Preliminary Constructions [1]

TracBeam LLC v. Cisco Systems, Inc.

Case No. 6:17-cv-525

Disputed Claim Term	Preliminary Construction
"mobile station location estimator" ('484 patent, claim 49)	Governed by 35 U.S.C. § 112 ¶ 6 **Function**: "estimating mobile station location" **Structure**: "location hypothesizing model (FOM) implemented on or by a location center or mobile base station"
"location determiner" ('327 patent, claim 1)	Governed by 35 U.S.C. § 112 ¶ 6 **Function**: "determining communication device location" **Structure**: "location hypothesizing model (FOM) implemented on or by a location center or mobile base station"
"location estimation determiner" ('231 patent, claim 34)	Governed by 35 U.S.C. § 112 ¶ 6 **Function**: "determining an estimate of mobile station location" **Structure**: "location hypothesizing model (FOM) implemented on or by a location center or mobile base station"
"mobile station location evaluator" ('484 patent, claims 25 and 57; '231 patent, claim 30)	Governed by 35 U.S.C. § 112 ¶ 6 **Function**: "determining mobile station location" **Structure**: "location hypothesizing model (FOM) implemented on or by a location center or mobile base station"
"pattern recognizers for estimating a location of one or more of the mobile unit M" ('525 patent, claim 1)	Governed by 35 U.S.C. § 112 ¶ 6 **Function**: "estimating a location of a mobile unit M using a pattern recognition technique" **Structure**: "location hypothesizing model (FOM) that uses pattern recognition and is implemented on or by a location center or mobile base station"
"similarity determining computational machine that determines location related information for locating the mobile unit M" ('543 patent, claim 1)	Governed by 35 U.S.C. § 112 ¶ 6 **Function**: "determining location related information for locating the mobile unit M using a similarity in wireless signal data"

[1] These preliminary constructions are only meant to indicate where the Court stands after considering the claim construction briefing, and the Court may change its position based upon the parties' arguments.

	Structure: "location center or mobile base station implementing a location hypothesizing model that determines a similarity or pattern in wireless signal data"
"stochastic technique" ('327 patent, claim 47; '231 claim 34)	"statistical based technique" **(by agreement, see Docket No. 81)**
"learning technique" ('231 patent, claim 34)	no construction necessary
"deadreckoning process" ('543 patent, claim 44)	"location determining process that uses data indicating a change in the direction, acceleration, or position of the mobile unit" **(by agreement)**
"initiating a plurality of requests for information" ('484 patent, claim 25)	no construction necessary **(by agreement)**
"patterns in multipath for wireless signals communicated between: (a) one or more of the communication stations, and (b) said mobile unit M" Or "multipath" ('525 patent, claim 1)	construing only "multipath" as: "wireless signals propagated over multiple paths due to objects or structures located between the mobile unit M and one or more communication stations"
"location representation" ('231 patent, claim 34)	no construction necessary