IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

AIRE TECHNOLOGY LTD.,)
Plaintiff,) Case No. 6:21-cv-01101-ADA
V.) JURY TRIAL DEMANDED
APPLE INC.,)
Defendant.)

DEFENDANT APPLE INC.'S REPLY CLAIM CONSTRUCTION BRIEF

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		1. A "measuring device" is not a name for structure	. 1
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TABLE OF EXHIBITS

Ex. No.	Description	Shorthand	
1	U.S. Patent No. 8,174,360	'360 patent	
2	U.S. Patent No. 8,205,249	'249 patent	
3	U.S. Patent No. 8,581,706	'706 patent	
4	Declaration of Dr. Michael Caloyannides	Caloyannides Decl.	
5	Prosecution History of U.S. Patent No. 8,174,360 (Excerpted)	'360 Pros. Hist.	
6	Finkenzeller, RFID Handbook: Radio-Frequency	Finkenzeller	
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7	Declaration of Dr. John Black	Black Decl.	
8	Prosecution History of U.S. Patent No. 8,205,249 (Excerpted)	'249 Pros. Hist.	
9	U.S. Pat. Pub. No. 20030101348 to Russo et al.	Russo	
10	Ross Anderson, Security Engineering (1st ed. 2001)	Anderson	
11	Lawrence O'Gorman, Securing Business's Front Door –	O'Gorman	
11	Password, Token, and Biometric Authentication (2002)	O Gorman	
12	Ruud M. Bolle et al., Biometric perils and patches, 35 Pattern	Bolle	
	Recognition 2727 (Oct. 2001)		
13	Hurford, Grammar: A Student's Guide (1994)	Hurford	
14	Vitto, Grammar by Diagram (2003)	Vitto	
15	U.S. Patent No. 8,695,883	'883 patent	
16	U.S. Patent No. 7,161,738	'738 patent	
17	American Heritage Dict. of the Eng. Lang. (3d ed. 1992)	Amer. Heritage	
18	Oxford English Dictionary (1961)	Oxford	
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21	Gregory R. Ganger, Authentication Confidences (Apr. 28,	Ganger	
21	2001)	Ganger	
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22	Authentication Framework for Ubiquitous Computing	Al-Muhtadi	
22	Environments, Proceedings 22nd International Conference on		
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23	Infringement Contentions to Defendant Apple Inc., Exhibit B	Contentions	
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24	and Internet Terms, 262 (Barron's Educational Series, Inc.	Downing	
	8 th ed. 2003)	D : 1: T	
25	Transcript of Deposition of Dr. Michael C. Brogioli	Brogioli Tr.	
26	Applicant Remarks and Amendments, dated November 26,	2240 D 11.	
	2008, filed in the prosecution of U.S. Patent No. 8,205,249	'249 Pros. Hist.	
	(U.S. Patent App. No. 10-531,259)		



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