

**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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