

Nguyen

From: Summerfield, George <George.Summerfield@klgates.com>
Sent: Monday, February 14, 2022 4:01 PM
To: 'Peter Tong'
Subject: Seth Sproul; Tony Nguyen; Jeff Burton; Joy Kete; Kate Quisenberry; Marc Abrahams; KLG_US_Charter Pacific
CPC Patent Technologies Pty Ltd. v. Apple Inc., 6:21-cv-00165 (W.D. Tex.)

[This email originated outside of F&R.]

Mr. Tong:

Following the Court’s instruction of February 10, 2022, the parties have conferred. CPC agrees to narrow the asserted claims against Apple in the instant litigation to the following:

- Claim 1 of the ‘039 Patent;
- Claim 10 of the ‘208 Patent; and
- Claims 1, 10, 11 and 15-17 of the ‘705 Patent

The parties have further agreed to adopt: 1) Apple’s proposed construction of “means for receiving the transmitted secure access signal” in claim 10 of the ‘208 Patent, i.e., “**Structure:** receiver 118 **Function:** receiving the transmitted secure access signal;” and 2) Apple’s proposed construction of “means for providing conditional access to the controlled item dependent upon [said] information [in said secure access signal] from that claim,” i.e., “**Structure:** controller 109 executing software 304 **Function:** providing conditional access to the controlled item dependent upon information in said secure access signal.”

The parties will continue to confer regarding the remainder of the deadlines proposed by the Court in its email of February 10, 2021.

Respectfully submitted,

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