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## <u>EXHIBIT A</u>: DISPUTED CLAIM TERMS

The following claim terms remain in dispute.

No.	TERM	PLAINTIFF'S PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION	
	TERMS FOR HUAWEI PATENTS				
1	"characterizing quantities of the communication quality for each of the groups" ('139 Patent, Claims 1 and 11)	"characteristics of the communication quality for each of the groups"	"group scores derived from the indication of communication quality for each base station in a group"		
2	"a storage unit in which group information generated by classifying the plurality of base stations into groups" ('139 Patent, Claim 11)	Not indefinite; plain and ordinary meaning	Indefinite because the claim term does not inform those skilled in the art about the claim's scope with reasonable certainty		
3	"combining" / "combined" ('292 Patent, Claims 1 and 2)	"a determination based on one or more inputs"	"merging"/ "merged"		
4	"GPS/cellular positioning results combining means for combining the GPS- based position result and the cellular-based position result with the	<b>Function:</b> combining the GPS- based position result and the cellular-based position result with the GPS positioning reliability and the cellular positioning reliability <b>Structure:</b> GPS/cellular positioning results combining unit 400 and/or	<b>Function:</b> <u>combining</u> the GPS based position result and the cellular-based position result with the GPS positioning reliability and the cellular positioning reliability <b>Structure:</b> GPS / Cellular Positioning Results Combining Unit		

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No.	TERM	PLAINTIFF'S PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
	GPS positioning reliability and the cellular positioning reliability" ('292 Patent, Claim 1)	components within a mobile handset that perform processing functions, such as, a CPU programmed to execute processing in accordance with the algorithm set forth in the specification, a processor that combines GPS/cellular position as described in Fig. 2 (block 605) and corresponding recitations in the specification as provided herein, or equivalents thereof. <i>See e.g.</i> , (4:42- 56), (Fig. 3 at 400), (3:12-17), (5:3- 7).	<b>400</b> performing the weighted mean disclosed in Figure 3 and at col. 4:49-56, block 606 in Fig. 2	
5	"GPS receiver means for receiving GPS- oriented signals and generating received GPS signals" ('292 Patent, Claim 1)	<b>Function:</b> receiving GPS-oriented signals and generating received GPS signals <b>Structure:</b> A GPS receiver 200 and/or components within a mobile handset that receive GPS signals, such as, an antenna and a transceiver or a processor that performs GPS receiving processes as described in Fig. 2 (block 600) and corresponding recitations in the specification as provided below or equivalents thereof. <i>See e.g.</i> , (2:64-65; block 600 in Fig. 2), (3:24-32), (4:65-5:2), (2:53-57), (5:3-7).	<ul> <li>Function: (1) receiving GPS oriented signals and (2) generating received GPS signals</li> <li>Structure: GPS receiver 200, Block 600 in Figure 2</li> </ul>	
6	"cellular receiver	Function: receiving cellular-	Function: (1) receiving cellular-	

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No.	TERM	PLAINTIFF'S PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
	means for receiving cellular-oriented signals and generating received cellular signals" ('292 Patent, Claim 1)	oriented signals and generating received cellular signals <b>Structure:</b> A cellular receiver 300 and/or components within a mobile handset that receive and generate cellular signals, such as, an antenna, a transceiver, a processor that performs cellular receiving processes as described in Fig. 2 (block 603) and corresponding recitations in the specification provided herein, or equivalents thereof. <i>See e.g.</i> , (2:66-3:4), (3:10- 11; see block 603 in Fig. 2), (4:4-9), (2:53-57), (5:3-7).	oriented signals and (2) generating received cellular signals <b>Structure:</b> cellular receiver 300, Block 603 in Fig. 2	
7	"GPS position calculation means for calculating the mobile handset's position from the received GPS signals and outputting a GPS-based position result" ('292 Patent, Claim 1)	<b>Function:</b> calculating the mobile handset's position from the received GPS signals and outputting a GPS- based position result <b>Structure:</b> At least one processor, for example, position calculation unit 201 and/or a mobile handset that perform processing functions or equivalents thereof. <i>See e.g.</i> , (2:64- 65; block 601 in Fig. 2), (3:24-38), (2:53-60), (5:3-7).	<b>Function:</b> (1) calculating the mobile handset's position from the received GPS signals and (2) outputting a GPS-based position result. <b>Structure:</b> position calculation unit for GPS 201, Block 601 in Fig. 2	
8	"cellular position calculation means for calculating the mobile handset's position from	<b>Function:</b> calculating the mobile handset's position from the received cellular signals and outputting a cellular-based position result	<b>Function:</b> (1) calculating the mobile handset's position from the received cellular signals and (2) outputting a cellular based position result.	

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No.	TERM	PLAINTIFF'S PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
	the received cellular signals and outputting a cellular-based position result" ('292 Patent, Claim 1)	<b>Structure:</b> A position calculation unit 301 and/or components within a mobile handset that perform processing functions, such as, a CPU programmed to execute processing in accordance with the algorithm set forth in the specification, or a processor that performs cellular position calculation processes as described in Fig. 2 (block 604) and corresponding recitations in the specification as provided herein, or equivalents thereof. <i>See e.g.</i> , (1:23- 27), (3:10-11; block 604 in Fig. 2), (4:4-16), (2:66-3:6), (5:3-7).	<b>Structure:</b> position calculation unit for cellular 301, which is insufficient structure because the specification does not disclose the necessary algorithm or flowchart, which renders the term indefinite	
9	"GPS reliability calculation means for calculating GPS positioning reliability based on the GPS- based position result" ('292 Patent, Claim 1)	<b>Function:</b> calculating GPS positioning reliability based on the GPS-based position result <b>Structure:</b> A GPS reliability calculation unit 204 and/or components within a mobile handset that perform processing functions, such as, a CPU programmed to execute processing in accordance with the algorithm set forth in the specification, a processor that performs GPS reliability calculation processes described in Fig. 2 (block 602) and corresponding recitations in the specification as provided herein, or equivalents thereof. <i>See</i>	<b>Function:</b> calculating GPS positioning reliability based on the GPS-based position result <b>Structure:</b> GPS reliability calculation unit 204, which is insufficient structure because the specification does not disclose the necessary algorithm or flowchart, which renders the term indefinite	

No.	TERM	PLAINTIFF'S PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
		<i>e.g.</i> , (2:60-65; block 602 in Fig. 2), (3:38-4:3), (5:3-7).		
10	"cellular reliability calculation means for calculating cellular positioning reliability based on the cellular- based position result" ('292 Patent, Claim 1)	<b>Function:</b> calculating cellular positioning reliability based on the cellular-based position result <b>Structure:</b> A cellular reliability calculation unit 304 and/or components within a mobile handset that perform processing functions, such as, a CPU programmed to execute processing in accordance with the algorithm set forth in the specification, , a processor that performs cellular reliability calculation processes as described in Fig. 2 (block 605) and corresponding recitations in the specification as provided herein, or equivalents thereof. <i>See e.g.</i> , (3:10- 11; block 605 in Fig. 2), (4:15-42), (3:6-11), (5:3-7).	<b>Function:</b> calculating cellular positioning reliability based on the cellular-based position result <b>Structure:</b> cellular reliability calculation unit 304, which is insufficient structure because the specification does not disclose the necessary algorithm or flowchart, which renders the term indefinite	
11	"still pictures encoded by a second encoding method, and second pictures corresponding to the still pictures and having a smaller number of pixels than the still pictures are recorded"	Plain and ordinary meaning	"still pictures encoded by the first encoding method and by a second encoding method, and second pictures corresponding to the still pictures and having a smaller number of pixels than the still pictures are recorded"	

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