

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

S.M.R INNOVATIONS LTD and
Y.M.R TECH LTD,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Civil Action No. 6:23-cv-00479-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

Plaintiffs S.M.R Innovations LTD and Y.M.R Tech LTD and Defendant Apple Inc.

jointly submit this Joint Claim Construction Statement for disputed claim terms of four patents at issue in this case: (1) U.S. Patent No. 7,969,990; (2) U.S. Patent No. 8,711,866; (3) U.S. Patent No. 9,699,223; and (4) U.S. Patent No. 10,547,648.

I. AGREED CONSTRUCTIONS

The parties agree that the terms transmit / transmitting / transmitted in the claims of the '223 patent should be construed as follows: "Plain meaning, where the transmission may use at least IR, microwave, radio, sound waves, ultrasound, wire and cable, light, laser, chemical, or quantum techniques, or other technologies that would occur to the skilled person."

II. DISPUTED CLAIM TERMS

Term/Phrase	Defendant's Construction	Plaintiffs' Construction
transmitting said media content to a plurality of copies ('223 pat., cl. 7)	Indefinite	Plain meaning
This phrase was proposed for	<u>Alternative, if not indefinite:</u> plain meaning, where the plain meaning refers to making copies	

Term/Phrase	Defendant's Construction	Plaintiffs' Construction
construction by Apple.	on the mobile device of the media content	
an announcer device . . . configured for indicating to surrounding equipment that said mobile communication device is available to receive rerouting ('990 pat., cls. 1-3, 9, & 24; '866 pat., cls. 22-24) This phrase was proposed for construction by Apple.	A device that announces to the environment that a particular device is available to accept rerouted media, including announcing when the device becomes unavailable and when it becomes available	Plain meaning
availability of compatible equipment / availability of said identified compatible media handling devices / availability for accepting a routed media available devices ('990 Patent, claims 1–3, 9, & 24; '866 Patent, claims 22-24; '223 Patent, claims 1, 5, 7-10, 13-16, 18, 19, & 22; '648 Patent, claims. 1, 5-8, 10, 11, 13, 15, 16, 18, & 19) These phrases were proposed for construction by Apple.	<u>Original Proposal</u>: Availability: whether equipment / device is free and able to receive a routed signal Available: devices that are free and able to receive a routed signal <u>Alternative</u>: plain meaning, where the plain meaning requires “readiness for immediate use,” not mere presence	Plain meaning
bidirectional / bidirectional link carrying streaming data ('990 Patent, claims 1-3, 9, & 24; '866 Patent, claim 22) These terms/phrases were proposed for construction by Apple.	Both directions of a link carry streaming media, as opposed to control signals and acknowledgments	Plain meaning
a media transformer . . . for transforming media into a form that accords with said determined media type requirements	This term is in means-plus-function form Function: transforming media into a form that accords with determined media type	Plain meaning (and not a means-plus-function term) Should the Court find the term governed by

Term/Phrase	Defendant's Construction	Plaintiffs' Construction
(’990 Patent, claims 1-3, 9, & 24; ’866 Patent, claims 22-24) This phrase was proposed for construction by Apple.	requirements Corresponding structure: no structure disclosed, and therefore the term is indefinite	§ 112, ¶ 6: Software for transforming input into a required media type, or types, and outputting the resulting media stream(s), or file(s), including voice to text, text to fax, image transformations, video transformations, and sound transformations.
a single incoming data stream (’990 Patent, claims 1-3, 9, & 24; ’866 Patent, claim 22) This phrase was proposed for construction by Apple.	Plain and ordinary meaning, where the “data” in this stream is the rerouted data [data for rerouting] that was initially received by the mobile communication device	Plain meaning
wirelessly communicating information to an intermediate routing device connected to the LAN for indirectly routing messages or media content (’648 Patent, claims 1, 5-8, 10, 11, 13, 15, 16, 18, & 19) This phrase was proposed for construction by Apple	<u>Original proposal</u>: Communicating information to a local area network device to indicate to the network which device has been selected for rerouting <u>Alternative</u>: plain meaning, where “for indirectly routing messages or media content” modifies “wirelessly communicating information” and where the information being rerouted is not transmitted from the mobile device to the ultimate recipient	Plain meaning

Dated: October 28, 2024

Respectfully submitted,

/s/ Cortney Alexander

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