

EXHIBIT A¹

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
A wireless device, comprising	1, 11, 18, 30, 31, 35	This preamble is limiting SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in <i>SoftView LLC v. Apple Inc., et al.</i> (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. how this preamble breathes life and meaning into the claim given the context of the intrinsic evidence and its descriptions of implementing browsing and zooming functionality for mobile and wireless devices. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Webster's Collegiate Dictionary (10th ed. 1997).</u>

¹ Defendants have identified a large number of terms for construction. For many of these terms, SoftView is unclear as to the potential dispute between the parties and has proposed that no construction is necessary. For some terms, and in an effort to identify potential disputes in good faith, SoftView has also proposed some alternative constructions. In so doing, SoftView does not agree that claim construction is necessary or appropriate for these terms.

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
processing means	1, 11, 18, 30, 31, 35, 70	No construction necessary, or in the alternative, “processor” SoftView contends that this term is not governed by 35 USC 112(f), but if 112(f) does apply: Function: processing Structure: a processor, microcontroller, and/or logic circuitry SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. how processors function and are considered structure. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Business Dictionary of Computers (1993).</u>
storage means /	1, 11, 18, 30,	No construction necessary, or in the alternative, “storage device”

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
storage means, in which a plurality of instructions are stored when executed by the processing means enable the wireless device to perform operations including,	31, 35, 70	SoftView contends that this term is not governed by 35 USC 112(f), but if 112(f) does apply: Function: storing a plurality of instructions Structure: dynamic or static storage device SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. how computer storage function and is considered structure. <u>Microsoft Computer Dictionary (3d ed. 1997).</u> <u>Business Dictionary of Computers (1993).</u>
format	1, 11, 18, 30,	No construction necessary, or in the alternative, "a particular way that information is stored"

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
	31, 35, 111 , 118 , 128, 133, 134, 144, 145, 209 , 216	SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. how computers use formats to process information. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Business Dictionary of Computers (1993).</u> <u>Webster’s Collegiate Dictionary (10th ed. 1997).</u> <u>Oxford Dictionary of English (3d ed. 2010).</u>
original / original Web page /	1 , 11, 18, 30, 31, 35,	No construction necessary.

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
original width and height of the Web page / original page layout, functionality, and design of content on the Web page	36, 37, 38, 50, 53, 55, 69, 70, 87, 111, 118, 128, 133, 134, 144, 145, 149, 150, 151, 161, 168, 171, 182, 185, 186, 187, 189, 193, 194, 196, 204, 206, 207, 209, 216,	SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Business Dictionary of Computers (1993).</u>

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
	252 , 253, 254, 264, 269, 282, 285 , 286, 287, 293, 294, 296, 304, 306, 307, 318, 319	
translating / translating at least a portion of the HTML-based Web content from its original format into scalable content that supports a scalable resolution-independent representation of the Web page ... preserves the original page layout, functionality and design of the content defined by its original format when scaled and rendered	1 , 11, 18, 30, 31, 35, 118 , 128, 133, 134, 144, 145, 209 , 216	No construction necessary, or in the alternative, translating means “converting” SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art;

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. how computers process information, including html. <u>Microsoft Computer Dictionary (4th. 1999).</u> <u>Business Dictionary of Computers (1993).</u> <u>Webster's Collegiate Dictionary (10h ed. 1997).</u> <u>Oxford Dictionary of English (3d ed. 2010).</u> <u>Webster's New World Computer Dictionary (10th ed. 2003).</u>
scalable content	1, 11, 18, 30, 31, 35, 36, 37, 38, 50, 53, 55, 69, 70, 118, 128, 133, 134, 144, 145,	Content capable of being rendered at multiple zoom levels SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art;

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
	149, 150, 151, 161, 168, 171, 182, 209, 216, 252, 253, 254, 264, 269, 282	6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Business Dictionary of Computers (1993).</u> <u>Webster's New World Computer Dictionary (10th ed. 2003).</u>
scalable / scaling / scaled	1, 11, 18, 30, 31, 35, 36, 37, 38, 50, 53, 55, 69, 70, 118, 128, 133, 134, 144, 145, 149, 150, 151,	capable of being rendered at multiple zoom levels / rendering at multiple zoom levels / rendered at a zoom level SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings;

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
	161, 168, 171, 182, 209 , 216 , 252 , 253, 254, 264, 269, 282	7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (3d ed. 1997).</u> <u>Business Dictionary of Computers (1993).</u> <u>Webster's New World Computer Dictionary (10th ed. 2003).</u>
preserve(s) / preserved / preserving / preservation / preserves the original layout, functionality, and design / preserves the original layout, functionality, and design of the HTML-based Web page content of each Web page / preserves the original layout, functionality, and design of the HTML-based Web page content of	1 , 11, 18, 30, 31, 35, 36 , 37, 38, 50, 53, 55, 69, 70 , 87 , 111, 118 , 128, 133, 134, 144, 145, 149 , 150, 151, 161,	No construction necessary SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
each Web page at each zoom level and panned view / while preserving the original page layout, functionality, and design of the Web page content at each zoom level and panned view	168, 171, 182, 185 , 186, 187, 189, 193, 194, 196, 204, 206, 207, 209 , 216 , 252 , 253, 254, 264, 269, 282, 285 , 286, 287, 293, 294, 296, 304, 306, 307,	8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Business Dictionary of Computers (1993).</u> <u>Webster's Dictionary New World College (4th ed. 2007).</u>

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
	318, 319	
enabling a user to zoom / enabling the user to zoom and pan a view of the Web page	11, 18, 53, 128, 133, 161, 168, 186, 193, 264, 269, 286, 293, 317 , 318, 319	No construction necessary SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u>
A mobile hand-held device, comprising	36 , 37, 38, 50, 53, 55, 69, 87 , 111,	This preamble is limiting SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.)

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
	128, 133	SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. how this preamble breaths life and meaning into the claim given the context of the intrinsic evidence and its descriptions of implementing browsing and zooming functionality for mobile and wireless devices. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Webster's Collegiate Dictionary (10th ed. 1997).</u>
processing / processing HTML-based Web content to produce scalable content / processing at least a portion of the HTML-based Web content to produce scalable content	36, 37, 38, 50, 53, 55, 69, 70, 149, 150, 151, 161,	No construction necessary SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art;

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
	168, 171, 182, 252 , 253, 254, 264, 269, 282	3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; 8. how processors function and are considered structure; and 9. claim construction as determined by PTAB in Inter Partes Reexaminations of '353 patent <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Business Dictionary of Computers (1993).</u> <u>Webster's New World Computer Dictionary (10th ed. 2003).</u>
zoom(s)	50, 55, 137, 171, 187, 194, 287, 294, 317 , 318, 319	No construction necessary SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art;

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u>
tapping	50, 55, 134, 171, 187, 194, 287, 294, 317 , 318, 319	No construction necessary SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Webster's Collegiate Dictionary (10th ed. 1997).</u>
fit across	53, 87 , 111, 118 , 128, 133, 134, 144, 145, 189, 196, 216, 264, 296, 285 , 286, 287, 293, 294, 296, 304, 306, 307	No construction necessary or in the alternative, fit across means spanning the width of the display with optional small borders and consideration of scroll bar schemes. SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Webster's Collegiate Dictionary (10th ed. 1997).</u>

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
A mobile device, comprising	70	This preamble is limiting SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in <i>SoftView LLC v. Apple Inc., et al.</i> (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. how this preamble breaths life and meaning into the claim given the context of the intrinsic evidence and its descriptions of implementing browsing and zooming functionality for mobile and wireless devices. <u>Microsoft Computer Dictionary (4th ed. 1999).</u>
A hand-held wireless device, comprising:	317	This preamble is limiting SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in <i>SoftView LLC v. Apple Inc., et al.</i> (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including:

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. how this preamble breaths life and meaning into the claim given the context of the intrinsic evidence and its descriptions of implementing browsing and zooming functionality for mobile and wireless devices. <u>Microsoft Computer Dictionary (3d ed. 1997).</u>
A machine-readable medium / A machine-readable medium having a plurality of instructions tangibly stored thereon, which when executed enable a device to perform operations comprising / A machine-readable medium having a plurality of instructions tangibly stored thereon, which when executed	216, 252, 253, 254, 264, 269, 282, 285, 286, 287, 293, 294,	No construction necessary. SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit;

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
enable a wireless device to perform operations comprising	296, 304, 306, 307	5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; 8. the overall operation of web browsers and how they render content; and 9. how processors function and process information from storage media. <u>Microsoft Computer Dictionary (4th ed. 1999).</u>
Web a e content	87	Web page content SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the

U.S. Patent No. 7,461,353		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; 8. the overall operation of web browsers and how they render content; and 9. how a POSITA would understand that this language contains a typo with only one possible correction.

U.S. Patent No. 7,844,889		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
original / original Web page / original width and height of the Web page / original page layout, functionality, and design of content on the Web page	1, 2, 3, 5, 13– 20, 22, 23, 33– 40, 108 , 109, 114, 115	See above proposed construction for '353 patent
format	1, 2, 3, 5, 13– 20, 22, 23, 33– 40, 108 , 109, 114, 115	See above proposed construction for '353 patent
processing /	1, 2, 3, 5, 13–	See above proposed construction for '353 patent

U.S. Patent No. 7,844,889		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
processing, via the wireless hand-held device, the markup language-based Web content with a rendering engine to generate page layout information corresponding to the original page layout of content on the Web page as interpreted by the rendering engine / processing HTML-based Web content with a rendering engine	20, 22, 23, 33–40, 108 , 109, 114, 115	
scalable / scaling / scaled	1, 2, 3, 5, 13–20, 22, 23, 33–40	See above proposed construction for '353 patent
scalable page layout information / scaled page layout information	1, 2, 3, 5, 13–20, 22, 23, 33–40, 108 , 109, 114, 115	No construction necessary, or in the alternative, “page layout information that enables rendering at multiple zoom levels” / “page layout information corresponding to a particular zoom level” SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art;

U.S. Patent No. 7,844,889		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Business Dictionary of Computers (1993).</u> <u>Webster's New World Computer Dictionary (10th ed. 2003).</u>
zoom	1, 2, 3, 5, 13–20, 22, 23, 33–40, 108 , 109, 114, 115	See above proposed construction for '353 patent
preserving / preservation / preserves the original page layout, functionality, and design /	1, 2, 3, 5, 13–20, 22, 23, 33–40, 108 , 109,	See above proposed construction for '353 patent

U.S. Patent No. 7,844,889		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
preserving the original page layout, functionality, and design of the content on the Web page defined by the markup language-based Web content / preserving the original page layout, functionality, and design of the content on the Web page defined by the HTML-based Web content as interpreted by the rendering engine	114, 115	
original / original page layout, functionality, and design	1, 2, 3, 5, 13–20, 22, 23, 33–40, 108 , 109, 114, 115	See above proposed construction for '353 patent
object(s)	5, 23, 35, 36	No construction necessary, or in the alternative, “a grouping of webpage content such as the paragraph of text or a graphic image associated with an HTML element” SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art;

U.S. Patent No. 7,844,889		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Look & Learn Dreamweaver, Glenn Weadock (2002).</u> <u>Webmaster in a Nutshell, Stephen Spainhour and Robert Eckstein (2nd ed. 1999).</u>
object datum	5	No construction necessary, or in the alternative, “reference point for an object used in a predictable manner” An object datum is defined by coordinate values SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit;

U.S. Patent No. 7,844,889		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Business Dictionary of Computers (1993).</u> <u>Look & Learn Dreamweaver, Glenn Weadock (2002).</u> <u>Webmaster in a Nutshell, Stephen Spainhour and Robert Eckstein (2nd ed. 1999).</u>
tapping	16, 18, 20	See above proposed construction for '353 patent
fit across	17, 19	See above proposed construction for '353 patent
vector	34, 35, 36	No construction necessary, or in the alternative, "A position vector comprising a point in a coordinate system" SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art;

U.S. Patent No. 7,844,889		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; 8. the overall operation of web browsers and how they render content; and 9. the difference between vector graphics and raster graphics. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Business Dictionary of Computers (1993).</u> <u>Affine Transformations, UT Austin CS384G, Fall 2010, Don Fussell.</u> <u>Vector Analysis for Computer Graphics, John Vince.</u> <u>Adobe Illustrator 9.0 User Guide (2000).</u> <u>Webster's New World Computer Dictionary (10th ed. 2003).</u> <u>Graphics File Formats, David C. Kay and John R. Levine (2nd ed. 1995).</u> <u>Creating Cool PowerPoint 97 Presentations, Glenn E. Weadock and Emily Sherrill Weadock (1997).</u>

U.S. Patent No. 7,844,889		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		<u>Look & Learn Dreamweaver, Glenn Weadock (2002).</u>
“scalable vector-based page layout information	34, 35, 36	No construction necessary, or in the alternative, “vector-based page layout information that is capable of being rendered at multiple zoom levels.” SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in <i>SoftView LLC v. Apple Inc., et al.</i> (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Business Dictionary of Computers (1993).</u> <u>Affine Transformations, UT Austin CS384G, Fall 2010, Don Fussell.</u> <u>Vector Analysis for Computer Graphics, John Vince.</u>

U.S. Patent No. 7,844,889		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		<u>Adobe Illustrator 9.0 User Guide (2000).</u> <u>Webster's New World Computer Dictionary (10th ed. 2003).</u> <u>Graphics File Formats, David C. Kay and John R. Levine (2nd ed. 1995).</u> <u>Creating Cool PowerPoint 97 Presentations, Glenn E. Weadock and Emily Sherrill Weadock (1997).</u> <u>Look & Learn Dreamweaver, Glenn Weadock (2002).</u>
bounding box / scaled bounding box	39, 109	No construction necessary, or in the alternative, “an outlined shape within which an object’s content (e.g., text or graphic image) will appear” SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the

U.S. Patent No. 7,844,889		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u>
in a fraction of a second	115	No construction necessary – plain meaning is less than 1 second. SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Webster’s Collegiate Dictionary (10th ed. 1997).</u>

U.S. Patent No. 8,533,628		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
A method for enabling a user to perform full page browsing of a Web page on a hand-held wireless device in a manner that replicates browsing the Web page on a desktop Web browser, wherein the Web page comprises HTML-based content and cascading style sheet (CSS) content defining a page layout and design of display content on the Web page, the method comprising	1, 2–5, 7–14	This preamble is limiting SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in <i>SoftView LLC v. Apple Inc., et al.</i> (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. how this preamble breaths life and meaning into the claim given the context of the intrinsic evidence and its descriptions of implementing browsing and zooming functionality for mobile and wireless devices. <u>Microsoft Computer Dictionary (4th ed. 1999).</u>
in a manner that replicates browsing the Web page on a desktop Web browser /	1, 2–5, 7–14	No construction necessary, or in the alternative, in a manner that has the same look and feel as the Web page on a desktop Web browser / in a manner that has the same look and feel as those Web pages on a desktop Web browser SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in <i>SoftView LLC v. Apple Inc., et al.</i> (D. Del.)

U.S. Patent No. 8,533,628		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
in a manner that replicates browsing of those Web pages on a desktop Web browser		SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (3d ed. 1997).</u> <u>Webster's Collegiate Dictionary (10th ed. 1997).</u>
enabling a user of the mobile device to zoom / enabling a user to zoom / enabling the user to perform zooming operations	1, 2-5, 7-14	See above proposed construction for '353 patent
scaled page layout information and/or content	1, 2-5, 7-14	See above proposed construction for '889 patent

U.S. Patent No. 8,533,628		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
scaled / scaling	1, 2–5, 7–14	See above proposed construction for '353 patent
zoom	1, 2–5, 7–14	See above proposed construction for '353 patent
scaling bounding box / scaled bounding box	1, 2–5, 7–14	See above proposed construction for '889 patent
vector	2	See above proposed construction for '889 patent
tap-based user input / tapping	4, 8, 9, 10	See above proposed construction for '353 patent

U.S. Patent No. 9,519,729		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
retrieving and processing at the mobile device the HTML-based Web content including the HTML code for the at least one form and the multiple columns and the CSS content to generate a scalable vector representation of the Web page / retrieving and processing the HTML-based Web content including the HTML code for the at least multiple columns and the CSS content at the mobile device to generate a scalable vector representation of the Web page /	1, 2–5, 7–10, 13, 14, 15–18, 21, 22	No construction necessary SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings;

U.S. Patent No. 9,519,729		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
retrieving and processing HTML-based Web content and the CSS content associated with the hyperlink to translate the HTML-based Web content and the CSS content associated with the hyperlink into an additional scalable vector representation / retrieving and processing HTML-based Web content associated with the hyperlink to translate the HTML-based Web content into an additional scalable vector representation		7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Business Dictionary of Computers (1993).</u> <u>Webster's Collegiate Dictionary (10th ed. 1997).</u> <u>Affine Transformations, UT Austin CS384G, Fall 2010, Don Fussell.</u> <u>Vector Analysis for Computer Graphics, John Vince.</u> <u>Adobe Illustrator 9.0 User Guide (2000).</u> <u>Webster's New World Computer Dictionary (10th ed. 2003).</u> <u>Graphics File Formats, David C. Kay and John R. Levine (2nd ed. 1995).</u> <u>Creating Cool PowerPoint 97 Presentations, Glenn E. Weadock and Emily Sherrill Weadock (1997).</u> <u>Look & Learn Dreamweaver, Glenn Weadock (2002).</u>
original / original page layout, functionality, and design /	1, 2-5, 7-10, 13, 14,	See above proposed construction for '353 patent

U.S. Patent No. 9,519,729		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
original page layout	15–18, 21, 22	
commercially available desktop browser	1, 2–5, 7–10, 13, 14 , 15–18, 21, 22	No construction necessary, or in the alternative, “commercially available desktop Web browser” SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in <i>SoftView LLC v. Apple Inc., et al.</i> (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Websters Collegiate Dictionary (10th Ed. 1997).</u>
processing	1, 2–5, 7–10, 13, 14 ,	See above proposed construction for ’353 patent

U.S. Patent No. 9,519,729		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
	15–18, 21, 22	
vector	1, 2–5, 7–10, 13, 14 , 15–18, 21, 22	See above proposed construction for '889 patent
scalable vector representation	1, 2–5, 7–10, 13, 14 , 15–18, 21, 22	Representation that enables rendering at multiple zoom levels and employs vector-based information for scaling SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in <i>SoftView LLC v. Apple Inc., et al.</i> (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u>

U.S. Patent No. 9,519,729		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		<u>Business Dictionary of Computers (1993).</u> <u>Affine Transformations, UT Austin CS384G, Fall 2010, Don Fussell.</u> <u>Vector Analysis for Computer Graphics, John Vince.</u> <u>Adobe Illustrator 9.0 User Guide (2000).</u> <u>Webster's New World Computer Dictionary (10th ed. 2003).</u> <u>Graphics File Formats, David C. Kay and John R. Levine (2nd ed. 1995).</u> <u>Creating Cool PowerPoint 97 Presentations, Glenn E. Weadock and Emily Sherrill Weadock (1997).</u> <u>Look & Learn Dreamweaver, Glenn Weadock (2002).</u>
zoom	1, 2-5, 7-10, 13, 14, 15-18, 21, 22	See above proposed construction for '353 patent
preserves / preserving / preserves the original page layout, functionality and design / preserves the original page layout, functionality and design defined by	1, 2-5, 7-10, 13, 14, 15-18, 21, 22	See above proposed construction for '353 patent

U.S. Patent No. 9,519,729		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
the HTML-based Web content including the at least one form and the multiple columns and the CSS content relative to the original page layout, functionality and design defined by the HTML-based Web content including the at least one form and the multiple columns and the CSS content when rendered by the commercially available desktop browser		
enabling a user to zoom / enabling a user to zoom in on a first of the multiple columns by tapping on the first column via the touch-sensitive display / enabling a user to zoom on an image by tapping on the image via the touch-sensitive display / enabling a user to zoom on the at least one paragraph by tapping on the at least one paragraph via the touch-sensitive display	7, 8, 13, 16, 18	See above proposed construction for '353 patent
tapping	7, 8, 9, 13, 18	See above proposed construction for '353 patent
fit across	9, 10	See above proposed construction for '353 patent
object(s)	21	See above proposed construction for '889 patent
primary datum	21	No construction necessary, or in the alternative, "origin point"

U.S. Patent No. 9,519,729		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Webster’s Collegiate Dictionary (10th ed. 1997).</u>
object datum	21	See above proposed construction for ’889 patent
layout location datum	21	No construction necessary, or in the alternative, “one or more points corresponding to the location of the object” SoftView’s claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.)

U.S. Patent No. 9,519,729		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Webster's Collegiate Dictionary (10th ed. 1997).</u> 1

U.S. Patent No. 10,083,154		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
A method performed by a mobile hand-held device including a touch-sensitive display and an HTML rendering engine	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	This preamble is limiting SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including:

U.S. Patent No. 10,083,154		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
		1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. how this preamble breaths life and meaning into the claim given the context of the intrinsic evidence and its descriptions of implementing browsing and zooming functionality for mobile and wireless devices. <u>Microsoft Computer Dictionary (4th ed. 1999).</u> <u>Webster's Collegiate Dictionary (10th ed. 1997).</u>
object(s)	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	See above proposed construction for '889 patent
bounding box	13, 14, 15, 16, 17, 18, 19, 20,	See above proposed construction for '889 patent

U.S. Patent No. 10,083,154		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
	21, 22, 23, 25	
translating / translating the first representation of the HTML document	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	See above proposed construction for '353 patent
scalable vector representation	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	See above proposed construction for '729 patent
primary datum	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	See above proposed construction for '729 patent
object datum	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	See above proposed construction for '889 patent
vector	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	See above proposed construction for '889 patent

U.S. Patent No. 10,083,154		
Term/Phrase/Clause	Claims	Preliminary Construction & Preliminary Identification of Extrinsic Evidence
the interpreted page layout, functionality, and design of the content is preserved at each of the first zoom level and the one or more user-defined zoom levels	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	No construction necessary SoftView's claim construction position is also supported by the claim construction opinion and supporting materials in SoftView LLC v. Apple Inc., et al. (D. Del.) SoftView also contends that its claim construction position can be supported by expert testimony, including: 1. technology that underlies the alleged inventions; 2. the level of ordinary skill in the art; 3. how the patent, claims, and intrinsic or extrinsic evidence would be understood by one of skill in the art; 4. the alleged inventions claimed in the patents-in-suit; 5. the meaning of the disputed claim terms, phrases, and clauses to one of ordinary skill in the art; 6. an analysis of statements from Defendants or their experts, including during IPR or reexam proceedings; 7. whether the claim language informs those skilled in the art about the scope of the alleged inventions with reasonable certainty when viewed in light of the specification and prosecution history, to inform those skilled in the art about the scope of the invention with reasonable certainty; and 8. the overall operation of web browsers and how they render content. <u>Microsoft Computer Dictionary (4th ed. 1999).</u>
preserved	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	See above proposed construction for '353 patent
in a fraction of a second	18	See above proposed construction for '889 patent