

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**CELLSPIN SOFT, INC.,  
Plaintiff**

**v.**

**BYTEDANCE, LTD, BYTEDANCE PTE.  
LTD, TIKTOK PTE. LTD.,  
Defendants.**

**Case No. 2:23-cv-496-JRG-RSP**

**JURY TRIAL DEMANDED**

**DEFENDANTS' P.R. 4-1 LIST OF PROPOSED CLAIM TERMS**

Pursuant to P.R. 4-1(a), and the Court's Docket Control Order (Dkt. No. 35), Defendants Bytedance, Ltd, Bytedance Pte. Ltd., and TikTok Pte. Ltd. (collectively, "Defendants") hereby provide their preliminary claim term identification for construction for U.S. Patent Nos. 8,756,336 (the "'336 Patent"); 8,862,757 (the "'757 Patent"); 8,898,260 (the "'260 Patent"); 8,904,030 (the "'030 Patent"); 9,900,766 (the "'766 Patent"); 11,234,121 (the "'121 Patent"); and 11,695,381 (the "'381 Patent") (collectively the "Asserted Patents"). Pursuant to P.R. 4-1(b), Defendants are prepared to meet and confer with Plaintiff Cellspin Soft, Inc., at a mutually agreeable time to combine and finalize the parties' respective lists of claim terms and claim elements to be construed and to facilitate the preparation of the Joint Claim Construction and Prehearing Statement for the Patents-in-Suit.

Defendants reserve the right to modify or supplement its preliminary proposed constructions after having an opportunity to review Plaintiff's preliminary proposed constructions. Defendants reserve the right to offer further extrinsic evidence to rebut preliminary claim constructions, testimony, or extrinsic evidence Plaintiff offers in support of its claim construction positions. Defendants also reserve the right to supplement, amend, and/or modify the following

list of proposed claim terms and claim elements for claim construction to facilitate the ultimate preparation of the Joint Claim Construction and Pre-Hearing Statement.

In addition, Defendants may provide declarations and/or testimony of one or more of their experts as evidence of how one having ordinary skill in the art would interpret the foregoing terms. Such declarations and/or testimony may address both the general understanding of the relevant terms and phrases in the field of the Asserted Patents as well as the understanding of terms and phrases in the context of the Asserted Patents' specifications and claims. Defendants' experts may also provide testimony concerning the appropriate level of skill in the art at the time of the inventions and the background of the technology at issue at the time of the inventions. Defendants reserve the right to introduce expert declarations or testimony to rebut Plaintiff's claim construction positions and any expert declarations or testimony introduced by Plaintiff.

In the instances in which Defendants identify a phrase below as a proposed phrase for construction, Defendants identify for potential construction both the words within the phrase (individually) and the phrase as a whole. Further, Defendants may construe the longer phrase in which the identified term or phrase appears. Additionally, the inclusion of any claim terms, phrases, or clauses on this list is not intended to and does not constitute an admission that the term or phrase is capable of construction and not indefinite under 35 U.S.C. § 112, lacking enablement or adequate written description, or otherwise incapable of construction. Defendants reserve the right to contest any such terms and the validity of any claim of the patents-in-suit.

Dated: October 29, 2024

Respectfully submitted,

By: /s/ Michael J. Ballanco

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**COUNSEL FOR DEFENDANTS  
BYTEDANCE LTD., BYTEDANCE PTE.  
LTD., AND TIKTOK PTE. LTD.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on October 29, 2024, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Michael J. Ballanco

Michael J. Ballanco

## **PROPOSED TERMS FOR CONSTRUCTION**

### **I. U.S. PATENT NO. 8,756,336**

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                                                                                                     | <b>Claim No(s).</b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| “segmented” / “segmenting”                                                                                                                                                   | 1                   |
| “Bluetooth enabled mobile device”                                                                                                                                            | 1, 2, 3, 4          |
| “receiving a synchronization message” / “sending, a synchronization request” / “receiving, a synchronization reply”                                                          | 1                   |
| “using a segmented data transfer protocol due in part to present data size and data transfer capabilities of the Bluetooth enabled mobile device”                            | 1                   |
| “user identifier”                                                                                                                                                            | 1, 5                |
| “resuming, the segmented data transfer from the point immediately following the last successful receipt of the segmented data by the web service, for said user identifier.” | 1                   |
| “application layer level”                                                                                                                                                    | 1                   |
| “after a network connection to the web service is restored”                                                                                                                  | 1                   |
| “segment identifier”                                                                                                                                                         | 1                   |

### **II. U.S. PATENT NO. 8,862,757**

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                                                                   | <b>Claim No(s).</b>         |
|--------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| “segmented” / “segmenting”                                                                                                                 | 1, 8, 15, 21                |
| “Bluetooth enabled mobile device”                                                                                                          | 1, 5, 8, 12, 15, 18, 21, 24 |
| “synchronization message” / “synchronization request” / “synchronization reply”                                                            | 1, 8, 15, 21                |
| “wherein said file is segmented in part due to size of said file and data transfer capabilities of said Bluetooth enabled mobile device, ” | 1, 8, 15, 21                |
| “user identifier”                                                                                                                          | 1, 4, 8, 11, 15, 17, 21, 23 |
| “corresponds to the content range”                                                                                                         | 7, 14, 20, 26               |
| “after a network connection to the web service is restored”                                                                                | 1                           |
| “segment identifier”                                                                                                                       | 1,7,8,14,15,20, 21,26       |

### **III. U.S. PATENT NO. 8,898,260**

| <b>Claim Terms, Phrases, or Clauses for Construction</b> | <b>Claim No(s).</b> |
|----------------------------------------------------------|---------------------|
| “segmented” / “segmenting”                               | 1, 6, 10, 15        |
| “Bluetooth enabled mobile device”                        | 1, 6, 10, 15        |

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                                                                                                                                                                                                                                                                    | <b>Claim No(s).</b>        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| “synchronization message” / “synchronization request” / “synchronization reply”                                                                                                                                                                                                                                                             | 1, 6, 10, 15               |
| “user identifier”                                                                                                                                                                                                                                                                                                                           | 1, 4, 6, 8, 10, 13, 15, 17 |
| “making available, at the web service, the segmented data received from the Bluetooth enabled mobile device for public or private consumption over the internet. . .” / “making available, at the web service, the reassembled data received from the Bluetooth enabled mobile device for public or private consumption over the internet.” | 1, 6, 10, 15               |
| “corresponds to the content range”                                                                                                                                                                                                                                                                                                          | 1, 6, 10, 15               |
| “after a network connection to the web service is restored”                                                                                                                                                                                                                                                                                 | 1, 6, 10, 15               |
| “segment identifier”                                                                                                                                                                                                                                                                                                                        | 1, 6, 10, 15               |

#### **IV. U.S. PATENT NO. 8,904,030**

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                                                                                                                                                                                                                                                                                  | <b>Claim No(s).</b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| Claims Elements Must be in an Ordered Combination                                                                                                                                                                                                                                                                                                         | 1, 6, 12, 15        |
| “establishing a paired secure (Bluetooth) connection between the Bluetooth enabled mobile device and a Bluetooth enabled data capture device” / “Bluetooth paired wireless connection”                                                                                                                                                                    | 1, 6, 12, 15        |
| “after the paired secure Bluetooth connection is established”                                                                                                                                                                                                                                                                                             | 1, 6                |
| “over the established paired secure Bluetooth connection”                                                                                                                                                                                                                                                                                                 | 1, 6, 12, 15        |
| “supported data capability”                                                                                                                                                                                                                                                                                                                               | 1, 12               |
| “encrypting, using cryptographic encryption key”                                                                                                                                                                                                                                                                                                          | 1, 6                |
| “transferring” / “receive” . . . “encrypted data”                                                                                                                                                                                                                                                                                                         | 1, 6, 12, 15        |
| “cryptographic encryption key”                                                                                                                                                                                                                                                                                                                            | 1, 6, 12, 15        |
| “Bluetooth enabled data capture device”                                                                                                                                                                                                                                                                                                                   | 1-3, 6-8, 12, 15    |
| “detecting and signaling” / “determining existence of” / “acquiring” / “get” / “obtaining” / “transfer” / “encrypting” / “creation of” / “change in status of” . . . “new data”                                                                                                                                                                           | 1, 4-6, 9-10, 12-17 |
| “receive[]” / “process” / “listen for” / “enable” / . . . “event notification”                                                                                                                                                                                                                                                                            | 1, 5, 12, 14-15, 17 |
| “Bluetooth enabled mobile device listens for the event notification sent from the Bluetooth enabled data capture device” / “enabling event notification listening on the Bluetooth enabled mobile device, to listen for event notifications sent from the Bluetooth enabled data capture device, over the established paired secure Bluetooth connection” | 1, 12, 15           |
| “data signal notification(s)”                                                                                                                                                                                                                                                                                                                             | 6, 10               |
| “user identifier”                                                                                                                                                                                                                                                                                                                                         | 1, 6, 12, 15        |

| <b>Claim Terms, Phrases, or Clauses for Construction</b> | <b>Claim No(s).</b> |
|----------------------------------------------------------|---------------------|
| “along with”                                             | 1, 6, 12, 15        |
| “creating” / “encrypting” / “get” ... “new data object”  | 6, 15               |
| “HTTP”                                                   | 1, 4, 7, 9          |

#### **V. U.S. PATENT NO. 11,659,381**

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                                                                | <b>Claim No(s).</b>        |
|-----------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Claims Elements Must be in an Ordered Combination                                                                                       | 1, 7, 12                   |
| “a mobile software application for a Bluetooth enabled cellular phone”                                                                  | 1, 7, 12                   |
| “establishing a paired Bluetooth connection between the Bluetooth enabled data capture device and the Bluetooth enabled cellular phone” | 1, 7, 12                   |
| “after establishing a paired Bluetooth connection”                                                                                      | 1, 7, 12                   |
| “over the established paired Bluetooth connection”                                                                                      | 1, 7, 12                   |
| “Bluetooth enabled data capture device”                                                                                                 | 1, 7, 12                   |
| “cryptographically authenticating”                                                                                                      | 1, 7, 12                   |
| “listen for an event notification”                                                                                                      | 1, 7                       |
| “detect and receive” / “store the received” / “transfer the received” . . . “new-data”                                                  | 1, 3-4, 7, 8-10, 12, 14-15 |
| “along with”                                                                                                                            | 1, 7, 12                   |
| “user authentication credential”                                                                                                        | 1-2, 7-8, 12-13            |
| “user preference” / “wherein the user preference comprises global positioning system information”                                       | 1, 7, 12                   |
| “online data publishing web service”                                                                                                    | 1                          |
| “user profile”                                                                                                                          | 1, 6                       |
| “poll” / “polling”                                                                                                                      | 12                         |

#### **VI. U.S. PATENT NO. 11,234,121**

| <b>Claim Terms, Phrases, or Clauses for Construction</b>        | <b>Claim No(s).</b> |
|-----------------------------------------------------------------|---------------------|
| Claims Elements Must be in an Ordered Combination               | 1, 4, 7, 9          |
| “short-range wireless communication device”                     | 1, 4, 7             |
| “short-range paired wireless connection”                        | 1, 4, 7             |
| “over the established short-range paired wireless connection”   | 1, 4, 9             |
| “after establishing the short-range paired wireless connection” | 1, 4, 9             |
| “short-range wireless enabled data capture device”              | 1-4, 7, 9-10        |
| “cellular network communication device”                         | 4, 7                |
| “cryptographically authenticating”                              | 1, 4, 9             |
| “event notification”                                            | 1, 4, 7             |
| “listen to the event notification”                              | 1,                  |

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                                                   | <b>Claim No(s).</b> |
|----------------------------------------------------------------------------------------------------------------------------|---------------------|
| “listen for the event notification” / “listen for an event notification”                                                   | 4, 7                |
| “mobile client application”                                                                                                | 1, 3-4, 7, 9,       |
| “user authentication credential”                                                                                           | 1-4, 6-7, 9         |
| “user preference” / “wherein the user preference comprises global positioning system information”                          | 1, 4, 7, 9          |
| “cellular network communication device”                                                                                    | 4, 7                |
| “timer setting on the single mobile client application” / “timer setting is no wait automatic or wait X minutes automatic” | 1, 4, 7, 9          |
| “acquire” / “store” / “upload” / “detect” / “transfer” / “receive” . . . “new-data”                                        | 1, 3, 4, 7, 9.      |
| “user data publishing website”                                                                                             | 1, 3-4, 6, 9        |
| “user data publishing web service”                                                                                         | 7                   |
| “publish the new-data for private use”                                                                                     | 3                   |
| “polling request” / “polling”                                                                                              | 9                   |
| “HTTP”                                                                                                                     | 1, 4, 7, 9          |

## VII. U.S. PATENT NO. 9,900,766

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                                                                                                                                                  | <b>Claim No(s).</b>   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| Claims Elements Must be in an Ordered Combination                                                                                                                                                                         | 1, 4, 9, 13           |
| “short-range wireless communication device”                                                                                                                                                                               | 1, 4, 9, 13           |
| “short-range paired wireless connection”                                                                                                                                                                                  | 1-2, 4-6, 9-10, 13-14 |
| “short-range wireless enabled cellular phone”                                                                                                                                                                             | 1, 9-13               |
| “short-range wireless enabled data capture device”                                                                                                                                                                        | 1-3, 9, 13            |
| “after establishing the short-range paired wireless connection” / “after the short-range paired wireless connection is established”                                                                                       | 1, 4, 9, 12           |
| “over the established short-range paired wireless connection”                                                                                                                                                             | 1, 4, 9               |
| “association protocol”                                                                                                                                                                                                    | 1, 4, 5, 9, 13        |
| “internet connected cellular phone”                                                                                                                                                                                       | 4                     |
| “establish a short-range paired wireless connection” . . . “between the short-range wireless enabled data capture device and a short-range wireless enabled cellular phone” / “with an internet connected cellular phone” | 1, 4, 9, 13           |
| “after establishing the short-range paired wireless connection” . . . “between the short-range wireless enabled data capture device and the short-range wireless enabled cellular phone” / “with the cellular phone”      | 1, 4                  |
| “cryptographically authenticating” / “cryptographically authenticated”                                                                                                                                                    | 1, 4, 8-9, 12-13      |
| “signal to notify”                                                                                                                                                                                                        | 1, 4, 9, 13           |
| “listen to the signal to notify”, “listen for the signal to notify”, “listen and process the signal to notify”                                                                                                            | 1, 4, 9               |

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                              | <b>Claim No(s).</b> |
|-------------------------------------------------------------------------------------------------------|---------------------|
| “acquire” / “store” / “upload” / “signal” / “publish” / “create” . . . “new-data” / “new-data object” | 1-4, 7-9, 11-13, 15 |
| “user information”                                                                                    | 1, 4, 9, 13         |
| “along with”                                                                                          | 1, 4, 9, 13         |
| “user identifier”                                                                                     | 1, 4, 9, 13         |
| “private consumption”                                                                                 | 1, 4, 9, 13         |
| “mobile client application”                                                                           | 1, 4, 9, 13         |
| “user data publishing website”                                                                        | 1, 4, 9, 13         |
| “HTTP”                                                                                                | 1, 4, 9, 13         |

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
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**CELLSPIN SOFT, INC.,  
Plaintiff**

**v.**

**BYTEDANCE, LTD, BYTEDANCE PTE.  
LTD, TIKTOK PTE. LTD.,  
Defendants.**

**Case No. 2:23-cv-496-JRG-RSP**

**JURY TRIAL DEMANDED**

**DEFENDANTS' P.R. 4-2(a) PRELIMINARY CLAIM  
CONSTRUCTIONS AND EXTRINSIC EVIDENCE**

Pursuant to P.R. 4-2 and the Court's Docket Control Order (Dkt. No. 35), Defendants Bytedance, Ltd, Bytedance Pte. Ltd., and TikTok Pte. Ltd. (collectively, "Defendants") hereby provide their Patent L.R. 4.2(a) and 4.2(b) disclosures.

The below chart includes Defendants' preliminary claim constructions and extrinsic evidence. Defendants' discovery is ongoing, and therefore Defendants reserve the right to modify the proposed claim constructions as well as to modify, add, or delete terms, phrases and/or clauses based on, without limitation, the constructions served or proposed by Plaintiff Cellspin Soft, Inc. ("Cellspin"), information learned in the course of meeting and conferring with Cellspin's counsel, information learned through the course of discovery or other means, and any further changes or amendments to the parties' infringement or invalidity contentions. Defendants reserve the right to rely on any evidence disclosed by Cellspin in its Patent L.R. 4.2(a) and 4.2(b) disclosures. Defendants also reserve the right to supplement its preliminary claim constructions with extrinsic evidence or expert testimony, including in rebuttal to Cellspin's preliminary or subsequent claim constructions. Inclusion of evidence as extrinsic below, such as IPR proceedings, does not preclude the same evidence from being considered as intrinsic evidence.

Defendants reserve the right to modify, supplement, or amend its list of claim terms, phrases, clauses and/or constructions set forth below. Additionally, Defendants reserve the right to separately request construction of portions of the identified claim terms, phrases, and/or clauses. For example, these proposed claim constructions are based on Cellspin's current infringement contentions. Should Cellspin assert that other claims are infringed, amend their infringement contentions, or should other claims otherwise become relevant, Defendants reserve the right to propose new claim constructions as required. Should Cellspin seek an improper interpretation of a term, phrase, and/or clause that has not been identified by the parties, Defendants reserve the right to seek the construction of that term, phrase, and/or clause. Defendants further reserve the right to identify additional extrinsic evidence to rebut the proposed constructions of Cellspin.

The claim terms, phrases, and/or clauses are generally identified at least with respect to the patent where such terms, phrases, and/or clauses occur. Unless otherwise indicated below, any additional occurrence, including in related asserted patents, of a listed claim term, phrase, and/or clause is intended to receive the same construction as the listed term, phrase, and/or clause, regardless of whether the later occurrence is also listed below.

Defendants' preliminary claim constructions shall not act as a waiver of any defense of noninfringement, invalidity, or unenforceability of any of Cellspin's asserted patents. Notwithstanding the preliminary claim constructions contained herein of any term, phrase, and/or clause, Defendants expressly reserve the right to challenge the validity of any or all claims in Cellspin's asserted patents on all possible grounds.

Defendants further reserve all rights to assert that terms, phrases, and/or clauses in the patents-in-suit are invalid under 35 U.S.C. § 112, including without limitation the terms, phrases,

and/or clauses listed in Defendants' Invalidity Contentions and any amendments or supplements thereto.

The inclusion of any claim terms, phrases, and/or clauses on this list is not intended, and should not be construed to mean, that any such terms, phrases, and/or clauses have a special or uncommon meaning. Additionally, the inclusion of any claim terms, phrases, and/or clauses on this list is not intended to and does not constitute an admission that the term, phrase, and/or clause is capable of construction and not indefinite under 35 U.S.C. § 112, lacking enablement or adequate written description, or otherwise incapable of construction. Defendants reserve the right to contest any such terms, phrases, and/or clauses and the validity of any claim of the patents-in-suit.

To the extent the claim terms, phrases, and/or clauses set forth herein include particular terms, phrases, and/or clauses appropriate to be construed separately, such terms, phrases, and/or clauses are deemed part of this disclosed list. Similarly, to the extent it is appropriate to construe terms, phrases, and/or clauses listed herein in the context of additional claim language, such additional language is deemed part of this disclosure.

Dated: November 12, 2024

Respectfully submitted,

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LTD., AND TIKTOK PTE. LTD.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on November 12, 2024, to all counsel of record who are deemed to have consented to electronic service.

/s/ Michael J. Ballanco

Michael J. Ballanco

## **PRELIMINARY PROPOSED CLAIM CONSTRUCTIONS**

### **I. U.S. PATENT NO. 8,756,336**

| <b>Claim Terms, Phrases, and/or<br/>Clauses for Construction</b>                                                                                                             | <b>Preliminary Proposed Constructions<br/>and Extrinsic Evidence</b>                                                                                                                                                                                                                                                                                 | <b>Claim<br/>No(s).</b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| “segmented” / “segmenting”                                                                                                                                                   | “divided/dividing a data file into multiple parts”                                                                                                                                                                                                                                                                                                   | 1                       |
| “Bluetooth enabled mobile device”                                                                                                                                            | “a mobile device that has the ability to send and/or receive Bluetooth wireless messages”                                                                                                                                                                                                                                                            | 1, 2, 3, 4              |
| “receiving a synchronization message” / “sending, a synchronization request” / “receiving, a synchronization reply”                                                          | Indefinite<br><br>Alternatively,<br><br>“receiving a message from the web server about synchronization of an interrupted segmented data transfer”<br><br>“sending a request to the web service to synchronize segmented data transfer”<br><br>“receiving a reply from the web service in response to request to synchronize segmented data transfer” | 1                       |
| “using a segmented data transfer protocol due in part to present data size and data transfer capabilities of the Bluetooth enabled mobile device”                            | “selecting a segmented data transfer protocol based on both the present data size and data transfer capabilities of the Bluetooth enabled mobile device”                                                                                                                                                                                             | 1                       |
| “user identifier”                                                                                                                                                            | “a text string that identifies uniquely a user of a web service and contains sufficient information to authenticate a user of the web service.”                                                                                                                                                                                                      | 1, 5                    |
| “resuming, the segmented data transfer from the point immediately following the last successful receipt of the segmented data by the web service, for said user identifier.” | “resuming, the segmented data transfer by transferring the next data segment in sequence after the last successfully transmitted data segment . . .”                                                                                                                                                                                                 | 1                       |
| “application layer level”                                                                                                                                                    | “performed by the client application”                                                                                                                                                                                                                                                                                                                | 1                       |

|                                                             |                                                         |   |
|-------------------------------------------------------------|---------------------------------------------------------|---|
| “after a network connection to the web service is restored” | “in response to a network connection being restored”    | 1 |
| “segment identifier”                                        | “a text string that identifies uniquely a data segment” | 1 |

## II. U.S. PATENT NO. 8,862,757

| <b>Claim Terms, Phrases, and/or Clauses for Construction</b>                                                                             | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                                                                                                                                                                                                              | <b>Claim No(s).</b>         |
|------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| “segmented” / “segmenting”                                                                                                               | “divided/dividing a file into multiple parts”                                                                                                                                                                                                                                                                                                 | 1, 8, 15, 21                |
| “Bluetooth enabled mobile device”                                                                                                        | “a mobile device that has the ability to send and/or receive Bluetooth wireless messages”                                                                                                                                                                                                                                                     | 1, 5, 8, 12, 15, 18, 21, 24 |
| “synchronization message” /<br>“synchronization request” /<br>“synchronization reply”                                                    | Indefinite<br><br>Alternatively, “receiving a message from the web server about synchronization of an interrupted segmented data transfer”<br><br>“sending a request to the web service to synchronize segmented data transfer”<br><br>“receiving a reply from the web service in response to request to synchronize segmented data transfer” | 1, 8, 15, 21                |
| “wherein said file is segmented in part due to size of said file and data transfer capabilities of said Bluetooth enabled mobile device” | “selecting a segmented data transfer protocol based on both the present data size and data transfer capabilities of the Bluetooth enabled mobile device”                                                                                                                                                                                      | 1, 8, 15, 21                |
| “user identifier”                                                                                                                        | “a text string that identifies uniquely a user of a web service and contains sufficient information to authenticate a user of the web service”                                                                                                                                                                                                | 1, 4, 8, 11, 15, 17, 21, 23 |
| “corresponds to the content range”                                                                                                       | Indefinite                                                                                                                                                                                                                                                                                                                                    | 7, 14, 20, 26               |

| <b>Claim Terms, Phrases, and/or Clauses for Construction</b> | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                | <b>Claim No(s).</b>         |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
|                                                              | Alternatively, “corresponds to the location of a portion of content, in bytes or other specified unit, in relation to the full body of content” |                             |
| “application layer level”                                    | “performed by the client application”                                                                                                           | 1, 8, 15, 21                |
| “after a network connection to the web service is restored”  | “in response to a network connection being restored”                                                                                            | 1                           |
| “segment identifier”                                         | "a text string that identifies uniquely a data segment"                                                                                         | 1, 7, 8, 14, 15, 20, 21, 26 |

### III. U.S. PATENT NO. 8,898,260

| <b>Claim Terms, Phrases, and/or Clauses for Construction</b>                          | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                                                                                                                                                                                                                     | <b>Claim No(s).</b> |
|---------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| “segmented” / “segmenting”                                                            | “divided/dividing a data file into multiple parts”                                                                                                                                                                                                                                                                                                   | 1, 6, 10, 15        |
| “Bluetooth enabled mobile device”                                                     | “mobile device that has the ability to send and/or receive Bluetooth wireless messages”                                                                                                                                                                                                                                                              | 1, 6, 10, 15        |
| “synchronization message” /<br>“synchronization request” /<br>“synchronization reply” | Indefinite<br><br>Alternatively,<br><br>“receiving a message from the web server about synchronization of an interrupted segmented data transfer”<br><br>“sending a request to the web service to synchronize segmented data transfer”<br><br>“receiving a reply from the web service in response to request to synchronize segmented data transfer” | 1, 6, 10, 15        |
| “user identifier”                                                                     | “a text string that identifies uniquely a user of a web service and contains                                                                                                                                                                                                                                                                         | 1, 4, 6, 8, 10,     |

| <b>Claim Terms, Phrases, and/or Clauses for Construction</b>                                                                                                                                                                                                                                                                                | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                                  | <b>Claim No(s).</b>    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
|                                                                                                                                                                                                                                                                                                                                             | sufficient information to authenticate a user of the web service”                                                                                                 | 13, 15, 17             |
| “making available, at the web service, the segmented data received from the Bluetooth enabled mobile device for public or private consumption over the internet. . .” / “making available, at the web service, the reassembled data received from the Bluetooth enabled mobile device for public or private consumption over the internet.” | “making available, at the web service, the segmented data received from the Bluetooth enabled mobile device for public or private consumption over the internet”  | 1, 6, 10, 15           |
| “corresponds to the content range”                                                                                                                                                                                                                                                                                                          | Indefinite<br><br>Alternatively, “corresponds to the location of a portion of content, in bytes or other specified unit, in relation to the full body of content” | 1, 6, 10, 15           |
| “application layer level”                                                                                                                                                                                                                                                                                                                   | “performed by the client application”                                                                                                                             | 1, 5, 6, 9, 10, 14, 15 |
| “after a network connection to the web service is restored”                                                                                                                                                                                                                                                                                 | “in response to a network connection being restored”                                                                                                              | 1, 6, 10, 15           |
| “segment identifier”                                                                                                                                                                                                                                                                                                                        | "a text string that identifies uniquely a data segment”                                                                                                           | 1, 6, 10, 15           |

#### **IV. U.S. PATENT NO. 8,904,030**

| <b>Claim Terms, Phrases, and/or Clauses for Construction</b>                                                                                  | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                                       | <b>Claim No(s).</b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| Claims Elements Must be in an Ordered Combination                                                                                             | the elements must be performed in the order they appear in the claims                                                                                                  | 1, 6, 12, 15        |
| “establishing a paired secure (Bluetooth) connection between the Bluetooth enabled mobile device and a Bluetooth enabled data capture device” | “in the condition of having an exchanged link key (either before connection establishment was requested or during connecting phase) between the Bluetooth enabled data | 1, 6, 12, 15        |

| <b>Claim Terms, Phrases, and/or Clauses for Construction</b>                                          | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                                                                                                                                                                                                                                                      | <b>Claim No(s).</b> |
|-------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| / “Bluetooth paired wireless connection”                                                              | capture device and the Bluetooth enabled mobile device”                                                                                                                                                                                                                                                                                                                               |                     |
| “after the paired secure Bluetooth connection is established”                                         | “after the paired connection is established and maintained on a continuous basis between the Bluetooth enabled data capture device and the Bluetooth enabled mobile device”                                                                                                                                                                                                           | 1, 6                |
| “over the established paired secure Bluetooth connection” /<br>“Bluetooth paired wireless connection” | “through the continuous, secure Bluetooth connection between the Bluetooth enabled data capture device and the Bluetooth enabled mobile device”<br><br>“in the condition of having an exchanged link key (either before connection establishment was requested or during connecting phase) between the Bluetooth enabled data capture device and the Bluetooth enabled mobile device” | 1, 6, 12, 15        |
| “supported data capability”                                                                           | “format of data that the Bluetooth enabled data capture device is configured to send or receive”                                                                                                                                                                                                                                                                                      | 1, 12               |
| “encrypting, using cryptographic encryption key”                                                      | “encryption involving an algorithm performed by the Bluetooth enabled data capture device”                                                                                                                                                                                                                                                                                            | 1, 6                |
| “transferring” / “receive” . . .<br>“encrypted data”                                                  | “data verified as legitimate by use of encryption and decryption involving an algorithm performed by the Bluetooth enabled data capture device”                                                                                                                                                                                                                                       | 1, 6, 12, 15        |
| “cryptographic encryption key”                                                                        | “an exchanged link key (either before connection establishment was requested or during connecting phase)”                                                                                                                                                                                                                                                                             | 1, 6, 12, 15        |

| <b>Claim Terms, Phrases, and/or Clauses for Construction</b>                                                                                                                                                                                                                                                                                              | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                               | <b>Claim No(s).</b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| “Bluetooth enabled data capture device”                                                                                                                                                                                                                                                                                                                   | “separate and apart from the mobile device and has the ability to send and receive Bluetooth wireless messages”                                | 1-3, 6-8, 12, 15    |
| “detecting and signaling” / “determining existence of” / “acquiring” / “get” / “obtaining” / “transfer” / “encrypting” / “creation of” / “change in status of” . . . “new data”                                                                                                                                                                           | “an indication of the presence of newly acquired data by the Bluetooth enabled data capture device”                                            | 1, 4-6, 9-10, 12-17 |
| “receive[]” / “process” / “listen for” / “enable” / . . . “event notification”                                                                                                                                                                                                                                                                            | “an indication of the presence of newly acquired data on the Bluetooth enabled data capture device”                                            | 1, 5, 12, 14-15, 17 |
| “Bluetooth enabled mobile device listens for the event notification sent from the Bluetooth enabled data capture device” / “enabling event notification listening on the Bluetooth enabled mobile device, to listen for event notifications sent from the Bluetooth enabled data capture device, over the established paired secure Bluetooth connection” | “an indication of the presence of newly acquired data on the Bluetooth enabled data capture device”                                            | 1, 12, 15           |
| “data signal notification(s)”                                                                                                                                                                                                                                                                                                                             | “an indication of the presence of newly acquired data on the Bluetooth enabled data capture device”                                            | 6, 10               |
| “user identifier”                                                                                                                                                                                                                                                                                                                                         | “a text string that identifies uniquely a user of a web service and contains sufficient information to authenticate a user of the web service” | 1, 6, 12, 15        |
| “along with”                                                                                                                                                                                                                                                                                                                                              | “at the same time”                                                                                                                             | 1, 6, 12, 15        |
| “creating” / “encrypting” / “get” . . . “new data object”                                                                                                                                                                                                                                                                                                 | “an indication of the presence of newly acquired data on the Bluetooth enabled data capture device”                                            | 6, 15               |
| “HTTP”                                                                                                                                                                                                                                                                                                                                                    | “Hypertext Transfer Protocol, excluding Hypertext Transfer Protocol Secure”                                                                    | 1, 4, 7, 9          |

**V. U.S. PATENT NO. 11,659,381**

| <b>Claim Terms, Phrases, and/or Clauses for Construction</b>                                                                            | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                                                                                                | <b>Claim No(s).</b> |
|-----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| Claims Elements Must be in an Ordered Combination                                                                                       | the elements must be performed in the order they appear in the claims                                                                                                                                                           | 1, 7, 12            |
| “a mobile software application for a Bluetooth enabled cellular phone”                                                                  | “software application provided with a Bluetooth-enabled cellular phone”                                                                                                                                                         | 1, 7, 12            |
| “establishing a paired Bluetooth connection between the Bluetooth enabled data capture device and the Bluetooth enabled cellular phone” | “in the condition of having an exchanged link key (either before connection establishment was requested or during connecting phase) between the Bluetooth enabled data capture device and the Bluetooth enabled cellular phone” | 1, 7, 12            |
| “after establishing a paired Bluetooth connection”                                                                                      | “after the paired connection is established and maintained on a continuous basis between the Bluetooth enabled data capture device and the Bluetooth enabled cellular phone”                                                    | 1, 7, 12            |
| “over the established paired Bluetooth connection”                                                                                      | “through the continuous, secure Bluetooth connection between the Bluetooth enabled data capture device and the Bluetooth enabled cellular phone”                                                                                | 1, 7, 12            |
| “Bluetooth enabled data capture device”                                                                                                 | “separate and apart from the Bluetooth enabled cellular phone and has the ability to send and receive Bluetooth wireless messages”                                                                                              | 1, 7, 12            |
| “cryptographically authenticating”                                                                                                      | “verified as legitimate by use of encryption and decryption involving an algorithm performed by the Bluetooth enabled data capture device and the Bluetooth enabled cellular phone”                                             | 1, 7, 12            |
| “listen for an event notification”                                                                                                      | “an indication of the presence of newly acquired data”                                                                                                                                                                          | 1, 7                |

| <b>Claim Terms, Phrases, and/or Clauses for Construction</b>                                      | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                                                                                                                                                       | <b>Claim No(s).</b>        |
|---------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| “detect and receive” / “store the received” / “transfer the received” . . . “new-data”            | “an indication of the presence of newly acquired data by the Bluetooth enabled data capture device”                                                                                                                                                                                    | 1, 3-4, 7, 8-10, 12, 14-15 |
| “along with”                                                                                      | “at the same time”                                                                                                                                                                                                                                                                     | 1, 7, 12                   |
| “user authentication credential”                                                                  | “data used to verify the identity of the user”                                                                                                                                                                                                                                         | 1-2, 7-8, 12-13            |
| “user preference” / “wherein the user preference comprises global positioning system information” | “global positioning system information specified by the user that are transmitted to a remote server to personalize a service”                                                                                                                                                         | 1, 7, 12                   |
| “online data publishing web service”                                                              | “a web-based service that receives and processes user data and credentials from a mobile device, stores user information in a database, and delivers personalized content to the mobile device”                                                                                        | 1                          |
| “user profile”                                                                                    | “data associated with a specific user”                                                                                                                                                                                                                                                 | 1, 6                       |
| “poll” / “polling”                                                                                | “checking status [of] on a predetermined basis by the Bluetooth enabled data capture device or Bluetooth enabled cellular phone, where “predetermined” refers to programming that sets the frequency of the status checks (e.g., at set intervals, dynamic intervals, randomly, etc.)” | 12                         |

## VI. U.S. PATENT NO. 11,234,121

| <b>Claim Terms, Phrases, or Clauses for Construction</b> | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                     | <b>Claim No(s).</b> |
|----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|---------------------|
| Claims Elements Must be in an Ordered Combination        | the elements must be performed in the order they appear in the claims                                                | 1, 4, 7, 9          |
| “short-range wireless communication device”              | “a short-range wireless communication device that has the ability to send and receive short-range wireless messages” | 1, 4, 7             |

| <b>Claim Terms, Phrases, or Clauses for Construction</b>        | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                                                                                                                      | <b>Claim No(s).</b> |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| “short-range paired wireless connection”                        | “in the condition of having an exchanged link key (either before connection establishment was requested or during connecting phase) between the short-range wireless enabled data capture device and the short-range wireless enabled cellular phone” | 1, 4, 7             |
| “over the established short-range paired wireless connection”   | “through the continuous, secure short-range wireless connection between the short-range wireless enabled data capture device and the short-range wireless enabled cellular phone”                                                                     | 1, 4, 9             |
| “after establishing the short-range paired wireless connection” | “after the paired connection is established and maintained on a continuous basis between the short-range wireless enabled data capture device and the short-range wireless enabled cellular phone”                                                    | 1, 4, 9             |
| “short-range wireless enabled data capture device”              | “separate and apart from the short-range wireless enabled cellular phone and has the ability to send and receive short-range wireless messages”                                                                                                       | 1-4, 7, 9-10        |
| “cellular network communication device”                         | “component that has the ability to send and receive short-range wireless messages”                                                                                                                                                                    | 4, 7                |
| “cryptographically authenticating”                              | “verified as legitimate by use of encryption and decryption involving an algorithm performed by the short-range wireless enabled data capture device and the short-range wireless enabled cellular phone”                                             | 1, 4, 9             |
| “event notification”                                            | “an indication of the presence of newly acquired data by the short-range wireless enabled data capture device”                                                                                                                                        | 1, 4, 7             |

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                                                   | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                                 | <b>Claim No(s).</b> |
|----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| “listen to the event notification”                                                                                         | “an indication of the presence of newly acquired data by the short-range wireless data capture device”                                                           | 1,                  |
| “listen for the event notification” / “listen for an event notification”                                                   | “an indication of the presence of newly acquired data”                                                                                                           | 4, 7                |
| “mobile client application”                                                                                                | “software application provided with the short-range wireless enabled cellular phone”                                                                             | 1, 3-4, 7, 9,       |
| “user authentication credential”                                                                                           | “data used to verify the identity of the user”                                                                                                                   | 1-4, 6-7, 9         |
| “user preference” / “wherein the user preference comprises global positioning system information”                          | “global positioning system information specified by the user that are transmitted to a remote server to personalize a service”                                   | 1, 4, 7, 9          |
| “timer setting on the single mobile client application” / “timer setting is no wait automatic or wait X minutes automatic” | “a configurable time parameter that controls the timing of the upload of data, either immediately (‘no wait’) or after a specified delay (‘wait X minutes’)”     | 1, 4, 7, 9          |
| “acquire” / “store” / “upload” / “detect” / “transfer” / “receive” . . . “new-data”                                        | “an indication of the presence of newly acquired data by the short-range wireless enabled cellular phone”                                                        | 1, 3, 4, 7, 9.      |
| “user data publishing website”                                                                                             | “a website corresponding to a specific user”                                                                                                                     | 1, 3-4, 6, 9        |
| “user data publishing web service”                                                                                         | “a web service corresponding to a specific user”                                                                                                                 | 7                   |
| “publish the new-data for private use”                                                                                     | Indefinite<br><br>Alternatively, “publishing to a specific user data publishing website where a user is authorized to view the user data publishing website”     | 3                   |
| “polling request” / “polling”                                                                                              | “checking status [of] on a predetermined basis by the Bluetooth enabled data capture device or Bluetooth enabled cellular phone, where “predetermined” refers to | 9                   |

| <b>Claim Terms, Phrases, or Clauses for Construction</b> | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                      | <b>Claim No(s).</b> |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|---------------------|
|                                                          | programming that sets the frequency of the status checks (e.g., at set intervals, dynamic intervals, randomly, etc.)” |                     |
| “HTTP”                                                   | “Hypertext Transfer Protocol, excluding Hypertext Transfer Protocol Secure”                                           | 1, 4, 7, 9          |

## VII. U.S. PATENT NO. 9,900,766

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                                                            | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                                                                                                                      | <b>Claim No(s).</b>   |
|-------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| Claims Elements Must be in an Ordered Combination                                                                                   | the elements must be performed in the order they appear in the claims                                                                                                                                                                                 | 1, 4, 9, 13           |
| “short-range wireless communication device”                                                                                         | “a mobile device that has the ability to send and/or receive short-range wireless messages”                                                                                                                                                           | 1, 4, 9, 13           |
| “short-range paired wireless connection”                                                                                            | “in the condition of having an exchanged link key (either before connection establishment was requested or during connecting phase) between the short-range wireless enabled data capture device and the short-range wireless enabled cellular phone” | 1-2, 4-6, 9-10, 13-14 |
| “short-range wireless enabled cellular phone”                                                                                       | “a cellular phone that has the ability to send and/or receive short-range wireless messages”                                                                                                                                                          | 1, 9-13               |
| “short-range wireless enabled data capture device”                                                                                  | “separate and apart from the mobile device and has the ability to send and/or receive short-range wireless messages”                                                                                                                                  | 1-3, 9, 13            |
| “after establishing the short-range paired wireless connection” / “after the short-range paired wireless connection is established” | “after the paired connection is established and maintained on a continuous basis between the short-range wireless enabled data capture                                                                                                                | 1, 4, 9, 12           |

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                                                                                                                                                  | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                                                                                                                                      | <b>Claim No(s).</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
|                                                                                                                                                                                                                           | device and the short-range wireless enabled cellular phone”                                                                                                                                                                                           |                     |
| “over the established short-range paired wireless connection”                                                                                                                                                             | “through the continuous, secure short-range wireless connection between the short-range wireless enabled data capture device and the short-range wireless enabled cellular phone”                                                                     | 1, 4, 9             |
| “association protocol”                                                                                                                                                                                                    | “set of procedures used in establishing a paired Bluetooth between the short-range wireless enabled data capture device and the short-range wireless enabled cellular phone”                                                                          | 1, 4, 5, 9, 13      |
| “internet connected cellular phone”                                                                                                                                                                                       | “cellular phone that has the ability to send and/or receive Bluetooth wireless messages”                                                                                                                                                              | 4                   |
| “establish a short-range paired wireless connection” . . . “between the short-range wireless enabled data capture device and a short-range wireless enabled cellular phone” / “with an internet connected cellular phone” | “in the condition of having an exchanged link key (either before connection establishment was requested or during connecting phase) between the short-range wireless enabled data capture device and the short-range wireless enabled cellular phone” | 1, 4, 9, 13         |
| “after establishing the short-range paired wireless connection” . . . “between the short-range wireless enabled data capture device and the short-range wireless enabled cellular phone” / “with the cellular phone”      | “after the paired connection is established and maintained on a continuous basis between the short-range wireless enabled data capture device and the short-range wireless enabled cellular phone”                                                    | 1, 4                |
| “cryptographically authenticating” / “cryptographically authenticated”                                                                                                                                                    | “verified as legitimate by use of encryption and decryption involving an algorithm performed by the Bluetooth enabled data capture device and the Bluetooth enabled cellular phone”                                                                   | 1, 4, 8-9, 12-13    |

| <b>Claim Terms, Phrases, or Clauses for Construction</b>                                                         | <b>Preliminary Proposed Constructions and Extrinsic Evidence</b>                                                                               | <b>Claim No(s).</b> |
|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| “signal to notify”                                                                                               | “an indication of the presence of newly acquired data by the short-range wireless enabled cellular phone”                                      | 1, 4, 9, 13         |
| “listen to the signal to notify” / “listen for the signal to notify” / “listen and process the signal to notify” | “an indication of the presence of newly acquired data by the short-range wireless enabled cellular phone”                                      | 1, 4, 9             |
| “acquire” / “store” / “upload” / “signal” / “publish” / “create” . . . “new-data” / “new-data object”            | “an indication of the presence of newly acquired data by the short-range wireless enabled cellular phone”                                      | 1-4, 7-9, 11-13, 15 |
| “user information”                                                                                               | “a text string that identifies uniquely a user of a web service and contains sufficient information to authenticate a user of the web service” | 1, 4, 9, 13         |
| “along with”                                                                                                     | “at the same time”                                                                                                                             | 1, 4, 9, 13         |
| “user identifier”                                                                                                | “a text string that identifies uniquely a user of a web service and contains sufficient information to authenticate a user of the web service” | 1, 4, 9, 13         |
| “private consumption”                                                                                            | Indefinite<br><br>Alternatively, “providing access to a specific user authorized by the user data publishing website”                          | 1, 4, 9, 13         |
| “mobile client application”                                                                                      | “software application provided with the short-range wireless communication device”                                                             | 1, 4, 9, 13         |
| “user data publishing website”                                                                                   | “a website corresponding to a specific user”                                                                                                   | 1, 4, 9, 13         |
| “HTTP”                                                                                                           | “Hypertext Transfer Protocol, excluding Hypertext Transfer Protocol Secure”                                                                    | 1, 4, 9, 13         |