

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

VLSI TECHNOLOGY LLC,
Plaintiff,

v.

INTEL CORPORATION,
Defendant.

C.A. No. 18-966 (CFC)

JOINT CLAIM CONSTRUCTION CHART

In accordance with Paragraph 8(a) of the Scheduling Order (D.I. 40), Plaintiff VLSI Technology LLC ("VLSI") and Defendant Intel Corporation ("Intel") respectfully file this Joint Claim Construction Chart setting forth the parties' proposed claim construction positions for certain terms and phrases in U.S. Patent Nos. 7,523,331 (the "'331 patent"), 7,246,027 (the "'027 patent"), 6,212,633 (the "'633 patent"), and 7,247,552 (the "'552 patent").

Attached as Exhibit A is a chart identifying: (1) the disputed terms/phrases; (2) each party's proposed construction of the disputed claim language; and (3) citation(s) only to the intrinsic evidence in support of the parties' respective proposed constructions. *See* D.I. 40 ¶ 8(a). Additionally, text searchable .PDF copies of the '331, '027, '633, and '552 patents are attached as Exhibits B through E,

and those portions of the prosecution histories cited by either party are attached as Exhibits F through CC. The Exhibits are organized as follows:

- Exhibit B '331 Patent
- Exhibit C '027 Patent
- Exhibit D '633 Patent
- Exhibit E '552 Patent
- Exhibit F '331 Patent File History Excerpt: 2006-03-14 Transmittal of New Application
- Exhibit G '331 Patent File History Excerpt: 2007-08-03 Examiner Search History
- Exhibit H '331 Patent File History Excerpt: 2007-08-08 Office Action
- Exhibit I '331 Patent File History Excerpt: 2007-11-06 Amendment and Response to Office Action
- Exhibit J '331 Patent File History Excerpt: 2008-01-23 Office Action
- Exhibit K '331 Patent Citation: Olson, U.S. Patent No. 5,253,352 (cited in Exhibit B)
- Exhibit L '331 Patent Citation: Moyer et al., U.S. Patent No. 5,893,142 (cited in Exhibit B)
- Exhibit M '331 Patent Citation: Yoshida, U.S. Patent No. 5,928,365 (cited in Exhibit B)

- Exhibit N '331 Patent Citation: Hanlon et al., U.S. Patent No. 6,105,141 (cited in Exhibit B)
- Exhibit O '331 Patent Citation: Omizo et al., U.S. Patent No. 6,260,151 (cited in Exhibits B and H)
- Exhibit P '331 Patent Citation: Hamilton, U.S. Patent No. 7,058,829 (cited in Exhibits B and J)
- Exhibit Q '027 Patent File History Excerpt: 2006-03-20 Office Action
- Exhibit R '027 Patent File History Excerpt: 2006-06-20 Response to Office Action
- Exhibit S '027 Patent File History Excerpt: 2006-09-06 Office Action
- Exhibit T '027 Patent Citation: Rostoker, et al., U.S. Patent No. 5,563,928 (cited in Exhibits C, Q, and S)
- Exhibit U '633 Patent File History Excerpt: 2000-06-05 Office Action
- Exhibit V '633 Patent File History Excerpt: 2000-09-05 Amendment and Response to Office Action
- Exhibit W '633 Patent File History Excerpt: 2000-11-30 Notice of Allowability
- Exhibit X '633 Patent Citation: Anderson, Don, FireWire System Architecture: IEEE 1394, First Edition. Addison Wesley, MindShare. Inc., 1998 (cited in Exhibit D)
- Exhibit Y '633 Patent Citation: IEEE, Std 1394–1995 IEEE Standard for a High Performance Serial Bus, 1996, IEEE (cited in Exhibit D)
- Exhibit Z '552 Patent File History Excerpt: 2005-01-11 Transmittal of New Application

Exhibit AA '552 Patent File History Excerpt: 2007-01-24 Office Action

Exhibit BB '552 Patent File History Excerpt: 2007-04-05 Amendment and Response to Office Action

Exhibit CC '552 Patent Citation: Shiue et al. U.S. Patent No. 5,923,088 (cited in Exhibit E)

In addition to the intrinsic materials disclosed, each party reserves the right to rely on other portions of the specifications and prosecution histories of the '331, '027, '633, and '552 patents during claim construction briefing and argument, including evidence cited by the opposing party in support of its proposed constructions.

Dated: May 3, 2019

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