

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

TOPWIRE LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Action No. 7:25-CV-00551-ADA

JURY TRIAL DEMANDED

**DEFENDANT APPLE INC.'S IDENTIFICATION OF PROPOSED
CLAIM TERMS FOR CONSTRUCTION**

Pursuant to the Court’s Scheduling Order (D.I. 26), Defendant Apple Inc. (“Apple”) hereby provides to Plaintiff TopWire LLC (“TopWire”) the below list identifying claim terms for construction from claims 1, 2, 3, 4, 6, and 9 of U.S. Patent No. 9,859,202 (collectively the “Asserted Claims” of the “Asserted Patent”). Identification of a claim term herein is intended to include the term as a whole and/or its constituent parts. The claim terms are identified at least with respect to the asserted claim where they first occur. Apple reserves the right to modify, supplement, and/or amend the list below (collectively or individually).

This preliminary list of claim terms is based on Apple’s present understanding of TopWire’s preliminary infringement contentions setting forth the accused products and Asserted Claims. Apple reserves the right to amend or supplement this list upon receipt of TopWire’s terms and upon exchange of the parties’ proposed claim constructions on May 19, 2026, pursuant to the Scheduling Order, or if TopWire amends its infringement contentions. Apple reserves the right to offer evidence and argument regarding the construction of any terms or elements that are identified by TopWire, or to argue for a plain meaning where it is evident that TopWire’s apparent interpretation deviates from that plain meaning. Apple’s investigation in this matter is ongoing, and discovery in this case has not started. Furthermore, the parties have not yet exchanged claim construction positions or begun expert discovery. For at least these additional reasons, Apple reserves the right to supplement or amend the list below.

<u>Term</u>	<u>Claims</u>
“metal pillars”	1, 4, 6, 9

Dated: May 5, 2026

Respectfully submitted,

By: /s/ Asim Zaidi
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record are being served with a copy of the foregoing via electronic mail on May 5, 2026.

/s/ Asim Zaidi
Asim Zaidi