## UNITED STATES INTERNATIONAL TRADE COMMISSION WASHINGTON, D.C.

## Before the Honorable E. James Gildea Administrative Law Judge

In the Matter of

CERTAIN DEVICES WITH SECURE COMMUNICATION CAPABILITIES, COMPONENTS THEREOF, AND PRODUCTS CONTAINING THE SAME Investigation No. 337-TA-858

## PARTIES' JOINT LIST OF PROPOSED CONSTRUCTIONS OF REMAINING DISPUTED CLAIM TERMS

Pursuant to Order No. 7, Complainants VirnetX, Inc. ("VirnetX") and Science

Applications International Corporation ("SAIC") (collectively, "Complainants") and Respondent

Apple Inc. ("Apple") hereby jointly submit the Parties' Joint List of Proposed Constructions of

Remaining Disputed Claim Terms regarding the United States Patent No. 8,051,181 ("the '181

patent").

## JOINT LIST OF PROPOSED CONSTRUCTIONS

Claim Term	Complainants' Proposed Construction	Respondent's Proposed Construction
unsecured name	A name that can be resolved by a conventional name service	Indefinite
secure name	An authenticated name that can be resolved by a secure name service and can be used for establishing a secure communication link	Indefinite; Or, in the alternative: a name of a device that corresponds to a network address that requires authorization by the secure name service for access and that is used for establishing a secure communication link
secure communication link	A direct communication link that provides data security through encryption where direct refers to direct addressability	A virtual private network (VPN) communication link, wherein a VPN is a network of computers which privately and directly communicate with each other by encrypting traffic on insecure paths between the computers where the communication is both secure and anonymous
secure name service	A lookup service that returns a network address for a requested secure name and facilitates establishing a secure communication link based on a secure name	Indefinite; or, in the alternative: a lookup service that returns a network address for a requested secure name upon authorization
sending a message securely	transmit information with data security	Sending a message over a secure communication link
the desire[d]	Customary and ordinary meaning to a person of ordinary skill in the art - No construction necessary	Indefinite

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Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served as indicated, to the parties listed below, on **February 25, 2013**:

The Honorable Lisa R. Barton Acting Secretary **U.S. INTERNATIONAL TRADE COMMISSION** 500 E Street, S.W., Room 112-A Washington, D.C. 20436 (VIA ELECTRONIC FILING)

The Honorable E. James Gildea Administrative Law Judge U.S. INTERNATIONAL TRADE COMMISSION 500 E. Street, S.W. Room 317-E Washington, D.C. 20436 (VIA HAND DELIVERY – 2 copies)

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