

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SOFTVIEW LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action Nos. 10-389-LPS
	)	12-984-LPS
APPLE INC.; AT&T MOBILITY LLC;	)	12-985-LPS
DELL INC.; HTC CORP.; HTC	)	12-986-LPS
AMERICA, INC.; HUAWEI	)	12-987-LPS
TECHNOLOGIES CO., LTD.;	)	12-988-LPS
FUTUREWEI TECHNOLOGIES, INC.;	)	12-989-LPS
KYOCERA CORP.; KYOCERA	)	12-990-LPS
WIRELESS CORP.; LG	)	12-991-LPS
ELECTRONICS, INC.; LG	)	
ELECTRONICS USA, INC.; LG	)	
ELECTRONICS MOBILECOMM	)	
U.S.A., INC.; MOTOROLA MOBILITY	)	
LLC; SAMSUNG ELECTRONICS CO.,	)	
LTD.; SAMSUNG ELECTRONICS	)	
AMERICA, INC.; SAMSUNG	)	
TELECOMMUNICATIONS AMERICA,	)	
LLC; and SONY ERICSSON MOBILE	)	
COMMUNICATIONS (USA) INC.,	)	
	)	
Defendants.	)	
	)	

AMENDED JOINT CLAIM CONSTRUCTION CHART

Pursuant to an agreement between the parties, the parties hereby submit this Amended Joint Claim Construction Chart in accordance with Paragraph 12 of the March 19, 2012 Scheduling Order and the August 6, 2012 Oral Order re Defendants’ Motion to Extend Claim Construction Issue Identification and Briefing Deadlines.

I. UNDISPUTED CLAIM TERMS

The parties do not dispute the constructions of the claim terms included in the following chart:

Term/Phrase in Issue and Asserted Claim(s) in Which Term/Phrase Appears	Agreed Construction
object[s] '353 Patent: 58, 59, 139 '926 Patent: 72	a grouping of webpage content, such as a paragraph of text or a graphic image
bounding box '353 Patent: 59, 139	an outlined shape within which an object's content (<i>e.g.</i> , text or graphic image) will appear

II. PROPOSED CONSTRUCTIONS OF DISPUTED CLAIM TERMS

The following chart identifies the disputed terms/phrases of the claims in issue and each side's proposed construction of the disputed claim language. SoftView has amended its proposed constructions for the terms "scalable content," "vector-based content," and "scalable vector-based content." A chart including SoftView's citations to the intrinsic evidence in support of its respective proposed constructions is attached hereto as Amended Appendix A. A chart including Defendants' citations to the intrinsic evidence in support of their respective proposed constructions is attached hereto as Amended Appendix B. A copy of U.S. Patent No. 7,461,353 ("the '353 patent") is attached hereto as Exhibit 1. A copy of U.S. Patent No. 7,831,926 ("the '926 patent") is attached hereto as Exhibit 2. A copy of those portions of the intrinsic record relied upon by SoftView is attached hereto as Amended Exhibit 3. A copy of those portions of the intrinsic record relied upon by Defendants is attached hereto as Amended Exhibit 4.

	Term/Phrase in Issue and Asserted Claim(s) in Which Term/Phrase Appears	Plaintiff's Proposed Construction	Defendants' Proposed Construction
1	scalable content ‘353 Patent: 33, 43, 48 by reference to 36, 52 by reference to 36, 58 by reference to 36, 59 by reference to 36, 66 by reference to 36, 139 by reference to 118, 183, 283 ‘926 Patent: 55 by reference to 52, 59, 72 by reference to 52, 75 by reference to 52	content capable of being rendered at multiple zoom levels	data in a format generated after pre-rendering that provides the layout, functionality, and design of the webpage at multiple user-selectable scaled resolutions “pre-rendering”: the process of blocks 150-154 of Figure 5 (see ‘353 patent, col. 15, l. 43 to col. 17, l. 41)
2	scalable / scaling / scaled ‘353 Patent: 33, 33 by reference to 1, 43, 48 by reference to 36, 52 by reference to 36, 58 by reference to 36, 59 by reference to 36, 66 by reference to 36, 139 by reference to 118, 183, 283 ‘926 Patent: 55 by reference to 52, 59, 72 by reference to 52, 75 by reference to 52	capable of being rendered at multiple zoom levels / rendering at multiple zoom levels / rendered at multiple zoom levels	“scaling” / “scaled”: These terms have a plain and ordinary meaning and do not need to be construed. However, if the Court chooses to construe these terms, the following constructions should be used: “scaling”: setting to a user-selected resolution “scaled”: set to a user-selected resolution “scalable”: defined in the context of “scalable content” and “scalable vector-based content”

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3	translating '353 Patent: 33 by reference to 1, 139 by reference to 118 '926 Patent: 30, 31 by reference to 30, 40 by reference to 30, 41 by reference to 30, 43 by reference to 30	This term has a plain and ordinary meaning and does not need to be construed. However, if the Court chooses to construe this term, the following construction should be used: converting	converting the format of
4	processing [the] HTML-based Web content to produce scalable content '353 Patent: 43 by reference to 36, 48 by reference to 36, 52 by reference to 36, 58 by reference to 36, 59 by reference to 36, 66 by reference to 36, 183 by reference to 149, 283 by reference to 252 '926 Patent: 55 by reference to 52, 59 by reference to 52, 72 by reference to 52, 75 by reference to 52	processing [the] HTML-based Web content to produce content capable of being zoomed in or out	converting [the] Web content from its HTML format to a scalable content format
5	format '353 Patent: 33 by reference to 1, 139 by reference to 118 '926 Patent: 30, 31 by reference to 30, 40 by reference to 30, 41 by reference to 30, 43 by reference to 30, 75	This term has a plain and ordinary meaning and does not need to be construed. However, if the Court chooses to construe this term, the following construction should be used: a particular way that information is encoded	structure of data in a file (e.g., .htm, .css, .svf, .bmp, .jpg, .gif)

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6	vector-based content '353 Patent: 33, 183, 283	content that includes one or more vectors	scalable content that includes, for each object, a directional data structure storing X & Y values from a single point for the page or frame to the object
7	scalable vector-based content '353 Patent: 43 '926 Patent: 30, 31 by reference to 30, 40 by reference to 30, 41 by reference to 30, 43, 59	content that (1) is capable of being rendered at multiple zoom levels and (2) includes one or more vectors	See Defendants' proposed construction for "vector-based content."
8	vector '353 Patent: 33, 43, 58, 139 by reference to 138, 183, 283 '926 Patent: 30, 31 by reference to 30, 40 by reference to 30, 41 by reference to 30, 43, 59, 72	A mathematical expression representing a length and a direction in a two-dimensional space. In an X, Y coordinate system, a vector is represented by a value X2, Y2 relative to an origin point, represented by X1, Y1.	for each object, a directional data structure that stores X & Y values from a single point for the page or frame to the object
9	primary datum '353 Patent: 58, 59 by reference to 58, 139 by reference to 138 '926 Patent: 72	an origin point defined at an X,Y coordinate	single point defined at a fixed X,Y coordinate on the full-size web page
10	object datum '353 Patent: 58, 59 by reference to 58, 139 by reference to 138 '926 Patent: 72	reference point for an object	X,Y coordinate for an object that is defined across objects at a consistent location on the objects

Term/Phrase in Issue and Asserted Claim(s) in Which Term/Phrase Appears		Plaintiff's Proposed Construction	Defendants' Proposed Construction
11	layout location datum ‘353 Patent: 58, 59 by reference to 58, 139 by reference to 138 ‘926 Patent: 72	one or more points corresponding to the location of the object	point defined at a fixed X,Y coordinate on the full-size web page that corresponds to an object
12	enabling the user to zoom and pan a view of the Web page ‘353 Patent: 317	enabling the user to zoom and move around the web page	using the scalable content to allow the user to resize and move around the web page
13	original original width and height of the Web page original page layout, functionality, and design	This term has a plain and ordinary meaning and does not need to be construed.	as viewed on a conventional desktop browser, such as Internet Explorer or Netscape Navigator, when the browser window is set to the full width resolution for which the page was designed the width and height of the Web page as viewed on a conventional desktop browser, such as Internet Explorer or Netscape Navigator, when the browser window is set to the full width resolution for which the page was designed the page layout, functionality, and design of the Web page as viewed on a conventional desktop browser, such as Internet Explorer or Netscape Navigator, when the browser window is set to the full width resolution

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original page layout '353 Patent: 33 by reference to 1, 43 by reference to 36, 48 by reference to 36, 52 by reference to 36, 58, 59 by reference to 36 and 58, 66 by reference to 36, 139 by reference to 118, 183 by reference to 149, 283 by reference to 252 '926 Patent: 30, 31 by reference to 30, 40 by reference to 30, 41 by reference to 30, 43 by reference to 30, 55 by reference to 52, 59 by reference to 52, 72, 75 by reference to 52		for which the page was designed the page layout of the Web page as viewed on a conventional desktop browser, such as Internet Explorer or Netscape Navigator, when the browser window is set to the full width resolution for which the page was designed

	Term/Phrase in Issue and Asserted Claim(s) in Which Term/Phrase Appears	Plaintiff's Proposed Construction	Defendants' Proposed Construction
14	fit across fit across the display rendered to fit across the display displayed to fit across the touch-sensitive display displayed to fit across at least one of a width and height of a display area of the touch-sensitive display '353 Patent: 33 by reference to 1, 48, 52 by reference to 51, 139 by reference to 118 '926 Patent: 40, 41	This term has a plain and ordinary meaning and does not need to be construed.	fully fill fully fill the display rendered to fully fill the display displayed to fully fill the touch-sensitive display displayed to fully fill at least one of a width and height of a display area of the touch-sensitive display
15	tapping '353 Patent: 52, 317 '926 Patent: 40, 41	This term has a plain and ordinary meaning and does not need to be construed.	making contact with the display using a stylus

	Term/Phrase in Issue and Asserted Claim(s) in Which Term/Phrase Appears	Plaintiff's Proposed Construction	Defendants' Proposed Construction
16	preserve(s) / preserved / preserving / preservation '353 Patent: 33 by reference to 1, 43 by reference to 36, 48 by reference to 36, 52 by reference to 36, 58 by reference to 36, 59 by reference to 36, 66, 139 by reference to 118, 183 by reference to 149, 283 by reference to 252 '926 Patent: 30, 31 by reference to 30, 40 by reference to 30, 41 by reference to 30, 43 by reference to 30, 55 by reference to 52, 59 by reference to 52, 72 by reference to 52, 75 by reference to 52	This term has a plain and ordinary meaning and does not need to be construed.	These terms are indefinite and therefore cannot be construed.
17	machine-readable medium '353 Patent: 283	The machine-readable medium may include, but is not limited to, floppy diskettes, optical disks, ROMs, RAMs, EPROMs, EEPROMs, magnetic or optical cards, flash memory, or other type of media/machine-readable medium suitable for storing electronic instructions.	a medium for electronic instructions, such as a floppy disk, optical disk, CD-ROM, magneto-optical disk, ROM, RAM, EPROM, EEPROM, magnetic or optical card, flash memory, or carrier wave

	Term/Phrase in Issue and Asserted Claim(s) in Which Term/Phrase Appears	Plaintiff's Proposed Construction	Defendants' Proposed Construction
18	storage means '353 Patent: 33 by reference to 1 '926 Patent: 30, 31 by reference to 30, 40 by reference to 30, 41 by reference to 30, 43 by reference to 30	<u>Function:</u> storing a plurality of instructions <u>Corresponding structure:</u> memory	<u>Function:</u> storing a plurality of instructions <u>Corresponding structure:</u> a floppy disk, optical disk, CD-ROM, magneto-optical disk, ROM, RAM, EPROM, EEPROM, magnetic or optical card, flash memory or carrier wave
19	processing means '353 Patent: 33 by reference to 1	<u>Function:</u> processing <u>Corresponding structure:</u> a processor, microcontroller, or logic circuitry	<u>Function #1:</u> rendering a browser interface via which a user is enabled to request access to an original Web page, the Web page comprising HTML-based Web content having an original format defining an original width and height of the Web page and an original page layout, functionality, and design of content on the Web page <u>Structure corresponding to Function #1:</u> Indefinite, as the specification does not disclose any algorithm for rendering a browser interface. <u>Function #2:</u> retrieving the Web page via the wireless communication means <u>Structure corresponding to Function #2:</u> Indefinite, as specification does not disclose any structure corresponding to "wireless communication means."

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		<u>Function #3</u>: 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 that preserves the original page layout, functionality and design of the content defined by its original format when scaled and rendered <u>Structure corresponding to Function #3</u>: The algorithm depicted at boxes 150-160 of Fig. 5 (also depicted at box 114 of Fig. 2C), and '353 patent col. 3, ll. 50-52, col. 10, ll. 31-55, and col. 15, l. 43 to col. 18, l. 39. <u>Function #4</u>: scaling the scalable content to render the Web page on the display such that a width of the Web page is rendered to fit across the display <u>Structure corresponding to Function #4</u>: The algorithm depicted at boxes 160-172 of Fig. 6, and corresponding text at '353 patent col. 3, ll. 53-55 and col. 19, l. 14 to col. 20, l. 47, wherein the scale factor is chosen such that the width of the Web page fits across the display.

	Term/Phrase in Issue and Asserted Claim(s) in Which Term/Phrase Appears	Plaintiff's Proposed Construction	Defendants' Proposed Construction
20	wireless communication[s] means '353 Patent: 33 by reference to 1 '926 Patent: 30, 31 by reference to 30, 40 by reference to 30, 41 by reference to 30, 43 by reference to 30, 55 by reference to 52, 59 by reference to 52, 72 by reference to 52, 75 by reference to 52	<u>Functions:</u> facilitate wireless communication with a network that supports access to the Internet facilitate communication with a mobile service provider network via which Web content may be accessed facilitate wireless communication with a network via which Web content may be accessed <u>Corresponding structure:</u> an antenna	<u>Functions (the appropriate function depends upon the specific claim):</u> facilitating wireless communication with a network that supports access to the Internet ('353 patent claim 33 by reference to claim 1) facilitating communication with a mobile service provider network via which Web content may be accessed ('926 patent claim 30 and claims 31, 40, 41, and 43 by reference to claim 30) facilitating wireless communication with a network via which Web content may be accessed ('926 patent claims 55, 59, 72, and 75 by reference to claim 52) <u>Corresponding structure:</u> Indefinite, as the specification does not disclose any structures corresponding to this limitation.

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