IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

HBCU MESSAGING US LP, *Plaintiff,* v. APPLE, INC. *Defendants.*	C.A. No. 1:24-cv-1199-ADA **JURY TRIAL DEMANDED**

HBCU MESSAGING US LP'S PROPOSED CONSTRUCTIONS

Pursuant to the April 9, 2025, Agreed Scheduling Order (Dkt. No. 49), Plaintiff HBCU Messaging US LP ("HBCU") hereby discloses the following proposed terms, constructions, and where applicable extrinsic evidence for the claim terms found in claim terms of the U.S. Patent No. 8,918,127 (the "'127 patent"), U.S. Patent No. 11,012,827 (the "'827 patent"), U.S. Patent No. 11,089,450 (the "'450 patent"), U.S. Patent No. 11,653,182 (the "'182 patent"), U.S. Patent No. 11,653,183 (the "'183 patent"), U.S. Patent No. 11,991,600 (the "'600 patent"), and U.S. Patent No. 11,991,601 (the "'601 patent").

Patent Owner EXHIBIT 2025
IPR2026-00104

HBCU's Proposed Patent Claim Terms	HBCU's Proposed Construction of its Proposed Patent Claim Terms	Extrinsic Evidence
"bearer" ('127 Patent, claims 1 and 11) ('827 Patent, claims 1, 2, 28) ('182 Patent claims 14, 15, 29, 30) ('183 Patent claims 1, 6, 7, 12, 14, 20) ('600 Patent claims 1, 13, 21, 29) ('601 Patent claim 12)	A protocol for transmitting data including SMS, packet-switched, GSM SS7, HSDPA, WCDMA, CDMA2000, or GPRS	
"cellular core network" ('127 Patent, claims 1 and 11) ('600 Patent, claims 5 and 16)	A network responsible for: routing voice, data, and multimedia traffic between mobile devices and a wider network; maintaining a database of subscriber information; providing access to a short message service center (SMSC) or multimedia message (MMS) server; and providing Internet access to one or more mobile devices via at least mobile operator base stations	
Apple's Proposed Patent Claim Terms	**HBCU's Proposed Construction of Apple's Proposed Patent Claim Terms**	**Extrinsic Evidence**
"wherein…when" ('127 and '182 patents)	Plain and ordinary meaning	
"third party provider" ('827, '600, and '601 patents)	Plain and ordinary meaning	

HBCU reserves the right to amend the foregoing statement if warranted by further investigation of relevant evidence. HBCU further reserves the right to amend its statement in response to any terms identified and constructions offered by Apple.

Dated: August 15, 2025

Respectfully submitted,

DEVLIN LAW FIRM LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all counsel of record via electronic mail.

/s/ Timothy Devlin
Timothy Devlin