

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

GEOSCOPE TECHNOLOGIES PTE. LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Action No. 1:22-cv-01373-MSN-JFA

**STIPULATION REGARDING  
AGREED UPON CLAIM CONSTRUCTIONS**

Pursuant to the Court’s Rule 16(b) Scheduling Order (Dkt. 47) and the Joint Discovery Plan (Dkt. 44), Plaintiff Geoscope Technologies PTE. Ltd. (“Geoscope”) and Defendant Apple Inc. (“Apple”) hereby provide their Stipulation Regarding Agreed Upon Claim Constructions.

**I. IDENTIFICATION OF AGREED UPON CLAIM CONSTRUCTIONS<sup>1</sup>**

**A. U.S. Patent Nos. 7,561,104, 8,400,358, and 8,786,494**

| Claim Term / Term Group                                                              | Patent(s) and Claim(s)                       | Construction                                                                                |
|--------------------------------------------------------------------------------------|----------------------------------------------|---------------------------------------------------------------------------------------------|
| Order of the “collecting . . .”<br>“modifying . . .” and<br>“comparing . . .” steps. | ’104: 1, 2<br>’358: 1, 15, 41<br>’494: 1, 25 | Collecting has to occur before<br>modifying, and modifying has to occur<br>before comparing |

**B. U.S. Patent No. 8,406,753**

| Claim Term / Term Group | Claim(s)   | Construction                                                     |
|-------------------------|------------|------------------------------------------------------------------|
| “calibration points”    | cls. 1, 32 | “Geographic points with which<br>calibration data is associated” |

<sup>1</sup> Apple’s identification of claims for these terms includes any asserted claims that depend from the identified claim.

|                                                                                               |       |                                                                                                                  |
|-----------------------------------------------------------------------------------------------|-------|------------------------------------------------------------------------------------------------------------------|
| Order of “providing ...,”<br>“generating ...,” “evaluating<br>...,” and “selecting ...” steps | cl. 1 | Providing has to occur before<br>generating, and generating has to occur<br>before both evaluating and selecting |
|-----------------------------------------------------------------------------------------------|-------|------------------------------------------------------------------------------------------------------------------|

**C. U.S. Patent No. 8,320,264**

| <b>Claim Term / Term Group</b> | <b>Claim(s)</b>   | <b>Construction</b>                                                                       |
|--------------------------------|-------------------|-------------------------------------------------------------------------------------------|
| “path loss”                    | cls. 1, 3, 13, 15 | “the difference between the transmitted<br>signal power and the received signal<br>power” |

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Jointly submitted,

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