

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

VARIA HOLDINGS LLC, Plaintiff, v. APPLE INC., Defendant.	Case No. 1:23-cv-07477-RPK-RML
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**VARIA HOLDINGS LLC AND APPLE INC.’S
JOINT DISPUTED CLAIM TERMS CHART**

Pursuant to the Joint Proposed Civil Case Management Plan (Dkt. 20) and Local Patent Rule 11, Plaintiff Varia Holdings LLC (“Varia”) and Defendant Apple Inc. (“Apple”) hereby provide their Joint Disputed Claim Terms Chart setting forth the Parties’ respective constructions for the disputed claim terms, phrases, or clauses the Parties contend require construction. As required by Joint Proposed Civil Case Management Plan (Dkt. 20), the Parties have met and conferred with respect to the disputed constructions in the attached Appendix A.

A. The Asserted Claims

Varia asserts the following patents, claims, and priority dates in its Preliminary Infringement Contentions and Complaint, as narrowed by its April 18, 2024 Identification of Asserted Claims:

Asserted Patent	Asserted Claims
U.S. Patent No. 8,127,984 (“984 patent”)	1, 6, 9, 13, 17, 21, 24, 26, 32, 36
U.S. Patent No. 8,381,974 (“974 patent”)	1, 4, 6, 8, 12, 15
U.S. Patent No. 9,405,947 (“947 patent”)	1, 5, 9, 12, 16, 19, 21, 26, 29

B. Varia's Reservation of Rights

Varia reserves the right to modify, add to, or delete from the list based on, without limitation, any term or phrase, or any portion thereof, identified by Apple as requiring construction. Varia further reserves the right to refine this list by combining or dividing identified terms, phrases, or clauses in an effort to resolve any dispute that may arise as to the proper disposition of the listed terms, phrases, or clauses. Varia also reserves the right to include additional portions of claims to provide context and clarity for the identified terms, phrases, or clauses. Furthermore, discovery is ongoing, and Varia reserves the right to revise, amend, supplement and/or withdraw any of the term(s) phrase(s), or clause(s) provided herein should discovery yield additional information.

If Apple modifies any claim, assertion, or contention in its Invalidity Contentions, or presents any new claim, assertion, or contention relevant to these claim terms, phrases, or clauses to the extent allowed by Local Patent Rules or the Court, Varia reserves the right to supplement or otherwise amend these proposed claim constructions. Apple's Core Technical Document Production is deficient in multiple respects and does not provide Varia with sufficient information regarding proprietary details of specific components in the Accused Products and how the Accused Features operate. Apple's Invalidity Contentions are deficient in multiple respects and do not provide Varia with sufficient information to understand the alleged factual and evidentiary bases for Apple's invalidity allegations. Varia's identification of claim terms or phrases and proposed constructions are based on Varia's current understanding of Apple's theories.

C. Apple's Reservation of Rights

Apple's inclusion of any claim terms, phrases, or clauses in this list is not intended, and should not be construed, to mean that any such terms, phrases, or clauses have a special or uncommon meaning. In addition, the inclusion of a claim term, phrase, or clause is not intended

to and does not constitute an admission that the term, phrase, or clause is capable of construction and is not indefinite or otherwise invalid under 35 U.S.C. § 112 or otherwise. Furthermore, to the extent a term renders a claim indefinite, all claims depending from that claim are similarly indefinite. Apple expressly reserves the right to contest any such issues concerning indefiniteness and invalidity.

Apple reserves the right to modify, add to, or delete from the list based on, without limitation, any term or phrase, or any portion thereof, identified by Varia as requiring construction. Apple further reserves the right to refine this list by combining or dividing identified terms, phrases, or clauses in an effort to resolve any dispute that may arise as to the proper disposition of the listed terms, phrases, or clauses. Apple also reserves the right to include additional portions of claims to provide context and clarity for the identified terms, phrases, or clauses. Furthermore, discovery is ongoing, and Apple reserves the right to revise, amend, supplement and/or withdraw any of the term(s) phrase(s), or clause(s) provided herein should discovery yield additional information.

If Varia modifies any claim, assertion, or contention in its Preliminary Infringement Contentions, or presents any new claim, assertion, or contention relevant to these claim terms, phrases, or clauses to the extent allowed by Local Patent Rules or the Court, Apple reserves the right to supplement or otherwise amend these proposed claim constructions. The Preliminary Infringement Contentions are deficient in multiple respects and do not provide Apple with sufficient information to understand the specific accused features and components and the alleged factual and evidentiary bases for Varia's infringement allegations. Among other reasons, the Preliminary Infringement Contentions lack the required specificity, fail to properly identify accused instrumentalities, and fail to explain adequately Varia's infringement theories for

numerous limitations. Varia has prejudiced Apple's ability to understand, for purposes of preparing these proposed claim constructions, what Varia alleges to be the scope of the Asserted Claims, and Apple's identification of claim terms or phrases and proposed constructions are based on Apple's current understanding of Varia's infringement theories.

D. Parties' Joint Disputed Claim Constructions

The Parties provide the attached Appendix A that identifies the claim terms, phrases, or clauses for which the Parties dispute the appropriate construction. Identification of a term, phrase, or clause in any of the Asserted Claims applies equally to variations or other instances of that term, phrase, or clause in any of the Asserted Claims in the Asserted Patents, unless otherwise stated. In the constructions provided in Appendix A, certain terms incorporate other claim language, and the proposed constructions for such claim terms should likewise be incorporated. A construction of a term applies equally to variations or other instances of that term in any of the Asserted Claims in the Asserted Patents.

The identified claims listed in this disclosure are representative.

Dated: May 9, 2024

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this document has been served on all counsel of record via the Court's ECF system on May 9, 2024.

/s/ Brian A. Rosenthal

**APPENDIX A: JOINT IDENTIFICATION OF PROPOSED CONSTRUCTIONS FOR DISPUTED CLAIM TERMS
FOR U.S. PATENT NOS. 8,127,984 (“’984”), 8,381,974 (“’974”), AND 9,405,947 (“’947”)**

Claim Term, Clause, or Phrase	Patent(s) and Claim(s)	Varia’s Proposed Constructions and Citations to Infringement Contentions	Apple’s Proposed Constructions and Citations to Invalidity Contentions
“transceiver”	’984: 1, 9, 13 ’974: 1, 6, 8	The components responsible for transmitting and receiving signals in a mobile communications device that are integrated into the electronics of the device <u>Citations to Infringement Contentions:</u> Preliminary Infringement Contentions p. 2. App. A pp. 7-13, 24-26, 38-42; App. B pp. 8-13, 18-21, 27-33, App. D col. D.	A single component within the mobile communication[s] device that includes common circuitry for transmitting and receiving both RFID and voice signals to/from an antenna <u>Citations to Preliminary Invalidity Contentions:</u> Invalidity Contentions pp. 25-57, 60, 64, 70. App. A pp. 1-6, 11-13, 15-21; App. B pp. 1-5, 9-11, 12-16. Exhibit A1 pp. 2-19, 42-53, 62-64; Exhibit A2 pp. 2-62, 133-153, 183-185; Exhibit A3 pp. 2-37, 67-81, 90-92; Exhibit A4 pp. 2-23, 41-50, 55-57; Exhibit A5 pp. 2-27, 60-72, 78-79; Exhibit A6 pp. 2-16, 29-37, 41-43; Exhibit A7 pp. 2-17, 27-29, 31-33; Exhibit A8 pp. 3-4, 8-9, 11-13; Exhibit A9 pp. 3-4, 8-9, 11-13; Exhibit A10 pp. 2-3, 7-8, 9-12; Exhibit A11 pp. 3-4, 8-9, 10-13. Exhibit B1 pp. 2-19, 33-43, 49-50; Exhibit B2 pp. 2-62, 101-121, 131-132; Exhibit B3 pp. 2-35, 57-71, 78-79; Exhibit B4 pp. 2-

“transmitter”	’984: 21, 32 ’974: 12	The components responsible for transmitting signals in a mobile communications device that are integrated into the electronics of the device <u>Citations to Infringement Contentions:</u> Preliminary Infringement Contentions p. 2. App. A pp.56-57, 59-64, 77-82; App. B pp. 40-41, 43-48; App. D col. D.	23, 34-44, 44-45; Exhibit B5 pp. 2-27, 47-59, 62-63; Exhibit B6 pp. 2-16, 24-31, 31-32; Exhibit B7 pp. 2-17, 23-26, 26-27; Exhibit B8 pp. 3-4, 6-8, 8-10; Exhibit B9 pp. 3-4, 6-8, 8-10; Exhibit B10 pp. 2-3, 5-6, 7-8; Exhibit B11 pp. 3-4, 6-8, 8-10.
			A single component within the mobile communication[s] device that includes common circuitry for transmitting both RFID and voice signals to an antenna <u>Citations to Invalidity Contentions:</u> Invalidity Contentions pp. 25-57, 60, 64. App. A pp. 24-31, 36-40; App. B pp. 18-24. Exhibit A1 pp. 67-78, 81-82; Exhibit A2 pp. 187-201, 205-206; Exhibit A3 pp. 96-118, 121-122; Exhibit A4 pp. 60-75, 79-80; Exhibit A5 pp. 82-91, 94-96; Exhibit A6 pp. 47-58, 61-62; Exhibit A7 pp. 36-45, 49-50; Exhibit A8 pp. 16-19, 23-25; Exhibit A9 pp. 16-19, 24-25; Exhibit A10 pp. 15-18, 22-24; Exhibit A11 pp. 16-19, 24-25. Exhibit B1 pp. 54-65; Exhibit B2 pp. 143-157; Exhibit B3 pp. 84-102; Exhibit B4 pp. 47-53; Exhibit B5 pp. 68-76; Exhibit B6 pp. 36-42; Exhibit B7 pp. 30-39; Exhibit B8 pp.

“communication circuitry”	’947: 16, 26	The combination of circuits responsible for outputting voice call and RFID signals, and receiving RFID signals, that are integrated into the electronics of the device <u>Citations to Infringement Contentions:</u> Preliminary Infringement Contentions p. 2. App. C at pp. 32-34, 36-39, 50-51, 53-57; App. D col. D.	11–14; Exhibit B9 pp. 11–14; Exhibit B10 pp. 10–12; Exhibit B11 pp. 11–14. A single component within the mobile communication[s] device that includes common circuitry for transmitting and receiving both RFID and voice signals to/from an antenna <u>Citations to Invalidity Contentions:</u> Invalidity Contentions pp. 25–57, 61, 65. App. C pp. 14–21, 26–32. Exhibit C1 pp. 71–88, 92–94; Exhibit C2 pp. 196–218, 221–223; Exhibit C3 pp. 91–110, 113–115; Exhibit C4 pp. 75–88, 92–95; Exhibit C5 pp. 78–93, 96–98; Exhibit C6 pp. 53–64, 67–69; Exhibit C7 pp. 48–56, 59–62; Exhibit C8 pp. 13–16, 21–24; Exhibit C9 pp. 13–16, 21–24; Exhibit C10 pp. 13–16, 21–24; Exhibit C11 pp. 13–16, 21–24.
“switchable mobile communication[s] device”	’984: 1, 13, 21, 32 ’974: 1, 8, 12	No Construction Required In the alternative, to the extent the preamble is limiting: mobile communication[s] device capable of changing states <u>Citations to Infringement Contentions:</u>	Mobile communication[s] device configured to switch between an RFID state and a voice call signal state <u>Citations to Invalidity Contentions:</u> Invalidity Contentions pp. 60, 64.

		Preliminary Infringement Contentions p. 2. App. A pp. 1-5, 30-34, 51-55, 72-76; App. B pp. 1-5, 22-26, 36-39.	App. A pp. 1-6, 15-21, 24-31, 36-40; App. B pp. 1-5, 12-16, 18-24. Exhibit A1 pp. 2-19, 62-64, 67-78, 81-82; Exhibit A2 pp. 2-62, 183-185, 187-201, 205-206; Exhibit A3 pp. 2-37, 90-92, 96-118, 121-122; Exhibit A4 pp. 2-23, 55-57, 60-75, 79-80; Exhibit A5 pp. 2-27, 78-79, 82-91, 94-96; Exhibit A6 pp. 2-16, 41-43, 47-58, 61-62; Exhibit A7 pp. 2-17, 31-33, 36-45, 49-50; Exhibit A8 pp. 3-4, 11-13, 16-19, 23-25; Exhibit A9 pp. 3-4, 11-13, 16-19, 24-25; Exhibit A10 pp. 2-3, 9-12, 15-18, 22-24; Exhibit A11 pp. 3-4, 10-13, 16-19, 24-25. Exhibit B1 pp. 2-19, 49-50, 54-65; Exhibit B2 pp. 2-62, 131-132, 143-157; Exhibit B3 pp. 2-35, 78-79, 84-102; Exhibit B4 pp. 2-23, 44-45, 47-53; Exhibit B5 pp. 2-27, 62-63, 68-76; Exhibit B6 pp. 2-16, 31-32, 36-42; Exhibit B7 pp. 2-17, 26-27, 30-39; Exhibit B8 pp. 3-4, 8-10, 11-14; Exhibit B9 pp. 3-4, 8-10, 11-14; Exhibit B10 pp. 2-3, 7-8, 10-12; Exhibit B11 pp. 3-4, 8-10, 11-14.
“proximal presence” / “proximal RFID reader”	’984: 9, 13, 21, 32 ’974: 6, 8, 12	Plain and ordinary meaning In the alternative, to the extent construction is required: the device is within the area surrounding an RFID reader in which a	Indefinite <u>Citations to Invalidity Contentions:</u>

	'947: 9, 16, 26	conventional RFID transponder will detect an RFID probing signal from the reader <u>Citations to Infringement Contentions:</u> Preliminary Infringement Contentions p. 2. App. A pp. 24-25, 35-39, 58-63, 78-81; App. B pp. 18-19, 27-31, 42-46; App. C pp. 19-22, 36-39, 53-55.	Invalidity Contentions pp. 60-62, 64-65. App. A pp. 11-13, 15-21, 24-31, 36-40; App. B pp. 9-11, 12-16, 18-24; App. C pp. 8-12, 14-21, 26-32. Exhibit A1 pp. 42-53, 62-64, 67-78, 81-82; Exhibit A2 pp. 133-153, 183-185, 187-201, 205-206; Exhibit A3 pp. 67-81, 90-92, 96-118, 121-122; Exhibit A4 pp. 41-50, 55-57, 60-75, 79-80; Exhibit A5 pp. 60-72, 78-79, 82-91, 94-96; Exhibit A6 pp. 29-37, 41-43, 47-58, 61-62; Exhibit A7 pp. 27-29, 31-33, 36-45, 49-50; Exhibit A8 pp. 8-9, 11-13, 16-19, 23-25; Exhibit A9 pp. 8-9, 11-13, 16-19, 24-25; Exhibit A10 pp. 7-8, 9-12, 15-18, 22-24; Exhibit A11 pp. 8-9, 10-13, 16-19, 24-25. Exhibit B1 pp. 33-43, 49-50, 54-65; Exhibit B2 pp. 101-121, 131-132, 143-157; Exhibit B3 pp. 57-71, 78-79, 84-102; Exhibit B4 pp. 34-44, 44-45, 47-53; Exhibit B5 pp. 47-59, 62-63, 68-76; Exhibit B6 pp. 24-31, 31-32, 36-42; Exhibit B7 pp. 23-26, 26-27, 30-39; Exhibit B8 pp. 6-8, 8-10, 11-14; Exhibit B9 pp. 6-8, 8-10, 11-14; Exhibit B10 pp. 5-6, 7-8, 10-12; Exhibit B11 pp. 6-8, 8-10, 11-14. Exhibit C1 pp. 43-69, 71-88, 92-94; Exhibit C2 pp. 140-194, 196-218, 221-223; Exhibit C3 pp. 48-82, 91-110, 113-115; Exhibit C4
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			pp. 45–71, 75–88, 92–95; Exhibit C5 pp. 50–76, 78–93, 96–98; Exhibit C6 pp. 29–47, 53–64, 67–69; Exhibit C7 pp. 32–45, 48–56, 59–62; Exhibit C8 pp. 8–10, 13–16, 21–24; Exhibit C9 pp. 8–10, 13–16, 21–24; Exhibit C10 pp. 8–10, 13–16, 21–24; Exhibit C11 pp. 8–10, 13–16, 21–24.
“operational space”	’947: 1, 9, 16, 26	Plain and ordinary meaning In the alternative, to the extent construction is required: the area surrounding an RFID reader in which a conventional RFID transponder will respond to an RFID probing signal from the RFID reader <u>Citations to Infringement Contentions:</u> Preliminary Infringement Contentions p. 2. App. C pp. 5-8, 20-21, 36-37, 53-55.	Indefinite <u>Citations to Invalidity Contentions:</u> Invalidity Contentions pp. 61, 65. App. C pp. 1–4, 8–12, 14–21, 26–32. Exhibit C1 pp. 2–19, 43–69, 71–88, 92–94; Exhibit C2 pp. 2–57, 140–194, 196–218, 221–223; Exhibit C3 pp. 2–24, 48–82, 91–110, 113–115; Exhibit C4 pp. 3–27, 45–71, 75–88, 92–95; Exhibit C5 pp. 2–22, 50–76, 78–93, 96–98; Exhibit C6 pp. 3–16, 29–47, 53–64, 67–69; Exhibit C7 pp. 3–22, 32–45, 48–56, 59–62; Exhibit C8 pp. 3–4, 8–10, 13–16, 21–24; Exhibit C9 pp. 3–4, 8–10, 13–16, 21–24; Exhibit C10 pp. 3–4, 8–10, 13–16, 21–24; Exhibit C11 pp. 3–4, 8–10, 13–16, 21–24.

“on detection of the RFID reader by the mobile communication device, outputting by the transceiver second RFID transponder data” / “output . . . RFID transponder data . . . upon the mobile communications device determining proximal presence of one or more RFID readers” / “output first RFID transponder data . . . in response to detection by the mobile communication device of the proximal RFID reader” / “on detection of the proximal RFID reader, output RFID transponder data as an RFID signal” / “on detection of the RFID reader, outputting, by the transceiver, the RFID transponder data as a radio frequency signal” / “the RFID signal is output in response to the mobile communication device determining the mobile communication device is in an operational space of the RFID reader” / “the outputting of the RFID signal comprises outputting	’984: 9, 13, 21, 32 ’974: 6, 8, 12 ’947: 1, 9, 16, 26	Plain and ordinary meaning <u>Citations to Infringement Contentions:</u> Preliminary Infringement Contentions p. 2. App. A pp. 25-26, 40-42, 59-63, 78-81; App. B pp. 19-21, 31-33, 43-47; App. C pp. 5-8, 22, 38-39, 54-55.	The [RFID transponder data / RFID signal] is outputted automatically whenever the mobile communication[s] device is within the [operational space / proximal presence] of the RFID reader <u>Citations to Invalidity Contentions:</u> Invalidity Contentions pp. 61, 65. App. A pp. 11-13, 15-21, 24-31, 36-40; App. B pp. 9-11, 12-16, 18-24; App. C pp. 1-4, 8-12, 14-21, 26-32. Exhibit A1 pp. 42-53, 62-64, 67-78, 81-82; Exhibit A2 pp. 133-153, 183-185, 187-201, 205-206; Exhibit A3 pp. 67-81, 90-92, 96-118, 121-122; Exhibit A4 pp. 41-50, 55-57, 60-75, 79-80; Exhibit A5 pp. 60-72, 78-79, 82-91, 94-96; Exhibit A6 pp. 29-37, 41-43, 47-58, 61-62; Exhibit A7 pp. 27-29, 31-33, 36-45, 49-50; Exhibit A8 pp. 8-9, 11-13, 16-19, 23-25; Exhibit A9 pp. 8-9, 11-13, 16-19, 24-25; Exhibit A10 pp. 7-8, 9-12, 15-18, 22-24; Exhibit A11 pp. 8-9, 10-13, 16-19, 24-25. Exhibit B1 pp. 33-43, 49-50, 54-65; Exhibit B2 pp. 101-121, 131-132, 143-157; Exhibit B3 pp. 57-71, 78-79, 84-102; Exhibit B4 pp. 34-44, 44-45, 47-53; Exhibit B5 pp. 47-59, 62-63, 68-76; Exhibit B6 pp. 24-31, 31-32, 36-42; Exhibit B7 pp. 23-26, 26-27, 30-39; Exhibit B8 pp. 6-8, 8-10, 11-14; Exhibit
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the RFID signal in response to determining the mobile communication device is within the proximal presence of the RFID reader” / “output an RFID signal . . . in response to detection of the proximal presence of the RFID reader external to the mobile communication device” / “in response to determining the mobile communication device is in the operational space of the RFID reader . . . , output an RFID signal”			B9 pp. 6–8, 8–10, 11–14; Exhibit B10 pp. 5–6, 7–8, 10–12; Exhibit B11 pp. 6–8, 8–10, 11–14. Exhibit C1 pp. 2–19, 43–69, 71–88, 92–94; Exhibit C2 pp. 2–57, 140–194, 196–218, 221–223; Exhibit C3 pp. 2–24, 48–82, 91–110, 113–115; Exhibit C4 pp. 3–27, 45–71, 75–88, 92–95; Exhibit C5 pp. 2–22, 50–76, 78–93, 96–98; Exhibit C6 pp. 3–16, 29–47, 53–64, 67–69; Exhibit C7 pp. 3–22, 32–45, 48–56, 59–62; Exhibit C8 pp. 3–4, 8–10, 13–16, 21–24; Exhibit C9 pp. 3–4, 8–10, 13–16, 21–24; Exhibit C10 pp. 3–4, 8–10, 13–16, 21–24; Exhibit C11 pp. 3–4, 8–10, 13–16, 21–24.
“the RFID reader”	’974: 6	Plain and ordinary meaning In the alternative, to the extent construction is required: an RFID reader <u>Citations to Infringement Contentions:</u> Preliminary Infringement Contentions p. 2. App. B pp. 18–21.	Indefinite <u>Citations to Invalidity Contentions:</u> App. B pp. 9–11. Exhibit B1 pp. 33–43; Exhibit B2 pp. 101–121; Exhibit B3 pp. 57–71; Exhibit B4 pp. 34–44; Exhibit B5 pp. 47–59; Exhibit B6 pp. 24–31; Exhibit B7 pp. 23–26; Exhibit B8 pp. 6–8; Exhibit B9 pp. 6–8; Exhibit B10 pp. 5–6; Exhibit B11 pp. 6–8.

“[facilitate / facilitating] the user” / “[facilitate / facilitating] a user”	’984: 6, 26 ’974: 4, 15 ’947: 5, 21	Plain and ordinary meaning In the alternative, to the extent construction is required, the terms should be construed in the context of the claims in which they appear: enabling a user to select [RFID transponder data/ RFID data] to output from the RFIDs stored in the device <u>Citations to Infringement Contentions:</u> Preliminary Infringement Contentions p. 2; App. A pp. 18-19, 66; App. B pp. 16-17, 49; App. C pp. 11, 43.	Indefinite <u>Citations to Invalidity Contentions:</u> Invalidity Contentions pp. 61–62, 65–66 . App. A pp. 9–10, 33–34; App. B pp. 8, 26; App. C pp. 6–7, 23–24. Exhibit A1 pp. 31–34, 79; Exhibit A2 pp. 101–113, 203; Exhibit A3 pp. 54–58, 119–120; Exhibit A4 pp. 35–37, 77; Exhibit A5 pp. 48–51, 93; Exhibit A6 pp. 24–26, 59–60; Exhibit A7 pp. 25–26, 47; Exhibit A8 pp. 6–7, 21; Exhibit A9 pp. 6–7, 21; Exhibit A10 pp. 5–6, 20; Exhibit A11 pp. 6–7, 21. Exhibit B1 pp. 26–29, 65–69; Exhibit B2 pp. 81–91, 158–168; Exhibit B3 pp. 49–52, 103–107; Exhibit B4 pp. 30–32, 54–56; Exhibit B5 pp. 38–42, 77–81; Exhibit B6 pp. 21–22, 43–44; Exhibit B7 pp. 21–22, 40–41; Exhibit B8 pp. 5–6, 15; Exhibit B9 pp. 5–6, 15; Exhibit B10 pp. 4, 14; Exhibit B11 pp. 5–6, 15. Exhibit C1 pp. 28–31, 90; Exhibit C2 pp. 90–100, 219–220, ; Exhibit C3 pp. 33–36, 111–112; Exhibit C4 pp. 33–38, 90; Exhibit C5 pp. 35–39, 94–95; Exhibit C6 pp. 22–24, 65–66; Exhibit C7 pp. 29, 57–58; Exhibit C8 pp. 6, 18–19; Exhibit C9 pp. 6, 18–19;
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			Exhibit C10 pp. 6, 18; Exhibit C11 pp. 6, 18–19.
“u on receipt of the RFID robin signal [sic]”	’947: 9	Parties have agreed in principle to correct this phrase to: Upon receipt of the RFID probing signal <u>Citations to Infringement Contentions:</u> Preliminary Infringement Contentions p. 2, App. C p. 22	Parties have agreed in principle to correct this phrase to: Upon receipt of the RFID probing signal <u>Citations to Invalidity Contentions:</u> Invalidity Contentions pp. 62, 66. App. C pp. 8–12. Exhibit C1 pp. 43–69; Exhibit C2 pp. 140–194; Exhibit C3 pp. 48–82; Exhibit C4 pp. 45–71; Exhibit C5 pp. 50–76; Exhibit C6 pp. 29–47; Exhibit C7 pp. 32–45; Exhibit C8 pp. 8–10; Exhibit C9 pp. 8–10; Exhibit C10 pp. 8–10; Exhibit C11 pp. 8–10.