EXHIBIT D12

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

Case No. 2:21-cv-00072-JRG (LEAD CASE) JURY TRIAL DEMANDED
Case No. 2:21-cv-00072-JRG (MEMBER CASE)
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DEFENDANTS' RESPONSIVE CLAIM CONSTRUCTION BRIEF



TABLE OF CONTENTS

I.	INTR	RODUCTION1
II.	ARG	UMENT3
	A.	Disputed Terms – All Defendants
		1. "SMS / short message service (SMS) messages" ('724 Patent, cl. 9; '055 Patent, cl. 3; '251 Patent, cls. 7, 30)
		2. "establishing a cellular phone communication network for designated participants" ('728 Patent, cl. 7) "providing a cellular phone communication network for designated participating users" ('724 Patent, cls. 9, 16)
		3. "similarly equipped" Terms ('728 Patent, cl. 7; '724 Patent, cls. 9, 16; '970 Patent, cls. 1, 11)
		4. "said database including the generation of one or more symbols associated with a particular participating users" ('724 Patent, cl. 9)
		5. "accessing an application program in each cell phone for generating one of more symbols representative of one or more participant users, each of whom have a similarly equipped cellular phone" ('724 Patent, cl. 9)
		6. "using the IP address previously" ('724 Patent, cl. 9)
		7. "map display" ('724 Patent, cl. 9)
		8. "free and operator selected text messages" ('728 Patent, cl. 7) 16
		9. "providing initiating cellular phone calling software in each cellular phone that is activated by touching a symbol on the touch display that automatically initiates a cellular phone call using the stored cellular phone number to the participant represented by the symbol" ('728 Patent, cl. 7)
	В.	Disputed Terms – T-Mobile
		1. "message" ('251 Patent, cls. 1, 24; '838 Patent, cl. 54, 55)
	C.	Disputed Terms – Lyft and Uber
		1. "a forced message alert software application / a forced message alert software application program" ('970 Patent, cls. 1, 2, 10, 11, 12)
		2. "a data transmission means that facilitates the transmission of electronic files between said PDA/cell phone in different locations" ('970 Patent, cl. 1) 27
		3. "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" ('970 Patent, cl. 2)



	to allow the message required response list to be cleared from the recipient's cell phone display" ('970 Patent, cl. 10)
	"required response list" ('970 Patent, cl. 10)
	5. "[a] method of receiving, acknowledging, and responding to a forced message alert from a sender PDA/cell phone to a recipient PDA/cell phone" ('970 Patent, cl. 10)
	6. "each representing a different participant that has a cellular phone that includes said voice communication, free and operator selected text messages, photograph and video, a CPU, said GPS system and a touch screen display" ('728 Patent, cl. 7)
	7. "receiving entity-of-interest data transmitted by the second mobile device, the entity-of-interest data comprising coordinates of a geographical location of a new entity of interest" ('1,838 Patent, cls. 1, 14)
	8. "obtaining first data provided by a first mobile device corresponding to a vehicle, the first data including a first identifier" ('1,838 Patent, cls. 1, 14) / "obtaining second data provided by a second mobile device corresponding to a participant, the second data including a second identifier associated with the participant" ('1,838 Patent, cls. 1, 14)
	9. "consisting of: a position of the participant symbol, positions of the one or more vehicle symbols, and a portion of the map displayed on the display of the mobile device" ('100 Patent, cl. 4) / "based on at least one criterion selected from the group consisting of: (1) passage of time, and (2) movement of the first vehicle" ('100 Patent, cl. 7) / "based on the participant selection data, performing one or more acts selected from the group consisting of: sending updated vehicle data to the first mobile device corresponding to the vehicle, sending updated participant data to the second mobile device corresponding to the participant, and sending a message to the first mobile device corresponding to the vehicle" ('1,838 Patent, cls. 1, 14)
III.	CONCLUSION44



TABLE OF AUTHORITIES

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Advanced Ground Info. Sys., Inc. v. Life360, Inc., 830 F.3d 1341 (Fed. Cir. 2016)	11, 12
AGIS Software Development, LLC v. Google LLC, No. 2:19-cv-361-JRG (E.D. Tex. Dec. 8, 2020)	passim
AGIS Software Development, LLC v. Huawei Device USA Inc., 17-513 (E.D. Tex. Oct. 10, 2018)	2, 3
ACQIS LLC v. Alcatel-Lucent USA Inc., No. 6:13-cv-638, 2015 WL 1737853, (E.D. Tex. Apr. 13, 2015)	8
Apple Inc. v. Motorola, Inc., 757 F. 3d 1286 (Fed. Cir. 2014)	17
Apple, Inc. v. Ameranth, Inc., 842 F.3d 1229 (Fed. Cir. 2016)	35
Bio-Rad Labs., Inc. v. 10X Genomics Inc., 967 F.3d 1353 (Fed. Cir. 2020)	4
Black & Decker, Inc. v. Robert Bosch Tool Corp., 260 F. App'x 284 (Fed. Cir. 2008)	33, 34
Blackboard, Inc. v. Desire2Learn, Inc., 574 F.3d 1371 (Fed. Cir. 2009)	11
Budde v. Harley-Davidson, Inc., 250 F.3d 1369 (Fed. Cir. 2001)	30
Bushnell Hawthorne, LLC v. Cisco Systems, Inc., 813 F. App'x 522 (Fed. Cir. May 14, 2020)	14
Cadence Pharm. Inc. v. Exela PharmSci Inc., 780 F.3d 1364 (Fed. Cir. 2015)	28
CBT Flint Partners, LLC v. Return Path, Inc., 654 F.3d 1353 (Fed. Cir. 2011)	17, 18
Datamize, LLC v. Plumtree Software, Inc., 417 F 3d 1342 (Fed. Cir. 2005)	6



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