

Exhibit B to Joint Claim Construction and Prehearing Statement
Philips North America, LLC v. Garmin Int’l, Inc., et al. (C.D. Cal.) Case No. 2:19-cv-06301-AL
Proposed Constructions of Each Disputed Term

U.S. Patent No. 6,013,007

'007 Claim Term	Philips’s Proposed Construction	Garmin’s Proposed Construction
<p>means for computing athletic performance feedback data from the series of timestamped waypoints obtained by said GPS receiver</p> <p>(Claims 1, 21)</p>	<p>a processor (and equivalents thereof) that determines any of the following from a series of time-stamped waypoints obtained by said GPS receiver during an exercise session: elapsed distance of an athlete; current or average speed of an athlete; current or average pace of an athlete</p> <p>35 U.S.C. § 112, ¶ 6</p> <p><u>Structure:</u></p> <p>a processor and equivalents thereof (see, e.g., Fig.6, col. 5 ll. 36-40 and col. 9 ll. 31-35.)</p> <p><u>Function:</u></p> <p>computing athletic performance feedback data [as construed above as elapsed distance of an athlete; current or average speed of an athlete; and/or current or average pace of an athlete] from the series of time-stamped waypoints obtained by said GPS receiver</p>	<p>35 U.S.C. § 112, ¶ 6.</p> <p>Indefinite.</p> <p>Function: computing athletic performance feedback data from the series of timestamped waypoints obtained by said GPS receiver</p> <p>Structure or algorithm: not disclosed</p>
<p>means for presenting the athletic performance feedback data to an athlete</p>	<p>No construction necessary.</p> <p>However, if construed Philips proposes the</p>	<p>35 U.S.C. § 112, ¶ 6.</p>

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(Claims 1, 21)	<p>following construction that reflects the structure and function: "a display and/or audio headphones (and equivalents thereof) that presents the athletic performance feedback data to an athlete"</p> <p>35 U.S.C. § 112, ¶ 6</p> <p>Structure:</p> <p>a display and/or audio headphones and equivalents thereof (See, e.g., Figs. 1A, 2, 3, 5, 6, original claims, col. 4 ll. 4-13, col 4. ll. 34-40, col. 7 ll. 56-67)</p> <p>Function:</p> <p>presenting the athletic performance feedback data to an athlete</p>	<p>Function: presenting the athletic performance feedback data to an athlete</p> <p>Structure: Wired headset (including components for audio connection, microphone, speech synthesizer etc.). Feedback data is optionally also scrolled across a display which is also being announced via the headphones.</p>
<p>means for suspending and resuming operation of said means for computing when a speed of the athlete falls below a predetermined threshold</p> <p>(Claim 7)</p>	<p>a processor (and equivalents thereof) that suspends said computing when a speed of the athlete is below a predetermined threshold and resumes said computing when a speed of the athlete is not below said predetermined threshold</p> <p>35 U.S.C. § 112, ¶ 6</p> <p>Structure:</p>	<p>35 U.S.C. § 112, ¶ 6.</p> <p>Indefinite.</p> <p>Function: suspending and resuming operation of said means for computing when a speed of the athlete falls below a predetermined threshold</p>

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	<p>a processor and equivalents thereof (see, e.g., Fig.6, col. 5 ll. 36-40 and col. 9 ll. 31-35.)</p> <p><u>Function:</u></p> <p>suspending and resuming operation of said means for computing when a speed of the athlete falls below a predetermined threshold (as construed above)</p>	
<p>modem for transmitting the athletic performance feedback data to a remote computer for comparison with athletic performance data of other athletes</p> <p>(Claim 21)</p>	<p>No construction necessary</p> <p>Alternatively: "modem" should be construed as "a device that modulates a digital signal into an analog one for transmission and which demodulates a received analog signal into a digital one."</p>	<p>modulator capable of sending standard telephone line and a capable of receiving signals from telephone line</p>
<p>means for exchanging GPS route waypoints via said Internet web site</p> <p>(Claim 25)</p>	<p>No construction necessary.</p> <p>However, if construed Philips proposes the following construction that reflects the structure and function: "an Internet web site (and equivalents thereof) that exchanges GPS route waypoints"</p>	<p>35 U.S.C. § 112, ¶ 6.</p> <p>Indefinite.</p> <p>Function: exchanging GPS route waypoints via said Internet web site</p>

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'007 Claim Term	Philips's Proposed Construction	Garmin's Proposed Construction
	<p>35 U.S.C. § 112, ¶ 6</p> <p><u>Structure:</u> an Internet web site and equivalents thereof (See, e.g., original claim, col. 9 ll. 52-62)</p> <p><u>Function:</u> exchanging GPS route waypoints</p>	

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U.S. Patent No. 7,088,233

'233 Claim Term	Philips's Proposed Construction	Garmin's Proposed C
governing information transmitted between the first personal device and the second device (Claim 1)	controlling the transmission of information between the first personal device and the second device	plain and ordinary meaning
wireless communication (Claims 1, 13, 15, 16)	an over-the-air communication (e.g. using radiofrequency (RF), infrared, or optical techniques)	plain and ordinary meaning
first personal device (Claims 1, 10, 14, 24)	No construction necessary Alternatively: "a device for private use by a person"	first personal medical device
body or physiological parameters (Claims 8, 9)	No construction necessary. Not indefinite.	Indefinite.
location determination module (Claim 24)	No construction necessary	a terrestrial location system

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