

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

FUNDAMENTAL INNOVATION SYSTEMS  
INTERNATIONAL LLC,

*Plaintiff,*

vs.

LG ELECTRONICS, INC., et al.,

*Defendants.*

Case No. 2:16-CV-01425-JRG-RSP  
LEAD CASE

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FUNDAMENTAL INNOVATION SYSTEMS  
INTERNATIONAL LLC,

*Plaintiff,*

vs.

HUAWEI DEVICE USA, INC. and HUAWEI  
DEVICE CO., LTD.,

*Defendants.*

Case No. 2:16-CV-01424-JRG-RSP

**DEFENDANTS' RESPONSIVE CLAIM CONSTRUCTION BRIEF**

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