IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SOFTVIEW, LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD. ; SAMSUNG ELECTRONICS AMERICA, INC. Defendants.	Case No. 2:25-cv-00246 **JURY TRIAL DEMANDED**

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Local Patent Rule ("P.R.") 4-3, and the Court's April 17, 2023 Scheduling Order (Dkt. No. 36), Plaintiff SoftView, LLC ("SoftView" or "Plaintiff"), and Defendants Samsung Electronics Co., LTD and Samsung Electronics America, Inc. (collectively "Samsung") hereby submit by and through their counsel, this Joint Claim Construction and Prehearing Statement. The parties hereby reserve their rights to supplement, modify and/or amend these proposed constructions or the rebuttal to same.

I. AGREED TERMS (P.R. 4-3)(a)(1))

The parties have agreed to the following constructions:

Proposed Terms	Patent Claims[1]	Agreed Construction
"A wireless device, comprising"	'353 Patent: **1**, 11, 18, 30, 31, 35	The preamble is limiting.
"A mobile hand-held device, comprising"	'353 Patent: **36**, 37, 38, 50, 53, 55, 69, **87**, 111	The preamble is limiting.
"A mobile device, comprising"	'353 Patent: **70**	The preamble is limiting.

[1] Listed claims also include all claims dependent thereon, even if those dependent claims do not contain the proposed terms. Independent claims are identified in bold.

Proposed Terms	Patent Claims[1]	Agreed Construction
"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 enable a wireless device to perform operations comprising"	'353 Patent: **216**, **252**, 253, 254, 264, 269, 282, **285**, 286, 287, 293, 294, 296, 304, 306, 307	The preamble is limiting.
"A hand-held wireless device, comprising"	'353 Patent: **317**, 318, 319	The preamble is limiting.
"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"	'628 Patent: **1**, 2–5, 7–14	The preamble is limiting.
"A method performed by a mobile hand-held device including a touch-sensitive display and an HTML rendering engine"	'154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	The preamble is limiting.
"translating" / "translate"	'353 Patent: **1**, 11, 18, 30, 31, 35, **118**, 128, 133, 134, 144, 145, **209**, **216** '729 Patent: 5, 17 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	"converting" ('353 Patent: 1, 118, 209, 216; '154 Patent: 13) / "convert" ('729 Patent: 5, 17)
"scalable content" / "scalable page layout information"	'353 Patent: **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" ('353 Patent: **1**, 11, 18, 30, 31, 35, **36**, 37, 38, 50, 53, 55, 69, **70**, **118**, 128, 133, 134, 144, 145, **149**, 150, 151, 161, 168, 171, 182, **209**, **216**,

Proposed Terms	Patent Claims[1]	Agreed Construction
	149, 150, 151, 161, 168, 171, 182, **209**, **216**, **252**, 253, 254, 264, 269, 282 '889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40	**252**, 253, 254, 264, 269, 282) / "page layout information capable of being rendered at multiple zoom levels" ('889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40)
"scalable" / "scaling" / "scaled" / "scale"[2]	'353 Patent: **1**, 11, 18, 30, 31, 35, **36**, 37, 38, 50, 53, 55, 69, **70**, **118**, 128, 133, 134, 144, 145, **149**, 150, 151, 161, 168, 171, 182, **209**, **216**, **252**, 253, 254, 264, 269, 282 '889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40, **108**, 109, 114, 115 '628 Patent: **1**, 2–5, 7–14 '729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	"capable of being rendered at multiple zoom levels" ('353 Patent: 1, 36, 70, 118, 149, 209, 216, 252; '889 Patent: 1, 22, 23, 34, 35; '729 Patent: 1, 5, 14, 17; '154 Patent: 13, 19) / "rendering at multiple zoom levels" ('353 Patent: 1, 118, 209, 216; '889 Patent: 35, 39; '628 Patent: 1, 2) / "rendered at multiple zoom levels" ('353 Patent: 1, 118, 209, 216; '889 Patent: 39, 108; '628 Patent: 1, 5, 11) / "render at multiple zoom levels" ('154 Patent: 21, 23)
"bounding box"	'889 Patent: 39, 109 '628 Patent: **1**, 2–5, 7–14 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	"an outlined shape within which an object's content (*e.g.*, text or graphic image) will appear"
"object datum"	'889 Patent: 5 '729 Patent: 21	"reference point for an object used in a predictable manner"

[2] The term "scale" is only intended to encompass the term when used as a verb, such as in claims 21 and 23 of the '154 Patent.

Proposed Terms	Patent Claims[1]	Agreed Construction
	'154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	
"primary datum"	'729 Patent: 21 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	"a fixed origin point defined at an X, Y coordinate"
"Web a e content"	'353 Patent: 69, **87**, 111, 128, 133	"Web page content"

II. DISPUTED TERMS (P.R. 4-3(a)(2))

Attached hereto as Exhibit A is a joint chart setting forth the constructions proposed by each side for each disputed claim term, phrase, or clause.

Attached hereto as Exhibits B and C are the parties' respective charts setting forth an identification of all references from the specification or prosecution history that support that position, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its position or to oppose any other party's position, including, but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses.

The parties hereby reserve their right to rely upon all evidence cited or referenced in the opposing side's chart and exhibit relating to disputed terms.

III. LENGTH OF TIME NECESSARY FOR CLAIM CONSTRUCTION HEARING (P.R. 4-3(a)(3))

A. SoftView's Position

At this time, SoftView anticipates a combined total of about three hours for presentation at the Claim Construction Hearing, with each side having equal time.

B. Samsung's Position

Samsung's position is that no claim construction hearing is needed, given the prior claim construction proceedings in *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 1103, 1104 (D. Del. Sept. 4, 2013).

IV. WITNESSES AT THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(a)(4))

At this time, the parties do not propose to call any witnesses at the Claim Construction Hearing.

V. ADDITIONAL ISSUES (P.R. 4-3(a)(5))

At this time, the parties have not identified other issues that might be appropriately addressed at a prehearing conference prior to the Claim Construction Hearing.

DATED: March 4, 2026

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CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2026, a true and correct copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system.

/s/ Justin Nemunaitis
Justin T. Nemunaitis

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SOFTVIEW LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	CASE NO. 2:25-CV-00246-JRG **JURY TRIAL DEMANDED**

EXHIBIT A - IDENTIFICATION OF CLAIM CONSTRUCTION PROPOSALS

Proposed Terms	Patent Claims[1]	SoftView Proposed Construction	Samsung Proposed Construction
"A machine-readable medium"	'353 Patent: **216**, **252**, 253, 254, 264, 269, 282, **285**, 286, 287, 293, 294, 296, 304, 306, 307	No construction necessary. This term should not be construed separately from the broader claim language, which excludes carrier waves	A medium for storing 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
"processing means"	'353 Patent: **1**, 11, 18, 30, 31, 35, **70**	§ 112 ⁋ 6 does not apply. If § 112 ⁋ 6 does apply, Function: "processing" Corresponding structure: a processor, microcontroller, or logic circuitry	Subject to § 112, ¶ 6. Function: "processing" Corresponding structure: a processor, microcontroller, or logic circuitry
"wireless communications means to facilitate wireless	'353 Patent: **1**, 11, 18, 30, 31, 35, **70**	§ 112 ⁋ 6 does not apply. If § 112 ⁋ 6 does apply,	Subject to § 112, ¶ 6. Function: "facilitate wireless

[1] Listed claims also include all claims dependent thereon, even if those dependent claims do not contain the proposed terms. Independent claims are identified in bold.

Proposed Terms	Patent Claims[1]	SoftView Proposed Construction	Samsung Proposed Construction
communication with a network that supports access to the Internet"		Function: "facilitate wireless communication with a network that supports access to the Internet" Corresponding structure: an antenna and wireless communications interface	communication with a network that supports access to the Internet" Corresponding structure: an antenna
"storage means"	'353 Patent: **1**, 11, 18, 30, 31, 35, **70**	§ 112 ⁋ 6 does not apply. If § 112 ⁋ 6 does apply, Function: storing a plurality of instructions Structure: dynamic or static storage device	Subject to § 112, ¶ 6. Function: "storing a plurality of instructions." Corresponding structure: "a floppy disk, optical disk, CD-ROM, magneto-optical disk, ROM, RAM, EPROM, EEPROM, magnetic or optical card, flash memory, or carrier wave"
"original"	'353 Patent: **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, 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, 318, 319 '889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40, **108**, 109, 114, 115	No construction necessary	The term "original" means "as designed for a desktop computer."

Proposed Terms	Patent Claims[1]	SoftView Proposed Construction	Samsung Proposed Construction
	’729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22		
“enabling a user to zoom on [a column / a paragraph / an image] [of the Web page / of the Web content]” / “to enable the Web page to be browsed at various zoom levels and panned views” / “enabling the user to, zoom and pan a view of the Web page” / “enabling the user to perform full page browsing of the Web page at multiple zoom levels” / “enabling the user to perform zooming operations”	’353 Patent: 11, 18, **87**, 111, 128, 133, 134, **185**, 186, 187, 189, 193, 194, 196, 204, 206, 207, **285**, 286, 287, 293, 294, 296, 304, 306, 307, **317**, 318, 319 ‘628 Patent: **1**, 2–5, 7–14	No construction necessary	“enabling a user to use scalable content to zoom on [a column / a paragraph / an image] [of the Web page / of the Web content]” (’353 Patent: 11, 18, 128, 133, 186, 193, 286, 293) / “enable the Web page to use scalable content to be browsed at various zoom levels and panned views” (’353 Patent: 87, 185, 285) / “enabling the user to use scalable content to zoom and move around the web page” (’353 Patent: 317) / “enabling the user to use scaled Web page content to perform full page browsing of the Web page at multiple zoom levels” (’628 Patent: 1) “enabling the user to use scaled Web page content to perform zooming operations” (’628 Patent: 4)
“processing HTML-based Web content to produce scalable content” / “processing at least a portion of the HTML-based Web content to produce scalable content” / “processing … the markup language-based Web content … to	’353 Patent: **36**, 37, 38, 50, 53, 55, 69, **70**, **149**, 150, 151, 161, 168, 171, 182, **252**, 253, 254, 264, 269, 282 ’889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40, **108**, 109, 114, 115 ’729 Patent: **1**, 2–	No construction necessary	“converting Web content from [HTML / markup language] to [scalable content / page layout information / a scalable vector representation of the Web page]” (’353 Patent: 36, 149, 252; ’889 Patent: 1, 108; ’729 Patent: 1, 14) / “converting at least a portion of the Web content from HTML to scalable content” (’353 Patent: 70) /

Proposed Terms	Patent Claims[1]	SoftView Proposed Construction	Samsung Proposed Construction
generate page layout information" / "processing the HTML-based Web content … to generate page layout information" / "processing … the HTML-based Web content … to generate a scalable vector representation of the Web page" / "processing the HTML-based Web content … to generate a scalable vector representation of the Web page" / "processing [HTML-based Web content / HTML-based Web content and the CSS content] associated with the hyperlink to translate the [HTML-based Web content / HTML-based Web content and the CSS content associated with the hyperlink] into an additional scalable vector representation"	5, 7–10, 13, **14**, 15–18, 21, 22		"converting Web content associated with the hyperlink from [HTML / HTML and CSS] to an additional scalable vector representation" ('729 Patent: 5, 17)
"scalable vector-based page layout information" / "scalable vector representation"	'889 Patent: 34, 35, 36 '729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	No construction necessary	"page layout information that (1) is capable of being rendered at multiple zoom levels and (2) includes one or more vectors" ('889 Patent: 34, 35, 36) / "representation of the [Web page / HTML document] that (1) is capable of being rendered at multiple zoom levels and (2)

Proposed Terms	Patent Claims[1]	SoftView Proposed Construction	Samsung Proposed Construction
			includes one or more vectors" ('729 Patent: 1, 5, 14, 17; '154 Patent: 13,19)
"object(s)"	'889 Patent: 5, 23, 35, 36 '729 Patent: 21 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	No construction necessary	"a grouping of webpage content, such as the paragraph of text or a graphic image"
"commercially available desktop browser"	'729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22	No construction necessary	"a desktop browser that was commercially available as of the earliest effective filing date of the '729 patent"
"format"	'353 Patent: **1**, 11, 18, 30, 31, 35, **118**, 128, 133, 134, 144, 145, **209**, **216** '889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40, **108**, 109, 114, 115	No construction necessary, or in the alternative, "a particular way that information is stored"	"a particular way that information is encoded"
"vector"	'889 Patent: 34, 35, 36 '628 Patent: 2 '729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	No construction necessary, or in the alternative, "a point in a coordinate system relative to another point"	"for each object, a directional data structure that stores X & Y values from a point for the page or frame to the object"

Proposed Terms	Patent Claims[1]	SoftView Proposed Construction	Samsung Proposed Construction
"layout location datum"	'729 Patent: 21 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	No construction necessary, or in the alternative, "one or more points corresponding to the location of the object"	"point defined at an X, Y coordinate that corresponds to the location of the object"

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SOFTVIEW LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	CASE NO. 2:25-CV-00246-JRG **JURY TRIAL DEMANDED**

EHIBIT B – SOFTVIEW'S IDENTIFICATION OF CLAIM CONSTRUCTION EVIDENCE

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[2][3]
"A machine-readable medium having a plurality of instructions [. . .] tangibly stored thereon"	'353 Patent: **216**, **252**, 253, 254, 264, 269, 282, **285**, 286, 287, 293, 294, 296, 304, 306, 307	No construction necessary. This term should not be construed separately from the broader claim language, which excludes carrier waves SoftView's claim construction position is also supported by '353 patent 4:16–41; 4:40–41; 5:25–58; 21:14–22:6; Fig. 10. *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and

[1] Listed claims also include all claims dependent thereon, even if those dependent claims do not contain the proposed terms. Independent claims are identified in bold.

[2] Citations to the specifications are generally made to the '353 patent, but SoftView may identify the same language in related patents. SoftView may also rely on the relevant claims identified in this chart for each term.

[3] In addition to the evidence identified below, SoftView also reserves the right to rely on any evidence identified by Samsung.

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[2][3]
		exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504), 500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 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's claim construction position is also supported by the declaration of Glenn Weadock. 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; 8. the overall operation of web browsers and how they render content; and

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[2][3]
		9. how processors function and process information from storage media. <u>Microsoft Computer Dictionary (4th ed. 1999).</u>
"processing means"	'353 Patent: **1**, 11, 18, 30, 31, 35, **70**	§ 112 ¶ 6 does not apply. If § 112 ¶ 6 does apply, Function: "processing" Corresponding structure: a processor, microcontroller, or logic circuitry SoftView's claim construction position is also supported by '353 patent abstract; 21:15–32; 4:16–41; 6:53–67; 8:19–9:13; 9:64–10:31; 15:43–67; 19:14–56; 20:8–17; 21: 22:1–6; Figs. 2A, 2C, 6, 10; claims 71, 72. *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504), 500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 SoftView's claim construction position is also supported by the declaration of Glenn Weadock.

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[2][3]
		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>
"wireless communications means to facilitate wireless communication with a network that supports access to the Internet"	'353 Patent: **1**, 11, 18, 30, 31, 35, **70**	§ 112 ¶ 6 does not apply. If § 112 ¶ 6 does apply, Function: "facilitate wireless communication with a network that supports access to the Internet" Corresponding structure: an antenna and wireless communications interface SoftView's claim construction position is also supported by '353 patent 6:53–67; 9:14–56; Fig. 10. *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[2][3]
		Construction Brief (Sealed) – Redacted version filed at Dkt. 504), 500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 SoftView's claim construction position is also supported by the declaration of Glenn Weadock. 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>

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[2][3]
"storage means"	'353 Patent: **1**, 11, 18, 30, 31, 35, **70**	§ 112 ¶ 6 does not apply. If § 112 ¶ 6 does apply, Function: storing a plurality of instructions Structure: dynamic or static storage device SoftView's claim construction position is also supported by '353 patent at 4:16–41; 4:40–41; 5:25–58; 21:14–22:6; Fig. 10. *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504), 500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 SoftView's claim construction position is also supported by the declaration of Glenn Weadock. 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;

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
		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>
"original"	'353 Patent: **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, 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,	No construction necessary SoftView's claim construction position is also supported by '353 patent at Abstract, Figs. 1-10, 2:20-62, 4:42-65, 8:56-15:31, 17:8-22:13. '353 file history, December 5, 2007 Examiner interview summary and corresponding applicant remarks, December 9 Applicant Remarks, January 12, 2008 Remarks, June 2, 2008 Examiner Interview Summary *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504), 500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings.

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
	294, 296, 304, 306, 307, 318, 319 '889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40, **108**, 109, 114, 115 '729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22	Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 SoftView's claim construction position is also supported by the declaration of Glenn Weadock. 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>
"enabling a user to zoom on [a column / a paragraph / an image] [of the Web page / of the Web content]" / "to enable the Web page to be browsed at	'353 Patent: 11, 18, **87**, 111, 128, 133, 134, **185**, 186, 187,	No construction necessary SoftView's claim construction position is also supported by '353 patent at Abstract, Figs. 1-10, 2:20-62, 4:42-65, 8:56-15:31, 17:8-22:13. '353 file history, December 5, 2007 Examiner interview summary and corresponding applicant remarks, December 9

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
various zoom levels and panned views" / "enabling the user to, zoom and pan a view of the Web page" / "enabling the user to perform full page browsing of the Web page at multiple zoom levels" / "enabling the user to perform zooming operations"	189, 193, 194, 196, 204, 206, 207, **285**, 286, 287, 293, 294, 296, 304, 306, 307, **317**, 318, 319 '628 Patent: **1**, 2–5, 7–14	Applicant Remarks, January 12, 2008 Remarks, June 2, 2008 Examiner Interview Summary *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504), 500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 SoftView's claim construction position is also supported by the declaration of Glenn Weadock. 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;

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
		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>
"processing HTML-based Web content to produce scalable content" / "processing at least a portion of the HTML-based Web content to produce scalable content" / "processing … the markup language-based Web content … to generate page layout information" / "processing the HTML-based Web content … to generate page layout information" / "processing … the HTML-based Web content … to generate a scalable vector representation of the Web page" / "processing the HTML-based Web content … to generate a scalable vector representation of the Web page" /	'353 Patent: **36**, 37, 38, 50, 53, 55, 69, **70**, **149**, 150, 151, 161, 168, 171, 182, **252**, 253, 254, 264, 269, 282 '889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40, **108**, 109, 114, 115 '729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22	No construction necessary SoftView's claim construction position is also supported by '353 patent abstract; 4:16–41; 6:17–35; 6:53–67; 7:1–19; 8:19–9:31; 9:64–10:56; 11:25–41; 12:1–20; 15:43–67; 17:1–7; 17:31–56; 19:14–56; 20:8–17; 21:15–46; 22:1–6; Figs. 2A, 2B, 2C, 6, 10. *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504), 500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 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.)

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
"processing [HTML-based Web content / HTML-based Web content and the CSS content] associated with the hyperlink to translate the [HTML-based Web content / HTML-based Web content and the CSS content associated with the hyperlink] into an additional scalable vector representation"		SoftView's claim construction position is also supported by the declaration of Glenn Weadock. 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; 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>
"scalable vector-based page layout information" / "scalable vector representation"	'889 Patent: 34, 35, 36 '729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22	No construction necessary SoftView's claim construction is also supported by the '353 patent 1:40-50, 3:4-67; 4:3-8; 4:64-5:24; 7:56-8:4; 8:57-9:13; 9:64-10:56; 12:12-18:39; 19:14-20:48; Figs. 2B, 2C, 4A-4G, 5-6. *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504),

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
	'154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 SoftView's claim construction position is also supported by the declaration of Glenn Weadock. 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>

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
		Affine Transformations, UT Austin CS384G, Fall 2010, Don Fussell. Vector Analysis for Computer Graphics, John Vince. Adobe Illustrator 9.0 User Guide (2000). Webster's New World Computer Dictionary (10th ed. 2003). Graphics File Formats, David C. Kay and John R. Levine (2nd ed. 1995). Creating Cool PowerPoint 97 Presentations, Glenn E. Weadock and Emily Sherrill Weadock (1997). Look & Learn Dreamweaver, Glenn Weadock (2002).
"object(s)"	'889 Patent: 5, 23, 35, 36 '729 Patent: 21 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	No construction necessary SoftView's claim construction position is also supported by '154 patent at 8:29–54; 10:46–11:7; 12:33–15:39; 15:51–17:49; 17:62–18:53; 19:36–20:67; 22:15–30; Figs. 2A–2C, 4A–4D, 5, 6 and the corresponding disclosures in the '729 patent and '889 patent. *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504), 500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456;

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
		16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 SoftView's claim construction position is also supported by the declaration of Glenn Weadock. 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>Look & Learn Dreamweaver, Glenn Weadock (2002).</u> <u>Webmaster in a Nutshell, Stephen Spainhour and Robert Eckstein (2nd ed. 1999).</u>
"commercially available desktop browser"	'729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22	No construction necessary SoftView's claim construction is also supported by the '353 patent 1:42–18; 2:47–58; 4:43–63; 5:25–34; 6:53–67; 7:20–37; 9:14–31; 11:25–41; 12:21–34; 15:19–67; 16:39–67; 17:31–41; 18:33–39; 18:47–19:13; 21:1–22:6; Fig. 10. *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
		Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504), 500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 SoftView's claim construction position is also supported by the declaration of Glenn Weadock. 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

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
		8. the overall operation of web browsers and how they render content. Microsoft Computer Dictionary (4th ed. 1999). Websters Collegiate Dictionary (10th Ed. 1997).
"format"	'353 Patent: **1**, 11, 18, 30, 31, 35, **118**, 128, 133, 134, 144, 145, **209**, **216** '889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40, **108**, 109, 114, 115	No construction necessary, or in the alternative, "a particular way that information is stored" SoftView's claim construction position is also supported by '353 patent Abstract, Figs. 1-10, 1:40-2:5, 4:42-65, 6:5-15:31, 15:43-22:13. '353 file history, December 5, 2007 Examiner interview summary and corresponding applicant remarks, December 9 Applicant Remarks, January 12, 2008 Remarks, June 2, 2008 Examiner Interview Summary *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504), 500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 SoftView's claim construction position is also supported by the declaration of Glenn Weadock.

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
		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>
"vector"	'889 Patent: 34, 35, 36 '628 Patent: 2 '729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22	No construction necessary, or in the alternative, "a point in a coordinate system relative to another point" SoftView's claim construction is also supported by the '353 patent 1:40-50, 3:4-67; 4:3-8; 4:64-5:24; 7:56-8:4; 8:57-9:13; 9:64-10:56; 12:12-18:39; 19:14-20:48; Figs. 2B, 2C, 4A-4G, 5-6. *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504),

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
	'154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 SoftView's claim construction position is also supported by the declaration of Glenn Weadock. 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; 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>

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
		Affine Transformations, UT Austin CS384G, Fall 2010, Don Fussell. Vector Analysis for Computer Graphics, John Vince. Adobe Illustrator 9.0 User Guide (2000). Webster's New World Computer Dictionary (10th ed. 2003). Graphics File Formats, David C. Kay and John R. Levine (2nd ed. 1995). Creating Cool PowerPoint 97 Presentations, Glenn E. Weadock and Emily Sherrill Weadock (1997). Look & Learn Dreamweaver, Glenn Weadock (2002).
"layout location datum"	'729 Patent: 21 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	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 '154 patent 8:29–54; 10:46–11:7; 12:33–15:39; 15:51–17:49; 17:62–18:36; 20:13–40; 24:49–53; Figs. 2A–2C ; 4A–4D, 5, 6 and the corresponding disclosures in the '729 patent. *See also, SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia *see* Dkt. 477), 478 (Defendants' Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended Joint Claim Construction Chart and exhibits thereto), 499 (Defendants' Responsive Claim Construction Brief (Sealed) – Redacted version filed at Dkt. 504), 500-501 (SoftView's Responsive Claim Construction Brief and exhibits thereto), 502 (SoftView's Comments on Defendants' Tutorial), 560 (Oral Order), 612 (SoftView's Letter Brief), 613 (Defendants' Letter Brief), 675 (*Markman* Hearing Transcript), 1103 (*Markman* Opinion), 1104 (*Markman* Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932;

Proposed Terms	Patent Claims[1]	SoftView's Proposed Construction and Supporting Evidence[23]
		11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257 SoftView's claim construction position is also supported by the declaration of Glenn Weadock. 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>

Exhibit C

EXHIBIT C—DEFENDANTS' CITATIONS TO INTRINSIC AND EXTRINSIC EVIDENCE

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
"A machine-readable medium"	'353 Patent: **216**, **252**, 253, 254, 264, 269, 282, **285**, 286, 287, 293, 294, 296, 304, 306, 307	A medium for storing 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	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2–5, 25 and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits.

[1] This Disclosure is intended to construe all terms across the Asserted Patents in a manner consistent with how they were construed in *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order).

[2] Listed claims also include all claims dependent thereon, even if those dependent claims do not contain the proposed terms. Independent claims are identified in bold.

[3] Citations to the '353 patent specification also refer to the identical portions of the '889, '729, '628, and '154 patent specifications. Any Figures referred to or discussed in the cited written portions of the specification are incorporated by reference herein, and any citation to Figures also include the discussion of the Figures in the written specification.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1–3, 23 and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 13. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix B—Defendants' Citations to Intrinsic Evidence) at 49. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants' Responsive Claim Construction Brief) at 1–2, 26–27 and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Responsive Claim Construction Brief) at 26 and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 179:12–185:25. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1103 (D. Del. Sept. 4, 2013) (Memorandum Opinion) at 19–20. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 5. **'353 patent**: Specification: 4:24–41; 43:17–19 '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7. '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83. '889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41. '628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28. '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Order Granting Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated August 8, 2011 at 9, 10. '353 *inter partes* reexamination, Application No. 95/002,132, Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated August 31, 2012 at 4–493. '353 *inter partes* reexamination, Application No. 95/002,132, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–23. '353 *inter partes* reexamination, Application No. 95/002,132, Non-Final Action dated April 7, 2017 at 5–18. '353 *inter partes* reexamination, Application No. 95/002,132, Remarks dated June 7, 2017 at 25–46. '353 *inter partes* reexamination, Application No. 95/002,132, Third Party Requester's Comments after Non-Final Action dated July 28, 2017 at 1–34. '353 *inter partes* reexamination, Application No. 95/002,132, Action Closing Prosecution dated October 2, 2018 at 2–57.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/002,132, Written Comments dated November 2, 2018 at 17–39. '353 *inter partes* reexamination, Application No. 95/002,132, Third Party Requester's Comments After Action Closing Prosecution dated December 3, 2018 at 1–33. '353 *inter partes* reexamination, Application No. 95/002,132, Right of Appeal Notice dated August 28, 2020 at 1–112. '353 *inter partes* reexamination, Application No. 95/002,132, Patent Owner's Revised Appeal Brief dated September 23, 2020 at 1–65. '353 *inter partes* reexamination, Application No. 95/002,132, Patent Owner's Appeal Brief dated November 24, 2020 at 1–59. '353 *inter partes* reexamination, Application No. 95/002,132, Third Party Requester's Appeal Brief dated November 30, 2020 at 1–32. '353 *inter partes* reexamination, Application No. 95/002,132, Patent Owner's Respondent Brief dated December 30, 2020 at 1–57. '353 *inter partes* reexamination, Application No.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			95/002,132, Third Party Requester's Respondent Brief dated January 14, 2021 at 1–27. '353 *inter partes* reexamination, Application No. 95/002,132, Patent Owner's Rebuttal Brief dated September 25, 2021 at 1–34. '353 *inter partes* reexamination, Application No. 95/002,132, PTAB Decision on Appeal dated April 6, 2022 at 1–15. '353 *inter partes* reexamination, Application No. 95/002,132, Patent Owner's Request for Rehearing dated May 5, 2022 at 1–50. '353 *inter partes* reexamination, Application No. 95/002,132, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–30. '353 *inter partes* reexamination, Application No. 95/002,132, PTAB Decision on Request for Rehearing dated September 22, 2022 at 1–35. '353 *inter partes* reexamination, Application No. 95/002,132, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated August 30, 2024 at 3–31.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/002,132, Right of Appeal Notice dated December 16, 2025 at 20–39. '926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122. '926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34. '926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39. '926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878. '926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36. '926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/002,126, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124;

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257[4]
"processing means"	'353 Patent: **1**, 11, 18, 30, 31, 35, **70**	Subject to § 112, ¶ 6. Function: "processing" Corresponding structure: a processor, microcontroller, or logic circuitry	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2-5, 26-29 and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits.

[4] The complete file histories of the listed applications can be accessed via https://data.uspto.gov/patent-file-wrapper/search

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1-3, 25-27 and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 14. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix B—Defendants' Citations to Intrinsic Evidence) at 50-52. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants' Responsive Claim Construction Brief) at 1-2, 28-29 and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Responsive Claim Construction Brief) at 27-29 and Exhibits. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 143:9-144:11; 186:1-189:14. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1103 (D. Del. Sept. 4, 2013) (Memorandum Opinion) at 21–23. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 5. **'353 patent**: Figures: 1C, 2C, 3, 4A, 4B, 4C, 4D, 4E, 4F, 5, 6, 10 Specification: 3:15-18; 3:25-27; 3:28-55; 3:65-67; 4:17-22; 8:19-9:13; 9:64-10:21; 12:12-20; 15:43-67; 18:40-20:6; 21:14-32; 22:1-24; 25:31-57 '353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133. '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96. '353 patent file history, Application No. 11/045,757, Notice of Allowance dated August 8, 2008, at 2-5. '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7. '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83. '889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010. '628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28. '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22. *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014) *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013) *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013) *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014) '353 *ex parte* reexamination, Application No. 90/009,994, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 48, 117, 208, 244, 323. '926 *ex parte* reexamination, Application No. 90/009,995, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3–678.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Order Granting Request for *Ex Parte* Reexamination dated July 17, 2012 at 2–22 '926 *ex parte* reexamination, Application No. 90/009,995, Non-Final Action dated September 16, 2016 at 2–24 '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated November 16, 2016 at 19–78 '926 *ex parte* reexamination, Application No. 90/009,995, Final Rejection dated June 20, 2017 at 2–37 '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated August 21, 2017 at 15–97 '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Appeal Brief dated January 22, 2018 at 1–65 '926 *ex parte* reexamination, Application No. 90/009,995, Examiner's Answer to Patent Owner Appeal Brief dated May 18, 2018 at 3–58

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Reply Brief dated July 18, 2018 at 1–37. '926 *ex parte* reexamination, Application No. 90/009,995, PTAB Decision on Appeal dated May 1, 2020 at 2–28. '353 *inter partes* reexamination, Application No. 95/000,634, Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated May 20, 2011 at 30, 65. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated September 30, 2011 at 6–81. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated May 22, 2017 at 11–71. '353 *inter partes* reexamination, Application No. 95/000,634, Action Closing Prosecution dated October 1, 2018 at 16–97. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Comments After Action Closing Prosecution dated November 1, 2018 at 1–91.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments After Action Closing Prosecution dated December 3, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated October 7, 2020 at 21–155. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Appeal Brief dated January 4, 2021 at 4–66. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Appeal Brief dated January 15, 2021 at 5–31. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated February 4, 2021 at 1–23. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Appeal dated February 8, 2021 at 3–33. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated April 6, 2022 at 2–86.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Request for Rehearing dated June 6, 2022 at 1–32. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated September 22, 2022 at 2–39. '353 *inter partes* reexamination, Application No. 95/000,634, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated August 30, 2024 at 3–31. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated December 16, 2025 at 20–39. '926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122. '926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51. '926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34. '926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39. '926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878. '926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257
"wireless communications means to facilitate wireless communication with a network that supports access to the Internet"	'353 Patent: **1**, 11, 18, 30, 31, 35, **70**	Subject to § 112, ¶ 6. Function: "facilitate wireless communication with a network that supports access to the Internet" Corresponding structure: an antenna	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2-5, 29-30 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1-3, 27-28 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 14-15 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			B—Defendants' Citations to Intrinsic Evidence) at 52-53 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants' Responsive Claim Construction Brief) at 1-2, 29-30 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's Responsive Claim Construction Brief) at 29-30 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 143:9-144:11; 189:17-192:7 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1103 (D. Del. Sept. 4, 2013) (Memorandum Opinion) at 23-25 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 5-6 **'353 patent**: Figures: 1A, 1B, 1C, 3, 10 Specification: 3:4-10; 3:11-14; 4:24-41; 6:53-64; 9:14-58; 21:14-22:6

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96 '353 patent file history, Application No. 11/045,757, Notice of Allowance dated August 8, 2008, at 2-5 '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7 '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83. '889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41. '628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28 '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3–678. '926 *ex parte* reexamination, Application No. 90/009,995, Order Granting Request for *Ex Parte* Reexamination dated July 17, 2012 at 2–22. '926 *ex parte* reexamination, Application No. 90/009,995, Non-Final Action dated September 16, 2016 at 2–24. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated November 16, 2016 at 19–78. '926 *ex parte* reexamination, Application No. 90/009,995, Final Rejection dated June 20, 2017 at 2–37. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated August 21, 2017 at 15–97. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Appeal Brief dated January 22, 2018 at 1–65.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Examiner's Answer to Patent Owner Appeal Brief dated May 18, 2018 at 3–58. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Reply Brief dated July 18, 2018 at 1–37. '926 *ex parte* reexamination, Application No. 90/009,995, PTAB Decision on Appeal dated May 1, 2020 at 2–28. '353 *inter partes* reexamination, Application No. 95/000,634, Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated May 20, 2011 at 31, 65. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated September 30, 2011 at 6–81. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Response to Office Action dated December 21, 2011 at 1–27. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated May 22, 2017 at 11–71.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Patent Owner Response dated August 23, 2017 at 5–41. '353 *inter partes* reexamination, Application No. 95/000,634, Action Closing Prosecution dated October 1, 2018 at 16–97. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Comments After Action Closing Prosecution dated November 1, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments After Action Closing Prosecution dated December 3, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated October 7, 2020 at 21–155. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Appeal Brief dated January 4, 2021 at 4–66. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Appeal Brief dated January 15, 2021 at 5–31.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated February 4, 2021 at 1–23. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Appeal dated February 8, 2021 at 3–33. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated April 6, 2022 at 2–86. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Request for Rehearing dated June 6, 2022 at 1–32. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated September 22, 2022 at 2–39. '353 *inter partes* reexamination, Application No. 95/000,634, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated August 30, 2024 at 3–31.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated December 16, 2025 at 20–39. '926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122. '926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34. '926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39. '926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878. '926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36. '926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
"storage means"	'353 Patent: **1**, 11, 18, 30, 31, 35, **70**	Subject to § 112, ¶ 6. Function: "storing a plurality of instructions." Corresponding structure: "a floppy disk, optical disk, CD-ROM, magneto-optical disk, ROM, RAM, EPROM, EEPROM, magnetic or optical card, flash memory, or carrier wave"	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2-5, 17 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1-3, 24-25 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 13-14 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix B—Defendants' Citations to Intrinsic Evidence) at 49-50 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants' Responsive Claim Construction Brief) at 1-2, 27-28 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's Responsive Claim Construction Brief) at 26 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 143:9-144:11; 179:12-189:11 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1103 (D. Del. Sept. 4, 2013) (Memorandum

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Opinion) at 19–21 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 5 **'353 patent**: Figures: 1A, 1C, 2A, 2C, 3, 5, 6, 10 Specification: 3:4-10; 3:15-18; 3:19-21; 3:25-27; 3:28-30; 3:50-52; 3:53-55; 3:65-67; 4:24-41; 5:25-6:17; 7:20-8:44; 16:39-17:7; 17:65-18:16;19:14-31; 21:14-46; 21:58-22:6; 43:17-19 '353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96 '353 patent file history, Application No. 11/045,757, Notice of Allowance dated August 8, 2008, at 2-5

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7 '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83. '889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010. '628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41. '628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22. *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Motorola Mobility, Inc. v. SoftView LLC, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014). '353 *ex parte* reexamination, Application No. 90/009,994, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 50, 119, 208, 245, 246. '926 *ex parte* reexamination, Application No. 90/009,995, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3–678. '926 *ex parte* reexamination, Application No. 90/009,995, Order Granting Request for *Ex Parte* Reexamination dated July 17, 2012 at 2–22. '926 *ex parte* reexamination, Application No. 90/009,995, Non-Final Action dated September 16, 2016 at 2–24.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated November 16, 2016 at 19–78. '926 *ex parte* reexamination, Application No. 90/009,995, Final Rejection dated June 20, 2017 at 2–37. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated August 21, 2017 at 15–97. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Appeal Brief dated January 22, 2018 at 1–65. '926 *ex parte* reexamination, Application No. 90/009,995, Examiner's Answer to Patent Owner Appeal Brief dated May 18, 2018 at 3–58. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Reply Brief dated July 18, 2018 at 1–37. '926 *ex parte* reexamination, Application No. 90/009,995, PTAB Decision on Appeal dated May 1, 2020 at 2–28. '353 *inter partes* reexamination, Application No. 95/000,634, Request for *Inter Partes*

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Reexamination of U.S. Patent 7,461,353 dated May 20, 2011 at 31, 32, 66. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated September 30, 2011 at 6–81. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated May 22, 2017 at 11–71. '353 *inter partes* reexamination, Application No. 95/000,634, Action Closing Prosecution dated October 1, 2018 at 16–97. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Comments After Action Closing Prosecution dated November 1, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments After Action Closing Prosecution dated December 3, 2018 at 1–91. '926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51. '926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39. '926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36. '926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. <u>Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.</u>: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257
"format"	'353 Patent: **1**, 11, 18, 30, 31, 35, **118**, 128, 133, 134, 144, 145, **209**, **216**	"a particular way that information is encoded"	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
	'889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40, **108**, 109, 114, 115		art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2-5, 11-13 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1-3, 6-7 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) and Exhibits

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 4-5 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix B—Defendants' Citations to Intrinsic Evidence) at 16-18 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants' Responsive Claim Construction Brief) at 1-2, 9-10 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's Responsive Claim Construction Brief) at 11-12 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 172:12-179:11 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1103 (D. Del. Sept. 4, 2013) (Memorandum Opinion) at 8-9 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 3

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 patent: Figures: 2A, 2B, 2C Specification: 1:61-2:3; 2:57-61; 3:19-27; 4:1-5:24; 6:5-18; 8:5-18; 8:57–9:13; 9:32-43; 9:52-56; 10:2-11:9; 11:41-58; 15:19-67; 20:56-67; 22:29 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3A (Provisional App. No. 60/211,019), FH000006 at lines 12-16; FH000009 at lines 6-8 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3B (Provisional App. No. 60/217,345), FH000022 (Figure 2); FH000024 (Figure 4); FH000016 at lines 3-5, 45-46; FH000017 at lines 18-22, 35-48; FH000018 at lines 51-53 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3C (File History for U.S. Patent App. No. 09/828,511), FH000042; FH000045 ¶ [0008]; FH000046 ¶ [0016], [0017]; FH000047 ¶ [0018]; FH000061-063 at claim 6, 7, 9-12, 16; FH000065-066 at claims 27-29; FH000117 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3D (File History for U.S. Patent No. 7,210,099), FH000185-194 at

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			claims 1, 3, 4, 5, 6, 9, 11, 12, 15-17, 19, 21-23, 25, 26, 27, 29-32, 34-36, 38 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3E (File History for U.S. Patent No. 7,461,353), FH000677-681 at claims 1, 3-7, 9-11, 13-15; FH000682; FH000729 at claim 20;FH000754 at claim 40; FH000760 at claim 66; FH000761 at claim 71; FH000766 at claim 93; FH000772 at claim 123 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3F (File History for U.S. Patent No. 7,831,926), FH003025 at claim 1; FH003030-031 at claims 25, 27; FH003036 at claim 49; FH003042 at claim 75 '353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96 '353 patent file history, Application No.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			11/045,757, Notice of Allowance dated August 8, 2008, at 2-5 '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7 '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83. '889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010. '628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41. '628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28 '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22. '729 patent file history, Application No. 12/941,106, Response to Office Action dated October 9, 2012, Remarks at 5-12. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 11, 2014, Remarks at 9-16. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 15, 2015, Remarks at 10-58.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'729 patent file history, Application No. 12/941,106, Response to Office Action dated January 19, 2016, Remarks at 9-28. *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Motorola Mobility, Inc. v. SoftView LLC, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014). '353 *ex parte* reexamination, Application No. 90/009,994, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3, 4, 8, 11, 13–17, 26, 31, 36, 43, 44, 46, 47, 49, 50–54, 61, 118–123, 130–133, 208, 209, 213, 216, 244, 246, 247, 249, 257, 258, 263, 264, 281, 284, 285, 292, 294, 295, 309, 310, 312, 313, 321, 322, 324–331, 333–339, 341, 342, 345, 346, 348, 349. '353 *ex parte* reexamination, Application No. 90/009,994, Remarks dated November 16, 2016 at 66, 67. '353 *ex parte* reexamination, Application No. 90/009,994, Final Rejection dated June 20, 2017 at 26. '926 *ex parte* reexamination, Application No. 90/009,995, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3–678. '926 *ex parte* reexamination, Application No. 90/009,995, Order Granting Request for *Ex Parte* Reexamination dated July 17, 2012 at 2–22.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Non-Final Action dated September 16, 2016 at 2–24. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated November 16, 2016 at 19–78. '926 *ex parte* reexamination, Application No. 90/009,995, Final Rejection dated June 20, 2017 at 2–37. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated August 21, 2017 at 15–97. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Appeal Brief dated January 22, 2018 at 1–65. '926 *ex parte* reexamination, Application No. 90/009,995, Examiner's Answer to Patent Owner Appeal Brief dated May 18, 2018 at 3–58. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Reply Brief dated July 18, 2018 at 1–37.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, PTAB Decision on Appeal dated May 1, 2020 at 2–28. '353 *inter partes* reexamination, Application No. 95/000,634, Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated May 20, 2011 at 3, 4, 7, 10, 14, 32–34, 66, 67. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated September 30, 2011 at 6–81. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Response to Office Action dated December 21, 2011 at 1–27. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Office Action dated January 20, 2012 at 2–27. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated May 22, 2017 at 11–71. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Remarks dated July 24, 2017 at 54–85.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Patent Owner Response dated August 23, 2017 at 5–41. '353 *inter partes* reexamination, Application No. 95/000,634, Action Closing Prosecution dated October 1, 2018 at 16–97. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Comments After Action Closing Prosecution dated November 1, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments After Action Closing Prosecution dated December 3, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated October 7, 2020 at 21–155. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Appeal Brief dated January 4, 2021 at 4–66. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Appeal Brief dated January 15, 2021 at 5–31.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated February 4, 2021 at 1–23. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Appeal dated February 8, 2021 at 3–33. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated April 6, 2022 at 2–86. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Request for Rehearing dated June 6, 2022 at 1–32. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated September 22, 2022 at 2–39. '353 *inter partes* reexamination, Application No. 95/000,634, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated August 30, 2024 at 3–31.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated December 16, 2025 at 20–39. '926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122. '926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34. '926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39. '926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878. '926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36. '926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
"original"	'353 Patent: **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, 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, 318, 319 '889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40, **108**, 109, 114, 115 '729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22	The term "original" means "as designed for a desktop computer."	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2-5, 20-22 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1-3, 16-17 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 9-10 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix B—Defendants' Citations to Intrinsic Evidence) at 42-46 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants' Responsive Claim Construction Brief) at 1-2, 20 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's Responsive Claim Construction Brief) at 17-19 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 15:9-68:18; 127:13-128:20

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 2 **'353 patent**: Figures 4A-9B Specification: Abstract; 1:4-7; 1:61-2:18; 2:22-38; 2:47-59; 3:31-64; 4:64-5:3; 5:10-11; 5:16-18; 5:67-6:3; 6:23-31; 7:25-32; 7:38-48; 7:56-8:44; 9:4-12; 10:22-31; 10:39-50; 11:3-9; 12:12–16:67; 17:8-30; 17:42-45; 18:33-39; 18:47-19:6; 19:28-31; 20:11-32; 20:45-67; 21:1-10 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3A (Provisional App. No. 60/211,019), FH000005 at 22-30; FH000008 at 7-15 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3C (File History for U.S. Patent App. No. 09/828,511), FH000042; FH000045 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3D (File History for U.S. Patent No. 7,210,099), FH000149 ¶¶ [0007], [0008]; FH000195 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3E (File History for U.S. Patent No. 7,461,353), FH000645;

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			FH000682; FH000983; FH001042; FH001046-048; FH001060-061; FH001065-081; FH001100-111; FH001211-212; FH001348-366 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3F (File History for U.S. Patent No. 7,831,926), FH002992; FH003381-382; FH003450-451; FH003530; FH003538-540; FH003542-543; FH003553-554; FH003562-582 '926 patent file history, Application No. 11/738,486, Notice of Allowance dated June 9, 2010, at 2-30 '353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96 '353 patent file history, Application No. 11/045,757, Notice of Allowance dated August 8, 2008, at 2-5

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 patent file history, Application No. 11/045,757, Supplemental Information Disclosure Statement Remarks dated Jan. 22, 2008, at 2-18 '353 patent file history, Application No. 11/045,757, Information Disclosure Statement dated June 8, 2001 App. No. 11/868,124, Remarks dated Nov. 24, 2010, at 18-139 App. No. 11/868,124, Reply to Action of January 24, 2011, dated July 22, 2011, at 14-18 App. No. 11/868,124, Response to Office Action of October 13, 2011, dated Apr. 3, 2012, at 14-19 App. No. 11/868,124, Office Action mailed Apr. 18, 2012, at 2-12 '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7 '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010. '628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41. '628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28 '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22. '729 patent file history, Application No. 12/941,106, Response to Office Action dated October 9, 2012, Remarks at 5-12. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 11, 2014, Remarks at 9-16. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 15, 2015, Remarks at 10-58. '729 patent file history, Application No. 12/941,106, Response to Office Action dated January 19, 2016, Remarks at 9-28. *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014). '353 *ex parte* reexamination, Application No. 90/009,994, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3–5, 9, 11, 21, 50–55, 61, 62, 66, 119–124, 133, 134, 137–139, 144, 208, 209, 213, 216, 218, 219, 235, 246, 247, 249, 251, 258, 259, 264, 265, 270, 324, 327, 331, 343. '353 *ex parte* reexamination, Application No.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			90/009,994, Remarks dated November 16, 2016 at 27, 36, 40, 41, 60, 64, 66. '353 *ex parte* reexamination, Application No. 90/009,994, Final Rejection dated June 20, 2017 at 17–20, 24–27. '353 *ex parte* reexamination, Application No. 90/009,994, Notice of Intent to Issue dated November 22, 2017 at 8, 9. '926 *ex parte* reexamination, Application No. 90/009,995, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3–678. '926 *ex parte* reexamination, Application No. 90/009,995, Order Granting Request for *Ex Parte* Reexamination dated July 17, 2012 at 2–22. '926 *ex parte* reexamination, Application No. 90/009,995, Non-Final Action dated September 16, 2016 at 2–24. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated November 16, 2016 at 19–78.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Final Rejection dated June 20, 2017 at 2–37. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated August 21, 2017 at 15–97. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Appeal Brief dated January 22, 2018 at 1–65. '926 *ex parte* reexamination, Application No. 90/009,995, Examiner's Answer to Patent Owner Appeal Brief dated May 18, 2018 at 3–58. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Reply Brief dated July 18, 2018 at 1–37. '926 *ex parte* reexamination, Application No. 90/009,995, PTAB Decision on Appeal dated May 1, 2020 at 2–28. '353 *inter partes* reexamination, Application No. 95/000,634, Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated May 20, 2011 at 3, 5, 10, 19, 20, 22–25, 27–29, 32–34, 37–40, 51, 52, 59, 66, 67, 70, 71, 73–75, 79, 83, 87, 99–101, 103.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Order Granting Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated August 8, 2011 at 9, 10, 16, 21, 22, 26. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated September 30, 2011 at 6–81. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Response to Office Action dated December 21, 2011 at 1–27. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Office Action dated January 20, 2012 at 2–27. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated May 22, 2017 at 11–71. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Remarks dated July 24, 2017 at 54–85. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Patent Owner Response dated August 23, 2017 at 5–41.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Action Closing Prosecution dated October 1, 2018 at 16–97. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Comments After Action Closing Prosecution dated November 1, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments After Action Closing Prosecution dated December 3, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated October 7, 2020 at 21–155. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Appeal Brief dated January 4, 2021 at 4–66. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Appeal Brief dated January 15, 2021 at 5–31. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated February 4, 2021 at 1–23.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Appeal dated February 8, 2021 at 3–33. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated April 6, 2022 at 2–86. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Request for Rehearing dated June 6, 2022 at 1–32. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated September 22, 2022 at 2–39. '353 *inter partes* reexamination, Application No. 95/000,634, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated August 30, 2024 at 3–31. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated December 16, 2025 at 20–39.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122. '926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51. '926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34. '926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878. '926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36. '926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. <u>Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.</u>: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257
"enabling a user to zoom on [a column / a	'353 Patent: 11, 18, **87**, 111, 128,	"enabling a user to use scalable content to zoom on [a column /	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
paragraph / an image] [of the Web page / of the Web content]" / "to enable the Web page to be browsed at various zoom levels and panned views" / "enabling the user to, zoom and pan a view of the Web page" / "enabling the user to perform full page browsing of the Web page at multiple zoom levels" / "enabling the user to perform zooming operations"	133, 134, **185**, 186, 187, 189, 193, 194, 196, 204, 206, 207, **285**, 286, 287, 293, 294, 296, 304, 306, 307, **317**, 318, 319 '628 Patent: **1**, 2–5, 7–14	a paragraph / an image] [of the Web page / of the Web content]" ('353 Patent: 11, 18, 128, 133, 186, 193, 286, 293) / "enable the Web page to use scalable content to be browsed at various zoom levels and panned views" ('353 Patent: 87, 185, 285) / "enabling the user to use scalable content to zoom and move around the web page" ('353 Patent: 317) / "enabling the user to use scaled Web page content to perform full page browsing of the Web page at multiple zoom levels" ('628 Patent: 1) "enabling the user to use scaled Web page content to perform zooming operations" ('628 Patent: 4)	the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2-5, 19-20 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1-3, 14-16 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 8-9 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix B—Defendants' Citations to Intrinsic Evidence) at 41-42 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants' Responsive Claim Construction Brief) at 1-2, 18-19 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's Responsive Claim Construction Brief) at 16-17 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 192:8-193:25 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1103 (D. Del. Sept. 4, 2013) (Memorandum Opinion) at 14-15

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 4 **'353 patent**: Figures: 1A, 1B, 1C, 2A, 2B, 2C, 3, 4A, 4B, 4C, 4D, 4E, 4F, 4G, 5, 6, 7A, 7B, 8A, 8B, 9A, 9B Specification: Abstract; 1:42-50; 2:22-59; 3:56-67; 4:3-8; 4:43-59; 4:64-5:34; 5:36-59; 6:6-9; 6:17-34; 6:42-10:55; 7:56-8:4; 8:50-9:13; 10:2-5; 10:22-31; 10:50-56; 11:4-9; 12:12-14; 15:43-20:55; 17:16-45; 18:17-21; 18:40-19:31; 20:25-43; 20:56-67 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3A (Provisional App. No. 60/211,019), FH000007 at 14-18, 29-33 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3B (Provisional App. No. 60/217,345), FH000018 at 3:15-17, 3:34-38 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3C (File History for U.S. Patent App. No. 09/828,511), FH000053 ¶ [0035]; FH000054 ¶ [0036] *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3D (File History for U.S. Patent No. 7,210,099), FH000195;

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			FH000616 ¶ [0007] *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3E (File History for U.S. Patent No. 7,461,353), FH000682 '353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96 '353 patent file history, Application No. 11/045,757, Notice of Allowance dated August 8, 2008, at 2-5 '926 patent file history, Application No. 11/738,486, Notice of Allowance dated June 9, 2010, at 2-30 App. No. 11/868,124, Remarks dated Nov. 24, 2010, at 18-139 App. No. 11/868,124, Reply to Action of January

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			24, 2011, dated July 22, 2011, at 14-18 App. No. 11/868,124, Response to Office Action of October 13, 2011, dated Apr. 3, 2012, at 14-19 App. No. 11/868,124, Office Action mailed Apr. 18, 2012, at 2-12 '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7 '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83. '889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010. '628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28 '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22. '729 patent file history, Application No. 12/941,106, Response to Office Action dated October 9, 2012, Remarks at 5-12. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 11, 2014, Remarks at 9-16. '729 patent file history, Application No.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			12/941,106, Response to Office Action dated April 15, 2015, Remarks at 10-58. '729 patent file history, Application No. 12/941,106, Response to Office Action dated January 19, 2016, Remarks at 9-28. *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Motorola Mobility, Inc. v. SoftView LLC, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014). '353 *ex parte* reexamination, Application No. 90/009,994, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 31, 32, 37, 54, 61, 62, 66, 93, 100, 110, 123, 131, 133, 137, 138, 154, 160, 169, 174, 176, 183, 190, 195, 198, 205, 209, 211, 212, 215, 217, 220, 222, 225, 228, 230, 234, 235, 238, 242, 250, 258, 259, 264, 296, 303, 314, 343. '353 *ex parte* reexamination, Application No. 90/009,994, Notice of Intent to Issue dated November 22, 2017 at 8, 10. '926 *ex parte* reexamination, Application No. 90/009,995, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3–678. '926 *ex parte* reexamination, Application No. 90/009,995, Order Granting Request for *Ex Parte* Reexamination dated July 17, 2012 at 2–22.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Non-Final Action dated September 16, 2016 at 2–24. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated November 16, 2016 at 19–78. '926 *ex parte* reexamination, Application No. 90/009,995, Final Rejection dated June 20, 2017 at 2–37. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated August 21, 2017 at 15–97. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Appeal Brief dated January 22, 2018 at 1–65. '926 *ex parte* reexamination, Application No. 90/009,995, Examiner's Answer to Patent Owner Appeal Brief dated May 18, 2018 at 3–58. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Reply Brief dated July 18, 2018 at 1–37.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, PTAB Decision on Appeal dated May 1, 2020 at 2–28. '353 *inter partes* reexamination, Application No. 95/000,634, Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated May 20, 2011 at 17, 18, 22–24, 27–29, 35, 36, 38–41, 44, 46–48, 53, 59, 68, 69, 73–77, 82, 83, 87, 91, 95, 98. '353 *inter partes* reexamination, Application No. 95/000,634, Order Granting Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated August 8, 2011 at 11. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated September 30, 2011 at 6–81. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Response to Office Action dated December 21, 2011 at 1–27. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated May 22, 2017 at 11–71.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Remarks dated July 24, 2017 at 54–85. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Patent Owner Response dated August 23, 2017 at 5–41. '353 *inter partes* reexamination, Application No. 95/000,634, Action Closing Prosecution dated October 1, 2018 at 16–97. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Comments After Action Closing Prosecution dated November 1, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments After Action Closing Prosecution dated December 3, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated October 7, 2020 at 21–155. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Appeal Brief dated January 4, 2021 at 4–66.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Appeal Brief dated January 15, 2021 at 5–31. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated February 4, 2021 at 1–23. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Appeal dated February 8, 2021 at 3–33. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated April 6, 2022 at 2–86. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Request for Rehearing dated June 6, 2022 at 1–32. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated September 22, 2022 at 2–39.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated August 30, 2024 at 3–31. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated December 16, 2025 at 20–39. '926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122. '926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51. '926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34. '926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39. '926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878. '926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36. '926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456;

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257
"processing HTML-based Web content to produce scalable content" / "processing at least a portion of the HTML-based Web content to produce scalable content" / "processing … the markup language-based Web content … to generate page layout information" / "processing the HTML-based Web content … to generate page layout information" / "processing … the HTML-based Web content … to generate a scalable vector	'353 Patent: **36**, 37, 38, 50, 53, 55, 69, **70**, **149**, 150, 151, 161, 168, 171, 182, **252**, 253, 254, 264, 269, 282 '889 Patent: **1**, 2, 3, 5, 13–20, 22, 23, 33–40, **108**, 109, 114, 115 '729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22	"converting Web content from [HTML / markup language] to [scalable content / page layout information / a scalable vector representation of the Web page]" ('353 Patent: 36, 149, 252; '889 Patent: 1, 108; '729 Patent: 1, 14) / "converting at least a portion of the Web content from HTML to scalable content" ('353 Patent: 70) / "converting Web content associated with the hyperlink from [HTML / HTML and CSS] to an additional scalable vector representation" ('729 Patent: 5, 17)	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2-5, 11 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1-3, 5-6 and Exhibits

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
representation of the Web page" / "processing the HTML-based Web content … to generate a scalable vector representation of the Web page" / "processing [HTML-based Web content / HTML-based Web content and the CSS content] associated with the hyperlink to translate the [HTML-based Web content / HTML-based Web content and the CSS content associated with the hyperlink] into an additional scalable vector representation"			*SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 3-4 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix B—Defendants' Citations to Intrinsic Evidence) at 12-16 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants' Responsive Claim Construction Brief) at 1–2, 8-9 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's Responsive Claim Construction Brief) at 10-11 and Exhibits

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 117:12–179:11 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1103 (D. Del. Sept. 4, 2013) (Memorandum Opinion) at 7-8 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 3 **'353 patent**: Figures: 1A, 1B, 1C, 2A, 2B, 2C, 4A, 4B, 4C, 4D, 4E, 4F, 4G, 6, 7A, 7B, 8A, 8B, 9B Specification: Abstract; 1:43-60; 2:24-29; 2:37-44; 3:33-36; 3:37-40; 3:62-66; 4:50-54; 6:50-56; 8:33-9:3; 10:2-20; 10:44-56; 11:3-24; 11:41-53; 12:7-20; 15:41-17:56; 18:40-56; 20:11-17; 20:17-27; 20:29-44; 20:41-45; 21:1-22:6; 22:34-36; 25:46-47 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3E (File History for U.S. Patent No. 7,461,353), FH000752-53; FH000920; FH000928; FH000933; FH001042-49; FH001057; FH001105; FH001107-09; FH001110; FH00111; FH001115; FH001208; FH001349; FH001389 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3F (File History

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			for U.S. Patent No. 7,831,926), FH003045; FH003523; FH003538; FH003540-54; FH003577 '926 patent file history, Application No. 11/738,486, Notice of Allowance dated June 9, 2010, at 2-30 '353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96 '353 patent file history, Application No. 11/045,757, Notice of Allowance dated August 8, 2008, at 2-5 *Apple Inc. v. Softview LLC*, No. APPEAL 2021-005530, 2022 WL 1210851, at *21-23 (P.T.A.B. Apr. 6, 2022) App. No. 11/868,124, Remarks dated Nov. 24, 2010, at 18-139

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			App. No. 11/868,124, Reply to Action of January 24, 2011, dated July 22, 2011, at 14-18 App. No. 11/868,124, Response to Office Action of October 13, 2011, dated Apr. 3, 2012, at 14-19 App. No. 11/868,124, Office Action mailed Apr. 18, 2012, at 2-12 '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7 '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83. '889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010. '628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28 '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22. '729 patent file history, Application No. 12/941,106, Response to Office Action dated October 9, 2012, Remarks at 5-12. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 11, 2014, Remarks at 9-16. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			15, 2015, Remarks at 10-58. '729 patent file history, Application No. 12/941,106, Response to Office Action dated January 19, 2016, Remarks at 9-28. *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Motorola Mobility, Inc. v. SoftView LLC, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014). '353 *ex parte* reexamination, Application No. 90/009,994, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3, 4, 8, 11, 17, 30, 36, 53, 54, 61, 94, 96, 99, 100, 107, 109, 110, 122, 123, 133, 177, 179, 182, 183, 192, 197, 198, 213, 216, 240, 249, 250, 258, 297, 299, 302, 303, 311, 314, 327, 347. '353 *ex parte* reexamination, Application No. 90/009,994, Remarks dated November 16, 2016 at 28–30, 32. '353 *ex parte* reexamination, Application No. 90/009,994, Final Rejection dated June 20, 2017 at 11, 12, 19, 20, 23. '353 *ex parte* reexamination, Application No. 90/009,994, Notice of Intent to Issue dated November 22, 2017 at 6–10. '926 *ex parte* reexamination, Application No. 90/009,995, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3–678.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Order Granting Request for *Ex Parte* Reexamination dated July 17, 2012 at 2–22. '926 *ex parte* reexamination, Application No. 90/009,995, Non-Final Action dated September 16, 2016 at 2–24. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated November 16, 2016 at 19–78. '926 *ex parte* reexamination, Application No. 90/009,995, Final Rejection dated June 20, 2017 at 2–37. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated August 21, 2017 at 15–97. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Appeal Brief dated January 22, 2018 at 1–65. '926 *ex parte* reexamination, Application No. 90/009,995, Examiner's Answer to Patent Owner Appeal Brief dated May 18, 2018 at 3–58.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Reply Brief dated July 18, 2018 at 1–37. '926 *ex parte* reexamination, Application No. 90/009,995, PTAB Decision on Appeal dated May 1, 2020 at 2–28. '353 *inter partes* reexamination, Application No. 95/000,634, Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated May 20, 2011 at 3, 7, 11, 33, 34, 36, 67, 70. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated September 30, 2011 at 6–81. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Response to Office Action dated December 21, 2011 at 1–27. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Office Action dated January 20, 2012 at 2–27. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated May 22, 2017 at 11–71.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Remarks dated July 24, 2017 at 54–85. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Patent Owner Response dated August 23, 2017 at 5–41. '353 *inter partes* reexamination, Application No. 95/000,634, Action Closing Prosecution dated October 1, 2018 at 16–97. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Comments After Action Closing Prosecution dated November 1, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments After Action Closing Prosecution dated December 3, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated October 7, 2020 at 21–155. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Appeal Brief dated January 4, 2021 at 4–66.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Appeal Brief dated January 15, 2021 at 5–31. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated February 4, 2021 at 1–23. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Appeal dated February 8, 2021 at 3–33. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated April 6, 2022 at 2–86. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Request for Rehearing dated June 6, 2022 at 1–32. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated September 22, 2022 at 2–39.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated August 30, 2024 at 3–31. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated December 16, 2025 at 20–39. '926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122. '926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51. '926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34. '926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39. '926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878. '926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36. '926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456;

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257
"object(s)"	'889 Patent: 5, 23, 35, 36 '729 Patent: 21 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	"a grouping of webpage content, such as the paragraph of text or a graphic image"	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2–5, 15-16 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1–3, 12-13 and Exhibits

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) at 1–2 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 7-8 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix B—Defendants' Citations to Intrinsic Evidence) at 29-34 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants' Responsive Claim Construction Brief) at 1–2, 16-18 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's Responsive Claim Construction Brief) at 15 and Exhibits

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 68:19-127:12 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1103 (D. Del. Sept. 4, 2013) (Memorandum Opinion) at 12 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 1 **'353 patent**: Figures: 4A, 4B, 4C, 4D,4E, 4F, 4G, 5, 6 Specification: 3:31-48; 7:38-8:44; 10:31-56; 12:21-18:16; 19:14-20:44; 21:58-22:6 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3E (File History for U.S. Patent No. 7,461,353), FH000668 ¶ 0084; FH000668-69 ¶ 0085; FH000680 ¶ 8; FH000927 at claim 75 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3F (File History for U.S. Patent No. 7,831,926), FH003016; FH003382; FH003587; FH003593 '926 patent Amendment and Response to Office Action dated Apr. 21, 2010, at 31

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 patent Comments on Statement of Reasons for Allowance dated Sept. 9, 2010, at 42-60 '353 patent Order Granting *Inter Partes* Reexamination dated Aug. 8, 2011, at 15 '353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96 '353 patent file history, Application No. 11/045,757, Notice of Allowance dated August 8, 2008, at 2-5 '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7 '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010. '628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41. '628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28 '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22. '729 patent file history, Application No. 12/941,106, Response to Office Action dated October 9, 2012, Remarks at 5-12. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 11, 2014, Remarks at 9-16. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 15, 2015, Remarks at 10-58. '729 patent file history, Application No. 12/941,106, Response to Office Action dated January 19, 2016, Remarks at 9-28. *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014). '353 *ex parte* reexamination, Application No. 90/009,994, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 4–6, 12–15, 18, 21–24, 27–31, 33, 35, 36, 38, 40–43, 45, 46, 54–89, 91–116, 123–130, 132–173, 175–194, 196–207, 209–221, 223, 224, 226, 228, 230–234, 236–241, 243, 250–256, 258–284, 286–291, 293, 294, 297–311, 314–321, 326–329, 331–336, 340, 341, 344, 345, 347, 348.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *ex parte* reexamination, Application No. 90/009,994, Order Granting Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated June 21, 2012 at 8–10, 14, 15, 17, 18. '353 *ex parte* reexamination, Application No. 90/009,994, Remarks dated November 16, 2016 at 40, 61–63, 67. '353 *ex parte* reexamination, Application No. 90/009,994, Final Rejection dated June 20, 2017 at 10–12, 15–18, 21–23, 27. '353 *ex parte* reexamination, Application No. 90/009,994, Notice of Intent to Issue dated November 22, 2017 at 5–9. '926 *ex parte* reexamination, Application No. 90/009,995, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3–678. '926 *ex parte* reexamination, Application No. 90/009,995, Order Granting Request for *Ex Parte* Reexamination dated July 17, 2012 at 2–22. '926 *ex parte* reexamination, Application No. 90/009,995, Non-Final Action dated September 16, 2016 at 2–24.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated November 16, 2016 at 19–78. '926 *ex parte* reexamination, Application No. 90/009,995, Final Rejection dated June 20, 2017 at 2–37. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated August 21, 2017 at 15–97. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Appeal Brief dated January 22, 2018 at 1–65. '926 *ex parte* reexamination, Application No. 90/009,995, Examiner's Answer to Patent Owner Appeal Brief dated May 18, 2018 at 3–58. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Reply Brief dated July 18, 2018 at 1–37. '926 *ex parte* reexamination, Application No. 90/009,995, PTAB Decision on Appeal dated May 1, 2020 at 2–28. '353 *inter partes* reexamination, Application No.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			95/000,634, Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated May 20, 2011 at 4–6, 16–20, 33, 34, 37–39, 41–59, 70–72, 77–82, 84, 85, 91–96, 98–102. '353 *inter partes* reexamination, Application No. 95/000,634, Order Granting Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated August 8, 2011 at 10–12, 15, 16, 20–23, 27, 28. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated September 30, 2011 at 6–81. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Response to Office Action dated December 21, 2011 at 1–27. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Office Action dated January 20, 2012 at 2–27. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated May 22, 2017 at 11–71. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Remarks dated July 24, 2017 at 54–85.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Action Closing Prosecution dated October 1, 2018 at 16–97. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Comments After Action Closing Prosecution dated November 1, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments After Action Closing Prosecution dated December 3, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated October 7, 2020 at 21–155. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Appeal Brief dated January 4, 2021 at 4–66. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Appeal Brief dated January 15, 2021 at 5–31. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated February 4, 2021 at 1–23.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Appeal dated February 8, 2021 at 3–33. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated April 6, 2022 at 2–86. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Request for Rehearing dated June 6, 2022 at 1–32. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated September 22, 2022 at 2–39. '353 *inter partes* reexamination, Application No. 95/000,634, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated August 30, 2024 at 3–31. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated December 16, 2025 at 20–39.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122. '926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51. '926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34. '926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878. '926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36. '926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
"vector"	'889 Patent: 34, 35, 36 '628 Patent: 2 '729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	"for each object, a directional data structure that stores X & Y values from a point for the page or frame to the object"	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. *See* "processing" terms above. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2–5, 14-15 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1–3, 8-10 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 6-7 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix B—Defendants' Citations to Intrinsic Evidence) at 18-22 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants' Responsive Claim Construction Brief) at 1–2, 11-13 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's Responsive Claim Construction Brief) at 13-14 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 11:11-127:12

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 1103 (D. Del. Sept. 4, 2013) (Memorandum Opinion) at 10-11 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 3-4 **'353 patent**: Figures: 1C, 2A, 2B, 2C, 4A, 4B, 4C, 4D, 4F, 4G, 5, 6 Specification: 1:43-50; 3:4-55; 4:2-8; 4:43-5:24; 5:65-6:67; 8:57-9:31; 10:22-56; 12:12-20; 15:42-55; 17:42-18:32; 18:40-20:45; 21:1-12; 23:4-9 Merriam-Webster Collegiate Dictionary, Tenth Edition at 1304 (Merriam-Webster, Inc. 2001) Microsoft Computer Dictionary, Fifth Edition at 548 (Microsoft Press 2002) *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3E (File History for U.S. Patent No. 7,461,353), FH000643-45; FH000722-23; FH00917-28; FH001045-46; FH001058; FH001111 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3F (File History

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			for U.S. Patent No. 7,831,926), FH003170; FH003382; FH003578-79; FH003589-97 '353 patent Order Granting *Inter Partes* Reexamination dated August 8, 2011, at 15 '353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96 '353 patent file history, Application No. 11/045,757, Notice of Allowance dated August 8, 2008, at 2-5 '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7 '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010. '628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41. '628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28 '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22. '729 patent file history, Application No. 12/941,106, Response to Office Action dated October 9, 2012, Remarks at 5-12. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 11, 2014, Remarks at 9-16. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 15, 2015, Remarks at 10-58. '729 patent file history, Application No. 12/941,106, Response to Office Action dated January 19, 2016, Remarks at 9-28. *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014). '353 *ex parte* reexamination, Application No. 90/009,994, Order Granting Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated June 21, 2012 at 8–10, 12, 14, 15, 17, 18. '353 *ex parte* reexamination, Application No. 90/009,994, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 5, 6, 11–15, 18, 22–24, 27–32, 35–38, 40–44, 46, 47,

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			54, 56–59, 61, 63–65, 68–93, 102–106, 109, 110, 112–115, 123, 125–136, 140–143, 145–148, 150–175, 177, 185–192, 194–205, 207, 209–212, 214–243, 250, 252–258, 260–264, 266–285, 287–295, 305–310, 312–314, 316–322, 324–339, 341, 342, 345, 346, 348, 349. '353 *ex parte* reexamination, Application No. 90/009,994, Remarks dated November 16, 2016 at 62–66. '353 *ex parte* reexamination, Application No. 90/009,994, Final Rejection dated June 20, 2017 at 10, 21–27. '353 *ex parte* reexamination, Application No. 90/009,994, Notice of Intent to Issue dated November 22, 2017 at 5, 6, 10. '926 *ex parte* reexamination, Application No. 90/009,995, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3–678. '926 *ex parte* reexamination, Application No. 90/009,995, Order Granting Request for *Ex Parte* Reexamination dated July 17, 2012 at 2–22.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Non-Final Action dated September 16, 2016 at 2–24. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated November 16, 2016 at 19–78. '926 *ex parte* reexamination, Application No. 90/009,995, Final Rejection dated June 20, 2017 at 2–37. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated August 21, 2017 at 15–97. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Appeal Brief dated January 22, 2018 at 1–65. '926 *ex parte* reexamination, Application No. 90/009,995, Examiner's Answer to Patent Owner Appeal Brief dated May 18, 2018 at 3–58. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Reply Brief dated July 18, 2018 at 1–37.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, PTAB Decision on Appeal dated May 1, 2020 at 2–28. '353 *inter partes* reexamination, Application No. 95/000,634, Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated May 20, 2011 at 3–7, 9–11, 14, 15, 17, 20, 38, 50–53, 58, 72, 78, 80–82, 86. '353 *inter partes* reexamination, Application No. 95/000,634, Order Granting Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated August 8, 2011 at 9–11, 13–18, 20–24, 27–29. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated September 30, 2011 at 6–81. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Response to Office Action dated December 21, 2011 at 1–27. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Office Action dated January 20, 2012 at 2–27.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated May 22, 2017 at 11–71. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Remarks dated July 24, 2017 at 54–85. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Patent Owner Response dated August 23, 2017 at 5–41. '353 *inter partes* reexamination, Application No. 95/000,634, Action Closing Prosecution dated October 1, 2018 at 16–97. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Comments After Action Closing Prosecution dated November 1, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments After Action Closing Prosecution dated December 3, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated October 7, 2020 at 21–155.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Appeal Brief dated January 4, 2021 at 4–66. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Appeal Brief dated January 15, 2021 at 5–31. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated February 4, 2021 at 1–23. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Appeal dated February 8, 2021 at 3–33. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated April 6, 2022 at 2–86. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Request for Rehearing dated June 6, 2022 at 1–32.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated September 22, 2022 at 2–39. '353 *inter partes* reexamination, Application No. 95/000,634, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated August 30, 2024 at 3–31. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated December 16, 2025 at 20–39. '926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122. '926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51. '926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34. '926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39. '926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878. '926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36. '926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. <u>Complete File Histories for U.S. Patent Application</u>

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257
"scalable vector-based page layout information" / "scalable vector representation"	'889 Patent: 34, 35, 36 '729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22 '154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	"page layout information that (1) is capable of being rendered at multiple zoom levels and (2) includes one or more vectors" ('889 Patent: 34, 35, 36) / "representation of the [Web page / HTML document] that (1) is capable of being rendered at multiple zoom levels and (2) includes one or more vectors" ('729 Patent: 1, 5, 14, 17; '154 Patent: 13,19)	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. *See* "processing" terms above. *See* "vector" terms above. *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2–10, 13-15 and Exhibits

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1–4, 7-10 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 1, 5-6 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix B—Defendants' Citations to Intrinsic Evidence) at 1-12, 18-22 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants'

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Responsive Claim Construction Brief) at 1–6, 10-13 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's Responsive Claim Construction Brief) at 1-8, 12-14 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 11:11-127:12 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1103 (D. Del. Sept. 4, 2013) (Memorandum Opinion) at 19-11 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 3 **'353 patent**: Figures: 1C, 2A, 2B, 2C, 4A, 4B, 4C, 4D, 4E, 4F, 4G, 5, 6, 7A, 7B, 8A, 8B, 9B Specification: 1:43-60; 2:24-27; 2:37-44; 3:14-66; 4:2-8; 4:64-5:9; 5:65-6:3; 6:7-10; 6:50-67; 8:47-53; 8:57-9:3; 10:9-16; 10:22-31; 10:34-56; 12:7-20; 15:41-55; 17:42-18:16; 18:17-32; 18:45-46; 18:66-19:3; 19:14-18; 19:20-63; 20:8-45; 21:1-13; 25:21-22; 26:20-21

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Merriam-Webster Collegiate Dictionary, Tenth Edition at 1304 (Merriam-Webster, Inc. 2001) Microsoft Computer Dictionary, Fifth Edition at 548 (Microsoft Press 2002) *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3E (File History for U.S. Patent No. 7,461,353), FH000643-45; FH000722-23; FH00917-28; FH001045-46; FH001058; FH001111 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3F (File History for U.S. Patent No. 7,831,926), FH003170; FH003382; FH003578-79; FH003589-97 '353 patent Order Granting *Inter Partes* Reexamination dated Aug. 8, 2011, at 15 '353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96 '353 patent file history, Application No. 11/045,757, Notice of Allowance dated August 8, 2008, at 2-5 '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7 '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83. '889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010. '628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28 '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22. '729 patent file history, Application No. 12/941,106, Response to Office Action dated October 9, 2012, Remarks at 5-12. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 11, 2014, Remarks at 9-16.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'729 patent file history, Application No. 12/941,106, Response to Office Action dated April 15, 2015, Remarks at 10-58. '729 patent file history, Application No. 12/941,106, Response to Office Action dated January 19, 2016, Remarks at 9-28. *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Motorola Mobility, Inc. v. SoftView LLC, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014). '353 *ex parte* reexamination, Application No. 90/009,994, Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated April 13, 2012 at 3–6, 8, 12–17, 23, 28, 30, 31, 36, 37, 41, 43, 44, 46, 54, 58, 59, 61, 63, 64, 71, 76, 80, 83, 84, 90, 104, 105, 109, 110, 114, 116, 123, 127, 128, 130, 131, 135, 147, 152, 154, 159, 160, 167, 169, 173, 174, 187, 190, 195, 197, 198, 202, 204, 205, 207, 209, 211, 212, 215, 217, 220, 222, 225, 228, 230, 233, 240, 242, 243, 250, 254, 256–258, 260–263, 269, 274, 279–281, 284, 285, 290, 292, 295, 307, 309, 310, 313, 314, 319–322, 325, 327, 329, 330, 332, 334, 336, 339, 340, 342, 346, 347, 349. '353 *ex parte* reexamination, Application No. 90/009,994, Order Granting Request for *Ex Parte* Reexamination of U.S. Patent 7,461,353 dated June 21, 2012 at 8, 10, 12, 14, 15, 17, 18. '926 *ex parte* reexamination, Application No. 90/009,995, Request for *Ex Parte* Reexamination

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			of U.S. Patent 7,461,353 dated April 13, 2012 at 3–678. '926 *ex parte* reexamination, Application No. 90/009,995, Order Granting Request for *Ex Parte* Reexamination dated July 17, 2012 at 2–22. '926 *ex parte* reexamination, Application No. 90/009,995, Non-Final Action dated September 16, 2016 at 2–24. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated November 16, 2016 at 19–78. '926 *ex parte* reexamination, Application No. 90/009,995, Final Rejection dated June 20, 2017 at 2–37. '926 *ex parte* reexamination, Application No. 90/009,995, Remarks dated August 21, 2017 at 15–97. '926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Appeal Brief dated January 22, 2018 at 1–65. '926 *ex parte* reexamination, Application No. 90/009,995, Examiner's Answer to Patent Owner Appeal Brief dated May 18, 2018 at 3–58.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *ex parte* reexamination, Application No. 90/009,995, Patent Owner Reply Brief dated July 18, 2018 at 1–37. '926 *ex parte* reexamination, Application No. 90/009,995, PTAB Decision on Appeal dated May 1, 2020 at 2–28. '353 *inter partes* reexamination, Application No. 95/000,634, Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated May 20, 2011 at 3, 5, 7, 11, 14, 15, 20, 50, 51, 58, 78, 86. '353 *inter partes* reexamination, Application No. 95/000,634, Order Granting Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated August 8, 2011 at 9, 10, 14, 16, 17, 19, 21, 23, 24, 28. '353 *inter partes* reexamination, Application No. 95/000,634, Non-Final Rejection dated September 30, 2011 at 6–81. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Response to Office Action dated December 21, 2011 at 1–27.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Office Action dated January 20, 2012 at 2–27. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments to Patent Owner Response dated August 23, 2017 at 5–41. '353 *inter partes* reexamination, Application No. 95/000,634, Action Closing Prosecution dated October 1, 2018 at 16–97. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner's Comments After Action Closing Prosecution dated November 1, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester's Comments After Action Closing Prosecution dated December 3, 2018 at 1–91. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated October 7, 2020 at 21–155. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Appeal Brief dated January 4, 2021 at 4–66.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Appeal Brief dated January 15, 2021 at 5–31. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated February 4, 2021 at 1–23. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Appeal dated February 8, 2021 at 3–33. '353 *inter partes* reexamination, Application No. 95/000,634, Third Party Requester Respondent Brief dated April 6, 2022 at 2–86. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '353 *inter partes* reexamination, Application No. 95/000,634, PTAB Decision on Request for Rehearing dated June 6, 2022 at 1–32. '353 *inter partes* reexamination, Application No. 95/000,634, Patent Owner Request for Rehearing dated September 22, 2022 at 2–39.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 *inter partes* reexamination, Application No. 95/000,634, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated August 30, 2024 at 3–31. '353 *inter partes* reexamination, Application No. 95/000,634, Right of Appeal Notice dated December 16, 2025 at 20–39. '926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122. '926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51. '926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34. '926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39. '926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878. '926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36. '926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456;

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257
"commercially available desktop browser"	'729 Patent: **1**, 2–5, 7–10, 13, **14**, 15–18, 21, 22	"a desktop browser that was commercially available as of the earliest effective filing date of the '729 patent"	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. **'353 patent**: Figures: 4A; 4B; 4C; 4D; 4E; 4F; 4G; 7A; 7B; 8A; 8B; 9A; 9B Specification: Abstract; 1:42-2:62; 4:42-5:35; 7:20-8:4; 9:64-10:21; 12:12-54; 15:19-17:56; 18:33-40; 19:4-13 '926 patent file history, Application No. 11/738,486, Notice of Allowance dated June 9, 2010, at 2-30

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96 '353 patent file history, Application No. 11/045,757, Notice of Allowance dated August 8, 2008, at 2-5 '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7 '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83. '889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41. '628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28 '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'729 patent file history, Application No. 12/941,106, Response to Office Action dated October 9, 2012, Remarks at 5-12. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 11, 2014, Remarks at 9-16. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 15, 2015, Remarks at 10-58. '729 patent file history, Application No. 12/941,106, Response to Office Action dated January 19, 2016, Remarks at 9-28. <u>Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.</u>: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257
"layout location datum"	'729 Patent: 21	"point defined at an X, Y coordinate that corresponds to	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the technology, state of the art at the time the applications leading to the

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
	'154 Patent: **13**, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	the location of the object"	Asserted Patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. *See* "object datum" and "primary datum" above *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478 (D. Del. Sept. 21, 2012) (Defendants' Opening Claim Construction Brief) at 2–5, 18-19 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 478-13 (D. Del. Sept. 21, 2012) (Declaration of Jack D. Grimes, Ph.D.) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 479 (D. Del. Sept. 21, 2012) (SoftView's Opening Claim Construction Brief) at 1–3, 13-14 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 481 (D. Del. Sept. 21, 2012) (Declaration of Glenn Reinman in Support of SoftView LLC's Opening Claim Construction Brief) and Exhibits

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkts. 496–498 (D. Del. Oct. 22, 2012) (Amended Joint Claim Construction Chart) and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Appendix A—Plaintiff's Citations to Intrinsic Evidence) at 8 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497-1 (D. Del. Oct. 22, 2012) (Amended Appendix B—Defendants' Citations to Intrinsic Evidence) at 34-41 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 499 (D. Del. Oct. 22, 2012) (Defendants' Responsive Claim Construction Brief) at 1–2, 15–16 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 500 (D. Del. Oct. 22, 2012) (SoftView's Responsive Claim Construction Brief) at 16 and Exhibits *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 675 (D. Del. Jan. 30, 2013) (Markman Transcript) at 11:11-127:12 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1103 (D. Del. Sept. 4, 2013) (Memorandum Opinion) at 14

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			SoftView LLC v. Apple Inc., No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order) at 4 **'353 patent**: Figures: 4A, 4B, 4C, 4D,4E, 4F, 4G, 5, 6 Specification: 3:29-50; 15:19-24; 17:16-18:16; 19:57-67; 20:7-22; 23:4-9 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3E (File History for U.S. Patent No. 7,461,353), FH000668 ¶ 0084; FH000668-69 ¶ 0085; FH000680 ¶ 8; FH000927 at claim 75 *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 497 (D. Del. Oct. 22, 2012) Ex. 3F (File History for U.S. Patent No. 7,831,926), FH003016; FH003382; FH003587; FH003593 '926 patent Comments on Statement of Reasons for Allowance dated Sept. 9, 2010, at 42-60 '926 patent Comments on Statement of Reasons for Allowance dated Sept. 9, 2010, at 47 n.11 '926 patent Amendment and Response to Office Action dated Apr. 21, 2010, at 31

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'353 patent Order Granting *Inter Partes* Reexamination dated Aug. 8, 2011, at 15 '353 patent file history, Application No. 11/045,757, Response to Office Action dated December 9, 2007, Remarks at 56-133 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated January 12, 2008, Remarks at 62-67 '353 patent file history, Application No. 11/045,757, Supplemental Amendment dated May 20, 2008, Remarks at 65-96 '353 patent file history, Application No. 11/045,757, Notice of Allowance dated August 8, 2008, at 2-5 '889 patent file history, Application No. 11/735,482, Non-final Rejection dated November 28, 2009, at 3-7 '889 patent file history, Application No. 11/735,482, Response to Office Action dated July 21, 2010, at Specification, Abstract, Claims; *see also id*., Remarks at 37-83.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'889 patent file history, Application No. 11/735,482, Notice of Allowance dated October 4, 2010. '628 patent file history, Application No. 11/735,477, Preliminary Amendment dated April 24, 2010 at Specification, Claims; *see also id.*, Remarks at 32. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated March 1, 2011 at 2-41. '628 patent file history, Application No. 11/735,477, Response to Office Action dated August 31, 2011, Remarks at 13-16. '628 patent file history, Application No. 11/735,477, Response to Office Action dated December 2, 2011 at 2-28 '628 patent file history, Application No. 11/735,477, Response to Office Action dated February 9, 2012, Remarks at 13-21. '628 patent file history, Application No. 11/735,477, Non-final Rejection dated June 20, 2012 at 2-37.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'628 patent file history, Application No. 11/735,477, Response to Office Action dated December 20, 2012, Remarks at 13-22. '729 patent file history, Application No. 12/941,106, Response to Office Action dated October 9, 2012, Remarks at 5-12. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 11, 2014, Remarks at 9-16. '729 patent file history, Application No. 12/941,106, Response to Office Action dated April 15, 2015, Remarks at 10-58. '729 patent file history, Application No. 12/941,106, Response to Office Action dated January 19, 2016, Remarks at 9-28. *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 3 at 1–76 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 11 at 1–42 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 25 at 1–60 (PTAB Jul. 19, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00004, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 36 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 37 at 1–5 (PTAB Oct. 18, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00004, Paper 51 at 1–35 (PTAB Mar. 27, 2014). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 3 at 1–78 (PTAB Oct. 2, 2012). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 11 at 1–39 (PTAB Mar. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 25 at 1–60 (PTAB Jul. 29, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 28 at 1–15 (PTAB Sep. 23, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 36 at 1–5 (PTAB Oct. 15, 2013). *Kyocera Corp. v. SoftView LLC*, IPR2013-00007, Paper 37 at 1–5 (PTAB Oct. 15, 2013).

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			Kyocera Corp. v. SoftView LLC, IPR2013-00007, Paper 51 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 1 at 1–52 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00256, Paper 12 at 1–37 (PTAB Mar. 27, 2014). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 1 at 1–54 (PTAB Apr. 29, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 9 at 1–4 (PTAB Jun. 20, 2013). *Motorola Mobility, Inc. v. SoftView LLC*, IPR2013-00257, Paper 12 at 1–35 (PTAB Mar. 27, 2014). '353 *inter partes* reexamination, Application No. 95/000,634, Request for *Inter Partes* Reexamination of U.S. Patent 7,461,353 dated May 20, 2011 at 52, 80. '926 *inter partes* reexamination, Application No. 95/000,635, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated May 23, 2011 at 1–122.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Order Granting Request for *Inter Partes* Reexamination dated August 8, 2011 at 2–15. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated October 1, 2011 at 2–25. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Response to Office Action dated December 21, 2011 at 1–26. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments After Non-Final Action dated January 20, 2012 at 1–30. '926 *inter partes* reexamination, Application No. 95/000,635, Non-Final Action dated May 16, 2017 at 2–51. '926 *inter partes* reexamination, Application No. 95/000,635, Remarks dated July 17, 2017 at 29–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Comments to Patent Owner Response dated August 16, 2017 at 4–34.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Action Closing Prosecution dated May 1, 2018 at 2–71. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner's Written Comments dated June 1, 2018 at 27–76. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester's Written Comments dated July 2, 2018 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, Right of Appeal Notice dated March 29, 2021 at 2–132. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Appeal Brief dated June 31, 2021 at 1–57. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Appeal Brief dated July 12, 2021 at 1–29. '926 *inter partes* reexamination, Application No. 95/000,635, Third Party Requester Respondent Brief dated July 21, 2021 at 1–15.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Respondent Brief dated August 2, 2021 at 1–35. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Rebuttal Brief dated October 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Appeal dated April 6, 2022 at 1–28. '926 *inter partes* reexamination, Application No. 95/000,635, Patent Owner Request for Rehearing dated May 5, 2022 at 1–49. '926 *inter partes* reexamination, Application No. 95/000,635, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. '926 *inter partes* reexamination, Application No. 95/000,635, Appellant SoftView's Combined Petition for Panel Rehearing and Rehearing *En Banc* dated July 26, 2024 at 1–39. '926 *inter partes* reexamination, Application No. 95/002,126, Request for *Inter Partes* Reexamination of U.S. Patent 7,831,926 dated August 31, 2012 at 1–878.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Order Granting Request for *Inter Partes* Reexamination dated November 26, 2012 at 2–36. '926 *inter partes* reexamination, Application No. 95/002,126, Non-Final Action dated April 7, 2017 at 2–25. '926 *inter partes* reexamination, Application No. 95/002,126, Remarks dated June 7, 2017 at 29–56. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments After Non-Final Action dated July 28, 2017 at 1–29. '926 *inter partes* reexamination, Application No. 95/002,126, Action Closing Prosecution dated October 1, 2018 at 2–79. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner's Written Comments dated November 1, 2018 at 21–60. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Written Comments dated December 3, 2018 at 1–29.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Right of Appeal Notice dated October 1, 2020 at 2–153. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Appeal Brief dated December 26, 2020 at 1–70. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Appeal Brief dated December 30, 2020 at 1–30. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Respondent Brief dated January 25, 2021 at 1–37. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester Respondent Brief dated January 26, 2021 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Rebuttal Brief dated September 25, 2021 at 1–27. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Appeal dated April 6, 2022 at 1–28.

Proposed Terms[1]	Patent Claims[2]	Samsung Proposed Constructions	Samsung's Citations to Intrinsic and Extrinsic Evidence[3]
			'926 *inter partes* reexamination, Application No. 95/002,126, Patent Owner Request for Rehearing dated May 5, 2022 at 1–50. '926 *inter partes* reexamination, Application No. 95/002,126, Third Party Requester's Comments in Opposition to Request for Rehearing dated June 6, 2022 at 1–24. '926 *inter partes* reexamination, Application No. 95/002,126, PTAB Decision on Request for Rehearing dated September 22, 2022 at 2–20. Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.: 09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 11/868,124; 12/326,092; 12/955,487; 12/941,106; 15/356,456; 16/128,394; 90/009,994; 90/009,995; 95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257