

# Exhibit B

**Exhibit A**  
*Philips North America, LLC v. Garmin Int'l, Inc., et al.* (C.D. Cal.) Case No. 2:19-cv-06301-AL  
**Philips's Preliminary Claim Constructions and Other P.R. 4-2 Disclosures**

| Patent & Claims                         | Term   | Philips's Preliminary Construction (and, where applicable, 35 U.S.C. § 112, ¶ 6 disclosures)   | Preliminary Identification of Portions of Specification and Prosecution History   | Preliminary Extractions                                     |
|---|--|--|---|---|
| U.S. Pat. No. 6,013,007<br>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><b>Structure:</b><br/>           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><b>Function:</b><br/>           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><b>Specification:</b><br/>           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 to rebut positions advanced by Garmin in support of any proposed construction.</p> | <p><b>Extractions:</b><br/>           on the more L. M.</p> |