

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

NIPPON TELEGRAPH AND TELEPHONE)
CORPORATION and ESSENTIAL WIFI) C.A. No. 1:20-cv-00583-ADA
LLC,)
)
Plaintiffs,)
)
v.)
)
TEXAS INSTRUMENTS INC.,)
)
Defendant.)

NIPPON TELEGRAPH AND TELEPHONE)
CORPORATION and ESSENTIAL WIFI) C.A. No. 1:20-cv-00632-ADA
LLC,)
)
Plaintiffs,)
)
v.)
)
MEDIATEK INC. and MEDIATEK USA)
INC.,)
)
Defendants.)

NIPPON TELEGRAPH AND TELEPHONE)
CORPORATION and ESSENTIAL WIFI) C.A. No. 1:20-cv-00769-ADA
LLC,)
)
Plaintiffs,)
)
v.)
)
ACER INC. and ACER AMERICA INC.,)
)
Defendants.)

DEFENDANTS' PRELIMINARY PROPOSED CONSTRUCTIONS

NTT EX2013
MediaTek v. NTT
IPR2020-1404

Pursuant to the Court’s Order (*e.g.*, Dkt. 31 in Case No. 1:20-cv-00632-ADA, Dkt. 23 in Case No. 1:20-cv-583-ADA, Dkt. 28 in Case No. 1:20-cv-00769-ADA), Defendants Texas Instruments Inc. (“TI”), MediaTek Inc. and MediaTek USA Inc. (collectively, “MediaTek”), and Acer Inc. and Acer America Inc. (collectively, “Acer”) (all defendants collectively, “Defendants”) hereby identify their preliminary proposed claim constructions. Unless otherwise specified below, where a claim term or phrase is identified below, Defendants seek to have it construed for purposes of all asserted claims of its respective patent, and all elements of all such claims containing the claim term or phrase.

Defendants reserve the right to revise their preliminary claim constructions, particularly in response to or in consideration of proposals and positions of Plaintiffs Nippon Telegraph and Telephone Corporation and Essential WiFi, LLC (collectively, “Plaintiffs”) concerning claim construction, validity, and/or infringement, and/or in response to the ongoing meet and confer process concerning claim construction.

U.S. Patent No. 7,280,551

Claim Term Identified for Construction	Defendants’ Preliminary Proposed Construction
“transmitting a plurality of wireless packets simultaneously”	at least this quoted portion of the preamble is limiting and should be given its plain meaning
“multiple wireless channels” / “wireless channels”	distinct frequency regions used to transmit different wireless packets
“mandatory channel”	plain meaning

U.S. Patent No. 7,400,616

Claim Term Identified for Construction	Defendants' Preliminary Proposed Construction
“transmitting a plurality of data packets simultaneously”	at least this quoted portion of the preamble is limiting and should be given its plain meaning
“data packets”	plain meaning

U.S. Patent No. 7,545,781

Claim Term Identified for Construction	Defendants' Preliminary Proposed Construction
“simultaneously transmitting . . . a plurality of wireless packets”	at least this quoted portion of the preamble is limiting and should be given its plain meaning
“multiple wireless channels” / “wireless channels”	distinct frequency regions used to transmit different wireless packets
“paired wireless channel other than”	channel that would be affected by leakage from the transmitting wireless channel
“predetermined time Ts”	a transmission inhibition time that is defined by a received packet during transmission of a wireless packet; alternatively, indefinite
“setting, by said transmit-side STA, time (Tmax+Ts) as transmission inhibition time to a paired wireless channel . . . , the transmission inhibition time used in the virtual carrier sense”	setting the virtual carrier sense transmission inhibition time for the paired wireless channel in the transmit-side STA to (Tmax+Ts)
“a virtual carrier sense unit of said transmit-side STA setting time (Tmax+Ts) as transmission inhibition time to a paired wireless channel”	a virtual carrier sense unit of said transmit-side STA setting the virtual carrier sense transmission inhibition time for the paired wireless channel in the transmit-side STA to (Tmax+Ts)

U.S. Patent No. 7,242,720

Claim Term Identified for Construction	Defendants' Preliminary Proposed Construction
“the OFDM signal transmitting device comprises at least an interference canceller among an inverse matrix computer, the interference canceller, and a pilot signal generator”	the OFDM signal transmitting device comprises at least an interference canceller operating in connection with an inverse matrix computer and a pilot signal generator
“the OFDM signal receiving device comprises at least an inverse matrix computer and an interference canceller among the inverse matrix computer, the interference canceller and a pilot signal generator”	the OFDM signal receiving device comprises at least an inverse matrix computer and an interference canceller operating in connection with a pilot signal generator
“the OFDM signal receiving device comprises at least an inverse matrix computer among the inverse matrix computer and a pilot signal generator”	the OFDM signal receiving device comprises at least an inverse matrix computer operating in connection with a pilot signal generator
“interference canceller”	plain meaning

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Respectfully submitted,

/s/ Kevin Jones

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of November, 2020, I served the foregoing electronically to all counsel of record.

/s/ Ognjen Zivojnovic
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