

**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

**DEFENDANTS' PRELIMINARY CLAIM CONSTRUCTIONS AND
EXTRINSIC EVIDENCE PURSUANT TO LOCAL PATENT RULE 4-2**

Pursuant to Local Patent Rule 4-2 and the Court's Fourth Amended Docket Control Order (Dkt. 40), Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc ("SEA") (collectively, "Defendants" or "Samsung") jointly serve on Plaintiff SoftView LLC ("Plaintiff" or "SoftView") the following preliminary constructions for the asserted claims of U.S. Patent Nos. 7,461,353 (the "'353 patent"); 7,844,889 (the "'889 patent"); 8,533,628 (the "'628 patent"); 9,519,729 (the "'729 patent"); and 10,083,154 (the "'154 patent") (collectively, the "Asserted Patents").

Samsung reserves the right to supplement and/or amend its preliminary constructions and extrinsic evidence for any reason, including in light of further claim construction discovery, as a result of the parties' meet-and-confer conferences pursuant to Local Patent Rule 4-2(c), in response to SoftView's proposed constructions and extrinsic evidence, or upon receiving materials that have not yet been produced. Samsung states that it alleges that the asserted claims are invalid, including for failing to comply with 35 U.S.C. § 112. Samsung's proposed constructions for terms, phrases,

or clauses with respect to claims and limitations should in no way be read to imply that the claims satisfy 35 U.S.C. § 112.

Samsung's inclusion of materials referenced in this disclosure is not an admission that any of these materials constitutes extrinsic evidence as opposed to intrinsic evidence. Samsung reserves all rights to submit any of these materials or similar materials as intrinsic or extrinsic evidence in the event the applicable standard provides for categorization as one or the other.

Samsung intends to rely on a sworn declaration from Dr. Craig Rosenberg to support its positions. A summary of the substance of Dr. Rosenberg's anticipated testimony is provided in the table below. He is available to be deposed regarding his opinions. Defendants additionally reserve the right to rely on rebuttal expert testimony from Dr. Rosenberg in the event that Plaintiff affirmatively relies on expert testimony in support of its proposed constructions.

Samsung also intends to rely on the Court's claim constructions in *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 1104 (D. Del. Sept. 4, 2013) (Markman Order), and any associated materials. Samsung maintains that SoftView is estopped from challenging those constructions.

Subject to the above reservations of rights, Samsung proposes the following preliminary constructions:

Proposed Terms¹	Patent Claims²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence³
"A wireless device, comprising"	'353 Patent: 1 , 11, 18, 30, 31, 35	The preamble is limiting.	Samsung may rely on testimony including from Dr. Craig

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 Although the file histories cited below include intrinsic evidence, Samsung nevertheless identifies them in its Patent Rule 4-2 Disclosure out of an abundance of caution.

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			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. <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; IPR2013-00257⁴
“A mobile hand-held device, comprising”	’353 Patent: 36 , 37, 38, 50, 53, 55, 69, 87 , 111	The preamble is limiting.	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

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	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			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. <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
“A mobile device, comprising”	’353 Patent: 70	The preamble is limiting.	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

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			art could discern the boundaries of this claim element with reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. <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
“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.	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. <u>Complete File Histories for</u>

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			<u>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
“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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> Dkt. 477), 478 (Defendants’ Opening Claim Construction Brief and

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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
“A hand-held wireless device, comprising”	’353 Patent: 317 , 318, 319	The preamble is limiting.	Samsung may rely on testimony including from Dr. Craig

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			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. <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
“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	’628 Patent: 1, 2–5, 7–14	The preamble is limiting.	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

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
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”			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. <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
“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.	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

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			upon a review of the intrinsic and extrinsic evidence. <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
“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. <i>See also, SoftView LLC v.</i>

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			<i>Apple Inc.</i>, No. 10-cv-00389⁵, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings.

⁵ The Delaware court ordered separate trials for the separate corporate defendants—severing the Samsung defendants to Case No. 1:12-cv-00987—but continued to manage common issues through the original lead case, *SoftView LLC v. Apple Inc.*, No. 10-cv-00389, Dkt. 440.

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			<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
“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. <i>See also, SoftView LLC v. Apple Inc.</i> , No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> Dkt. 477), 478 (Defendants’ Opening

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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
“storage means”	’353 Patent: 1, 11,	Subject to § 112, ¶ 6.	Samsung may rely on testimony

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
	18, 30, 31, 35, 70	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”	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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			(<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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 ’889 Patent: 1, 2, 3, 5, 13–20, 22, 23, 33–40, 108, 109, 114, 115	“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 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. <i>See also, SoftView LLC v.</i>

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			<i>Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <i>See also</i>, <i>Microsoft Computer Dictionary</i> (5th ed. 2002). <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;

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			95/000,634; 95/000,635; 95/002,126; 95/002,132; IPR2013-00004; IPR2013-00007; IPR2013-00256; IPR2013-00257
“original” / “original Web page” / “original width and height of the Web page” / “original page layout, functionality, and design of content on the Web page” / “original format” / “original page layout of content on the Web page” / “original page layout”	’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.” ⁶	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. <i>See also, SoftView LLC v. Apple Inc.</i> , No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> Dkt. 477), 478 (Defendants’ Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits thereto), 496-498 (Amended

⁶ In the first column, Samsung has identified for illustrative purposes a number of terms and phrases containing the term “original.” Samsung’s proposed construction is limited to the term “original” as it appears in these larger terms and phrases. Samsung does not seek to construe the larger terms and phrases except to the extent they contain terms identified elsewhere in this disclosure.

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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
“translating” / “translate”	’353 Patent: 1, 11, 18, 30, 31, 35, 118 , 128, 133, 134, 144, 145, 209, 216	“converting” (’353 Patent: 1, 118, 209, 216; ’154 Patent: 13) / “convert” (’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

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
	'729 Patent: 5, 17 '154 Patent: 13 , 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25		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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			foregoing filings. <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
“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, 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	“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 , 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)	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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
“scalable” / “scaling” / “scaled” / “scale” ⁷	’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)	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. <i>See also, SoftView LLC v. Apple Inc.</i> , No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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

⁷ 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 ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			Defendants’ Tutorial), 560 (Oral Order), 612 (SoftView’s Letter Brief), 613 (Defendants’ Letter Brief), 675 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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
“preserve(s)” / “preserved” / “preserving” / “preservation” / “preserves the original layout, functionality,	’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,	The term “preserve” and its variants have their plain and ordinary meaning. ⁸	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

⁸ In the first column, Samsung has identified for illustrative purposes a number of terms and phrases containing the terms “preserve(s),” “preserved,” “preserving,” and “preservation.” Samsung’s proposed construction is limited to the terms “preserve(s),” “preserved,” “preserving,” and “preservation” as they appear in these larger terms and phrases. Samsung does not seek to construe the larger terms and phrases except to the extent they contain terms identified elsewhere in this disclosure (e.g., “original”).

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
and design of the HTML-based Web page content of each Web page [at each zoom level and panned view]” / “preserves the original page layout, functionality, and design defined by the HTML-based Web content” / “preserving the original page layout, functionality, and design of the Web page content at each zoom level and panned view” / “preserving the original page layout, functionality, and design of the content on the Web page defined by the [markup language-based Web content / HTML-based Web content as interpreted by the rendering engine]” / “the interpreted page layout, functionality, and design of the content is preserved at each of the first zoom level and the one or more user-defined zoom levels”	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 ’154 Patent: 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25		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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <u>Complete File Histories for</u>

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			<u>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 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	“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	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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> Dkt. 477), 478 (Defendants’ Opening Claim Construction Brief and

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
		scaled Web page content to perform zooming operations” (’628 Patent: 4)	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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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
“processing HTML-based Web content to	’353 Patent: 36 , 37, 38, 50, 53, 55,	“converting Web content from [HTML / markup	Samsung may rely on testimony including from Dr. Craig

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
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” / “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	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	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)	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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
additional scalable vector representation”			(<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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
“tapping” / “tap-based user input” / “tap”	’353 Patent: 50, 55, 134, 171, 187, 194, 287, 294, 317, 318, 319 ’889 Patent: 16, 18, 20 ’628 Patent: 4, 8, 9, 10 ’729 Patent: 7, 8, 13, 14, 15–18, 21, 22	Plain and ordinary meaning	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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389,

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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-

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			00007; IPR2013-00256; IPR2013-00257
“fit across”	’353 Patent: 1, 11, 18, 30, 31, 35, 53, 87, 111, 118, 128, 133, 134, 144, 145, 189, 196, 216, 264, 269, 285, 286, 287, 293, 294, 296, 304, 306, 307 ’889 Patent: 17, 19 ’628 Patent: 5, 8, 9, 10 ’729 Patent: 9, 10 ’154 Patent: 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	Plain and ordinary meaning	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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			Defendants’ Tutorial), 560 (Oral Order), 612 (SoftView’s Letter Brief), 613 (Defendants’ Letter Brief), 675 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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
“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

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			reasonable certainty, based upon a review of the intrinsic and extrinsic evidence. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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;

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			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
“object datum”	’889 Patent: 5 ’729 Patent: 21 ’154 Patent: 13 , 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	“reference point for an object used in a predictable manner”	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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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 ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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
“vector”	’889 Patent: 34, 35, 36 ’628 Patent: 2 ’729 Patent: 1, 2–5, 7–10, 13, 14, 15–18, 21, 22	“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

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
	'154 Patent: 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25		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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants' Tutorial – lodged via multimedia), 476 (SoftView's Tutorial – lodged via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <u>Complete File Histories for U.S. Patent Application and</u>

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			<u>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
“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. <i>See also, SoftView LLC v. Apple Inc.</i> , No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> Dkt. 477), 478 (Defendants’ Opening Claim Construction Brief and exhibits thereto), 479–481

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			(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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <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
“bounding box”	’889 Patent: 39, 109	“an outlined shape within which an object’s content (e.g., text or graphic	Samsung may rely on testimony including from Dr. Craig Rosenberg to explain the

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
	'628 Patent: 1, 2–5, 7–14 '154 Patent: 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	image) will appear”	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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			incorporate by reference extrinsic evidence cited in the foregoing filings. <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
“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. <u>Complete File Histories for U.S. Patent Application and Inter Partes Review Nos.:</u>

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			09/828,511; 09/878,097; 11/045,649; 11/045,757; 11/735,477; 11/735,482; 11/738,486; 11/738,932; 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
“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”	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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> Dkt. 477), 478 (Defendants’ Opening Claim Construction Brief and exhibits thereto), 479–481 (SoftView Opening Claim Construction Brief and exhibits

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). <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 '154 Patent: 13 , 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25	"point defined at an X, Y coordinate that corresponds to the location of 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

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			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. <i>See also, SoftView LLC v. Apple Inc.</i>, No. 10-cv-00389, Dkts. 475 (Defendants’ Tutorial – lodged via multimedia), 476 (SoftView’s Tutorial – lodged via multimedia <i>see</i> 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 (<i>Markman</i> Hearing Transcript), 1103 (<i>Markman</i> Opinion), 1104 (<i>Markman</i> Order). Defendants incorporate by reference extrinsic evidence cited in the foregoing filings. <u>Complete File Histories for</u>

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			<u>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
“Web a e content”	’353 Patent: 69, 87, 111, 128, 133	“Web page content”	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. <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;

Proposed Terms ¹	Patent Claims ²	Proposed Constructions	Preliminary Identification of Extrinsic Evidence ³
			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

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document was served upon counsel of record for Plaintiff on February 11, 2026, via electronic service.

/s/ Brian Bieluch

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