United States District Court, S.D. California.

QUALCOMM INCORPORATED, Plaintiff. v. MAXIM INTEGRATED PRODUCTS, INC, Defendants. Maxim Integrated Products, Inc, Counterclaimants. v. Qualcomm Incorporated, Counterdefendant.

No. 02CV2429-B (JMA)

Nov. 7, 2005.

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CLAIM CONSTRUCTION ORDER FOR UNITED STATES PATENT NUMBER 6,615,027

RUDI M. BREWSTER, Senior District Judge.

Before the Court is the matter of claim construction for the asserted claims of United States Patent Number 6,615,027 ("the '027 Patent") in the above-titled patent infringement action. Pursuant to Markman v. Westview Instruments, Inc., 517 U.S. 370 (1996), on April 12-13, 2005, the Court conducted a *Markman* hearing regarding construction of the disputed claim terms for the '027 Patent. Plaintiff Qualcomm, Inc. was represented by the law firm of Day, Casebeer, Madrid & Batchelder LLP, and Defendant Maxim Integrated Products, Inc. was represented by the firm of Perkins, Coie, Brown & Bain LLP.

The purpose of the Markman hearing was for the Court, with the assistance of the parties, to interpret the pertinent claims at issue in the '027 Patent. Additionally, the Court and the parties prepared a "case glossary" for this patent only, containing terms found in the claims and the specification for the '027 Patent, which are

considered to be technical in nature and which a jury of laypersons would not understand clearly without specific definition. As the case advances, the parties may request additional terms to be added to the glossary as to further facilitate the jury's understanding of the disputed claims.

After careful consideration of the parties' arguments and the applicable statutes and case law, the Court **HEREBY CONSTRUES** the claim terms in dispute in the '027 Patent and **ISSUES** the relevant jury instructions as written in Exhibit A, attached hereto. Further, the Court **HEREBY DEFINES** all pertinent technical terms as written in Exhibit B, attached hereto.

IT IS SO ORDERED.

| EXHIBIT A-UNITED | STATES PATENT | NUMBER 6.6 | 615,027-CLAIM CHART |
|------------------|---------------|------------|---------------------|
| | | | |

| Verbatim Patent Language | Court's Claim Construction |
|----------------------------------|---|
| Claim 1. | Claim 1. |
| Circuitry to generate an | Circuitry to generate an interface signal [a means of communication |
| interface signal between a first | across a boundary] between a first integrated circuit [commonly |
| integrated circuit and a second | referred to as a "chip," an integrated circuit is a combination of |
| integrated circuit comprising: | interconnected electrical components inseparably associated on or |
| | within a continuous piece of semiconductor material] and a second |
| | integrated circuit comprising [including but not limited to]: |
| | a reference circuit [a network of electrical components connected |
| provide a reference signal; | directly or indirectly] configured to provide a reference signal [a |
| | benchmark signal against which something else can be compared]; |
| an interface circuit implemented | an interface circuit implemented on the first integrated circuit and |
| on the first integrated circuit | operatively coupled [associated in such a way that power or signal |
| and operatively coupled to the | information may be transferred from one to another] to the reference |
| reference circuit, the interface | circuit, the interface circuit configured to receive the reference signal and a |
| | data input and to generate the interface signal in response thereto; and |
| reference signal and a data | |
| input and to generate the | |
| interface signal in response | |
| thereto; and | |
| a circuit element implemented | a circuit element implemented on the second integrated circuit and |
| on the second integrated circuit | |
| and operatively coupled to the | information may be transferred from one to another] to the interface |
| interface circuit, the circuit | circuit, the circuit element [a part of a circuit] configured to receive the |
| element configured to receive | interface signal and provide an output signal in response, |
| the interface signal and provide | |
| an output signal in response, | |
| - | wherein the interface signal is a differential current signal [a signal in |
| differential current signal. | which the information is conveyed through a difference in magnitude |
| | between two currents]. |
| Claim 2. | Claim 2. |
| The circuitry of claim 1, | The circuitry of claim 1, wherein the reference circuit is implemented on the |
| wherein the reference circuit is | second integrated circuit. |
| implemented on the second | |

| integrated circuit. | |
|--|---|
| Claim 3. | Claim 3. |
| | The Circuitry of claim 1, further comprising: |
| comprising: | ine cheming of championing. |
| at least one capacitor coupled | at least one capacitor [a device capable of storing energy in the form of |
| · · · | an electric field or charge] coupled between the differential current |
| signal. | signal [coupled between the two conductors that make up the |
| | differential current signal]. |
| Claim 4. | Claim 14. |
| The circuitry of claim 1, | The circuitry of claim 1, wherein the interface signal represents an analog |
| wherein the interface signal | inphase (I) or quadrature (Q) baseband signal [an analog signal is a |
| represents an analog inphase (I) | signal in which the information content is expressed via a property of |
| or quadrature (Q) baseband | the signal, such as magnitude, frequency, amplitude and/or phase; a |
| signal in a quadrature | baseband signal is a signal with a band of frequencies occupied by the |
| transmitter. | signal before it modulates the carrier (or subcarrier) frequency to form |
| | the transmitted line or radio signal; an inphase (I) baseband signal is a |
| | signal adapted to modulate an inphase carrier signal, i.e., one whose |
| | waves are synchronized in step with a timing reference; and a |
| | quadrature (Q) baseband signal is a signal adapted to modulate a |
| | quadrature phase carrier signal, i.e., one whose waves are 1/4 cycle (i.e., |
| | 90 degrees) out of synchronization with the waves of an inphase carrier |
| | signal] in a quadrature transmitter [a transmitter for transmitting |
| Claim 5. | signals that include inphase and quadrature signals]. Claim 5. |
| | |
| The circuitry of claim 1, wherein the reference signal is | The circuitry of claim 1, wherein the reference signal is a voltage related to a bandgap voltage [a voltage derived from the difference in energy |
| a voltage related to a bandgap | between two specific electron energy bands of a semiconductor]. |
| voltage. | between two specific electron energy bands of a semiconductor j. |
| Claim 6. | Claim 6. |
| The circuitry of claim 1, | The circuitry of claim 1, wherein the reference signal is a current generated |
| wherein the reference signal is | from a reference voltage and a resistor [a device whose primary function] |
| a current generated from a | is resisting current flow]. |
| reference voltage and a resistor | |
| Claim 7. | Claim 7. |
| The circuitry of claim 6, | The circuitry of claim 6, wherein the output signal is a voltage signal [a |
| wherein the output signal is a | signal in which information is conveyed through variations in voltage], |
| voltage signal, and wherein the | and wherein the resistor is external to the first and second integrated |
| resistor is external to the first | circuits. |
| and second integrated circuits. | |
| Claim 8. | Claim 8. |
| The circuitry of claim 6, | The circuitry of claim 6, wherein the output signal is a current signal [a |
| wherein the output signal is a | signal in which information is conveyed through variations in current], |
| current signal, and wherein the | and wherein the resistor is implemented on the second integrated circuit. |
| resistor is implemented on the | |
| second integrated circuit. | |
| <u></u> | Claim 9. |
| Claim 9. | |

| The circuitry of claim 6, wherein the interface circuit includes: | The circuitry of claim 6, wherein the interface circuit includes: |
|--|--|
| to provide two or more mirror paths, and | a current mirror [a circuit capable of generating a signal whose current level is proportional to the current level of another signal] configured to receive the reference signal and to provide two or more mirror paths [paths for the flow of current generated by a current mirror], and |
| a <i>switch array coupled to the</i> <i>current mirror</i> , the switching array configured to receive and decode the data input and to direct current from a set of selected mirror paths to an output of the switch array. | a <i>switch array</i> [<i>a set of switches</i>] coupled to the current mirror, the switching array configured to receive and decode the data input and to direct current from a set of selected mirror paths to an output of the switch array. |
| Claim 10. The circuitry of claim 1, wherein the data input comprises at least four bits of resolution. | Claim 10. The circuitry of claim 1, wherein the data input comprises at least four bits of resolution [the data input has a resolution range of at least 16 possible values]. |
| Claim 11. The circuitry of claim 10, wherein the data input comprises at least eight bits of resolution. | Claim 11. The circuitry of claim 10, wherein the data input comprises at least eight bits of resolution [the data input has a resolution range of at least 256 possible values]. |
| Claim 12. The circuitry of claim 1, wherein the interface circuit is oversampled by an oversampling ratio of two or greater. | Claim 12. The circuitry of claim 1, wherein the interface circuit is oversampled [having a condition in which the values, or "samples," belonging to a digital signal are processed at a rate higher than necessary to accurately represent its analog form] by an oversampling ratio [the ratio of the sampling rate of a digital signal to the rate that is necessary to accurately represent its analog form] of two or greater. |
| Claim 13. The circuitry of claim 12, wherein the oversampling ratio is 16 or greater. | Claim 13 The circuitry of claim 12, wherein the oversampling ratio is 16 or greater. |
| Claim 14. The circuitry of claim 1, wherein the circuit element is a variable gain amplifier (VGA). | Claim 14. The circuitry of claim 1, wherein the circuit element is a variable gain amplifier (VGA) [a unidirectional device that is capable of enlarging the waveform supplied to it, where the gain can be changed over a range, either continuously or in incremental steps]. |
| Claim 15. The circuitry of claim 1, wherein the circuit element is a modulator. Claim 16. The circuitry of claim 15, | Claim 15. The circuitry of claim 1, wherein the circuit element is a modulator [a device capable of combining an information signal with a carrier signal]. Claim 16. The circuitry of claim 15, wherein the modulator includes |
| The encurry of claim 15, | The encodery of claim 15, wherein the modulator includes |

| wherein the modulator includes | |
|--|--|
| a pair of current sources | a pair of current sources [a device for providing a current at a specified |
| coupled to the interface signal, | value] coupled [associated in such a way that power or signal |
| and | information may be transferred from one to another] to the interface |
| | signal [a means of communication across a boundary], and |
| a pair of cross-coupled differential amplifiers, each differential amplifier coupled to a respective current source, the differential amplifiers | a pair of cross-coupled [having the condition in which the "positive" output of one differential device is coupled to the "negative" output of another differential device, and vice versa] differential amplifiers, each differential amplifier [an amplifier whose output signal is proportional to the difference between two input signals] coupled [associated in such |
| configured to receive a carrier signal and to generate the output signal based, in part, on the carrier signal and the interface signal. | a way that power or signal information may be transferred from one to another] to a respective current source, the differential amplifiers configured to receive a carrier signal and to generate the output signal based, in part, on the carrier signal [a signal of a single frequency capable of being modulated by an information signal] and the interface signal [a means of communication across a boundary]. |
| Claim 17. | Claim 17. |
| The circuitry of claim 16, wherein each current source in the modulator provides a bias current that is related to the reference signal. | The circuitry of claim 16, wherein each current source in the modulator provides a bias current [a current delivered to a circuit or device for establishing its operating point] that is related to the reference signal. |
| Claim 18. | Claim 18. |
| A transmitter comprising the circuitry of claim 1. | A transmitter comprising the circuitry of claim 1. |
| Claim 19 | Claim 19 |
| A transmitter in a CDMA | A transmitter in a CDMA [an acronym for Code Division Multiple |
| cellular telephone comprising the circuitry of claim 1. | Access, a digital communication technique that uses codes to separate users' information] cellular telephone comprising the circuitry of claim 1. |
| Claim 20. | Claim 20. |
| Circuitry in a transmitter comprising: | Circuitry in a transmitter comprising: |
| a first interface circuit implemented on a first integrated circuit, the first interface circuit configured to receive a first data input and provide a first differential current signal; and | a first interface circuit implemented on a first integrated circuit, the first interface circuit configured to receive a first data input and provide a first differential current signal; and |
| a modulator implemented on a second integrated circuit and operatively coupled to the first interface circuit, the modulator configured to receive the first differential current signal and a carrier signal and to generate an | |

| output signal in response | |
|---|---|
| thereto. | |
| Claim 21. | Claim 21. |
| The circuitry of claim 20, | The circuitry of claim 20, further comprising: |
| further comprising: | |
| a second interface circuit implemented on the first | a second interface circuit implemented on the first integrated circuit, the second interface circuit configured to receive a second data input and |
| integrated circuit, the second | provide a second differential current signal, |
| interface circuit configured to | |
| receive a second data input and | |
| provide a second differential | |
| current signal, | |
| | wherein the modulator is further configured to receive the second |
| configured to receive the | differential current signal and to generate the output signal in response to |
| second differential current | the second differential current signal. |
| signal and to generate the | |
| output signal in response to the | |
| second differential current | |
| signal. | |
| Claim 22. | Claim 22. |
| The circuitry of claim 21, | The circuitry of claim 21, wherein the first and second data inputs |
| wherein the first and second | correspond to inphase (I) and quadrature (Q) baseband signals in a |
| data inputs correspond to | quadrature transmitter. |
| inphase (I) and quadrature (Q) | |
| baseband signals in a | |
| quadrature transmitter. | |
| Claim 23. | Claim 23. |
| The circuitry of claim 21, | The circuitry of claim 21, further comprising: |
| further comprising: | |
| a capacitor coupled between | a capacitor coupled between each of the first and second differential current |
| each of the first and second | signals. |
| differential current signals. | |
| Claim 24. | Claim 24. |
| The circuitry of claim 21, | The circuitry of claim 21, wherein each of the first and second data inputs |
| wherein each of the first and | has eight or more bits of resolution [the data input has a resolution |
| second data inputs has eight or | range of at least 256 possible values]. |
| more bits of resolution. | |
| Claim 25. | Claim 25. |
| The circuitry of claim 21, | The circuitry of claim 21, wherein the first and second interface circuits are |
| wherein the first and second | operated at an oversampled rate relative to a rate of the first and second data |
| interface circuits are operated a | unputs. |
| an oversampled rate relative to a rate of the first and second | |
| data inputs. | |
| Claim 26. | Claim 26. |
| [| |
| The circuitry of claim 25, | The circuitry of claim 25, wherein the oversampled rate is sixteen or |

| Claim 27. | Claim 27. |
|--|---|
| The circuitry of claim 20, Further comprising: | The circuitry of claim 20, further comprising: |
| | a reference circuit implemented on the second integrated circuit and configured to provide a reference signal, |
| | wherein the first interface circuit couples to the reference circuit and is further configured to receive the reference signal and to generate the first differential current signal based, in part, on the reference signal. |
| Claim 28. The circuitry of claim 27, wherein the reference signal is a current generated based on a reference voltage. | Claim 28. The circuitry of claim 27, wherein the reference signal is a current generated based on a reference voltage. |
| Claim 29 | Claim 29 |
| A transmitter in a cellular elephone comprising: | A transmitter in a cellular telephone comprising: |
| a digital processor implemented | a digital processor implemented on a first integrated circuit and configured to provide digital inphase (I) and quadrature (Q) baseband signals; |
| circuits implemented on the first integrated circuit and coupled to the digital processor, each interface circuit configured to receive a respective digital | first and second interface circuits implemented on the first integrated circuit and coupled to the digital processor, each interface circuit configured to receive a respective digital baseband signal and provide an analog baseband signal, wherein each quantized [subdivided into non-overlapping intervals, with a discrete value assigned to each subdivision] analog baseband signal comprises at least four bits of resolution [the analog baseband signal has a resolution range of at least 16 possible values] and is implemented as a differential current signal; and |
| a modulator implemented on a second integrated circuit and | a modulator implemented on a second integrated circuit and operatively coupled to the First and second interface circuits, the modulator configured to receive and modulate [to combine an information signal with a |

| and second interface circuits, the modulator configured to | carrier signal] the analog baseband signals with a carrier signal to provide a modulated output signal |
|---|---|
| receive and modulate the | |
| analog baseband signals with a | |
| carrier signal to provide a | |
| modulated output signal. | |
| Claim 30. | Claim 30. |
| The transmitter of claim 29, | The transmitter of claim 29, further comprising: |
| further comprising: | |
| a reference circuit implemented | a reference circuit implemented on the second integrated circuit and |
| on the second integrated circuit | configured to provide a reference signal, |
| and configured to provide a | |
| reference signal, | |
| wherein each interface circuit | wherein each interface circuit couples to the reference circuit and is further |
| couples to the reference circuit | configured to receive the reference signal, and wherein the analog baseband |
| and is further configured to | signals are further generated based, in part, on the reference signal. |
| receive the reference signal, | |
| and wherein the analog | |
| baseband signals are further | |
| generated-based, in part, on the | |
| reference signal. | |
| Claim 31. | Claim 31. |
| A device comprising: | A device comprising: |
| | an interface circuit formed on a first integrated circuit (IC) for generating a |
| first integrated circuit (IC) for | differential current signal responsive to a reference signal and to a digital |
| generating a differential current | |
| signal responsive to a reference | |
| signal and to a digital data | |
| input; and | |
| a circuit element formed on a | a circuit element formed on a second IC for generating an output signal on |
| second IC for generating an | the basis of the differential current signal. |
| output signal on the basis of the differential current signal. | |
| <u> </u> | Claim 32. |
| Claim 32. The device of claim 21, whereir | |
| the device of claim 31, whereif the device is a transmitter. | The device of claim 31, wherein the device is a transmitter. |
| | |
| Claim 33. | Claim 33. |
| | The device of claim 32, wherein the transmitter is a quadrature transmitter. |
| the transmitter is a quadrature | |
| transmitter. | $C1 \div 24$ |
| Claim 34. | Claim 34. |
| | The device of claim 31, wherein the device is a CDMA telephone. |
| the device is a CDMA | |
| telephone. | |
| Claim 35. | Claim 35. |

The device of claims 31, 32, or The device of claims 31, 32, or 34, wherein the reference signal is generated

| 34, wherein the reference signal by a reference circuit on the second IC. |
|--|
| is generated by a reference |
| circuit on the second IC. |
| Claim 36. Claim 36. |
| The device of claims 31, 32, or The device of claims 31, 32, or 34, further comprising a reference circuit for |
| 34, further comprising a generating the reference signal. |
| reference circuit for generating |
| the reference signal. |
| Claim 37. Claim 37. |
| The device of claims 31, 32, or The device of claims 31, 32, or 34, further comprising at least one capacitor |
| 34, further comprising at least coupled between the differential current signal. |
| one capacitor coupled between |
| the differential current signal. |
| Claim 38. Claim 38. |
| The device of claims 31, 32, or The device of claims 31, 32, or 34, wherein the digital data input is at least |
| 34, wherein the digital data one of an analog inphase (I) and a quadrature (Q) baseband signal. |
| input is at least one of an |
| analog inphase (I) and a |
| quadrature (Q) baseband signal. |
| Claim 41. Claim 41. |
| The device of claims 31, 32, or The device of claims 31, 32, or 34, wherein the reference signal is a current |
| 34, wherein the reference signal generated from a reference voltage and a resistor. |
| is a current generated from a |
| reference voltage and a resistor. |
| Claim 42. Claim 42. |
| The device of claim 41, wherein The device of claim 41, wherein the output signal is a voltage signal and the |
| the output signal is a voltage resistor is external to the first and second ICs. |
| signal and the resistor is |
| external to the first and second |
| ICs. |
| Claim 43. Claim 43. |
| The device of claim 41, wherein The device of claim 41, wherein the output signal is a current signal and |
| the output signal is a current resistor is implemented on the second IC. |
| signal and resistor is |
| implemented on the second IC. |
| Claim 44. Claim 44. |
| The device of claims 31, 32, or The device of claims 31, 32, or 34, wherein the interface circuit includes a |
| 34, wherein the interface circuit current mirror for generating at least two mirror paths using the reference |
| includes a current mirror for signal and a switch array for decoding the digital data input and for |
| generating at least two mirror directing current from selected ones of the mirror paths to generate the |
| paths using the reference signal differential current signal. |
| and a switch array for decoding |
| the digital data input and for |
| directing current from selected |
| ones of the mirror paths to |
| generate the differential current |
| benerate the anterential current |

| signal. | |
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| Claim 45. | Claim 45. |
| The device of claims 31, 32, or | The device of claims 31, 32, or 34, wherein the digital data input is at least a |
| 34, wherein the digital data | four bit [four binary values of zeros or ones to identify sixteen separate |
| input is at least a four bit digital | |
| data input. | |
| Claim 46. | Claim 46. |
| The device of claims 31, 32, or | The device of claims 31, 32, or 34, wherein the digital data input is an |
| 34, wherein the digital data | oversampled digital data signal. |
| input is an oversampled digital | |
| data signal. | |
| Claim 47. | Claim 47. |
| The device of claims 31, 32, or | The device of claims 31, 32, or 34, wherein the circuit element is any of a |
| 34, wherein the circuit element | variable gain amplifier (VGA), mixer [a device capable of converting an |
| is any of a variable gain | input signal to a different frequency range in response to an oscillating |
| amplifier (VGA), mixer, and | signal], and power amplifier (PA) driver [a device capable of supplying |
| power amplifier (PA) driver. | a signal that meets the minimum input power requirements of a power |
| | amplifier]. |
| Claim 48. | Claim 48. |
| The device of claims 31, 32, or | The device of claims 31, 32, or 34, wherein the circuit element is a |
| 34, wherein the circuit element | modulator. |
| is a modulator. | |
| Claim 49. | Claim 49. |
| the modulator includes a pair of current sources coupled to the differential current signal, and a pair of cross-coupled differential amplifiers, each differential amplifier coupled to a respective current source, the differential amplifiers operating to receive a carrier signal and to generate the output signal based, in part, on the carrier signal and the differential current signal. Claim 50. The device of claim 49, wherein each current source in the | |
| modulator provides a bias current that is related to the reference signal. | |
| Claim 51. | Claim 51. |
| | The device of claim 48, wherein the modulator performs direct up |
| | conversion [converting an information signal to an output signal having |

| up conversion. | a higher frequency that is suitable for radio transmission, without first converting the information signal to an output signal having an intermediate frequency]. |
|---|--|
| Claim 52. | Claim 52. |
| A device comprising: | A device comprising: |
| an interface circuit for generating a differential current signal, responsive to a reference | an interface circuit for generating a differential current signal, responsive to a reference signal and to a digital data input and adapted for external capacitive filtering [use of a capacitor to suppress portions of an |
| and adapted for external | tinputted signal so that desired frequencies are passed through and other frequencies are suppressed] between the differential current signal [between the two conductors that make up the differential |
| differential current signal; and | |
| a circuit element for generating an output signal on the basis of the differential current signal. | a circuit element for generating an output signal on the basis of the |
| Claim 53. | Claim 53. |
| The device of claim 52, wherein the device is a transmitter. | The device of claim 52, wherein the device is a transmitter. |
| Claim 54. | Claim 54. |
| The device of claim 53, wherein | The device of claim 53, wherein the transmitter is a quadrature transmitter. |
| the transmitter is a quadrature transmitter. | |
| Claim 55. | Claim 55. |
| The device of claim 52, wherein the device is a CDMA | The device of claim 52, wherein the device is a CDMA telephone. |
| telephone. | |
| Claim 56. | Claim 56. |
| The device of claims 52, 53, or 55, wherein the digital data input is at least one of an analog inphase (I) and a | The device of claims 52, 53, or 55, wherein the digital data input is at least one of an analog inphase (I) and a quadrature (Q) baseband signal. |
| quadrature (Q) baseband signal | • |
| Claim 57. | Claim 57. |
| The device of claims 52, 53, or 55, wherein the interface circuit includes a current mirror for generating at least two mirror paths using the reference signal | The device of claims 52, 53, or 55, wherein the interface circuit includes a current mirror for generating at least two mirror paths using the reference signal and a switch array for decoding the digital data input and for directing current from selected ones of the mirror paths to generate the differential current signal. |
| and a switch array for decoding the digital data input and for directing current from selected ones of the mirror paths to | |
| generate the differential current | |
| signal. Claim 58. | Claim 58 |
| | Claim 58. The device of claims 52, 53, or 55, wherein the circuit element is any of a |
| The device of claims 32, 33, or | The device of claims 52, 53, or 55, wherein the circuit element is any of a |

| rrent - o a eive a carrier |
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| or |
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| g nal al t signal lly as a nd a |
| |

FN1. The preceding portion of claim 63 is introductory language that does not limit the scope of the claim.

| Claim 66. | Claim 66. |
|--|--|
| | The analog integrated circuit of claim 63, wherein the |
| reference signal is a current generated from a | reference signal is a current generated from a |
| reference voltage and a resistor. | reference voltage and a resistor. |
| Claim 67. | Claim 67. |
| The analog integrated circuit of claim 66, wherein the | The analog integrated circuit of claim 66, wherein the |
| output signal is a voltage signal and the resistor is | output signal is a voltage signal and the resistor is |
| external to the analog integrated circuit. | external to the analog integrated circuit. |
| Claim 68. | Claim 68. |
| The analog integrated circuit of claim 66, wherein the | The analog integrated circuit of claim 66, wherein the |
| output signal is a current signal and the resistor is | output signal is a current signal and the resistor is |
| implemented on the analog integrated circuit. | implemented on the analog integrated circuit. |
| Claim 69. | Claim 69. |
| The analog integrated circuit of claim 63, wherein the | The analog integrated circuit of claim 63, wherein the |
| circuit element is any of a variable gain amplifier | circuit element is any of a variable gain amplifier |
| (VGA), mixer, and power amplifier (PA) driver. | (VGA), mixer, and power amplifier (PA) driver. |
| Claim 70. | Claim 70. |
| The analog integrated circuit of claim 63, wherein the | The analog integrated circuit of claim 63, wherein the |
| circuit element is a modulator. | circuit element is a modulator. |
| Claim 71. | Claim 71. |
| The analog integrated circuit of claim 70, wherein the | The analog integrated circuit of claim 70, wherein the |
| modulator includes a pair of current sources coupled | modulator includes a pair of current sources coupled |
| to the differential current signal, and a pair of cross- | to the differential current signal, and a pair of cross- |
| coupled differential amplifiers, each differential | coupled differential amplifiers, each differential |
| amplifier coupled to a respective current source, the | amplifier coupled to a respective current source, the |
| differential amplifiers operating to receive a carrier | differential amplifiers operating to receive a carrier |
| | signal and to generate the output signal based, in part, |
| on the carrier signal and the differential current | on the carrier signal and the differential current |
| signal. | signal. |
| Claim 72. | Claim 72. |
| The analog integrated circuit of claim 71, wherein | The analog integrated circuit of claim 71, wherein |
| each current source in a modulator provides a bias | each current source in a modulator provides a bias |
| current that is related to the reference signal. | current that is related to the reference signal. |
| Claim 73. | Claim 73. |
| The analog integrated circuit of claim 70, wherein the | 6 6 |
| modulator performs direct up conversion. | modulator performs direct up conversion. |
| Claim 78. | Claim 78. |

| A method comprising: | A method comprising: |
|---|--|
| generating a reference signal; | generating a reference signal; |
| providing the reference signal to a first circuit; | providing the reference signal to a first circuit; |
| receiving a digital data input at the first circuit; | receiving a digital data input at the first circuit; |
| generating a differential current signal in the first | generating a differential current signal in the first |
| circuit based, in part, on the digital data input and the | circuit based, in part, on the digital data input and the |
| reference signal; | reference signal; |
| providing the differential current signal from the first | providing the differential current signal from the first |
| circuit to a second circuit; | circuit to a second circuit; |
| receiving the differential current signal at the second | receiving the differential current signal at the second |
| circuit; and | circuit; and |
| generating an output signal from a circuit element in | generating an output signal from a circuit element in |
| the second circuit, the output signal being based at | the second circuit, the output signal being based at |
| least in part on the differential current signal. | least in part on the differential current signal. |
| Claim 79. | Claim 79. |
| The method of claim 78, wherein the reference signal | The method of claim 78, wherein the reference signal |
| is a current generated from a reference voltage. | is a current generated from a reference voltage. |
| Claim 80. | Claim 80. |
| The method of claim 78, further comprising filtering | The method of claim 78, further comprising filtering |
| the differential current signal. | [suppressing portions of an inputted signal so that |
| | desired frequencies are passed through and other |
| | frequencies are suppressed] the differential current signal. |
| Claim 81. | Claim 81. |
| The method of claim 78, | The method of claim 78, |
| further comprising providing a signal related to the | further comprising providing a signal related to the |
| reference signal to the circuit element, wherein the | reference signal to the circuit element, wherein the |
| output signal is further generated based, in part, on | output signal is further generated based, in part, on |
| the signal related to the reference signal. | the signal related to the reference signal. |
| | |

EXHIBIT B-GLOSSARY RE: UNITED STATES PATENT NUMBER 6,615,027

| Term | Definition |
|----------------|--|
| analog | the analog baseband signal has a resolution range of at least 16 possible values |
| baseband | |
| signal | |
| comprises at | |
| least four | |
| bits of | |
| resolution | |
| analog | an analog signal is a signal in which the information content is expressed via a property of the |
| inphase (I) or | signal, such as magnitude, frequency, amplitude and/or phase; a baseband signal is a signal |
| quadrature | with a band of frequencies occupied by the signal before it modulates the carrier (or |
| (Q) baseband | subcarrier) frequency to form the transmitted line or radio signal; an inphase (I) baseband |
| signal | signal is a signal adapted to modulate an inphase carrier signal, i.e., one whose waves are |
| | synchronized in step with a timing reference; and a quadrature (Q) baseband signal is a signal |

| | adapted to modulate a quadrature phase carrier signal, i.e., one whose waves are 1/4 cycle (i.e 90 degrees) out of synchronization with the waves of an inphase carrier signal |
|----------------|--|
| bandgap | a voltage derived from the difference in energy between two specific electron energy bands of |
| voltage | a semiconductor |
| between the | between the two conductors that make up the differential current signal |
| differential | |
| current | |
| signal | |
| | a current delivered to a circuit or device for establishing its operating point |
| capacitor | a device capable of storing energy in the form of an electric field or charge |
| capacitive | use of a capacitor to suppress portions of an inputted signal so that desired frequencies are |
| filtering | passed through and other |
| carrier signal | a signal of a single frequency capable of being modulated by an information signal |
| CDMA | an acronym for Code Division Multiple Access, a digital communication technique that uses |
| | codes to separate users' information |
| circuit | a network of electrical components connected directly or indirectly |
| circuit | a part of a circuit |
| element | |
| comprising | including but not limited to |
| coupled | associated in such a way that power or signal information may be transferred from one to |
| I | another |
| coupled | coupled between the two conductors that make up the differential current signal |
| between the | |
| differential | |
| current | |
| signal | |
| cross- | having the condition in which the "positive" output of one differential device is coupled to the |
| coupled | "negative" output of another differential device, and vice versa |
| current | a circuit capable of generating a signal whose current level is proportional to the current level |
| mirror | of another signal |
| current | a signal in which information is conveyed through variations in current |
| signal | |
| current | a device for providing a current at a specified value |
| sources | |
| differential | an amplifier whose output signal is proportional to the difference between two input signals |
| amplifier | |
| <u> </u> | a signal in which the information is conveyed through a difference in magnitude between two |
| current | currents |
| signal | |
| the | the input differential current signal |
| differential | |
| current | |
| signal (for | |
| claim 63) | |
| direct up | converting an information signal to an output signal having a higher frequency that is suitable |
| conversion | for radio transmission, without first converting the information signal to an output signal |

| | having an intermediate frequency |
|--|---|
| eight bits of resolution | the data input has a resolution range of at least 256 possible values |
| eight or more bits of resolution | the data input has a resolution range of at least 256 possible values |
| filtering | suppressing portions of an inputted signal so that desired frequencies are passed through and other frequencies are suppressed |
| four bit | four binary values of zeros or ones to identify sixteen separate values |
| four bits of resolution | a resolution range of 16 possible values |
| integrated circuit | commonly referred to as a "chip," an integrated circuit is a combination of interconnected electrical components inseparably associated on or within a continuous piece of semiconductor material |
| interface signal | a means of communication across a boundary |
| mirror paths mixer | paths for the flow of current generated by a current mirror a device capable of converting an input signal to a different frequency range in response to an oscillating signal |
| modulate | to combine an information signal with a carrier signal |
| modulator | a device capable of combining an information signal with a carrier signal |
| oversampled | having a condition in which the values, or "samples" belonging to a digital signal are processed at a rate higher than necessary to accurately represent its analog form |
| oversampling ratio | the ratio of the sampling rate of a digital signal to the rate that is necessary to accurately represent its analog form |
| power amplifier (PA) driver | a device capable of supplying a signal that meets the minimum input power requirements of a power amplifier |
| reference signal | a benchmark signal against which something else can be compared |
| resistor | a device whose primary function is resisting current flow |
| responsive to an input differential current signal | capable of accepting an input differential current signal and capable of taking some action in response |
| quadrature transmitter | a transmitter for transmitting signals that include inphase and quadrature signals |
| quantized | subdivided into non-overlapping intervals, with a discrete value assigned to each subdivision |
| switch array | a set of switches |
| transmit signal path | circuitry through which a transmit signal can flow |
| | a unidirectional device that is capable of enlarging the waveform supplied to it, where the gain can be changed over a range, either continuously or in incremental steps |
| voltage | a signal in which information is conveyed through variations in voltage |

signal

S.D.Cal.,2005. Qualcomm Inc. v. Maxim Integrated Products, Inc.

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