IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

INGENIOSPEC, LLC, Plaintiff, v. APPLE INC., Defendant.	Case No. 1:25-cv-00867-ADA **(LEAD CASE)**
INGENIOSPEC, LLC, Plaintiff, v. APPLE INC., Defendant.	Case No. 1:25-cv-00877-ADA **(MEMBER CASE)**

DEFENDANT'S PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the Scheduling Order (No. 1:25-cv-00867-ADA, Dkt. 36), Defendant hereby submits the following list of preliminary Proposed Claim Constructions. Defendant is prepared to meet and confer with Plaintiff for the purpose of narrowing the issues further.

Defendant's investigation and discovery remain ongoing, and Defendant reserves the right to supplement and/or modify these constructions and this disclosure based upon information learned through the course of its investigation or otherwise. Defendant further reserves the right supplement and/or modify these constructions and this disclosure in light of the positions that Plaintiff takes in this litigation. Such positions may require the Court to construe other terms in addition to the ones listed below.

PROPOSED CLAIM CONSTRUCTIONS:

No.	Term and Patent(s) / Asserted Claims	Defendant's Proposed Construction
1.	Preamble, including "input signals" '789 patent, claim 13.	Preamble is limiting + "signals input to the audio system"
2.	"head-worn personal electronic apparatus" / "head-worn wearable electronic device" / "head-worn electronic personal audio apparatus"/ "head-worn electronic device" / Preamble ('355 patent) '901 patent, claims 1-7, 9-10, 12-15 18, 20-21, 25-28, 30-31, 35, 38-50 53-54, 56-58; '355 patent, claims 1-3, 5-19, 21-54, 57-70, 72, 75-82, 85-92, 95-100; '693 patent, claims 24-27, 30, 31, 33-38, 42, 49, 50, 52-54, 61, 64, 70-73.	"electronic eyewear or headwear"
3.	"[a/the] speaker[s] … proximate to an ear of the user" / "the first speaker . . . proximate to a first ear of the user" / "the second speaker . . . proximate to a second ear of the user"	"[a/the] speaker[s] . . . near an ear of the user" / "the first speaker . . . near a first ear of the user" / "the second speaker . . . near a second ear of the user"

IngenioSpec EX2011
Apple v. IngenioSpec, IPR2026-00419
Page 1

	’901 patent, claims 1 and 35; ’355 patent, claims 1, 17, 65, 77, 87; ’693 patent, claims 24, 42, 75.	
4.	Preamble, including “to at least help [a/the] user hear audio outputs produced by the device” ’599 patent, claims 1, 20, 22, 24.	Preamble is limiting + indefinite
5.	“provide[d] that . . . the wireless headset is active” / “provide[d] that said determining determines” and “said determining comprises determining whether the wireless headset is active” ’104 patent, claims 2, 6, 10.	“upon establishing a communication link between the wireless headset and the wireless communication system”

Dated: December 22, 2025

Respectfully submitted,

/s/ Steven J. Wingard

Steven J. Wingard
Texas Bar No. 00788694
swingard@scottdoug.com
Stephen L. Burbank
Texas Bar No. 24109672
sburbank@scottdoug.com
Robert P. Earle
Texas Bar No. 24124566
rearle@scottdoug.com
SCOTT DOUGLASS & MCCONNICO LLP
303 Colorado Street, Suite 2400
Austin, TX 78701
Telephone: (512) 495-6300
Facsimile: (512) 495-6399

James R. Barney (*Pro hac vice*)
Frank A. DeCosta, III
Sonja W. Sahlsten (*Pro hac vice*)
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
901 New York Avenue, N.W.
Washington, D.C. 20001-4413
(202) 408-4000
james.barney@finnegan.com
frank.decosta@finnegan.com
sonja.sahlsten@finnegan.com

Kara A. Specht
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
271 17th St. NW Suite 1400
Atlanta, GA 30363-6209
(404) 653-6400
kara.specht@finnegan.com

Attorneys for Defendant Apple Inc.

CERTIFICATE OF SERVICE

I certify that on December 22, 2025, the foregoing document was electronically served via e-mail on all counsel of record.

/s/ Steven J. Wingard
Steven J. Wingard