

Exhibit A

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

HANSHOW TECHNOLOGY CO., LTD.,

Plaintiff,

v.

SES-imagotag SA et al,

Defendants.

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NO. 2:23-CV-00174-RWS-RSP

PRELIMINARY CONSTRUCTIONS

ID	Disputed Term	Preliminary Construction
A	"normal monitoring mode" (’216 Patent, Claims 1, 7, and 14)	"a normal mode that has a longer monitoring period than the monitoring period of the fast monitoring mode"
B	"fast monitoring mode" (’216 Patent, Claims 1, 7, and 14)	"a mode that has a shorter monitoring period than the monitoring period of the normal monitoring mode"
C	"the base station comprises two wake-up modes: a normal wake-up mode and a[/the] fast wake-up mode" (’216 Patent, Claims 1, 7, and 14)	"the base station comprises two wake-up modes for waking up an electronic tag device, a normal wakeup mode wherein the base station sets a wake-up duration that is longer than the monitoring period of the normal monitoring mode, and a[/the] fast wake-up mode wherein the base station sets a wake-up duration that is longer than the monitoring period of the fast monitoring mode."

D	“fast wake-up instruction” (’216 Patent, Claims 1, 7, and 14)	“instruction from the base station to the electronic tag device requiring the electronic tag to remain awake for a time range that is longer than the monitoring period of the fast monitoring mode ”
E	“external device” (’216 Patent, Claims 1, 7, and 14)	“a device external to the electronic tag device”
F	“bearer tag” (’210 Patent, Claims 1, 2, 6, 7, 12, 14, 15, and 16; ’994 Patent, Claims 1, 2, 6, 7, and 12)	“tag containing information related to one or more corresponding services”
G	“service management request” (’210 Patent, Claims 1 and 6; ’994 Patent, Claims 1, 2, 6, 7, 15, and 18)	“a request that identifies a service and identification of the user”
H	“initiat[e/ing] determination of service information, related to [the] one or more services, from the bearer tag” (’210 Patent, Claims 1 and 6; ’994 Patent, Claims 1 and 6)	“initat[e/ing] determination of the service information contained within the bearer tag related to [the] one or more services”
I	“services platform for management of the one or more services according to a billing arrangement” (’210 Patent, Claims 1, 5, 6, 10, and 14)	Not subject to 35 U.S.C. § 112(6). Plain and ordinary meaning.
J	“services platform communicating with the mobile communication service provider for managing the one or more services and the one or more costs according to the billing arrangement” (’994 Patent, Claims 1 and 6)	Not subject to 35 U.S.C. § 112(6). Plain and ordinary meaning.

K	“A non-transitory computer-readable storage medium carrying one or more sequences of one or more instructions which, when executed by one or more processors, cause the one or more processors to at least perform the following” (’210 Patent, Claims 1 and 15)	The preamble is limiting.
L	“wherein managing the one or more services comprises activating, modifying, discovering, accessing, or setting up the one or more services, and the management of the one or more services comprises activation, modification, discovery, accessing, and setting up of the one or more services.” (’210 Patent, Claims 1 and 6)	“and” is conjunctive, that is “management” requires the ability to do activation, modification, discovery, accessing, and setting up of the one or more services.
M	“predetermined billing arrangement” (’210 Patent, Claims 3 and 8; ’994 Patent, Claims 3 and 8)	Plain and ordinary meaning.
N	“mobile communication service provider that has a billing arrangement with a user account associated with the user equipment” (’994 Patent, Claims 1 and 6)	