and 1a.</p> <p><b><u>Fig. 4:</u></b></p> <p><b><u>Fig. 8:</u></b></p> <p>'742 Patent, Fig. 4 and 8; '621 Patent, Figs. 6 and 8; '626 Patent, Fig. 6; '036 Patent, Fig. 6; '369 Patent, Fig. 4.</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p><b>'621 Patent:</b></p> <p><b><u>Figs. 6 and 8:</u></b></p> <p>See also 10:38-52, 5:11-29</p>
9	<p>"transceiver/amplifier section"</p> <p>('742 Patent: Claim 66; '626 Patent: Claim 33, 64; '369 Patent: Claim 61)</p>	<p>"Circuitry including a transceiver function and an amplifying function"</p> <p>In the alternative, plain and ordinary meaning</p> <p><u>Intrinsic Evidence</u></p> <p><b>A-4:</b> '369 Fig. 4; Col. 10: ll. 6-54</p> <p><b>A-5:</b> '626 Fig. 6; Col. 9: ll. 35-62</p> <p><b>A-8:</b> '742 Fig. 8; Col. 11: ll. 27-65</p>	<p>"component including a transceiver and amplifier"</p> <p><u>Evidence</u></p> <p><b><u>'742 Patent:</u></b></p> <p><b><u>7:35-41;</u></b></p> <p>See also '369 Patent: 6:32-37</p> <p><b><u>7:60-64;</u></b></p> <p><b><u>11:28-35;</u></b></p> <p>See also '369 Patent, 10:6-12.</p> <p><b><u>11:41-45:</u></b></p> <p>See also '369 Patent, 10:18-22.</p> <p><b><u>11:49-55:</u></b></p> <p>See also '369 Patent, 10:26-31.</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p><b><u>11:59-65:</u></b></p> <p><i>See also</i> '369 Patent: 10:36-42.</p> <p><b><u>11:67-12:4:</u></b></p> <p><i>See also</i> '369 Patent, 10:44-48.</p> <p><b><u>13:1-19;</u></b></p> <p><b><u>13:47-14:13;</u></b></p> <p><b><u>14:14-25;</u></b></p> <p><b><u>14:43-47;</u></b></p> <p><b><u>Fig. 4:</u></b></p> <p><i>See also</i> '369 Patent, Fig. 4.</p> <p><b><u>Figs. 8 and 8a</u></b></p> <p><b><u>'621 Patent:</u></b></p> <p><b><u>6:62-65; 7:6-11; 10:65-11:6; 11:10-16;</u></b>  <b><u>11:21-25; 11:61-12:1; 12:43-13:9;</u></b>  <b><u>13:10-21; 13:40-45; Figs 6, 8, 8a.</u></b></p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p><b><u>'626 Patent:</u></b></p> <p><b><u>5:59-61;</u></b></p> <p><i>See also</i> '036 Patent, 5:59-61.</p> <p><b><u>9:35-44;</u></b></p> <p><i>See also</i> '036 Patent, 9:41-50.</p> <p><b><u>9:47-53;</u></b></p> <p><i>See also</i> '036 Patent, 9:53-59.</p> <p><b><u>9:58-62;</u></b></p> <p><i>See also</i> '036 Patent, 9:64-10:1</p> <p><b><u>Fig. 6:</u></b></p> <p><i>See also</i> '036 Patent, Fig. 6.</p> <p><i>See also</i> 742 Patent: Claims 1, 9, 10, 18, 20, 21, 22, 24, 25, 27, 29, 30, 32, 34, 35, 37, 39, 40, 42, 44, 45, 46, 48, 49, 50, 52, 53, 54, 56, 57, 58, 60, 61, 62, 64, 65, 66, 68, 69, 70, 72, 73, 74, 76, 77. '621 Patent: Claims 1, 3, 4, 5, 7, 8, 9, 11, 12, 13, 15, 16, 17, 19, 20, 21, 23, 24, 25, 27, 28, 29, 31, 32, 33, 35, 36, 37, 39, 40, 41,</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			43, 44, 45, 47, 48, 49, 51, 52, 53, 55, 56; '626 Patent: Claims 33, 61, 64. '369 Patent: Claims 33, 61, 64.
10	<p>"circuitry means for converting said pre-video signal to a post-video signal for direct reception by a standard video device" ('839 Patent: Claim 1)</p> <p>"circuitry means for receiving said pre-video signal, and for converting said pre-video signal to a post-video signal which may be received by a standard video device" ('839 Patent: Claim 28)</p> <p>"circuitry means for converting said pre-video signal to a post-video signal for reception by a standard video device" ('255 Patent: Claim 1)</p> <p>"circuitry means for receiving said pre-video signal from said pre-video conductor and for converting said pre-video signal to a post-video signal which may be received by a standard video device" ('255 Patent: Claim 8):</p> <p>"circuitry means for converting said pre-video signal to a post-video signal for reception by a standard video device" ('740 Patent: Claim 1)</p>	<p>Each term is a means-plus-function term governed by 35 U.S.C. § 112(6).</p> <p>Agreed Structure for '839, '255, '740 Patents: processing circuitry in Fig. 4b or in Figs. 5a-5e.</p> <p>Agreed Structure for '742, '621 patents: processing circuitry in Fig. 9b or in Figs. 10a-10e</p> <p>Agreed Structure for '626, '036, '369 patents: processing circuitry in Fig. 7b or in Figs. 8a-8e.</p> <p><b>Function:</b> "conditioning of the pre-video signal to place it in a form that may be viewed on a standard video device" (applies to all claims)</p> <p><u>Intrinsic Evidence</u>  <b>A-1:</b> '901  Col. 5: ll. 59- Col. 6: ll. 1;  Col. 6: ll. 22-33;  Col. 7: ll. 61- Col. 8: ll. 3;</p>	<p>Each term is a means-plus-function term governed by 35 U.S.C. § 112(6).</p> <p>Agreed Structure for '839, '255, '740 Patents: processing circuitry in Fig. 4b or in Figs. 5a-5e.</p> <p>Agreed Structure for '742, '621 patents: processing circuitry in Fig. 9b or in Figs. 10a-10e</p> <p>Agreed Structure for '626, '036, '369 patents: processing circuitry in Fig. 7b or in Figs. 8a-8e.</p> <p><b>'839 Patent</b>  <b>Function:</b>  "converting said pre-video signal to a post-video signal for direct reception by a standard video device" ('839 Patent: Claim 1)  "receiving said pre-video signal, and for converting said pre-video signal to a post-video signal which may be received by a</p>



#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
	<p>"circuitry means for receiving said pre-video signal from said image sensor and for converting said pre-video signal to a post-video signal which may be received by a standard video device" ('740 Patent: Claim 13)</p> <p>"circuitry means for converting said pre-video signal to a desired video format" ('742 Patent: Claim 22)</p> <p>"circuitry means for processing and converting said pre-video signal to a desired video format" ('742 Patent: Claims 42, 58, 66)</p> <p>"circuitry means for processing and converting said pre-video signal to a desired video format" ('621 Patent: Claims 25, 29)</p> <p>"circuitry means for converting said pre-video signal to a desired video format" ('626 Patent: Claims 1, 33)</p> <p>"circuitry means for processing and converting said pre-video signal to a desired video format" ('626 Patent: Claims 58, 64)</p> <p>"circuitry means for converting said pre-video signal to a desired video format" ('036 Patent: Claims 1)</p>	<p>Col. 9: ll. 13-16; Col. 10: ll. 15-35</p> <p><b>A-2:</b> '839 Col. 6: ll. 63 - Col. 7: ll. 5; Col. 7: ll. 26-37; Col. 8: ll. 65 - Col. 9: ll. 7; Col. 10: ll. 17-20; Col. 11: ll. 31-51</p> <p><b>A-3:</b> '255 Col. 7: ll. 1-10; Col. 7: ll. 31-42; Col. 9: ll. 3-12; Col. 10: ll. 22-25; Col. 11: ll. 36-57</p> <p><b>A-4:</b> '369 Col. 8: ll. 35-50 Col. 8: ll. 53- Col. 9: ll. 11; Col. 11: ll. 46-55; Col. 12: ll. 38-41; Col. 14: ll. 16-36</p> <p><b>A-5:</b> '626 Col. 8: ll. 2-15; Col. 8: ll. 18-43; Col. 10: ll. 31-39; Col. 11: ll. 23-26; Col. 13: ll. 1-20</p> <p><b>A-6:</b> '036 Col. 8: ll. 7-20;</p>	<p>standard video device" ('839 Patent: Claim 28)</p> <p><b>'255 Patent</b> <b>Function:</b> "converting said pre-video signal to a post-video signal for reception by a standard video device" ('255 Patent: Claim 1) "receiving said pre-video signal from said pre-video conductor and for converting said pre-video signal to a post-video signal which may be received by a standard video device" ('255 Patent: Claim 8)</p> <p><b>'740 Patent</b> <b>Function:</b> "converting said pre-video signal to a post-video signal for reception by a standard video device" ('740 Patent: Claim 1) "receiving said pre-video signal from said image sensor and for converting said pre-video signal to a post-video signal which may be received by a standard video device" ('740 Patent: Claim 13)</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
	<p>"circuitry means . . . for converting said first signal to a desired video format" ('036 Patent: Claim 17)</p> <p>"circuitry means for processing and converting said pre-video signal to a desired video format" ('036 Patent: Claims 33, 35)</p> <p>"circuitry means for converting said pre-video signal to a desired video format" ('369 Patent: Claim 1, 17)</p> <p>"circuitry means for processing and converting said pre-video signal to a desired video format" ('369 Patent: Claims 49, 55, 61)</p>	<p>Col. 8: Il. 22-48; Col. 10: Il. 36-45; Col. 11: Il. 28-31; Col. 13: Il. 6-25</p> <p><b>A-7: '740</b> Col. 9: Il. 66- Col. 10: Il. 8; Col. 10: Il. 29-40; Col. 12: Il. 1-10; Col. 13: Il. 20-23; Col. 14: Il. 35-55</p> <p><b>A-8: '742</b> Col. 9: Il. 56- Col. 10: Il. 4; Col. 10: Il. 17-33; Col. 14: Il. 34-43; Col. 15: Il. 29-32; Col. 17: Il. 8-30</p> <p><b>A-9: '621</b> Col. 9: Il. 24-38; Col. 9: Il. 44-67; Col. 13: Il. 31-40; Col. 14: Il. 28-31; Col. 16: Il. 6-26</p>	<p><b>'742 Patent</b> <b>Function:</b> "converting said pre-video signal to a desired video format" (742 Patent: Claim 22); "processing and converting said pre-video signal to a desired video format" ('742 Patent: Claims 42, 58, 66)</p> <p><b>'621 Patent</b> <b>Function:</b> "processing and converting said pre-video signal to a desired video format" ('621 Patent: Claims 25, 29)</p> <p><b>'626 Patent</b> <b>Function:</b> "converting said pre-video signal to a desired video format" ('626 Patent: Claims 1, 5, 11, 33, 34) "processing and converting said pre-video signal to a desired video format" ('626 Patent: Claims 58, 64)</p> <p><b>'036 Patent</b> <b>Function:</b> "converting said pre-video signal to a desired video format" ('036 Patent: Claims 1, 2, 6), "converting said first signal to a desired video format" ('036 Patent: Claims 17)</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>"processing and converting said pre-video signal to a desired video format" ('036 Patent: Claims 33, 35);</p> <p><b><u>'369 Patent</u></b>  <b>Function:</b>  "converting said pre-video signal to a desired video format" ('369 Patent: Claim 1, 17)  "processing and converting said pre-video signal to a desired video format" ('369 Patent: Claims 49, 55, 61)</p> <p><u>Evidence</u></p> <p><b><u>'839 Patent</u></b>  '839 Patent, 3:49-53, 3:67-4:4, 5:23-28, 6:66-7:5, 11:31-64, 12:47-58, Figs 4b and 5a-5e; <i>see also</i> 8:49-53; 9:1-7:</p> <p><b><u>'255 Patent</u></b>  '255 Patent, 3:53-57, 4:4-8, 5:26-31, 7:4-10, 11:37-12:2, 12:52-58, Figs. 4b and 5a-5e; <i>see also</i> 8:54-57; 9:6-12.</p> <p><b><u>'740 Patent</u></b>  <i>See</i> '740 Patent, 4:39-43, 4:57-61, 7:65-8:3, 10:2-8, 14:35-67, 15:50-61, Figs. 4b and 5a-5e; <i>see also</i> 11:52-55; 12:3-10.</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p><b><u>'742 Patent</u></b>  See '742 Patent, 4:46-51, 4:65-5:2, 8:7-12, 9:58-63, 17:8-44, 18:11-17, Figs. 9b and 10a-10e; <i>see also</i> 6:24-31; 6:37-43; 9:63-10:4; 10:21-27; 10:28-33; 11:5-16; 14:8-13; 14:14-25; 14:37-43; 17: 53-18:3; 18:17-23; 19:6-9; Figs. 1 and 1a; Fig. 4; Fig. 8.</p> <p><b><u>'621 Patent</u></b>  See '621 Patent, 4:27-33, 4:47-50, 7:21-26, 9:26-31, 16:6-41, 17:7-14, Figs. 9b and 10a-10e; <i>see also</i> 6:10-17; 6:22-29; 9:31-37; 9:55-61; 9:61-67; 10:38-52; 13:3-9; 13:10-21; 13:34-40; 16:50-67; 18:4-7; Figs. 1 and 1a; Figs. 6 and 8.</p> <p><b><u>'626 Patent</u></b>  See '626 Patent, 4:11-17, 4:31-34, 6:1-6, 8:4-8, 13:1-34, 14:1-7, Figs. 7b and 8a-8e; <i>see also</i> 5:11-18; 5:19-26; 8:9-15; 8:32-38; 8:38-43; 9:13-28; 10:39-45; 13:46-60; 14:62-65; Figs. 1 and 1a; Fig. 6.</p> <p><b><u>'036 Patent</u></b>  See '036 Patent, 4:18-24, 4:38-41, 6:7:13, 8:9-14, 13:6-39, 14:6-12, Figs. 7b and 8a-8e; <i>see also</i> 5:17-24; 5:25-32; 8:14-20; 8:37-43; 8:43-48; 9:18-29;</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>10:33-39; 13:48-65; 15:1-6; Figs. 1 and 1a; Fig. 6.</p> <p><b>'369 Patent</b>  See '369 Patent, 4:32-37, 4:51-55, 6:54-59, 8:37-42, 14:16-51, 15:18-29, Figs. 7b and 8a-8e; see also 5:29-36; 5:38-44; 8:42-50; 8:67-9:6; 9:6-11; 9:50-61; 11:49-55; 14:60-15:10; 16:12-15; Figs. 1 and 1a; Fig. 4.</p> <p>See also the evidence cited for term 8, above.</p>
11	<p>"timing and control circuitry"</p> <p>('565 Patent: Claims 1, 31; '052 Patent: Claims 1, 2, 3; '896 Patent: Claims 1, 21)</p>	<p>Agreed construction: "the electronic components which control the release of the image signal from the pixel array"</p>	
12	<p>"timing and control means,"</p> <p>and</p> <p>"circuitry means . . . for timing and control"</p> <p>('839 Patent: Claim 28)</p>	<p><b>Function:</b> "controlling release of the image signal from the pixel array" (applies to all claims)</p> <p><u>Intrinsic Evidence</u>  <b>A-1:</b> '901  Col. 3: ll. 1-4;  Col. 9: ll. 17-21  <b>A-2:</b> '839  Col. 4: ll. 4-7;</p>	<p><b>'839 Patent</b></p> <p><b>Function:</b></p> <p>"timing and control the array of CMOS pixels" ('839 Patent: Claim 1)</p> <p>"controlling the release of information from the array of CMOS pixels . . . producing a pre-video signal" (839 Patent: Claim 28)</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
	<p>('839 Patent: Claim 1; '255 Patent: Claims 1, 8; '740 Patent: Claims 1, 13; '742 Patent: Claims 22, 42, 58, 66; '621 Patent: Claim 25, 29; '626 Patent: Claims 1, 33, 58, 64; '036 Patent: Claims 1, 17, 33; '369 Patent: Claims 1, 17, 49, 55, 61)</p>	<p>Col. 10: ll. 33-36</p> <p><b>A-3:</b> '255 Col. 4: ll. 8-11; Col. 10: ll. 38-40</p> <p><b>A-4:</b> '369 Col. 4: ll. 55-58; Col. 13: ll. 18-20</p> <p><b>A-5:</b> '626 Col. 4: ll. 34-38; Col. 12: ll. 3-5</p> <p><b>A-6:</b> '036 Col. 4: ll. 41-45 Col. 12: ll. 8-10</p> <p><b>A-7:</b> '740 Col. 4: ll. 61-64; Col. 13: ll. 36-38</p> <p><b>A-8:</b> '742 Col. 5: ll. 2-55; Col. 16: ll. 9-11</p> <p><b>A-9:</b> '621 Col. 4: ll. 50-54; Col. 15: ll. 8-11</p> <p>Structure for '839, '255, '740 Patents: timing circuitry in Fig. 4a (excluding boxes 90, 44, and 46)</p>	<p><b>Structure:</b> "Timing and Control Circuits" box 92 shown in Fig. 4a</p> <p><b>'255 Patent</b></p> <p><b>Function:</b> timing and control of the array of pixels ('255 Patent: Claims 1 and 8)</p> <p><b>Structure:</b> "Timing and Control Circuits" box 92 shown in Fig. 4a</p> <p><b>'740 Patent</b></p> <p><b>Function:</b>  timing and control of the array of pixels. ('740 Patent: Claims 1, 13)</p> <p><b>Structure:</b> "Timing and Control Circuits" box 92 shown in Fig. 4a</p> <p><b>'742 Patent</b></p> <p><b>Function:</b>  timing and control of the array of pixels ('742 Patent: Claims 22, 42, 58, 66)</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
		<p>Structure for '369, '626, '036 Patents: timing circuitry in Fig. 7a (excluding boxes 90, 44, and 46)</p> <p>Structure for '742 and '621 Patents: timing circuitry in Fig. 9a (excluding boxes 90, 44, and 46)</p> <p><u>Intrinsic Evidence</u></p> <p><b>A-1:</b> '901 Col. 8: ll. 56- Col. 10: ll. 14</p> <p><b>A-2:</b> '839 Col. 9: ll 60- Col. 11: ll. 30</p> <p><b>A-3:</b> '255 Col. 9: ll. 65 – Col. 11: ll. 35</p> <p><b>A-4:</b> '369 Col. 12: ll. 13- Col. 14: ll. 15</p> <p><b>A-5:</b> '626 Col. 10: ll. 65- Col. 12: ll. 67</p> <p><b>A-6:</b> '036 Col. 11: ll. 3- Col. 13: ll. 5</p> <p><b>A-7:</b> '740 Col. 12: ll. 63- Col. 14: ll. 34</p> <p><b>A-8:</b> '742</p>	<p><b>Structure:</b> "Timing and Control Circuits" box 92 in Fig. 9a.</p> <p><b>'621 Patent</b></p> <p><b>Function:</b> timing and control of the array of pixels ('621 Patent: Claims 25, 29)</p> <p><b>Structure:</b> "Timing and Control Circuits" box 92 in Fig. 9a</p> <p><b>'626 Patent</b></p> <p><b>Function:</b> timing and control of the array of CMOS pixels ('626 Patent: Claims 1, 33, 58, 64)</p> <p><b>Structure:</b> "Timing and Control Circuits" box 92 in Fig. 7a</p> <p><b>'036 Patent</b></p> <p><b>Function:</b> timing and control of the array of CMOS pixels (036 Patent: Claims 1, 17, 33)</p> <p><b>Structure:</b> "Timing and Control Circuits" box 92 in Fig. 7a</p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
		<p><b>A-9:</b> '621 Col. 14: ll. 3- Col. 16: ll. 5</p>	<p><b><u>'369 Patent</u></b></p> <p><b>Function:</b> timing and control of the array of CMOS pixels ('369 Patent: Claims 1, 17, 49, 55, 61)</p> <p><b>Structure:</b> "Timing and Control Circuits" box 92 in Fig. 7a</p> <p><u>Evidence</u></p> <p><b><u>'839 Patent</u></b> '839 Patent, 4:4-7, 9:60-62, 10:33-35, Fig. 4a</p> <p><b><u>'255 Patent</u></b> '255 Patent, 4:8-11, 9:65-67, 10:38-40, Fig. 4a</p> <p><b><u>'740 Patent</u></b> 740 Patent, 4:61-64, 12:63-65, 13:36-38, Fig. 4a</p> <p><b><u>'742 Patent</u></b> '742 Patent, 5:2-5, 15:4-6, 16:9-11, Fig. 9a</p> <p><b><u>'621 Patent</u></b> '621 Patent, 4:50-54, 14:3-5, 15:8-10, Fig. 9a</p>



#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p><b><u>'626 Patent</u></b> '626 Patent, 4:34-38, 10:65-67, 12:3-5, Fig. 7a</p> <p><b><u>'036 Patent</u></b> '036 Patent, 4:41-45, 11:3-5, 12:8-10, Fig. 7a</p> <p><b><u>'369 Patent</u></b> '369 Patent, 4:55-58, 12:13-15, 13:18-20, Fig. 7a</p> <p>"Active-Pixel Image Sensor Integrated With Readout Circuits" NASA Tech Briefs (Oct. 1996), produced at SAM-438_00184114-00184120</p>
13	<p>"said image sensor has a generally square shape"</p> <p>('565 Patent: Claim 32; '052 Patent: Claims 1, 7)</p> <p>"the image sensor is generally square shape" ('896 Patent: Claims 1, 21)</p>	<p>"Square for the most part"</p> <p><u>Extrinsic evidence</u> <b>C-1:</b> The American Heritage College Dictionary (3<sup>rd</sup> Edition) entries for 'generally'</p> <p><b>C-2:</b> WO 00/44276 Fig. 5; Col. 14: ll. 1-7; Col. 18: ll. 15-19</p>	<p>"said image sensor has a square shape" or, in the alternative, this term is indefinite.</p> <p><u>Evidence</u></p> <p><b><u>'839 Patent:</u></b> <b><u>6:38-43;</u></b></p>

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			<p>'565 Patent, 9:3-8, Figs. 1a and 1b; '052 Patent, 9:3-8, Figs. 1a and 1b; '896 Patent, 9:12-17, Figs. 1a and 1b</p> <p><b><u>Figs. 1a and 1b:</u></b></p> <p><b><u>5:5-8;</u></b></p> <p>See also '255 Patent, 5:8-10, Fig. 2b; '052 Patent, Fig. 2b, 6:59-61; '565 Patent, , 6:59-61, Fig. 2b; '896 Patent, 6:65-67, Fig. 2b; '740 Patent, 7:48-50, Fig. 2b</p> <p><b><u>7:26-27;</u></b></p> <p>See also '255 Patent, 7:31-32, Fig. 2b; '052 Patent, 9:58-59, Fig. 2b; '565 Patent, 9:58-59, Fig. 2b; '896 Patent, 10:1-2, Fig. 2b.</p> <p><b><u>Fig. 2b:</u></b></p> <p>"Generally" The American Heritage College Dictionary 485 (3d ed. 1997)</p> <p>"Generally" Merriam Webster's Collegiate Dictionary 567 (10th ed. 1997)</p>
14	"time select switch"	"Feature for selectively varying integration periods to produce an image of desired brightness"	"Switch for selectively varying integration periods to produce an image of desired brightness"

#	Terms (Claims)	Collect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
	('740 Patent: Claims 1, 13)	<p><u>Intrinsic Evidence</u></p> <p><b>A-7:</b> '740 Title Abstract Figs. 9 and 10; Col. 1: ll. 20-23; Col. 3: ll. 37-40; Col. 5: ll. 28- Col. 6: ll. 54; Col. 8: ll. 29-34; Col. 16: ll. 47- Col. 17: ll. 8; Col. 18: ll. 49- Col. 19: ll. 57; Col. 20: ll. 48-59</p> <p><b>A-13:</b> '693 Col. 12: ll. 13-65</p>	<p><u>Evidence</u></p> <p><b>'740 Patent:</b></p> <p><b><u>6:6-17; 6:33-39; 6:43-54; 19:37-57; Fig. 10.</u></b></p> <p><b><u>'740 Patent File History:</u></b></p> <p><b><u>Jan. 5, 2000 Office Action, at 2-8, 10-12;</u></b></p> <p><b><u>Apr. 25, 2000 Amendment;</u></b></p> <p><b><u>Apr. 25, 2000 Response, at 11-13.</u></b></p> <p>"Switch" The American Heritage College Dictionary 1373 (3d ed. 1997)</p> <p>"Switch" Merriam Webster's Collegiate Dictionary 1193 (10th ed. 1997)</p> <p>"Switch" Nell Sclater, McGraw-Hill Dictionary of Electronics 454 (6th ed. 1997)</p> <p>"Component" The American Heritage College Dictionary 285 (3d ed. 1997)</p>

#	Terms (Claims)	Cellect's Proposed Construction	Samsung's Proposed Construction <sup>1</sup>
			"Component" Merriam Webster's Collegiate Dictionary 236 (10th ed. 1997)  "Component" Nell Sclater, McGraw-Hill Dictionary of Electronics 91 (6th ed. 1997)