

Exhibit C 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
Philips’s Proposed Claim Constructions and Supporting Evidence

Patent & Claims	Term	Philips’s Proposed Construction (and, where applicable, 35 U.S.C. § 112, ¶ 6 disclosures)	Identification of Portions of Specification and Prosecution History	Identifying Evidence
U.S. Pat. No. 6,013,007				
U.S. Pat. No. 6,013,007 Claims 1, 21	“means for computing athletic performance feedback data from the series of time-stamped waypoints obtained by said GPS receiver”	<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>Structure: a processor and equivalents thereof (<i>see, e.g.</i>, Fig.6, col. 5 ll. 36-40 and col. 9 ll. 31-35.)</p> <p>Function: 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</p>	<p>Specification: Fig.6 and related written disclosure; Fig. 11 and related written disclosure; col. 1 ll. 5-13; col. 1 ll. 59 – 68; col. 2 ll. 1-54; col. 4 ll. 4-40; col. 5 ll. 36-40; col. 6 l. 63 – col. 7 l. 5; col. 7 ll. 41-50; col. 9 ll. 31-35; col. 9 l. 63 – col. 10 l. 58; col. 10 l. 63 – col. 11 l. 7.</p> <p>Philips may rely on any aspects of the specification and prosecution history cited by Garmin for this term, as well any additional other portions necessary to rebut positions advanced by Garmin in support of any proposed construction.</p>	<p>Expert Evidence: rely on one of Dr. T. summary Ex. E</p>

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		of time-stamped waypoints obtained by said GPS receiver		
U.S. Pat. No. 6,013,007 Claim 7	“means for suspending and resuming operation of said means for computing when a speed of the athlete falls below a predetermined threshold”	<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>a processor and equivalents thereof (<i>see, e.g.</i>, Fig.6, col. 5 ll. 36-40 and col. 9 ll. 31-35.)</p> <p>Function:</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>Specification:</p> <p>Fig.6 and related disclosure, col. 5 ll. 36-40; col. 8 ll. 5-13; col. 9 ll. 31-35.</p> <p>Philips may rely on any aspects of the specification and prosecution history cited by Garmin for this term, as well any additional other portions necessary to rebut positions advanced by Garmin in support of any proposed construction.</p>	Philips evidence for th

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		Not indefinite.		
U.S. Pat. No. 6,013,007 Claims 1, 21	“means for presenting the athletic performance feedback data to an athlete”	<p>No construction necessary.</p> <p>However, if construed Philips proposes the 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: a display and/or audio headphones and equivalents thereof (<i>See, e.g.</i>, 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>Specification:</p> <p>Figs. 1A, 2, 3, 5, 6 (and related disclosures of each figure), original claims, col. 4 ll. 4-13, col 4. ll. 34-40, col. 7 ll. 56-67.</p> <p>Philips may rely on any aspects of the specification and prosecution history cited by Garmin for this term, as well any additional other portions necessary to rebut positions advanced by Garmin in support of any proposed construction.</p>	Philips evidence for th

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		presenting the athletic performance feedback data to an athlete		
U.S. Pat. No. 6,013,007 Claim 21	“modem for transmitting the athletic performance feedback data to a remote computer for comparison with athletic performance feedback data of other athletes”	No construction necessary 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.”	Specification: col. 6 ll. 29-42 Philips may rely on any aspects of the specification and prosecution history cited by Garmin for this term, as well any additional other portions necessary to rebut positions advanced by Garmin in support of any proposed construction.	Barro Comp (1998) IBM (1994) Padg Hatto Com 1995 Perso Hills Perso 1996 Netw Carn Philip extrin Garm

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U.S. Pat. No. 6,013,007 Claim 25	“means for exchanging GPS route waypoints via said Internet web site”	<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>Structure: an Internet web site and equivalents thereof (<i>See, e.g.</i>, original claim, col. 9 ll. 52-62)</p> <p>Function: exchanging GPS route waypoints</p>	<p>Specification: Original claim, col. 9 ll. 52-62.</p> <p>Philips may rely on any aspects of the specification and prosecution history cited by Garmin for this term, as well any additional other portions necessary to rebut positions advanced by Garmin in support of any proposed construction.</p>	Philips evidence for th
U.S. Pat. No. 7,088,233				
U.S. Pat. No. 7,088,233 Claim 1	“governing information transmitted between the first personal	controlling the transmission of information between the first	<p>Specification: Figs. 1, 5, 6 (and related written disclosures for each figure)</p>	Merrill defin

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