

EXHIBIT D

**EXHIBIT D –
Defendants T-Mobile and WhatsApp, Inc. Proposed Claim Constructions**

No.	Claim Term/Phrase	Patent/Claims	Proposed Construction	Additional Intrinsic Evidence	I
1.	SMS / short message service (SMS) messages	'724:9; '055:3, 12, 31; '251:7, 30	"cellular-based (rather than IP-based) messages of limited size consistent of text and numbers"	<i>See, e.g.</i> , '055 Patent at 5:49-60, 9:35-40, 13:27-60, 14:54-56, cl. 1; '055 File History 10/30/15 Amendment and Response to Office Action; '055 File History 2/29/16 Amendment and Response to Office Action; '055 File History 3/24/16 Non- Final Rejection; '251 Patent, Claim 7; '441 File History 2/23/11 Amendment and Response to Office Action.	<i>See, e.g.</i> Hargrave Dictiona CC_000 Brad H Multime (4th ed. CC_000 3rd Ger Project, Group T realizati Service (PP); 3C (1999) (European Standard realizati Service (PP); ET European Standard Short M support interface

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					Siegmund Personal Handbo Siegmund Introduc 24, 51-5 Nov. 19 Testimo 35-41. Nov. 18 Testimo at 40-45 AGISTY AGISTY Previous orders a otherwis claim co AGIS Sa v. Goog 2:19-cv-
2.	providing a cellular phone communication network for	'724:9	Preamble is limiting	<i>See, e.g.</i> , '724 Patent at 1:6-50; 2:18-54; 3:5-56; 4:7-11; 4:32-64; 5:1-3; 5:21-64; 6:5-60; 8:25-50; 10:12-55;	

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	designated participating users			11:20-55; 12:5-16:20; Fig. 3; November 12, 2005 Applicant’s Amendment and Response	
3.	similarly equipped cellular phone	’724:9 ’728:7	Indefinite	<i>See, e.g.</i> , ’724 Patent at 2:10-44; 2:48-3:23; 4:24-5:15; 8:11-22; 9:31-47; 10:17-11:15; 12:12-62; 15:50-16:10; Figs. 1-4; cls. 9, 16; 728 Patent at 2:55-3:20; 8:35-9:11; 728 Patent File History at 11/12/2005 Amendment	<i>See, e.g.</i> Dr. Shas
4.	said database including the generation of one or more symbols associated with a particular participating user	’724:9	Indefinite	<i>See, e.g.</i> , ’724 Patent at 1:9-12, 2:48-50, 4:34-38, 6:24-32, 7:13-16, 7:25-27, 7:48-56, 10:45-56, 18:33-35, Claim 9;	<i>See, e.g.</i> Dr. Shas Botto, D and Inte (1999) (Dick Po Dictiona 18 (200 19); C.J Databas (2004) (Rob & C Systems Impleme Manage (DEFS-

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					<p>Freedma Desktop 32 (1999 64);</p> <p><i>Advance Systems, Case No. Middleb 12 (S.D. DEFS-C CC 000</i></p>
5.	database	'724:9	“a persistent collection of data arranged for search and retrieval”	<p><i>See, e.g., 724 Patent at 1:6-17, 2:48-3:20, 4:24-36, 5:9-15, 5:51-66, 6:24-59, 6:60-7:24, 7:25-27, 7:28-46, 7:48-64, 7:65-8:10, 8:23-48, 9:48-10:8, 10:9-22, 10:40-56, 15:59-16:10, 17:18-35, 18:13-32, 18:57-19:7, 19:56-20:19, 20:20-41, cl. 5, cl. 9, cl. 11;</i></p> <p><i>728 Patent at 1:6-15, 2:18-54, 3:24-43, 3:44-56, 4:54-5:8, 3:62-4:23, 7:61-67, 8:40-9:11, 10:40-61, 11:5-9, 11:17-19, cl. 1, cl. 3, cl. 10;</i></p> <p><i>724 File History, Application dated 04/17/2006; 724 File</i></p>	<p><i>See, e.g. Dr. Sha Authorit Standar CC_000 Desktop (DEFS- The Nev Comput CC_000 Introduc Systems (DEFS- Dictiona Internet (DEFS- Coronel Design, Manage</i></p>

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