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

JAWBONE INNOVATIONS, LLC,	§	Case No. 2:21-cv-00186-JRG
Plaintiff,	§	**JURY TRIAL DEMANDED**
v.	§	
SAMSUNG ELECTRONICS CO. LTD. and SAMSUNG ELECTRONICS AMERICA, INC.,	§	
Defendants.	§	

JAWBONE INNOVATIONS, LLC'S
OPENING CLAIM CONSTRUCTION BRIEF

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A. “a signal processor coupled with the first and second microphone signals and operative … to apply a varying linear transfer function between the first and second microphone signals” (’357 Patent, claim 1) / “a processing component … applying a varying linear transfer function between the acoustic signals” (’080 Patent, claim 14) 5

B. “response [to speech/noise]” / “linear response [to speech/noise]” (’357 Patent, claims 1, 15, and 17; ’080 Patent, claims 1, 7, 9, and 14; ’691 Patent, claim 1, 3-7, 23-34, and 41-45) 8

C. “an adaptive noise removal application coupled to . . . and generating” (’080 Patent, claims 1and 7) 10

D. “an adaptive noise removal application . . . generating denoised output signals by forming a plurality of combinations . . . by filtering and summing the plurality of combinations . . . and by a varying linear transfer function between the plurality of combinations” (’080 Patent, claims 1 and 7) 13

E. “microphone” (’543 Patent, claims 1 and 26) 15

F. “the one receiver” / “the two receivers” (’058 Patent, claim 1) 16

G. “acoustic noise” (’091 Patent, claims 1, 10, 11, and 17) 20

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Pursuant to the Court's Second Amended Docket Control Order (Dkt. 58), Plaintiff Jawbone Innovations, LLC ("Jawbone") hereby submits its Opening Claim Construction Brief. The asserted patents are U.S. Patent Nos. 8,019,091 (the "'091 Patent"), 7,246,058 (the "'058 Patent"), 10,779,080 (the "'080 Patent"), 11,122,357 (the "'357 Patent"), 8,467,543 (the "'543 Patent"), and 8,503,691 (the "'691 Patent"), (together, the "Asserted Patents").[1]

I. INTRODUCTION

Samsung ignores the disclosures of the Asserted Patents to argue that multiple, plainly understandable limitations are indefinite. Even where Samsung has proposed constructions, those constructions import limitations from the specification and attempt to limit the claims to the disclosed embodiments. The Court should reject Samsung's indefiniteness arguments and unsupported constructions and adopt Jawbone's proposals.

II. THE PATENTS IN SUIT

Jawbone is a pioneer in audio processing technology. The Asserted Patents in this case stem from the groundbreaking work of Dr. Gregory Burnett, named inventor or co-inventor on every Asserted Patent, and his co-workers. The patented inventions all generally relate to noise suppression in acoustic signal processing.

A. The '091 Patent

The '091 Patent generally relates to accomplishing noise suppression in a multiple microphone system using a Voice Activity Detector (VAD). ('091 Patent, Abstract.) The system receives acoustic signals from microphones, as well as voicing information (such as the vibration of human tissue) from the VAD. (*Id.*) By using that information, the system can generate a transfer function that characterizes the received acoustic signals, while the VAD indicates that the user is

[1] In its Election of Asserted Claims pursuant to the Court's Order Focusing Patent Claims and Prior Art (Dkt. 49), Jawbone did not elect any claims of 8,280,072 (the "'072 Patent").

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