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

SMART MOBILE TECHNOLOGIES LLC, Plaintiff, v. APPLE INC., Defendant.	Case No. 6:21-cv-00603-ADA-DTG
SMART MOBILE TECHNOLOGIES LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Case No. 6:21-cv-00701-ADA-DTG

PLAINTIFF'S RESPONSIVE CLAIM CONSTRUCTION BRIEF
REGARDING THE '434 PATENT FAMILY

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C. "is configured to" ('434 Patent, claims 1, 6; '653 Patent, claims 1, 4, 8, 14, 17, 27); '946 Patent, claims 1, 4, 8, 14, 17, 27; '291 Patent, claim 5; '083 Patent, claims 5, 8, 12; '943 Patent, claims 1, 5, 8, 12) 3

D. "wherein a transmission interface is created and wherein said transmission interface uses a plurality of IP enabled interfaces on the mobile device which utilize the plurality of wireless transmit and receive components on the mobile device to enable a single interface comprised of multiplexed signals from the plurality of wireless transmit and receive components" ('653 Patent, claim 1) / "wherein a first interface for transmission is created and wherein said first interface for transmission uses a plurality of interfaces for Internet Protocol communication on the mobile device which utilize the plurality of wireless transmit and receive units on the mobile device to enable a single interface comprised of multiplexed signals from the plurality of wireless transmit and receive units" ('946 Patent, claim 1) 8

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TABLE OF AUTHORITIES

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