

EXHIBIT C – Samsung’s Proposed Constructions and Identification of Evidence

Exhibit C

**Exhibit C1: Samsung’s Proposed Constructions and Identification of Evidence for the ’033 Patent**

**Exhibit C2: Samsung’s Proposed Constructions and Identification of Evidence for the ’922 Patent**

**Exhibit C3: Samsung’s Proposed Constructions and Identification of Evidence for the ’678 Patent**

**Exhibit C4: Samsung’s Proposed Constructions and Identification of Evidence for the ’085 Patent**

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**Exhibit C1: Samsung’s Proposed Constructions and Identification of Evidence for the ’033 Patent**

<u>Term</u>	<u>Patent/ Claim(s)</u>	<u>Defendants’ Proposed Construction</u>	<u>Intrinsic Evidence</u>	<u>Extrinsic Evidence</u>
“gear train”	’033 Patent  Claims 1, 16, 17, 18	A combination of two or more gears that transmit motion from one shaft to another.	’033 Patent at 8:29-33.	<p><i>Gear Train</i>, COLLINS DICTIONARY (10<sup>th</sup> ed. 2009):</p> <p>“a system of gears that transmit power form one shaft to another”</p> <p>Suman Walia, <i>Dictionary of Mechanical Engineering</i> (2007):</p> <p>“combination of two or more gears used to transmit motion between two rotating shafts or between a shaft and a slide”</p> <p><i>Gear Train</i>, MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS, (6<sup>th</sup> ed. 2003):</p> <p>“A combination of two or more gears used to transmit motion between two rotating shafts or</p>

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				<p>between a shaft and a slide”</p> <p><i>Gear Train</i>, CHAMBERS DICTIONARY OF SCIENCE AND TECHNOLOGY (2007):</p> <p>“Two or more GEAR WHEELS, transmitting motion from one shaft to another. With external spur or bevel gears, the velocity ratio is inversely proportional to the number of gear teeth.”</p> <p>Defendants further reserve the right to rely on any extrinsic evidence produced by Plaintiff.</p>
<p>“simulation of a mechanical watch movement comprising a gear train, said simulation being visible so as to indicate the time”</p>	<p>’033 Patent Claim 1</p>	<p>A simulation of a mechanical watch with a gear train where the positions of the internal components and the resulting time are calculated and displayed according to the components’ interactions.</p>	<p>’033 Patent at 3:64-4:6, 4:27-36, 6:26-41, 7:65-8:9, 8:28-56;</p>	<p>Testimony and CV of Dr. Sarrafzadeh will explain the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of ordinary skill in the art at the time of the invention in the context of the patent specification</p>

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				<p>and other intrinsic/extrinsic evidence, how those of ordinary skill in the art at the time of the invention would have understood statements made by the patentee during prosecution of the applications, and the level of ordinary skill in the relevant art. Dr. Sarrafzadeh may also offer a declaration, if necessary, to respond to Plaintiff’s contentions, any expert testimony on behalf of Plaintiff, or for the Court’s benefit.</p> <p><i>Simulation</i>, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11<sup>th</sup> ed. 2003):</p> <p>“The imitative representation of the functioning of one system or process by means of the function of another &lt;a computer ~ of an industrial process&gt;”</p>
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				<p><i>Simulation</i>, CHAMBERS DICTIONARY OF SCIENCE AND TECHNOLOGY (2007):</p> <p>“The representation of physical systems and phenomena by computers, models and other equipment.”</p> <p><i>Simulate</i>, The IEEE Standard Dictionary of Electrical and Electronics Terms (1996):</p> <p>Simulate: “(1) (computers) To represent the function of one system by another, for example, to represent one computer by another, to represent a physical system by the execution of a computer program, to represent a biological system by a mathematical model. (2) (modeling and simulation) To represent a system by a model that behaves or operate like the system.”</p>
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