

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

**Before the Honorable MaryJoan McNamara
Administrative Law Judge**

In the Matter of

**CERTAIN WIRELESS FRONT-END MODULES
AND DEVICES CONTAINING THE SAME**

Inv. No. 337-TA-1413

JOINT CLAIM CONSTRUCTION CHART

Pursuant to the procedural schedule in this Investigation (Order No. 10) and Ground Rule 1.14, Complainants Skyworks Solutions, Inc., Skyworks Solutions Canada, Inc., and Skyworks Global Pte. Ltd. (collectively, “Complainants”), Respondents Kangxi Communication Technologies (Shanghai) Co., Ltd., Grand Chip Labs, Inc., D-Link Corporation, D-Link Systems, Inc., and Ruijie Networks Co., Ltd. (collectively, “Respondents”), and the Commission Investigative Staff (“Staff”) submit this Joint Claim Construction Chart for the asserted claims of U.S. Patent Nos. 8,717,101 (the “101 patent”), 9,917,563 (the “563 patent”), and 9,450,579 (the “579 patent”).¹

¹ In an effort to further streamline the dispute, Complainants plan to move to partially terminate the investigation as to U.S. Patent No. 9,148,194 and its one asserted claim. Respondents and Staff have indicated they do not oppose this motion.

DISPUTED TERMS

Disputed Claim Term	Patent(s) and Claim(s)	Complainants' Proposed Construction	Respondents' Proposed Construction	Staff's Proposed Construction
“a current amplifier configured to amplify the control current to generate a correction current”	'101 patent, claims 1, 2, 10, 11, 21, 22	Plain meaning, which is “a current amplifier configured to achieve a target gain of a control current to generate a correction current”	Plain meaning, such as “a current amplifier configured to increase the control current to generate a correction current”	Plain meaning, such as “a current amplifier configured to increase the control current to generate a correction current”
“amplifying the control current using a current mirror of a current amplifier to generate a correction current”	'101 patent, claims 17, 18, 20	Plain meaning, which is “achieving a target gain of a control current, using a current mirror of a current amplifier, to generate a correction current”	Plain meaning, such as “increasing the control current using a current mirror of a current amplifier to generate a correction current”	Plain meaning, such as “increasing the control current using a current mirror of a current amplifier to generate a correction current”
“current mirror”	'101 patent, claims 1, 2, 10, 11, 17, 18, 20, 21, 22	Plain meaning, which is “one or more circuits configured to mirror a current, which can be configured to achieve a target gain, having at least two transistors with their base or gate terminals tied together”	Plain meaning, such as “one or more circuits configured to mirror a current, which can be configured to achieve a target gain”	Plain meaning, such as “one or more circuits configured to mirror a current, which can be configured to achieve a target gain”
“integrated circuit”	'563 patent, claims 14, 15, 17, 20	Plain meaning, which is “a circuit made up of multiple interconnected electronic components integrated on one or more dies”	Plain meaning, which is “a circuit made up of multiple interconnected electronic components integrated on a die”	Plain meaning, such as “a circuit made up of multiple interconnected electronic components integrated on one or more dies”

“inhibiting”	’579 patent, claim 7	Plain meaning, which is “suppressing or reducing” This term is not indefinite	Indefinite	Plain meaning, which is “suppressing or reducing” This term is not indefinite
“low-frequency”	’579 patent, claim 7	Plain meaning, which is “below the lower edge of the band containing the fundamental frequency” This term is not indefinite	Indefinite	Plain meaning, which is “below the lower edge of the band containing the fundamental frequency” This term is not indefinite

AGREED CONSTRUCTION

“a gain correction circuit configured to generate a control current in response to activation of the power amplifier enable signal and to mirror the control current to generate a correction current”	’563 patent, claims 14, 15, 17, 20	Plain meaning, which is “a circuit for gain correction of the power amplifier configured to generate a control current in response to activation of the power amplifier enable signal and to mirror the control current to generate a correction current”
“time dependent signal generator configured to shape an enable signal of the power amplifier to generate a control current” / “shaping an enable signal using a time-dependent signal generator to generate the control current”	’101 patent, claims 1, 2, 10, 11, 17, 18, 20, 21, 22	Plain meaning, which is “a circuit configured to change an enable signal of the power amplifier to achieve a desired shape of a control current, where the control current changes based on time” / “changing an enable signal using a circuit to achieve a desired shape of a control current, where the control current changes based on time”

Dated: November 27, 2024

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**IN THE MATTER OF CERTAIN WIRELESS FRONT-END MODULES AND DEVICES
CONTAINING THE SAME
Inv. No. 337-TA-1413**

CERTIFICATE OF SERVICE

I, Lanta M. Chase, hereby certify that on November 27, 2024 I caused a copy of the foregoing, **JOINT CLAIM CONSTRUCTION CHART**, to be filed and served upon the following parties as indicated below:

<p>The Honorable Lisa R. Barton Secretary U.S. International Trade Commission 500 E Street, S.W. Washington, DC 20436</p>	<p><input checked="" type="checkbox"/> Via Electronic Filing <input type="checkbox"/> Via Overnight Delivery <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via Electronic Mail</p>
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/s/ Lanta Chase

Lanta M. Chase