EXHIBIT B – Plaintiff Slyde's Proposed Constructions and Identification of Evidence

Exhibit B1: Slyde's Proposed Constructions and Identification of Evidence for the '033 Pa

Term	**Patent/Claim(s)**	**Slyde's Proposed Construction**	**Intrinsic Evidence**	**Extrinsi**
"gear train"	'033 Patent Claim(s) 1, 16, 17, 18	Plain and ordinary meaning	'033 Patent at Fig. 4; 3:31-42; 8:14-38.	Plaintiff may rel on of Fabio Chiussi, proper construction
"simulation of a mechanical watch movement comprising a gear train, said simulation being visible so as to indicate the time"	'033 Patent Claim(s) 1	Plain and ordinary meaning	'033 Patent at Fig. 4; 1:35-63; 2:34-4:36; 6:47-61; 8:28-39; 7:14-9:3; 9:28-36.	Plaintiff may rel on of Fabio Chiussi, proper construction
"a simulation of a mechanical watch movement comprising a gear train visible so as to indicate the time"	'033 Patent Claim(s) 16	Plain and ordinary meaning	'033 Patent at Fig. 4; 1:35-63; 2:34-4:36; 6:47-61; 8:28-39; 7:14-9:3; 9:28-36.	Plaintiff may rel on of Fabio Chiussi, proper construction
"an electronic display of a simulated mechanical watch movement comprising a gear train and of time indicators so as to simulate a mechanical watch"	'033 Patent Claim(s) 17	Plain and ordinary meaning	'033 Patent at Fig. 4; 1:35-63; 2:34-4:36; 6:47-61; 8:28-39; 7:14-9:3; 9:28-36.	Plaintiff may rel on of Fabio Chiussi, proper construction
"mechanical watch"	'033 Patent Claim(s) 1, 16, 17	Plain and ordinary meaning	'033 Patent at Fig. 4; 1:35-63; 3:31-63; 4:7-26; 7:65-8:38.	Plaintiff may rel on of Fabio Chiussi, proper construction

EXHIBIT B – Plaintiff Slyde's Proposed Constructions and Identification of Evidence

Term	Patent/Claim(s)	Slyde's Proposed Construction	Intrinsic Evidence	Extrinsic
"synchronizing the displayed time by said displayed mechanical movement with that of said quartz oscillator"	'033 Patent Claim(s) 1 and 16	Plain and ordinary meaning	'033 Patent at FIGS. 1 and 4; 3:64-4:6; 5:15-6:41; 7:46-8:56.	Plaintiff may rely on of Fabio Chiussi, proper construction
"at least one of said elements of said movement"	'033 Patent Claim(s) 6	Plain and ordinary meaning	'033 Patent at Fig. 4; 1:35-63; 3:31-63; 4:7-26; 6:15-19; 7:46-8:56.	*Calibre*, Dictionary Federation of the S FH, *ava* https://dictionary.fhs Calibers, Professiona *at* https://professionalw *Calibre*, Watch Gl https://web.archive.c 2804/http://watchesc glossary/. Christophe Roulet *mechanical watch* Haute Horlogerie https://www.hauteho hes-and-culture/libra mechanical-watch-w

EXHIBIT B – Plaintiff Slyde's Proposed Constructions and Identification of Evidence

Term	Patent/Claim(s)	Slyde's Proposed Construction	Intrinsic Evidence	Extrinsic
				Plaintiff may rely on of Fabio Chiussi, proper construction
"means for modifying the running of said displayed regulating organ according to the accelerations to which the watch is subjected"	'033 Patent Claim(s) 10	Not governed by 35 U.S.C. § 112(6). **In the alternative, to the extent the Court finds this term is governed by 35 U.S.C. § 112(6):** **Function**: "modifying the running of said displayed regulating organ according to the accelerations to which the watch is subjected" **Structure**: accelerometer, or accelerometer combined with a gyroscope configured to implement the algorithm disclosed in the, or equivalents thereof.	'033 Patent at Figs 2, 3, 4, and 5; 3:31-63; 6:26-41; 7:14-8:64	Plaintiff may rely on of Fabio Chiussi, proper construction

EXHIBIT B – Plaintiff Slyde's Proposed Constructions and Identification of Evidence

Term	Patent/Claim(s)	Slyde's Proposed Construction	Intrinsic Evidence	Extrinsic
"means for entering and executing a request for said synchronization by the user"	'033 Patent Claim(s) 12	Not governed by 35 U.S.C. § 112(6). **In the alternative, to the extent the Court finds this term is governed by 35 U.S.C. § 112(6):** **Function**: "entering and executing a request for said synchronization by the user" **Structure**: "a display associated with a touch sensor," "one of the push-buttons or on the touch sensor", or equivalents thereof	'033 Patent at Figs 2, 3, 4, and 5; 3:31-63; 5:42-63; 6:47-61; 7:14-8:64.	Plaintiff may rely on of Fabio Chiussi, proper construction
"Method for displaying time in a wristwatch, comprising displaying on an electronic display of a simulated mechanical watch movement comprising a gear train and of time indicators so as to	'033 Patent Claim(s) 17	Plain and ordinary meaning. Preamble is not limiting.	'033 Patent at Figs 2, 3, 4, and 5; 2:59-3:63; 5:42-63; 6:47-61; 7:14-8:64.	Plaintiff may rely on of Fabio Chiussi, proper construction

4

EXHIBIT B – Plaintiff Slyde's Proposed Constructions and Identification of Evidence

Term	Patent/Claim(s)	Slyde's Proposed Construction	Intrinsic Evidence	Extrinsic
simulate a mechanical watch"				

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