IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

Arnouse Digital Devices Corp.	
Plaintiff,	
v.	Civil Action No.: 5:11-cv-155-CR
Motorola Mobility, Inc.	
Defendant.	

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to the partially stipulated Markman scheduling order (D.I. 24), Plaintiff Arnouse

Digital Devices, Corp. ("Arnouse") and Defendant Motorola Mobility, Inc. ("MMI") submit the

following Joint Claim Construction and Prehearing Statement.

Disputed Claims with Disputed Terms Highlighted within U.S. Patent No. 7,516,484	MMI's Construction	Arnouse's Construction	MMI's Intrinsic Evidence	Arnouse's Intrinsic Evidence
Claim 1: Preamble of claim 1	**The preamble of claim 1 is limiting**	**The preamble of claim 1 is limiting, and claim 1 is directed to a reader, not the combination of a reader and a portable computer.**		
Claim 1: **A reader configured to interact with a portable computer without input and output means for interacting directly therewith**, the reader comprising:	An electronic device that is designed to be connected to a portable computer that by itself is not capable of receiving information from or providing information to a user because it lacks input and output means, as those terms are defined below. In other words, the portable computer needs the reader for the user to interact with the computer.	An electronic device that is designed to be connected to a portable computer, wherein the portable computer lacks input and output means, as those terms are defined below, but includes a processor, a memory, and an operating system. In other words, the portable computer needs the reader for the user to interact with the programs, hardware, and user information of the portable computer.	Office Action mailed January 13, 2009. Response to Office Action mailed January 13, 2009, pg. 9. '484 patent, Abstract. '484 patent, col. 3, ll. 14-16. '484 patent, col. 3, ll. 54-62. '484 patent, col. 4, ll. 44-48. '484 patent, col. 6, ll. 4-21. '484 patent, col. 6, ll. 22-31. '484 patent, col. 6, ll. 52-58. '484 patent, col. 7, ll. 33-35. '484 patent, col. 7, ll. 37-38. '484 patent, col. 7, ll. 45-57.	**Any intrinsic evidence relied upon by MMI and** '484 patent, col. 6, ll. 4-6 '484 patent, col. 3, ll. 10-11 '484 patent, col. 4, ll. 66 to col.5, ll. 50 '484 patent, col. 5, ll. 63 to col.6, ll. 8 '484 patent, col. 6, ll. 22-31 '484 patent, col. 7, ll. 36-45 '484 patent, col. 5, ll. 66 to col. 6, ll. 3

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Disputed Claims with Disputed Terms Highlighted within U.S. Patent No. 7,516,484	MMI's Construction	Arnouse's Construction	MMI's Intrinsic Evidence	Arnouse's Intrinsic Evidence
			'484 patent, col. 9, ll. 11-21. '484 patent, claim 3. '484 patent, claim 19.	
Claim 1: A reader configured to interact with a portable computer without **input and output means** for interacting directly therewith, the reader comprising	Any component that allows a portable computer to receive information from or provide information to a user, including but not limited to, a keyboard, keypad, button, display, touch screen, speaker, webcam, microphone, or headphone jack.	Any component that allows a portable computer to interact directly with the programs, hardware, and user information of the portable computer by receiving information from or providing information to a user, including but not limited to, a keyboard, keypad, button, display, touch screen, speaker, webcam, microphone, or headphone jack.	Office Action mailed January 13, 2009. Response to Office Action mailed January 13, 2009, pg. 9. '484 patent, Abstract. '484 patent, col. 3, ll. 14-16. '484 patent, col. 3, ll. 54-62. '484 patent, col. 4, ll. 44-48. '484 patent, col. 6, ll. 4-21. '484 patent, col. 6, ll. 22-31. '484 patent, col. 6, ll. 52-58. '484 patent, col. 7, ll. 33-35. '484 patent, col. 7, ll. 37-38. '484 patent, col. 7, ll. 45-57. '484 patent, col. 9, ll. 11-21.	**Any intrinsic evidence relied upon by MMI and** '484 patent, col. 4, ll. 66 to col.5, ll. 50 '484 patent, col. 5, ll. 63 to col. 6, ll 8 '484 patent, col. 6, ll. 22 -28

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Disputed Claims with Disputed Terms Highlighted within U.S. Patent No. 7,516,484	MMI's Construction	Arnouse's Construction	MMI's Intrinsic Evidence	Arnouse's Intrinsic Evidence
			'484 patent, claim 3. '484 patent, claim 19.	
Claim 1: a housing that is at least one of an **input or an output device**; and.	Any component that allows the reader to receive information from or provide information to a user, including but not limited to, a keyboard, keypad, button, display, touch screen, speaker, webcam, microphone, or headphone jack.	Any component that allows the reader to interact directly with the programs, hardware, and user information of the portable computer by receiving information from or providing information to a user, including but not limited to, a keyboard, keypad, a display, touch screen, speaker, webcam, microphone, or headphone jack.	'484 patent, Abstract. '484 patent, col. 3, ll. 14-16. '484 patent, col. 3, ll. 54-62. '484 patent, col. 4, ll. 44-48. '484 patent, col. 6, ll. 4-21. '484 patent, col. 6, ll. 22-31. '484 patent, col. 6, ll. 52-58. '484 patent, col. 7, ll. 33-35. '484 patent, col. 7, ll. 37-38. '484 patent, col. 7, ll. 45-57. '484 patent, col. 9, ll. 11-21. '484 patent, claim 3. '484 patent, claim 19.	**Any intrinsic evidence relied upon by MMI and** '484 patent, col. 6, ll. 6-8 '484 patent, col. 6, ll.22-28 '484 patent, col. 7, ll. 36-45
Claim 1: wherein the reader is configured to be a **non-functioning shell** when not connected to the portable	non-working device	means that the reader can access the programs, hardware, and user information stored on the portable	'484 patent, Abstract. '484 patent, col. 1, ll. 48-67.	**Any intrinsic evidence relied upon by MMI and** '484 patent, col. 6, ll. 10-12

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Disputed Claims with Disputed Terms Highlighted within U.S. Patent No. 7,516,484	MMI's Construction	Arnouse's Construction	MMI's Intrinsic Evidence	Arnouse's Intrinsic Evidence
computer, and. **Claim 15:** wherein the reader is configured to be **a non-functioning shell** when not connected to the portable computer.		computer when connected thereto, and ceases to function and does not retain any user information when not connected to the portable computer.	'484 patent, col. 6, ll. 10-21. '484 patent, col. 7, ll. 7-24. '484 patent, col. 7, ll. 36-45. '484 patent, col. 7, ll. 46-58. '484 patent, col. 8, l. 66 – col. 9, l. 4. '484 patent, col. 9, ll. 9-11.	'484 patent, col. 7, ll. 7-45
Claim 1: **wherein the readers are configured so that they will not operate with a computer other than a portable computer of the system** **Claim 15:** **wherein the readers are configured so that they will not operate with a computer other than a portable computer of the system**	wherein the reader is designed to operate with only a portable computer that does not have input and output means. In other words, the portable computer needs the reader for the user to interact with the computer.	means that the reader has a non-universal design that limits the types of portable computers that may be used with the reader	Third Revised Accelerated Examination Support Document, pg. 6. '484 patent, col. 1, ll. 40-44. '484 patent, col. 6, ll. 16-21. '484 patent, col. 6, ll. 38-42. '484 patent, col. 6, ll. 46-50. '484 patent, col. 8, ll. 7-8.	**Any intrinsic evidence relied upon by MMI and** '484 patent, col.5, ll. 45-62 U.S. Provisional Application No. 61/028,373 at ¶8. '484 patent, col. 3, ll. 51-53 '484 patent, col. 6, ll. 22-31
Claim 15: **at least one portable computer**, each comprising: storage; and at least one connector for connecting to at least one reader;	No construction needed.	A portable computer is a readily mobile device that includes a processor, storage, an operating system, and a connector.		**Any intrinsic evidence relied upon by MMI and** '484 patent, col. 3, ll. 10-11 '484 patent, col. 4, ll. 66 to

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