

1 KNEAFSEY & FRIEND LLP  
SEAN M. KNEAFSEY (SBN 180863)  
2 [skneafsey@kneafseyfriend.com](mailto:skneafsey@kneafseyfriend.com)  
800 Wilshire Blvd. Ste. 710  
3 Los Angeles, CA 90017  
4 Telephone: (213) 892-1200  
Facsimile: (213) 892-1208  
5

6 NIRO, HALLER & NIRO  
RAYMOND P. NIRO (*pro hac vice*)  
7 [rniro@nshn.com](mailto:rniro@nshn.com)  
CHRISTOPHER J. LEE (*pro hac vice*)  
8 [clee@nshn.com](mailto:clee@nshn.com)  
RICHARD B. MEGLEY, JR. (*pro hac vice*)  
9 [megleyjr@nshn.com](mailto:megleyjr@nshn.com)  
OLIVER. D. YANG (*pro hac vice*)  
10 [oyang@nshn.com](mailto:oyang@nshn.com)  
181 West Madison, Suite 4600  
11 Chicago, IL 60602-4515  
Telephone: (312) 236-0733  
12 Facsimile: (312) 236-3137

13 Attorneys for Plaintiff  
UNIVERSAL ELECTRONICS INC.

14  
15 IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION

16 UNIVERSAL ELECTRONICS INC.,

17 Plaintiff,

18 v.

19 PEEL TECHNOLOGIES, INC.,

20 Defendant.  
21

Case No. SACV13-01484 AG (JPRx)

**JOINT CLAIM CONSTRUCTION  
CHART PURSUANT TO S.P.R.  
3.5.1**

Honorable Andrew J. Guilford  
Magistrate Judge Jean P. Rosenbluth

22  
23  
24 Pursuant to the Court’s S.P.R. 3.4, the Parties hereby submit their Joint  
25 Claim Construction Chart of disputed claim constructions, as follows:  
26  
27  
28

05675.00001/6060541.1

1 **I. S.P.R. 3.4.1 – The Parties' Agreed Constructions**

2 The parties have agreed to the follow constructions:

3

4 Patent / Claim	Term	Agreed Construction
5 '101 6 Claim 6	mark-up language formatted page tag	an element of a mark-up language formatted page including a start tag, at least the first and second data fields, and an end tag
7 '504 8 Claims 1 and 9 8	static touch	a non-moving contact with a surface at a location
10 '930 11 Claim 1	in response, using the input to select at least one of the plurality of lists of favorite 12 channels	the mode specifying input automatically selects at least one of the favorite channels lists
13 '243 14 Claims 1 and 8	control codes to which the appliance is adapted to respond	more than one control code to which the appliance is adapted to respond
15 '112 16 Claims 1 and 17 2	keycode link information	data that defines a relationship, distinct from a link between a physical/soft key and a function to be performed

18 The parties have also agreed that they believe any 35 U.S.C. § 112 defenses,  
19 such as indefiniteness, should be addressed during later phases of the case and not  
20 during claim construction. Accordingly, they have agreed to refrain from  
21 substantively arguing any §112 defenses during claim construction, although they  
22 will briefly apprise Your Honor of those defenses in their claim construction  
23 briefing. If Your Honor believes that a § 112 defense issue should be addressed  
24 during claim construction, the parties request the opportunity to submit additional  
25 briefing and evidence on the issue.

26  
27  
28

**II. S.P.R. 3.4.2 – EACH PARTIES' PROPOSED CONSTRUCTIONS**

The following chart shows each party's proposed construction of each disputed term, together with an identification of all intrinsic and extrinsic evidence supporting each proposed construction.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

05675.00001/6060541.1

Patent And Claim	Party Proposing	Term	Plaintiff UEI's Proposed Constructions	Defendant PEE Proposed Const
'243 Claims 1 and 8	Peel	data that functions to identify the appliance	data sufficient to identify the appliance  11:38-41; 5:39-42, 48-49; 4:1-34, 45-46; Abstract; 1:59-60; 11:38-29, 12:58; 11:33, 55; 12:40, 42; 12:18	data, distinct from code, sufficient to identify the appliance  <b>'243 Patent</b> Abstract, Fig. 13:63; 3:21-33; 4:1-49; 6:42-49; 6:65-58; 11:7-41; 12:13:39-42; 13:61-8, 10, 14, 18  <b>Prosecution History</b> September 13, 2011 Applicant Initiated Request at UEIPEEL001209
'101 Claim 6	Peel	data for use in generating an infrared code to be transmitted	data stored in the mark-up language page including information for use in generating an infrared code to be transmitted  Fig. 5; 2:42-44; 5:22-35; 11:12-22; 13:30-37 & 57-62; UEIPEEL000024-32	data stored in the mark-up language page including information for use in generating an infrared code to be transmitted  <b>'101 Patent</b> Figs. 10c, 12, 19:6:17-22; 11:12-22; 13:21-

Patent And Claim	Party Proposing	Term	Plaintiff UEI's Proposed Constructions	Defendant PEE Proposed Const
				<p>62; 14:54-62; 16:16:67-17:10; 17:21; 20:3-9; 21:4-28; 22:38-50; cla 14, and 16</p> <p><b>Prosecution His</b> December 21, 20 to Non-Final Rej UEIPEEL00005 0071; February 7 Response After I Rejection at UEIPEEL00002:</p>
'101 Claim 6	Peel	label	<p>displayed text and/or image</p> <p>Fig. 10g, 12 &amp; 13; 2:58-60; 2:64-3:4; 19:17-22, 26-32; 20:5-16; 32:25-27</p>	<p>displayed text, d graphic or icon</p> <p><b>'101 Patent</b> Figs. 12, 13; 13: 14:50-55; 16:18- 17:10; 17:16-21; claim 6</p>
'101 Claim 6	Peel	hyperlink which is activatable to initiate a use of the data in the first data field	direct relationship between the label in the second data field that causes the use of the data in the first data field	direct relationship the label in the s field and the infr the first data field

05675.00001/6060541.1

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.