

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

NIPPON TELEGRAPH AND
TELEPHONE CORPORATION and
ESSENTIAL WIFI LLC,

Plaintiffs,

v.

MEDIATEK INC. AND
MEDIATEK USA INC.

Defendants.

C. A. No. 1:20-cv-00632-ADA

JURY TRIAL DEMANDED

NIPPON TELEGRAPH AND
TELEPHONE CORPORATION and
ESSENTIAL WIFI LLC,

Plaintiffs,

v.

ACER INC. AND
ACER AMERICA INC,

Defendants.

C. A. No. 1:20-cv-00769-ADA

JURY TRIAL DEMANDED

NIPPON TELEGRAPH AND
TELEPHONE CORPORATION and
ESSENTIAL WIFI LLC,

Plaintiffs,

v.

TEXAS INSTRUMENTS INC.,

Defendant.

C.A. No. 1:20-cv-00583-ADA

JURY TRIAL DEMANDED

**PLAINTIFFS' PROPOSED DEFINITIONS FOR CLAIM TERMS FOR
CONSTRUCTION**

Pursuant to the Court's Scheduling Order dated September 9, 2020 (Dkt. 31), Plaintiffs Nippon Telegraph and Telephone Corp. and Essential WiFi, LLC hereby provide the attached list of proposed constructions for claim terms that the parties have exchanged for construction in the asserted claims of U.S. Patent Nos. 7,280,551 ("the '551 Patent"), No. 7,545,781 ("the '781 Patent"), No. 7,400,616 ("the '616 Patent"), and No. 7,242,720 ("the '720 Patent").

The following disclosure is based on information currently available to Plaintiffs. Plaintiffs reserve the right to amend their proposed constructions in response to Defendants' proposed constructions and/or as part of the meet-and-confer process provided under the local rules and the Court's Scheduling Order. Plaintiffs further reserve the right to further modify, amend, or supplement these disclosures in any other manner consistent with the Federal Rules of Civil Procedure and the Court's rules.

Preliminary Claim Constructions

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

Claim Term	Proposed Construction
“mandatory channel”	“one of several frequency ranges provided between two STAs, whose busy/idle state determines whether there is transmission regardless of idle state of the other available channels”
“wireless channels”	“frequency ranges provided to transmit packets”
“multiple wireless channels”	“multiple frequency ranges provided to transmit packets”
“transmitting a plurality of wireless packets simultaneously”	The claim term speaks for itself and should be construed as plain meaning; usage in preamble is not limiting.

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

Claim Term	Proposed Construction
“wireless channels”	“frequency ranges provided to transmit packets”
“multiple wireless channels”	“multiple frequency ranges provided to transmit packets”
“paired wireless channel other than”	The claim term speaks for itself and should be construed as plain meaning
“predetermined time Ts”	“amount of time that is defined before the duration of a data transmission is known”
“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”	The claim term speaks for itself and should be construed as plain meaning
“a virtual carrier sense unit of said transmit-side STA setting time (Tmax+Ts) as transmission inhibition time to a paired wireless channel”	The claim term speaks for itself and should be construed as plain meaning
“simultaneously transmitting . . . a plurality of wireless packets”	The claim term speaks for itself and should be construed as plain meaning; usage in preamble is not limiting.

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

Claim Term	Proposed Construction
“data packet”	“a unit of data that is transmitted over a wireless medium”
“transmitting a plurality of data packets simultaneously”	“data packet” construed as above; remainder of the claim term speaks for itself and should be construed as plain meaning; usage in preamble is not limiting.

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

Claim Term	Proposed Construction
“interference canceller”	“a device, embodied in software and/or hardware, designed to reduce effects of unwanted signals or noise on a desired signal”
“the OFDM signal transmitting device comprises at least an interference canceller among an inverse matrix computer, the interference canceller, and a pilot signal generator”	“interference canceller” construed as above; remainder of the claim term speaks for itself and should be construed as plain meaning.
“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”	“interference canceller” construed as above; remainder of the claim term speaks for itself and should be construed as plain meaning.
“the OFDM signal receiving device comprises at least an inverse matrix computer among the inverse matrix computer and a pilot signal generator”	Claim term speaks for itself and should be construed as plain meaning.

Dated: November 3, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2020, I electronically served the foregoing document *via* electronic mail to all counsel of record.

/s/ Steven R. Daniels

Steven R. Daniels