

# EXHIBIT B

**EXHIBIT B  
DEFENDANTS’ JOINT PROPOSED CLAIM CONSTRUCTIONS**

**I. DISPUTED TERMS**

Claim Term	Defendants’ Proposed Construction <sup>3</sup>	Defendants’ Supporting Intrinsic Evidence	Defendants’ Extrinsic Evidence
<p><b>“e-purse” / “electronic purse”</b></p> <p>’218 patent – all claims                      ’855 patent – all claims                      ’787 patent – all claims                      ’009 patent – claims 3–5                      ’046 patent – all claims</p>	<p>“application that stores electronic money locally (i.e., in the user’s portable device)”</p>	<p>The ’218, ’855, ’787, ’009, and ’046 patents in their entirety, including without limitation: ’218 patent at 1:6-38, 2:9-46, 3:51-60, 3:61-4:7, 4:62-64, 4:67-5:4, 5:5-18, 7:10-8:12, all Figures, claims 1, 7, 15;<sup>4</sup> ’855 patent, claim 1; ’787 patent, claim 1 (“fund stored in the emulator”); ’009 patent at 1:19-44, 5:10-15, 6:43-46, 10:3-6, 10:13-29, 14:51-52, 15:1-7, 15:39-48, 17:12-15, 17:39-49, 17:62-67, 18:1-6, 19:63-67, 21:48-64, claim 3 (“the application is an electronic purse (e-purse)”); ’046 patent at 4:12-17, 7:46-53, 12:64-13:5, 13:10-20, 15:32-35, 15:60-16:4, 16:18-23, 16:24-29, 20:46-51 and claim 1 (“electronic purse (e-purse)</p>	<p>Cambridge Business Dictionary, webp (GOOG-PA-RFC 21553).<sup>5</sup>                      Dictionary of e-F (2003) (excerpt) (RFCYBER-0002                      Newton’s Telecomm. 2005) (excerpt) (RFCYBER-0002                      Klaus Finkenzell Radio-Frequency Fundamentals and (1999) (GOOG-00021201).                      Vesna Hassler, e-Payment Applications (GOOG-PA-RFC</p>

<sup>3</sup> Unless otherwise noted, the proposed construction is Google’s and Samsung’s joint proposed construction.

<sup>4</sup> Citations to one patent should be understood to include identical language in the specifications of the other Ass

<sup>5</sup> Samsung produced the identical extrinsic evidence in its production with the bates prefix SAMSUNG.

Claim Term	Defendants' Proposed Construction <sup>3</sup>	Defendants' Supporting Intrinsic Evidence	Defendant Extrinsic
		<p>maintained locally in the mobile device”).</p> <p>The ’218, ’855, ’787, ’009, and ’046 patent file histories in their entirety, including without limitation:</p> <p>’218 file history, 12/31/2010 Response to Office Action at 9-10.</p> <p>’855 file history, 9/5/2012 Response to Office Action.</p> <p>’787 file history, 11/18/2013 Response to Office Action.</p> <p>’046 file history, 11/29/2019 Response to Office Action.</p>	<p>Government Smartphone U.S. General Services Administration (Feb. 2004) (GOOG-PA-RFCYBER-000012108).</p> <p>Uwe Hansmann, “Smart Card Handheld Application Device” (2d ed. 2002) (GOOG-PA-RFCYBER-000012108).</p> <p>Wolfgang Rankl, “Smart Card Handheld Application Device” (2d ed. 2002) (GOOG-PA-RFCYBER-000012108).</p> <p>John Wenninger, “Electronic Purse” (2d ed. 2002) (GOOG-PA-RFCYBER-000012108).</p> <p>Common Electronics - I Requirements, Vol. 1 (Mar. 2000) (GOOG-PA-RFCYBER-00007534).</p> <p>Common Electronics - II Requirements, Vol. 2 (Mar. 2000) (GOOG-PA-RFCYBER-00008005).</p> <p>WO1998/049658A1 (GOOG-PA-RFCYBER-000012108).</p>

Claim Term	Defendants' Proposed Construction <sup>3</sup>	Defendants' Supporting Intrinsic Evidence	Defendant Extrinsic
<p><b>"applet"</b>                      '218 patent – all claims                      '855 patent – all claims                      '787 patent – all claims</p>	<p>"application configured to perform a specific task"</p>	<p>The '218, '855, and '787 patents in their entirety, including without limitation: '218 patent at 4:39-41, 4:44-46, 4:65-67, 5:1-2, 5:27-29, 6:3-10, 7:5-9, 7:25-28, and 7:29-30.                      The '218, '855 and '787 patent file histories in their entirety, including without limitation:                      '855 file history, 9/5/2012 Response to Office Action.</p>	<p>WO2002/041230                      PA-RFCYBER-0002                      U.S. Patent Application No. 2006/016500                      PA-RFCYBER-0002                      U.S. 6,983,882 (PA-RFCYBER-0002)                      Expert testimony of Vanderhoof and others to how a person in the art would understand the art would understand based on a review of extrinsic evidence.</p>
<p><b>"applet"</b>                      '218 patent – all claims                      '855 patent – all claims                      '787 patent – all claims</p>	<p>"application configured to perform a specific task"</p>	<p>The '218, '855, and '787 patents in their entirety, including without limitation: '218 patent at 4:39-41, 4:44-46, 4:65-67, 5:1-2, 5:27-29, 6:3-10, 7:5-9, 7:25-28, and 7:29-30.                      The '218, '855 and '787 patent file histories in their entirety, including without limitation:                      '855 file history, 9/5/2012 Response to Office Action.</p>	<p>Computer Desktest ed. 2001) (excerpt) RFCYBER-0002                      Dictionary of e-Files 2003) (excerpt) (RFCYBER-0002)                      Hargrave's Computer Dictionary (1st edition) (GOOG-PA-RFCYBER-0002)                      McGraw-Hill Dictionary and Technical Terms (excerpt) (GOOG-00022240).</p>

Claim Term	Defendants' Proposed Construction <sup>3</sup>	Defendants' Supporting Intrinsic Evidence	Defendant Extrinsic
<p>“personalizing” / “personalize” /</p>	<p>“[configuring / configure / configured /</p>	<p>The '218, '855, '787, and '009 patents in their entirety, including</p>	<p>Microsoft Comp ed. 2002) (except RFCYBER-0002 PA-RFCYBER- Uwe Hansmann, Application Dev (2d ed. 2002) (G RFCYBER-0000 Wolfgang Rankl Smart Card Hand (GOOG-PA-RFC Runtime Environ Java Card Platfo (March 15, 2006 RFCYBER-0002 Sun Microsystem Specification, Ja Version 2.2.2 (M PA-RFCYBER- Expert testimony Vanderhoof and to how a person the art would unc based on a review extrinsic evidenc Uwe Hansmann, Application Dev</p>

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