

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before the Honorable David P. Shaw
Administrative Law Judge

In the Matter of

CERTAIN MOBILE TELEPHONES,
TABLET COMPUTERS WITH
CELLULAR CONNECTIVITY, AND
SMART WATCHES WITH CELLULAR
CONNECTIVITY, COMPONENTS
THEREOF, AND PRODUCTS
CONTAINING SAME

Inv. No. 337-TA-1299

**RESPONDENT APPLE INC.'S PROPOSED CONSTRUCTIONS
OF IDENTIFIED CLAIM TERMS**

Pursuant to Ground Rule 6.C and Order No. 5 (Procedural Schedule), Respondent Apple Inc. submits the following proposed constructions for the claim terms identified by the parties for claim construction for U.S. Patent No. 8,102,805 (“805 patent”) and U.S. Patent No. 9,532,355 (“355 patent”), together with supporting intrinsic and extrinsic evidence.

This disclosure is made without prejudice to Apple’s right to seek construction of terms not identified herein, including in response to any other party’s disclosure of its proposed claim terms and/or constructions. Apple reserves the right to object to any proposed claim term not identified in accordance with Order No. 5.

The cited evidence is exemplary, and Apple reserves the right to cite additional evidence, including in response to arguments made by another party. Apple may rely on any part of the file history of the asserted patents and the file history of any application from which the asserted patents claim priority, including in response to arguments made by another party. Apple may

rely on the testimony of one or more of its disclosed experts regarding the proper construction of each term.

Discovery is still ongoing in this Investigation. Depositions have not yet commenced and there are deficiencies in the discovery Complainants Ericsson Inc. and Telefonaktiebolaget LM Ericsson have provided to date. Accordingly, Apple reserves the right to supplement, amend, or modify this submission.

Subject to the foregoing, Apple proposes the following constructions, attached hereto as Exhibit A.

Respectfully submitted,

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EXHIBIT A

Term	List of Claims in Which Term Appears	Apple's Proposed Construction	Intrinsic Evidence
System Information Radio Network Temporary Identifier (SI-RNTI)	All asserted claims for the '355 patent	An identifier indicating that the subframe contains a piece of system information but is not the last subframe in the time window that contains system information	<p>'355 patent, 5:51-57: "If the current subframe is the last subframe, the RNTI of the L1/L2 control channel is set to ESI-RNTI for indicating to the UE 120 that the subframe is the last subframe in the window containing system information. (Step 406). Otherwise, the control channel RNTI is set to SI-RNTI for indicating to the UE 120 that the subframe contains system information, but is not the last subframe. (Step 408)."</p> <p>'355 patent, 4:37-42: "Also, for the last piece of system information to be transmitted within the window, the SI-RNTI is replaced with an End of-System-Information RNTI (ESI-RNTI). The reception of an ESI-RNTI informs the UE 120 that no more system information is transmitted within the window."</p> <p>'355 patent, 6:14-18: "The window detection and evaluation unit 150 then determines whether</p>

the current subframe is the last subframe in the window or the last subframe containing system information, e.g., whether the RNTI of the control channel is ESI-RNTI (Step 508).”

'355 patent, Figure 5:

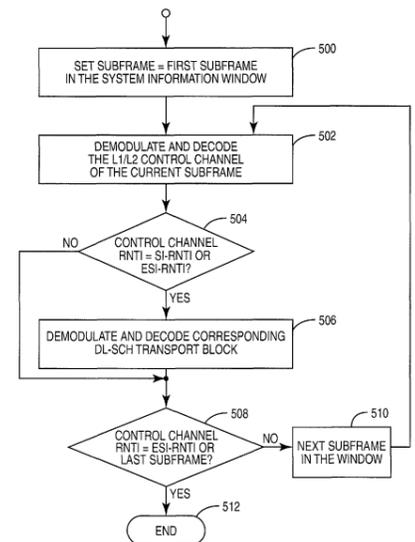


FIG. 5

'355 patent, Figure 4:

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