

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

FERID ALLANI

Plaintiff,

v.

APPLE, INC.,

Defendant.

CIVIL ACTION NO. 6:24-cv-304-ADA

JURY TRIAL DEMANDED

PLAINTIFF’S PRELIMINARY INFRINGEMENT CONTENTIONS

Plaintiff Ferid Allani (“Plaintiff”) provides the following Preliminary Infringement Contentions to Defendant Apple, Inc. (“Defendant”). This disclosure is based on the information available to Plaintiff as of the date of this disclosure, and Plaintiff reserves the right to amend this disclosure to the full extent consistent with the Court’s Rules and Orders.

I. INFRINGEMENT

Plaintiff asserts that Defendant infringes one or more of the following claims (collectively, “Asserted Claims”) of the following patents (collectively, “Asserted Patents”):

U.S. Patent No. 8,271,877 (“the ’877 patent”), claims 12, 15, 17-19.

U.S. Patent No. 10,943,058 (“the ’058 patent”), claims 24-27.

Plaintiff asserts that the Asserted Claims of the ’877 patent are infringed by the various apparatuses used, made, sold, offered for sale, or imported into the U.S. by Defendant, including the Apple iPhone, iPhone 6, iPhone 6S, iPhone 6 Plus, iPhone 6S Plus, iPhone SE, iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X, iPhone XR, iPhone XS, iPhone XS Max, iPhone 11, iPhone 11 Pro, iPhone 11 Pro Max, iPhone 12, iPhone 12 Mini, iPhone 12 Pro, iPhone 12 Pro Max, iPhone SE (Second Generation), iPhone 13, iPhone 13 Mini, iPhone 13 Pro, iPhone 13 Pro

Max, iPhone SE (Third Generation), iPhone 14, iPhone 14 Plus, iPhone 14 Pro, iPhone 14 Pro Max, iPhone 15, iPhone 15 Plus, iPhone 15 Pro, iPhone 15 Pro Max, iPad Air, iPad mini, iPad Pro, Apple Watch (First through Seventh Generation), and other iOS enabled mobile devices (e.g., iPod Touches) (the “Accused Products”). Plaintiff asserts that the Asserted Claims of the ’058 patent are infringed by the various apparatuses used, made, sold, offered for sale, or imported into the U.S. by Defendant, and the methods performed thereon, including the Apple iPhone, iPhone 6, iPhone 6S, iPhone 6 Plus, iPhone 6S Plus, iPhone SE, iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X, iPhone XR, iPhone XS, iPhone XS Max, iPhone 11, iPhone 11 Pro, iPhone 11 Pro Max, iPhone 12, iPhone 12 Mini, iPhone 12 Pro, iPhone 12 Pro Max, iPhone SE (Second Generation), iPhone 13, iPhone 13 Mini, iPhone 13 Pro, iPhone 13 Pro Max, iPhone SE (Third Generation), iPhone 14, iPhone 14 Plus, iPhone 14 Pro, iPhone 14 Pro Max, iPhone 15, iPhone 15 Plus, iPhone 15 Pro, and iPhone 15 Pro Max. The Accused Products infringe substantially in the way described in the claim charts attached hereto as Exhibits 1-2.

Exhibits 1-2, which Plaintiff incorporates by reference, identify each element of the Asserted Claims of the Asserted Patents found in the exemplary Accused Product. Plaintiff’s analysis is based on certain limited information that is publicly available and Plaintiff’s own investigation before any discovery in this action. Plaintiff reserves the right to amend or supplement these disclosures to the full extent consistent with the Court’s Rules and Orders.

Plaintiff in no way intends that the Accused Products are limited to the methods and apparatuses that are identified in the Exhibits, but instead contends that the Accused Products are meant to refer to all methods and apparatuses that involve all similar products that practice at least one of the Asserted Claims. For example, Plaintiff does not intend to limit the Accused Products to devices that include the specific icons and navigation paths identified in Exhibits 1-2. Unless

otherwise stated, Plaintiff's assertions of infringement apply to all models, variations, versions, and applications of each of the Accused Products since issuance of the Asserted Patents, and, on information and belief, that different models, variations, versions, and applications of each of the Accused Products all operate in the substantially the same manner for purposes of infringement of the Asserted Claims.

With respect to the Asserted Patents, each element of each Asserted Claim is considered to be literally present. Plaintiff also contends that each Asserted Claim is infringed or has been infringed under the Doctrine of Equivalents in Defendant's Accused Products. Plaintiff also contends that Defendant directly and indirectly infringes the Asserted Claims. For example, the Accused Products are provided by Defendant to others (including distributors, dealers, and customers), who are actively encouraged and instructed (for example, through online instructions on their website, user manuals, and information and instructions supporting sales and services by others) by Defendant to use the Accused Products in ways that directly infringe at least one claim of each of the Asserted Patents. Defendant therefore specifically intends for and induces its customers to practice at least one claim of each of the Asserted Patents through the others' normal and customary use of the Accused Products. Other theories of infringement are set forth in Exhibits 1-2.

II. PRIORITY DATES

The Asserted Claims of the '877 patent are entitled to a priority date at least as early as December 30, 1999. At this time, and based on currently available evidence, Plaintiff contends the earliest corroborated date of invention for the '877 patent is December 30, 1999. The Asserted Claims of the '058 patent are entitled to a priority date at least as early as December 30, 1999. At

this time, and based on currently available evidence, Plaintiff contends the earliest corroborated date of invention for the '058 patent is December 30, 1999.

III. DOCUMENT PRODUCTION

VoIP-Pal will produce copies of the file histories for the Asserted Patents and documents relating to the priority of the Asserted Patents.

Dated: October 17, 2024

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**ATTORNEYS FOR PLAINTIFF
FERID ALLANI**

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the PLAINTIFF'S PRELIMINARY INFRINGEMENT CONTENTIONS via electronic mail this 17th day of October, 2024.

By: /s/Lewis E. Hudnell, III

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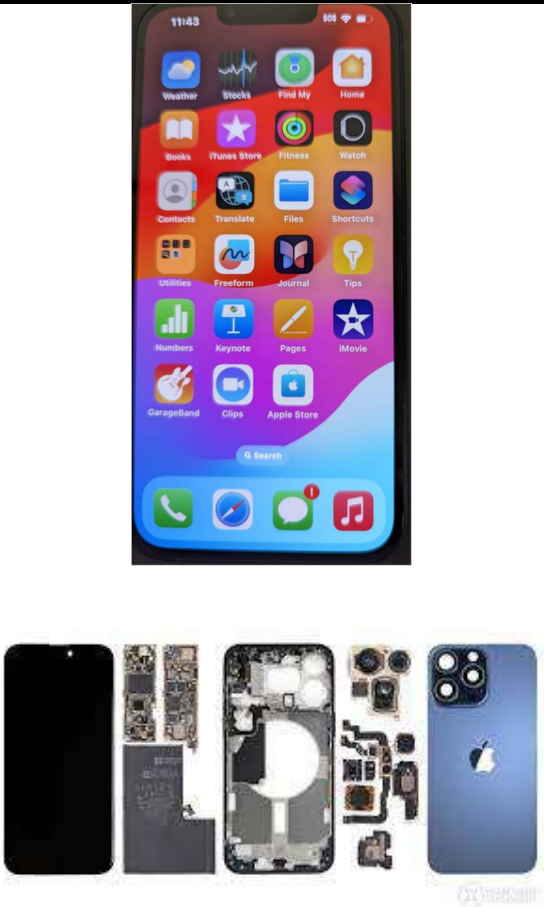
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EXHIBIT 1

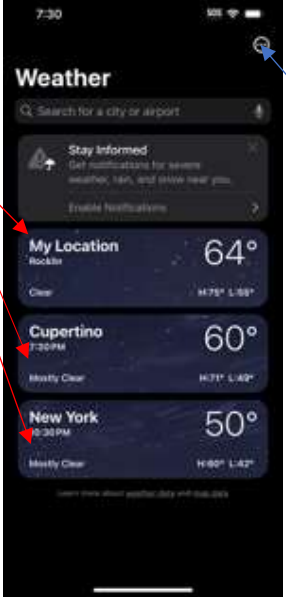
EXHIBIT 1

US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
A device for accessing information- or service-providing web sites comprising a mobile communication device connectable through a communication network to the Internet, control and processing device or devices, data storage device or devices, a display, and pointing and selection device or devices,	An iOS Device, such as an iPhone, iPad, Apple Watch, or iPod Touch, implements iOS, an operating system designed for, among other things, enabling the device to access information- or service-providing Web sites, which includes remote information available on the Web. The iOS Device comprises a mobile communication device connected through a communication network and comprises a control & processing unit, memory, a display (the iOS Device screen), and a pointing and selection device (the touch-sensitive screen).	 The image shows two representations of an iOS device. The top part is a front-facing view of an iPhone displaying the iOS home screen with various app icons like Weather, Stocks, Find My, Home, Books, iTunes Store, Fitness, Watch, Contacts, Translate, Files, Shortcuts, Utilities, Freeform, Journal, Tips, Numbers, Keynote, Pages, iMovie, GarageBand, Clips, and the App Store. The bottom part is a disassembled view of an iPhone, showing the internal components including the display, battery, logic board, camera, and other hardware.

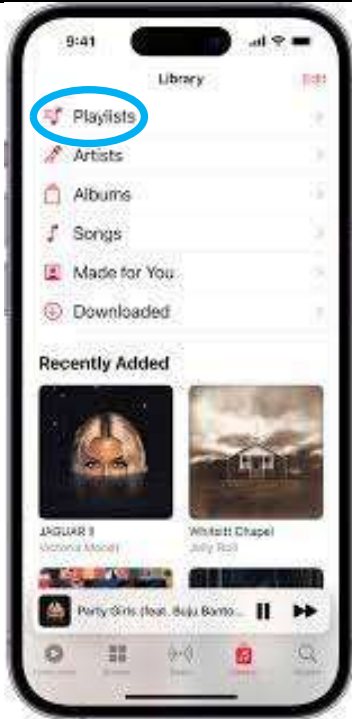
US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
said storage device or devices containing a plurality of selection pages each comprising a set of icons	The iOS Device provides selection pages (screen pages) which are organized within a tree menu structure: a home screen selection page (screen page) initially displayed and theme/sub-theme pages, for example, a weather page or a music page, linked to said home screen. The selection pages include a set of icons. The selection pages (screen pages) are stored in a memory unit of the iOS Device, as they are accessible even when the iOS Device has not yet been connected to Internet or is in airplane mode.	Icons  Selection page

US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
		Icons  7:30 Weather Search for a city or airport Stay Informed Get notifications for severe weather, rain, and snow near you. Enable Notifications My Location Rocklin 64° Clear H: 75° L: 58° Cupertino 7:20 PM 60° Mostly Clear H: 71° L: 49° New York 10:30 PM 50° Mostly Clear H: 60° L: 42° Learn more about weather data and how it's used Selection page

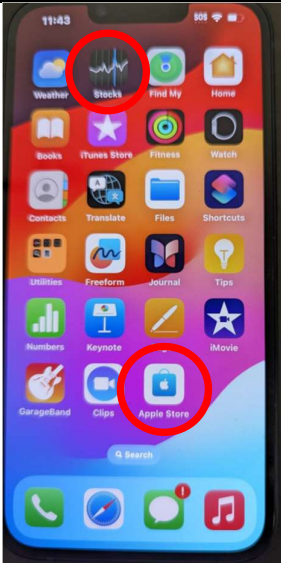
US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
characterized in that, for each said selection page, the set of icons includes one or more direct access icons for directly accessing an information- or service-providing web site and one or more selection icons for locally accessing another selection page within a structure of a tree menu,	The selection pages (screen pages) displayed on the iOS Device screen are specifically designed to include icons. In one example: ➤ The first selection page (screen page) includes direct access icons like <i>Stocks</i> and selection icons like <i>Weather</i>.	Selection Icon  Direct Access Icon Selection page

US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
	➤ A second selection page (screen page) reached from the <i>Weather</i> icon further includes direct access icons and a selection icon. To the extent that the accused products do not literally satisfy this claim limitation, this difference is insubstantial. The accused products perform the same function of accessing an information- or service-providing remote service, in the same way by transmitting data such as a resource address or the like identifying the requested data, to achieve the same result of having the remote service return the requested data for display on the iOS Device.	Direct Access Icons  Selection Icon Selection page

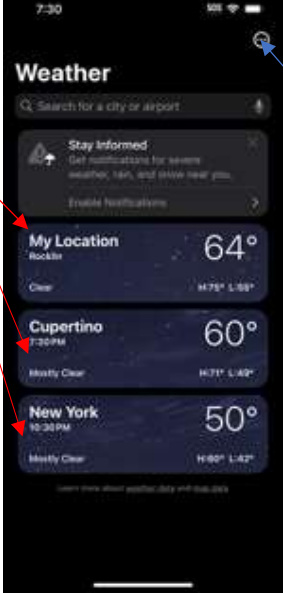
US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
	In another example: ➤ The first selection page (screen page) includes a direct access icon like <i>Stocks</i> and selection icon like <i>Music</i> that links to another selection page (screen page) with a selection icon for <i>Playlists</i> that links to another selection page (screen page).	 Selection page

US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
		 Selection page

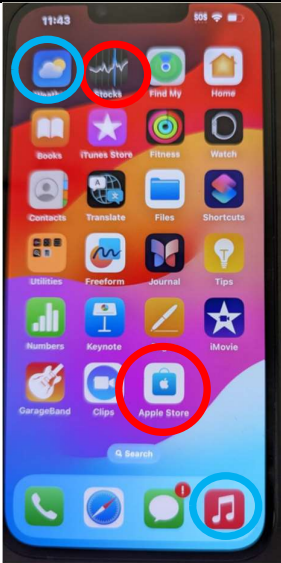
US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
		

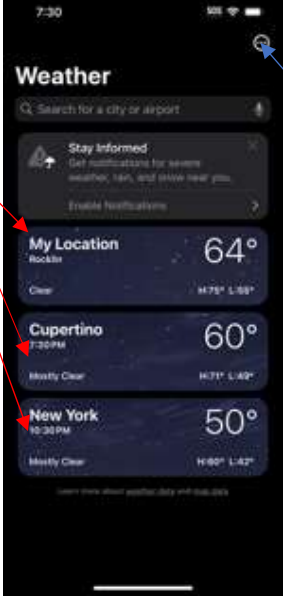
US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
wherein at least one of said selection pages comprises two or more direct access icons,	The first selection page (screen page) (the home screen) comprises at least the direct access icon <i>Stocks</i> and the direct access icon <i>Apple Store</i>.	

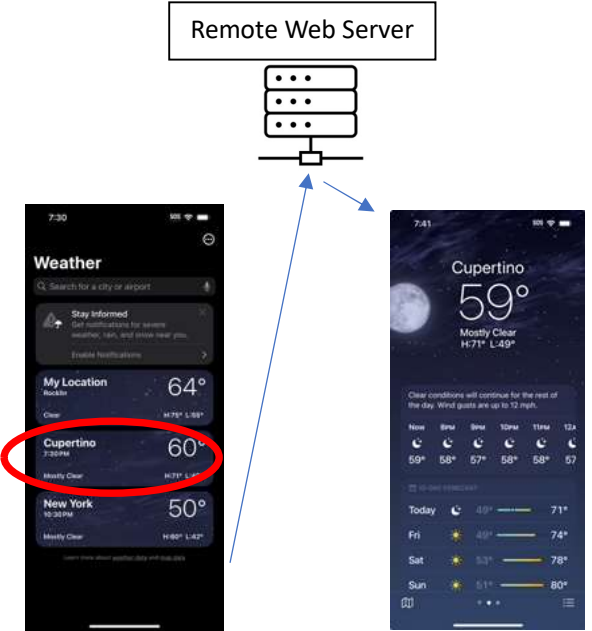
US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
and in that the control and processing device or devices are programmed for: enabling a preliminary search locally performed within said communication device in different themes and sub-themes within a plurality of selection pages organized in said structure of tree menu and beforehand locally stored in said data storage means within said communication device,	A user of the iOS Device who wants to obtain information can make a preliminary search through successive first, second, third or more locally stored selection pages (screen pages) relating to a particular theme to reach a direct access icon dedicated to the information. For example, a user wanting weather information can make a preliminary search starting with the home selection page (screen page) by selecting a selection icon relating to the subject of weather and then choosing from a subsequent selection page (screen page) a direct access icon providing weather information about a specific location.	 Selection Icon Direct Access Icon Selection page

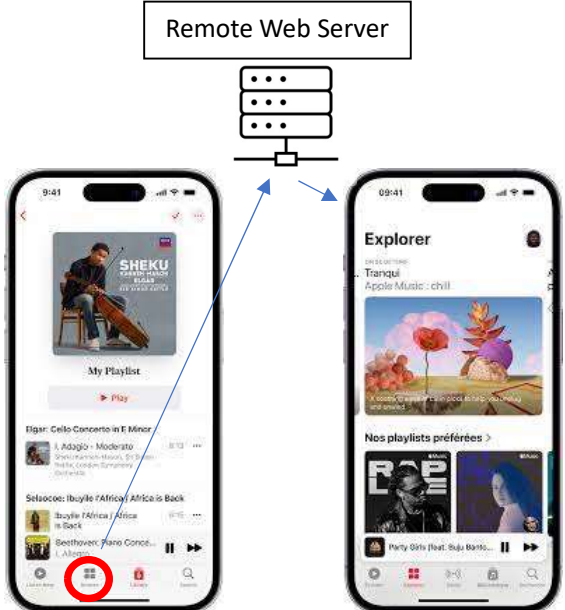
US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
		Direct Access Icons A screenshot of an iOS Weather app interface. At the top, the status bar shows the time 7:30, signal strength, and battery level. Below the status bar is the 'Weather' title and a search bar. A 'Stay Informed' section with a plus icon and a close icon is present. Below this are three weather cards: 'My Location' (Rocklin, 64°, Clear, High 75°, Low 58°), 'Cupertino' (7:20 PM, 60°, Mostly Clear, High 71°, Low 49°), and 'New York' (11:30 PM, 50°, Mostly Clear, High 60°, Low 42°). Red arrows point from the text 'Direct Access Icons' to the plus icons on the weather cards. A blue arrow points from the text 'Selection Icon' to a small circular icon in the top right corner of the app interface. Selection Icon Selection page

US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
		

US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
each said selection page comprising a set of icons including one or more icons for directly accessing an information- or service-providing web site and one or more selection icons for locally accessing and displaying on the display means another selection page within said structure of tree menu, and	The selection pages (screen pages) displayed on the iOS Device screen are specifically designed to include icons. In one example: ➤ The first selection page (screen page) includes at least the direct access icons <i>Stocks</i> and <i>Apple Store</i> (red), and the selection icons <i>Weather</i> and <i>Music</i> (blue).	

US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
	➤ A subsequent selection page (screen page) following the list link from the previous page includes direct access icons for specific weather locations and a selection icon to another selection page (screen page) to control settings.	Direct Access Icons  The screenshot shows the iOS Weather app interface. At the top, there's a status bar with the time 7:30 and signal/battery icons. Below that is the 'Weather' title and a search bar. A 'Stay Informed' section with a plus icon and a close icon is present. Below this is a list of weather locations: 'My Location' (Rocklin, 64°, Clear, High 75°, Low 58°), 'Cupertino' (7:20 PM, 60°, Mostly Clear, High 71°, Low 49°), and 'New York' (10:30 PM, 50°, Mostly Clear, High 60°, Low 42°). Red arrows point from the 'Direct Access Icons' label to the plus icon in the 'Stay Informed' section and the location cards. A blue arrow points from the 'Selection Icon' label to a small circular icon in the top right corner of the app screen. Selection Icon

US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
emitting on the communication network, in response to selecting a direct access icon by the pointing and selection device or devices in a selection page being currently displayed, an address of an information- or service-providing web site corresponding to said selected direct access icon, said address being locally generated during the preliminary search and selection steps.	The display is capable of being used to search the tree structure of selection pages and a selection of a direct access icon is capable of being selected via the touchscreen display. In response to the selection of a direct access icon, the iOS Device emits a dedicated address, such as a URL or the like, on the communication network to get access to a remote Web server. The address is locally stored on the iOS Device and is retrieved upon selection. For example, from the <i>Weather</i> selection page, selecting a particular location direct access icon causes an address of an information- or service-providing web site to be transmitted leading to weather information for that location being returned to the iOS Device.	 The diagram illustrates the process of selecting a location from a weather application on an iOS device. At the top, a 'Remote Web Server' is represented by a server icon. Below it, two iOS device screens are shown. The left screen displays the 'Weather' app with a list of locations: 'My Location' (64°), 'Cupertino' (60°), and 'New York' (50°). The 'Cupertino' entry is circled in red, indicating it has been selected. A blue arrow points from this selection to the 'Remote Web Server'. The right screen shows the resulting weather page for Cupertino, displaying a temperature of 59° and 'Mostly Clear' conditions.

US 8,271,877 B2 – Claim 12	iOS Devices	Representative iOS Device
	As another example, a direct access icon on a music-related selection page causes an address of an information- or service-providing web site to be transmitted leading to music information being returned to the iOS Device.	 The diagram illustrates a system architecture for an iOS device. At the top, a 'Remote Web Server' is represented by a box with three server icons. Below it, two iOS devices are shown. The left device displays a music playlist titled 'My Playlist' with a red circle around the 'Library' icon at the bottom. The right device displays an 'Explorer' page with various music recommendations. Arrows indicate data flow from the devices to the server and back.

US 8,271,877 B2 – Claim 15	iOS Device	Representative iOS Device
The device according to claim 12, characterized in that the direct access icons comprise icons for accessing commercial sites.	The iOS Device includes a direct access icon for accessing a commercial site. For example, the iOS Device includes a direct access icon for accessing the <i>Apple Store</i> where apps and content may be purchased.	

US 8,271,877 B2 – Claim 17	iOS Device	Representative iOS Device
The device according to claim 12, wherein said at least one selection page comprising two or more direct access icons comprises direct access icons corresponding to distinct sources of information or services.	The iOS Device includes at least two direct access icons corresponding to distinct sources of information or services. For example, the iOS Device includes a direct access icon for accessing <i>Stocks</i> and the <i>Apple Store</i>, which are distinct sources of information.	

US 8,271,877 B2 – Claim 18	iOS Device	Representative iOS Device
The device according to claim 12 wherein said mobile communication device is a mobile phone.	The iPhone devices are mobile phones.	

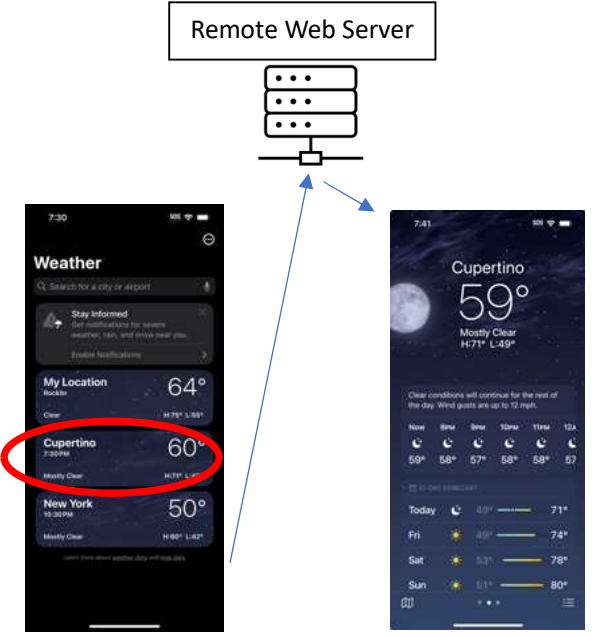
US 8,271,877 B2 – Claim 19	iOS Device	Representative iOS Device
The device according to claim 12 wherein a page from a web site is displayed on said display in response to selecting a direct access icon.	The iOS Device includes direct access icons that cause a page from a web site to be displayed on said display. For example, accessing a weather page for a particular location causes a page for weather information for that location to be displayed. To the extent that the accused products do not literally satisfy this claim limitation, this difference is insubstantial. The accused products perform the same function of accessing an information- or service-providing remote service, in the same way by transmitting data such as a resource address or the like identifying the requested data, to achieve the same result of having the remote service return the requested data for display on the iOS Device.	 The diagram illustrates the process of accessing a weather page. A 'Remote Web Server' is shown at the top, connected to two iOS devices. The left device displays a weather app with a list of locations: 'My Location' (64°), 'Cupertino' (60°, highlighted with a red circle), and 'New York' (50°). The right device displays the weather page for Cupertino, showing a temperature of 59° and 'Mostly Clear' conditions. Arrows indicate the flow of data from the server to the devices and between the devices.

EXHIBIT 2

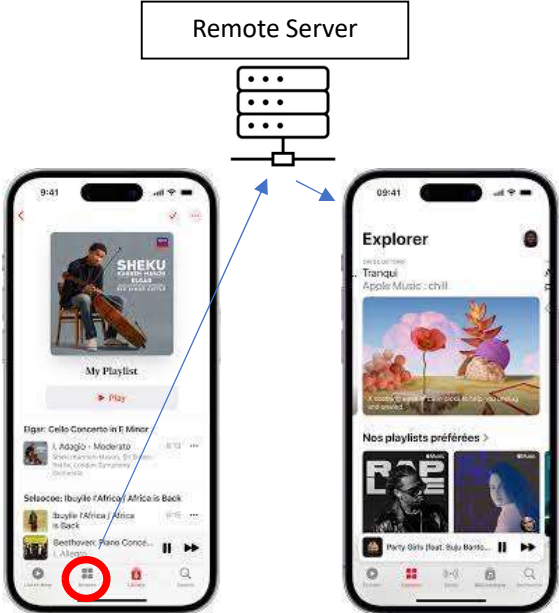
EXHIBIT 2

US 10,943,058 B2 – Claim 24	iOS Devices	Representative iOS Device
A mobile communication device connectable to remote sources of information or services through a communication network, the communication device comprising a display, data storage, a processor, a controller and a plurality of pages locally stored in said data storage and displayable on said display,	An iOS Device, such as an iPhone, iPad, Apple Watch, or iPod Touch, implements iOS, an operating system designed for, among other things, enabling the device to access information- or service-providing internet sites, which includes remote information available on the internet. The iOS Device comprises a mobile communication device connected through a communication network and comprises a control & processing unit, memory, a display (the iOS Device screen), and a pointing and selection device (the touch-sensitive screen).	

US 10,943,058 B2 – Claim 24	iOS Devices	Representative iOS Device
wherein a first one of said locally stored pages is specifically designed to include at least one direct access icon capable of being selectively activated to connect said mobile communication device to a first predetermined one of said remote sources of information or services, and at least one selection icon capable of being selectively activated to display a second one of said locally stored pages on said display, wherein said second one of said locally stored pages is specifically designed to include at least one second direct access icon capable of being selectively activated to connect said mobile communication device to a second predetermined one of said remote sources of information or services, and at least one second selection icon capable of being selectively activated to display a third one of said locally stored pages on said display, wherein said third one of said locally stored pages is specifically designed to include at least one third direct access icon capable of being selectively activated to connect said mobile communication device to a third predetermined one of said remote sources of information or services, or at least one third selection icon capable of being selectively activated to display a fourth one of said locally stored pages on said display,	The iOS Device provides selection pages (screen pages) including a home screen selection page (screen page) initially displayed and further selection pages (screen pages), for example, a weather page or a music page, linked to said home screen. The selection pages (screen pages) are stored locally in a memory unit of the iOS Device, as they are accessible even when the iOS Device has not yet been connected to Internet or is in airplane mode. In one example: ➤ The first selection page (screen page) includes a direct access icon (red) like <i>Stocks</i> that links to a remote resource relating to stocks and selection icon (blue) like <i>Music</i> that links to second selection page (screen page).	 Selection page

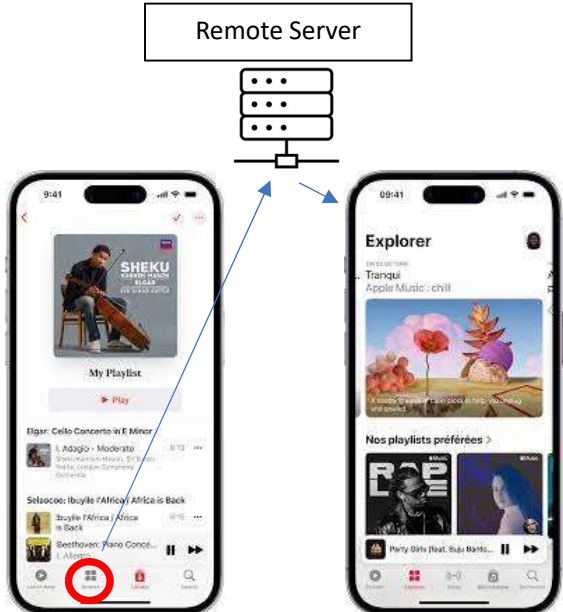
US 10,943,058 B2 – Claim 24	iOS Devices	Representative iOS Device
	➤ The second selection page (screen page) includes a direct access icon (red), such as the <i>Explorer</i> button, that links to a remote resource and a selection icon (blue) for <i>Playlists</i> that links to a third selection page (screen page).	 Selection page

US 10,943,058 B2 – Claim 24	iOS Devices	Representative iOS Device
	➤ The third selection page (screen page) includes a selection icon (blue) that links to a fourth selection page (screen page) for settings.	 Selection page

US 10,943,058 B2 – Claim 24	iOS Devices	Representative iOS Device
	The <i>Explorer</i> button is an access icon because it is selectively activated to connect the iOS device to a remote source of information or services.	 The diagram illustrates the connection between two iOS devices and a Remote Server. At the top, a box labeled 'Remote Server' is connected to two server icons. Below the server, two arrows point to two smartphone screens. The left smartphone screen displays a music app interface with a red circle around the 'Explorer' button in the bottom dock. The right smartphone screen displays the 'Explorer' app interface, showing a 'Tranquil' playlist and 'Nos playlists préférées'.

US 10,943,058 B2 – Claim 24	iOS Devices	Representative iOS Device
wherein the mobile communication device is a mobile phone.	The iPhone devices are mobile phones.	

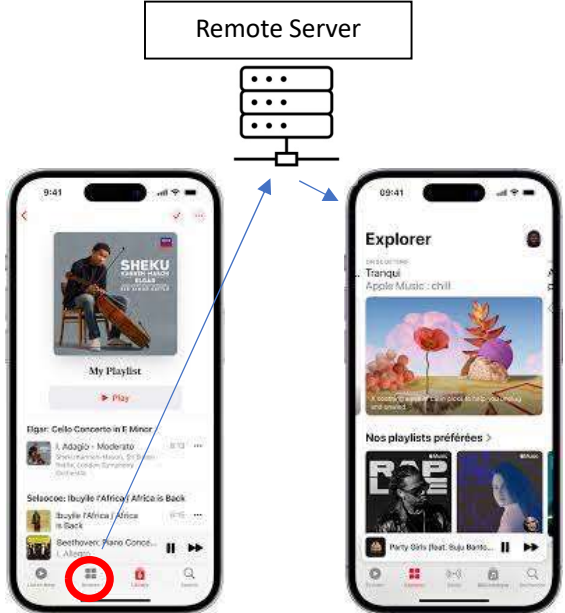
US 10,943,058 B2 – Claim 25	iOS Devices	Representative iOS Device
The mobile communication device according to claim 24, wherein at least one of the selection pages is further specifically designed to include one or more icons for directly accessing a search engine on the Web.	The iOS Device includes a selection page (screen page) with an icon for directly accessing a search engine on the Web. For example, the home screen includes an icon to launch Safari which provides direct access to Web searching.	

US 10,943,058 B2 – Claim 26	iOS Devices	Representative iOS Device
The mobile communication device according to claim 24, wherein selective activation of a direct access icon comprises emitting, on the communication network, an address of the first, second or third predetermined one of said remote sources.	The activating the direct access icons on the iOS Device causes the device to emits a predetermined address, such as a URL or the like, on the communication network to get access to a remote server.	 The diagram illustrates a system architecture for an iOS device. At the top, a box labeled 'Remote Server' is connected via a network symbol to two mobile devices. The device on the left displays a music application interface with a 'My Playlist' section and a red circle highlighting the 'Library' icon in the bottom dock. The device on the right displays an 'Explorer' application interface. Blue arrows indicate the flow of data or communication between the devices and the remote server.

US 10,943,058 B2 – Claim 27	iOS Devices	Representative iOS Device
A method for accessing information- or service-providing Web sites, from a mobile communication device connected through a communication network and provided with a display, comprising:	An iOS Device, such as an iPhone, iPad, Apple Watch, or iPod Touch, implements iOS, an operating system designed for, among other things, enabling the device to access information- or service-providing internet sites, which includes remote information available on the internet. The iOS Device comprises a mobile communication device connected through a communication network and comprises a control & processing unit, memory, a display (the iOS Device screen), and a pointing and selection device (the touch-sensitive screen).	 The image is a composite of three photographs. The top photograph shows the front of an iPhone with the iOS home screen, displaying various app icons like Weather, Stocks, Find My, Home, Books, iTunes Store, Fitness, Watch, Contacts, Translate, Files, Shortcuts, Utilities, Freeform, Journal, Tips, Numbers, Keynote, Pages, iMovie, GarageBand, Clips, and the App Store. The bottom left photograph shows a disassembled iPhone, revealing internal components such as the logic board, battery, and camera module. The bottom right photograph shows the back of a blue iPhone, highlighting the triple-camera system and the Apple logo.

US 10,943,058 B2 – Claim 27	iOS Devices	Representative iOS Device
a preliminary search for information or service, locally performed within said communication device in different themes and sub-themes within a plurality of successively displayed selection pages, said selection pages being organized in a tree menu structure and beforehand locally stored within said communication device, each said selection page being specifically designed to include a set of icons,	The iOS Device provides selection pages (screen pages) which are organized within a tree menu structure: a home screen selection page (screen page) initially displayed and theme/sub-theme pages, for example, a weather page or a music page, linked to said home screen. The selection pages include a set of icons. The iOS Device is enabled to the perform the step of making a preliminary search for information or service, locally performed within said communication device in different themes and sub-themes within a plurality of successively displayed selection pages (screen pages), with the selection pages (screen pages) being locally pre-stored in a tree menu structure. The selection pages (screen pages) are stored in a memory unit of the iOS Device, as they are accessible even when the iOS Device has not yet been connected to Internet or is in airplane mode. For example, a user who wants to obtain information can make a preliminary search through successive first, second, third or more locally stored selection pages (screen pages) relating to a particular theme, such as music, to reach a direct access icon dedicated to the information. For example, a user wanting to listen to music can make a preliminary search starting with the home selection page (screen page) by selecting a selection icon relating to music and then	 Selection page

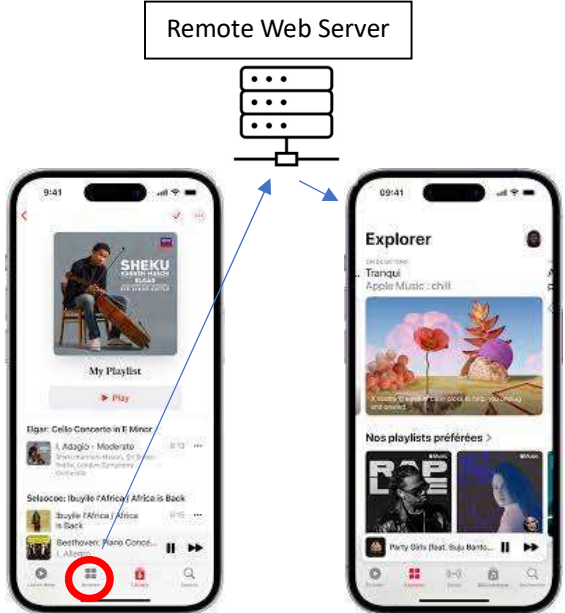
US 10,943,058 B2 – Claim 27	iOS Devices	Representative iOS Device
	choosing from a subsequent selection page (screen page) a direct access icon linking to information about music.	 Selection page

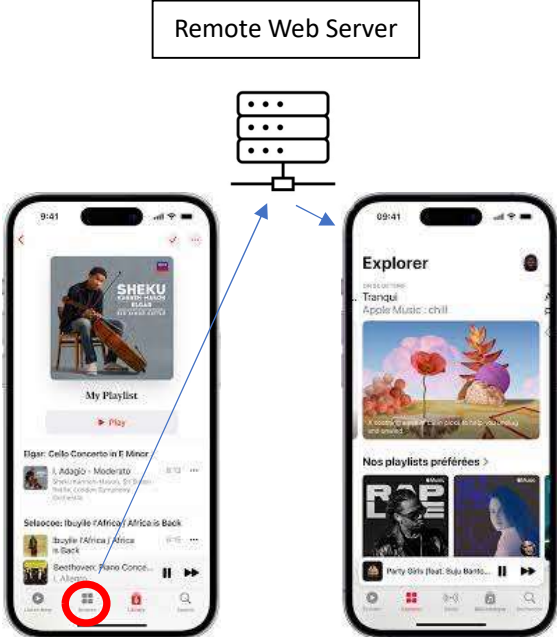
US 10,943,058 B2 – Claim 27	iOS Devices	Representative iOS Device
		 The diagram illustrates a system architecture where two iOS devices interact with a central Remote Server. The Remote Server is represented by a box with three server icons. Two arrows point from the server to the devices. The left device shows a music application interface with a 'My Playlist' screen. A red circle highlights the 'Library' icon in the bottom dock. The right device shows an 'Explorer' screen with various music recommendations. The devices are connected to the server, indicating a cloud-based service or data synchronization.
said selection pages further comprising a first selection page, a second selection page and a third selection page, said first selection page being specifically designed to include a selection icon for locally accessing said second selection page, and said second selection page being specifically designed to include a selection icon for locally accessing said third selection page, said third selection page being specifically designed to include one or more direct access	The iOS Device provides selection pages (screen pages) including a home screen selection page (screen page) initially displayed and further selection pages (screen pages), for example, a weather page or a music page, linked to said home screen. The selection pages (screen pages) are stored locally in a memory unit of the iOS Device, as they are accessible even when the iOS Device has not yet been connected to Internet or is in airplane mode.	

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icons for directly accessing an information- or service-providing Web site, and	In one example: ➤ The first selection page (screen page) includes a direct access icon (red) like <i>Stocks</i> that links to a remote resource relating to stocks and selection icon (blue) like <i>Music</i> that links to second selection page (screen page).	 Selection page

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	➤ The second selection page (screen page) includes a direct access icon (red), such as the <i>Explorer</i> button, that links to a remote resource and a selection icon (blue) for <i>Playlists</i> that links to a third selection page (screen page).	 Selection page

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	➤ The third selection page (screen page) includes a direct access icon (red), such as the <i>Explorer</i> button, that links to a remote resource.	 Selection page

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	The <i>Explorer</i> button accesses an information- or service-providing Web site because it is selectively activated to connect the iOS device to a remote source of information or services. To the extent that the accused products do not literally satisfy this claim limitation, this difference is insubstantial. The accused products perform the same function of accessing an information- or service-providing remote service, in the same way by transmitting data such as a resource address or the like identifying the requested data, to achieve the same result of having the remote service return the requested data for display on the iOS Device.	 The diagram illustrates the connection between two iOS devices and a Remote Web Server. At the top, a box labeled 'Remote Web Server' is connected to two smartphones. The left smartphone displays a music player interface with a red circle around the 'Library' icon. The right smartphone displays an 'Explorer' app interface. Arrows indicate data flow between the devices and the server.
emitting on the communication network, in response to a selection of a direct access icon in a selection page being currently displayed, an address of an information- or service-providing web site corresponding to said selected icon, said address being locally generated during said displaying and selection and for directly accessing said information- or service-providing Web site,	The iOS Device is enabled to perform the step of emitting on the communication network, in response to a selection of a direct access icon in a selection page being currently displayed, an address of an information- or service-providing web site corresponding to said selected icon.	

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	In response to the selection of a direct access icon, the iOS Device emits a dedicated address, such as a URL or the like, on the communication network to get access to a remote Web server. The address is locally stored on the iOS Device and is retrieved upon selection. For example, a direct access icon on a music-related selection page causes an address of an information- or service-providing web site to be transmitted leading to music information being returned to the iOS Device.	 The diagram illustrates the system architecture. At the top, a box labeled 'Remote Web Server' is connected via a network icon to two smartphones. The left smartphone displays a music playlist titled 'My Playlist' with a red circle highlighting a direct access icon in the bottom navigation bar. The right smartphone displays a music explorer page titled 'Explorer' with various music-related content. Arrows indicate the flow of information between the devices and the server.

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wherein: at least one of said selection pages further being specifically designed to include one or more icons for directly accessing a search engine on the Web, and	The iOS Device includes a selection page (screen page) with an icon for directly accessing a search engine on the Web. For example, the home screen includes an icon to launch Safari which provides direct access to Web searching.	

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the mobile communication device is a mobile phone.	The iPhone devices are mobile phones.	