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UNIVERSAL ELECTRONICS INC.,
Plaintiff,
v.
PEEL TECHNOLOGIES, INC.,
Defendant.

Case No. SACV13-01484 AG (JPRx)
**UNIVERSAL ELECTRONICS
INC.'S OPENING CLAIM
CONSTRUCTION BRIEF**
Honorable Andrew J. Guilford
Magistrate Judge Jean P. Rosenbluth
Hearing Date: July 29, 2014
Time: 9:00 a.m.
Dept.: 10D

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V. ARGUMENT8

 A. "data that functions to identify the appliance" ('243 Patent, claims 1 and 8)8

 B. "data for use in generating an infrared code to be transmitted" ('101 Patent, claim 6)10

 C. "label" ('101 Patent, claim 6)13

 D. "hyperlink which is activatable to initiate a use of the data in the first data field" ('101 Patent, claim 6)15

 E. "key code" ('642 Patent, claims 1, 2, 5, 22 & 23)15

 F. "keystroke indicator signal" ('642 Patent, claims 1, 2, 5, 22 & 23)19

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G. "identify/identifying one of a plurality of sets of information which is associated with the first class" ('351 Patent, claims 1 and 18).....21

H. "second data representative of the motion made across the touch-sensitive surface" ('309 Patent, Claim 1)23

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1 **I. INTRODUCTION**

2 Plaintiff and Counter-Defendants Universal Electronics, Inc. ("UEI") hereby
3 submits its opening claim construction brief in accordance with the Joint Report on
4 Early Meeting of the Parties (Dkt. No. 39) and Standing Patent Rule 3.5.

5 **II. BACKGROUND INFORMATION**

6 **A. The Parties And Accused Products**

7 With its headquarters in Santa Ana and 1,807 employees world-wide in
8 2013, UEI has been at the forefront of remote control technology since 1986. UEI's
9 on-going commitment to innovation has resulted in over 260 issued and pending
10 United States patents. Its business includes pre-programmed and programmable
11 universal infrared and radio frequency remote controls.

12 Defendant, Peel Technologies, Inc. ("Peel") was first incorporated in 2008 in
13 Delaware. Peel has sold and distributed software and hardware used in connection
14 with remote control devices. For example, Peel has provided software products
15 called the "TV App," "WatchON App," and "Peel Smart Remote App," which are
16 applications that can be downloaded and used with various mobile devices,
17 including Android mobile phones and tablets, such as the Samsung Galaxy. Peel
18 has also sold a product called the "Peel Universal Remote" consisting of a Peel
19 "Fruit" hardware device and a software component for use with the iOS operating
20 system. The Peel "Fruit" hardware is an IR component that allows Apple products,
21 which do not have a built-in IR blaster, to emit IR signals. The applications display
22 icons, and receive inputs, via a touch screen.

23 Accused features and functionalities relevant to the present claim
24 construction issues include the application interfaces, which include mark-up
25 language formatted page tags that are used to display labels (i.e. buttons), to the
26 user. The labels are part of a data structure that includes both a first data field and a
27 second data field, where the first data field contains data for use in generating an
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