

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PATHWAY IP LLC

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, and UNINCORPORATED ASSOCIATIONS IDENTIFIED ON
THE ATTACHED SCHEDULE "A,"

Defendants.

Case No.: 1:24-cv-05218

Judge Franklin U. Valderrama

Magistrate Judge Jeffrey T. Gilbert

JURY TRIAL DEMAND

**PLAINTIFF’S PROPOSED CLAIM TERMS FOR CONSTRUCTION
UNDER LOCAL PATENT RULE 4.1**

Pursuant to Local Patent Rule 4.1, Plaintiff Pathway IP LLC provides the following Proposed Claim Terms for Construction. Plaintiff identifies the following claim terms and phrases, together with their proposed constructions, regarding U.S. Patent No. 7,841,729 (the '729 Patent). Plaintiff does not assert that any of the claim terms or phrases is governed by 35 U.S.C. § 112(f) (previously 35 U.S.C. § 112 ¶6). The proposed constructions below are preliminary and Plaintiff reserves the right to reconsider any proposed construction throughout the claim construction process and to submit any construction to the Court during briefing. Further, Plaintiff reserves the right to take the position that any claim term, including the terms below, do not require construction and/or should be given their plain and ordinary meaning.

Claim Term	Proposed Construction
Bulb	One or more elements that operate in unison to emit light
Circular Configuration	Plain and ordinary meaning or a relative arrangement of elements having the form of a circle
Communication terminal	An electronic device capable of sending electronic messages such as, for example, a cellular phone

Conform	Plain and ordinary meaning, or to have the same shape, outline, or contour as another element
Optimal	Plain and ordinary meaning, or desirable or satisfactory
... positionable relative to the web camera ...	Plain and ordinary meaning, or being capable of change in relative position to each other either by moving the bulb or moving the web camera
... projecting the emitted light ...	Directing scattered, spillover, or other light emitted from the bulb in a desired direction
Reflector	Plain and ordinary meaning, or an element or surface that has a surface layer that reflects at least a non-insubstantial amount of light
Toroidal	Plain and ordinary meaning, or having a shape of a toroid, <i>i.e.</i> , a surface formed by rotating a shape around an axis that lies in the same plane as the shape without intersecting the shape.
Web camera	Either a separate camera device or a camera integrated into an electronic device such as, for example, a cellular phone

DATED: April 25, 2025

Respectfully Submitted,

/s/ Benjamin A. Campbell

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 16, 2025, the foregoing PLAINTIFF'S PROPOSED CLAIM TERMS FOR CONSTRUCTION UNDER LOCAL PATENT RULE 4.1 was served on counsel of record identified in the Service List below via electronic mail:

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