

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

| | | |
|--------------------|---|----------------------------|
| MYW SEMITECH, LLC, |) | |
| |) | |
| Plaintiff, |) | |
| |) | C.A. No. 25-504-RGA-EGT |
| v. |) | |
| |) | |
| APPLE INC., |) | JURY TRIAL DEMANDED |
| |) | |
| Defendant. |) | |

APPLE INC.’S PROPOSED CONSTRUCTIONS

In accordance with the Scheduling Order in this case (D.I. 26), including as most recently amended on February 10, 2026 (*see* D.I. 78 and associated docket order), Apple Inc. (“Apple”) hereby provides the following proposed construction of U.S. Patent Nos. 11,107,768 (“’768 patent”), 11,538,763 (“’763 patent”), and 11,894,306 (“’306 patent”) to MYW Semitech, LLC (“Semitech”):

| Term | Proposed Construction |
|--|---|
| “semiconductor chip” (’768 patent claims 1, 4, 5, 16, 25; ’763 patent claims 1, 4, 5, 14; ’306 patent claims 10, 13, 14, 17) | Plain and ordinary meaning, which is “a semiconductor device comprising an IC (integrated circuit)” |

Discovery and Apple’s investigation are ongoing. Apple reserves the right to amend and/or supplement this list, including in response to Semitech’s own constructions, contentions, discovery responses, the meet and confer process, and based on subsequent discovery and/or investigation. Apple further reserves the right to supplement this disclosure in light of the positions that Semitech takes in this litigation.

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12703762 / 12209.00061

Respectfully submitted,

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