EXHIBIT B

EXHIBIT B - JOINT CLAIM CONSTRUCTION CHART – DISPUTED TERMS

Pursuant to Local Patent Rule 4-5(d), Plaintiff AGIS Software Development LLC and Defendants Samsung Electronics Co., Ltd. and

hereby provide a Joint Claim Construction Chart containing the claim terms and phrases for the claims for U.S. Patent Nos. 8,213,970; 9,46?

addition, the parties hereby identify the claim number(s) where the terms and phrases appear.

No.	Claim Language	Term/Patent(s) & Claim(s)	Plaintiff's Construction	Defendants' Construction	
1	**'970 Patent, claim 2** A communication system for transmitting, receiving, confirming receipt, and responding to an electronic message, comprising: a predetermined network of participants, wherein each participant has a similarly equipped PDA/cell phone that includes a CPU and a touch screen display a CPU and memory; a data transmission means that facilitates the transmission of electronic files between said PDA/cell phones in different locations; a sender PDA/cell phone and at least one recipient PDA/cell phone for each electronic message; a forced message alert software application program including a list of required possible responses to be selected by a participant recipient of a forced message response loaded on each participating PDA/cell phone; means for attaching a forced message alert software packet to a voice or text message creating a forced message alert that is transmitted by said sender PDA/cell phone to the recipient PDA/cell phone, said forced message alert software packet containing a list of possible required responses and requiring the forced message alert software on said recipient PDA/cell phone to transmit an automatic acknowledgment to the	"means for displaying a geographical map with georeferenced entities on the display of the sender PDA/cell phone" '970 Patent: claim 2	Governed by 35 U.S.C. § 112(6). Function: "displaying a geographical map with georeferenced entities on the display of the sender PDA/cell phone" Structure: "PDA/cell phone hardware including display 16 and a wireless receiver and/or transreceiver; and equivalents thereof" Alternatively: Function: "displaying a geographical map with georeferenced entities on the display of the sender PDA/cell phone" Structure: "a PC or PDA/cell phone configured to implement the algorithm disclosed in the '970 Patent at 4:55-59, 5:10-14, 5:37-40, 6:33-37, and equivalents thereof"	Governed by 35 U.S.C. § 112(6). Function: "displaying a geographical map with georeferenced entities on the display of the sender PDA/cell phone" Structure: "the sender PDA/cell phone including display 16 and configured to implement the algorithm described in the '970 patent at 4:55-59, 5:37-44, 6:27-37"	

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	said forced message alert is received by the recipient PDA/cell phone; means for requiring a required manual response from the response list by the recipient in order to clear recipient's response list from recipient's cell phone display; means for receiving and displaying a listing of which recipient PDA/cell phones have automatically acknowledged the forced message alert and which recipient PDA/cell phones have not automatically acknowledged the forced message alert; means for periodically resending said forced message alert to said recipient PDA/cell phones that have not automatically acknowledged the forced message alert; and means for receiving and displaying a listing of which recipient PDA/cell phones have transmitted a manual response to said forced message alert and details the response from each recipient PDA/cell phone that responded; and **means for displaying a geographical map with georeferenced entities on the display of the sender PDA/cell phone**; means for obtaining location status data associated with the recipient PDA/cell phone; and means for presenting a recipient symbol on the geographical map corresponding to a correct geographical location of the recipient PDA/cell phone, wherein the forced message alert software application program on the recipient PDA/cell phone includes:

means for transmitting the | | | | |

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	sender PDA/cell phone immediately upon receiving a forced message alert from the sender PDA/cell phone; means for controlling of the recipient PDA/cell phone upon transmitting said automatic acknowledgement and causing, in cases where the force message alert is a text message, the text message and a response list to be shown on the display of the recipient PDA/cell phone or causes, in cases where the forced message alert is a voice message, the voice message being periodically repeated by the speakers of the recipient PDA/cell phone while said response list is shown on the display; means for allowing a manual response to be manually selected from the response list or manually recorded and transmitting said manual response to the sender PDA/cell phone; and means for allowing a manual response to be manually selected from the response list or manually recorded and transmitting said manual response to the sender PDA/cell phone; and means for clearing the text message and a response list from the display of the recipient PDA/cell phone or stopping the repeating voice message and clearing the response list from the display of the recipient PDA/cell phone once the manual response is				

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No.	Claim Language	Term/Patent(s) & Claim(s)	Plaintiff's Construction	Defendants' Construction	
2	'970 Patent, claim 2 A communication system for transmitting, receiving, confirming receipt, and responding to an electronic message, comprising: a predetermined network of participants, wherein each participant has a similarly equipped PDA/cell phone that includes a CPU and a touch screen display a CPU and memory; a data transmission means that facilitates the transmission of electronic files between said PDA/cell phones in different locations; a sender PDA/cell phone and at least one recipient PDA/cell phone for each electronic message; a forced message alert software application program including a list of required possible responses to be selected by a participant recipient of a forced message response loaded on each participating PDA/cell phone; means for attaching a forced message alert software packet to a voice or text message creating a forced message alert that is transmitted by said sender PDA/cell phone to the recipient PDA/cell phone, said forced message alert software packet containing a list of possible required responses and requiring the forced message alert software on said recipient PDA/cell phone to transmit an automatic acknowledgment to the sender PDA/cell phone as soon as said forced message alert is received by the recipient PDA/cell phone; means for requiring a required manual response from the response	"means for obtaining location and status data associated with the recipient PDA/cell phone" '970 Patent: claim 2	Governed by 35 U.S.C. § 112(6). Function: "obtaining location and status data associated with the recipient PDA/cell phone" Structure: "a PC or PDA/cell phone configured to implement the algorithm disclosed in the '970 Patent at 2:38-43 and 3:52-62, and equivalents thereof"	Governed by 35 U.S.C. § 12(6). Function: Indefinite because the function of "obtaining location and status data associated with the recipient PDA/cell phone," recites "status data" that is indefinite Structure: Does not require construction because "status data" in the function is indefinite	

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