

EXHIBIT B

EXHIBIT B: Plaintiff AGIS Software Development LLC’s Proposed Constructions to Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.

No.	Claim Term/Phrase	Patent/Claims	AGIS’s Proposed Construction	Additional Intrinsic Evidence
1	means for displaying a geographical map with georeferenced entities on the display of the sender PDA/cell phone	'970 Patent Claim 2	<p>Governed by 35 U.S.C. § 112(6).</p> <p>Function: “displaying a geographical map with georeferenced entities on the display of the sender PDA/cell phone”</p> <p>Structure: “PDA/cell phone hardware including display 16 and a wireless receiver and/or transreceiver; and equivalents thereof”</p> <p>Alternatively: Function: “displaying a geographical map with georeferenced entities on the display of the sender PDA/cell phone”</p> <p>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”</p>	'970 Patent at FIGs. 1a, 1b; 4:12-18; 4:55-59; 5:10-44; 6:1-65.
2	means for obtaining location and status data associated with the	'970 Patent Claim 2	Governed by 35 U.S.C. § 112(6).	'970 Patent at Abstract; FIGs. 1a, 1b; 3:52-67; 4:12-18; 4:60; 5:27; 5:51

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No.	Claim Term/Phrase	Patent/Claims	AGIS’s Proposed Construction	Additional Intrinsic Evidence
	recipient PDA/cell phone		<p>Function: “obtaining location and status data associated with the recipient PDA/cell phone”</p> <p>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”</p>	
3	means for presenting a recipient symbol on the geographical map corresponding to a correct geographical location of the recipient PDA/cell phone	’970 Patent Claim 2	<p>Governed by 35 U.S.C. § 112(6).</p> <p>Function: “presenting a recipient symbol on the geographical map corresponding to a correct geographical location of the recipient PDA/cell phone”</p> <p>Structure: “PDA/cell phone hardware including display 16 and a wireless receiver and/or transceiver; and equivalents thereof”</p> <p>Alternatively: Function: “presenting a recipient symbol on the geographical map corresponding to a correct</p>	’970 Patent at FIGs. 1a, 1b; 4:12-46; 5:10-7:4.

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			geographical location of the recipient PDA/cell phone” Structure: “a PC or PDA/cell phone configured to implement the algorithm disclosed in the ’970 Patent at 6:25-27, 6:33-37, and equivalents thereof”		
4	predetermined network of participants, wherein each participant has a similarly equipped PDA/cell phone	’970 Patent Claim 2	Plain and ordinary meaning.	’970 Patent at 2:7-35; 3:29-40; 3:52-67; 4:12-46; 5:17-27; 7:8-16; 7:47-63.	A T 2 2 2
5	which triggers the forced message alert software application program to take control of the recipient PDA/cell phone	’970 Patent Claim 10	Plain and ordinary meaning.	’970 Patent at FIGs. 1b, 4; 8:37-57.	A e M c t
6	status data	’970 Patent Claims 2, 10	Plain and ordinary meaning.	’970 Patent at Abstract; FIG. 1a, 1b; 3:52-67; 4:12-18; 5:17-27; 6:38-7:4.	A e M c t