UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

FUTURE LINK SYSTEMS, LLC,

Case No. 6:21-cv-0263-ADA

Plaintiff,

JURY TRIAL DEMANDED

APPLE, INC.,

v.

Defendant.

PLAINTIFF FUTURE LINK SYSTEMS, LLC'S PRELIMINARY PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the Court's Scheduling Order, Plaintiff Future Link Systems, LLC ("Future Link") hereby discloses to Defendant in the above-captioned action its preliminary proposed construction for the claim terms, phrases, or clauses from the patents-in-suit (set forth in Exhibit A), which the parties collectively have identified for claim construction purposes.

Future Link has not yet completed its investigation, collection of information, discovery, and analysis relating to this action. Further discovery and investigation may require Future Link to supplement, modify, or alter the preliminary claim constructions, including, for example, in view of any developments that arise during the meet and confer process. Accordingly, Future Link expressly reserves the right to supplement, modify, or alter its preliminary proposed claim constructions. Future Link reserves all of its rights and does not waive any proposed construction, defense, or position by the submission of this disclosure.



Dated: October 12, 2021

/s/ James Milkey.

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendant identified in the above caption on October 12, 2021 via e-mail.

/s/ James Milkey
James Milkey



Exhibit A



Future Link's Preliminary Claim Constructions

USPN 6,317,804

Claim term of '804 Patent	Preliminary proposed c
"functional block" / "functional blocks"	Plain and ordinary meaning
"serial port" / "serial ports"	"a port that transfers bits, charact sequentially" – <i>see Intel Corp. v. LLC</i> , C.A. No. 1-14-cv-00377-LI (D. Del. Aug, 2, 2016) / plural of construed
"serial command, data and clock interconnects"	Plain and ordinary meaning
"selectively couple"	Plain and ordinary meaning

USPN 7,917,680

Claim term of '680 Patent	Preliminary proposed c
"packet"	Plain and ordinary meaning
"packet-based communications" / "communicating packet data" / "communicate the packets"	Plain and ordinary meaning



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