Exhibit 8

EXHIBIT A

U.S. Patent No. 7,812,828		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"mathematically fitting an ellipse to at least one of the pixel groups" (claims 1 and 10) Identified by Samsung.	for at least one of the pixel groups, applying a unitary transformation of the group covariance matrix of second moments of proximity data for all pixels in that pixel group to fit an ellipse	**Intrinsic Evidence** *See* Amendment dated 2/24/2010 (application no. 11/677,958) at 10-12. *See also* Interview Summary dated 2/2/2010 (application no. 11/677,958). *See also* U.S. Patent No. 7,812,828 ('828 Patent) at 26:17-46. **Additional Evidence** Documents from *In the Matter of Certain Mobile Devices and Related Software*, 337-TA-750, including but not limited to deposition testimony and exhibits, parties' claim construction disclosures, parties' expert reports, parties' prehearing briefs, trial testimony and exhibits, parties' posthearing briefs, and initial and final determinations.
"segmenting each proximity image into one or more pixel groups that indicate significant proximity" (claim 1) "segment the proximity	Plain and ordinary meaning.	

U.S. Patent No. 7,812,828		
Claim Term	**Proposed Construction**	**Supporting Evidence**
image into one or more pixel groups" (claim 24) Identified by Apple.		
"pixel" (claims 1, 6, 9, 10, 16, 24, and 31) Identified by Apple.	Plain and ordinary meaning.	
"means for producing a proximity image representing a scan of a plurality of electrodes of a touch-sensitive surface, the proximity image having a plurality of pixels corresponding to the touch-sensing electrodes" Identified by Samsung and Apple.	**Function**: producing a proximity image representing a scan of a plurality of electrodes of a touch-sensitive surface, the proximity image having a plurality of pixels corresponding to the touch-sensing electrodes **Structure**: circuitry that constructs and outputs a proximity image including: (1) a proximity sensing device that measures self-capacitance of one or more pixilated sensing electrodes, as in figs. 2-6; and (2) circuitry that	**Intrinsic Evidence** *See* '828 Patent at 16:4-32. *See also* Figures 2-6, 7A and 7B.

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,812,828		
Claim Term	**Proposed Construction**	**Supporting Evidence**
	converts each signal from the proximity sensing device to a digital code appropriate for processing by computer by using digital-to-analog converter to convert a digital stored background signal value to a voltage, using a differential amplifier to subtract that background signal from the proximity sensing device signal, and then converting this difference signal to digital code using an analog to digital converter, as in figs. 7A and 7B; and equivalents thereof.	
"means for segmenting the proximity image into one or more pixel groups, each pixel group representing a touch object on or near the touchsensitive surface" Identified by Samsung and Apple.	**Function**: segmenting the proximity image into one or more pixel groups, each pixel group representing a touch object on or near the touch-sensitive surface **Structure**: a host computer programmed to perform the steps diagrammed in figure 18 and equivalents thereof.	**Intrinsic Evidence** *See* '828 Patent at 23:8-23, 25:54-56. *See also* Figure 8.
"means for fitting an ellipse to at least one of the pixel groups"	**Function**: fitting an ellipse to at least one of the pixel groups	*See* '828 Patent at 14:6-8, 25:61-26:34.

U.S. Patent No. 7,812,828		
Claim Term	**Proposed Construction**	**Supporting Evidence**
Identified by Samsung and Apple.	**Structure**: using a programmed host computer as described in 14:6-8, parameterizing the grouped pixel data in at least one of the pixel groups by (1) computing a proximity-weighted centroid from positions and proximities of each pixel in a pixel group using equations 12-14 in the specification; (2) computing a group covariance matrix of x-y second moments using equations 15-18 of the specification; (3) after calculating the eigenvalues of the covariance matrix in equation 15, using these eigenvalues to determine axis lengths and orientation of an ellipse using equations 19-21 of the specification; and equivalents thereof.	
"means for transmitting one or more ellipse parameters as a control signal to an electronic or electromechanical device"	**Function**: transmitting one or more ellipse parameters as a control signal to an electronic or electromechanical device **Structure**: *Indefinite. There is no*	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,812,828		
Claim Term	**Proposed Construction**	**Supporting Evidence**
Identified by Samsung and Apple.	*structure that performs the claimed function.*	
"means for tracking a path of one or more pixel groups through a plurality of time-sequenced proximity images" Identified by Samsung and Apple.	**Function**: tracking a path of one or more pixel groups through a plurality of time-sequenced proximity images **Structure**: *Indefinite. There is no structure that performs the claimed function.*	
"means for fitting an ellipse to at least one of the pixel groups in a plurality successive proximity images" Identified by Samsung and Apple.	**Function**: fitting an ellipse to at least one of the pixel groups in a plurality successive proximity images **Structure**: using a programmed host computer as described in 14:6-8, parameterizing the grouped pixel data in at least one of the pixel groups by (1) computing a proximity-weighted centroid from positions and proximities of each pixel in a pixel group using equations 12-14 in the	**Intrinsic Evidence** *See* '828 Patent at 14:6-8, 25:61-26:34.

U.S. Patent No. 7,812,828		
Claim Term	**Proposed Construction**	**Supporting Evidence**
	specification; (2) computing a group covariance matrix of x-y second moments using equations 15-18 of the specification; (3) after calculating the eigenvalues of the covariance matrix in equation 15, using these eigenvalues to determine axis lengths and orientation of an ellipse using equations 19-21 of the specification; and equivalents thereof	
"means for tracking a change in one or more ellipse parameters through a plurality of time-sequenced proximity images" Identified by Samsung and Apple.	**Function**: tracking a change in one or more ellipse parameters through a plurality of time-sequenced proximity images **Structure**: *Indefinite. There is no structure that performs the claimed function.*	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 6,493,002		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"cursor"	A movable indicator on a computer screen identifying the point that will be affected by input from the user.	**Intrinsic Evidence** Figs. 2A, 2C, 2D, 2E; 8:55-62; 12:44-52; 12:67-13:-8; 16:3-14; 17:23-30; 17:46-50; 20:14-17: **Extrinsic Evidence** Deposition of Steven Christensen 10/26/11 at 116:20-119:22.
"cursor control device"	A trackpad, trackball, or mouse that causes a cursor to move and select objects on the display.	**Intrinsic Evidence** Fig. 9; 5:2-4; 7:2-3; 7:20-23; 10:1-12; 12:40-13:13; 15:60-61; 15:65-67: 16:2-6; 20:30-31. **Extrinsic Evidence** Deposition of Steven Christensen 10/26/11 at 116:25-117:8; 118:6-119:12; 130:18-131:1
"programming module"	Plain and ordinary meaning.	
"independently displayed and independently active"	Indefinite under 35 U.S.C. § 112 ¶2.	
"at least one of the plurality of display areas and its associated programming module is sensitive to user input"	At least one of the plurality of display areas and its associated programming module responds when the cursor is placed over the area and is clicked on using the cursor control device.	**Intrinsic Evidence** Figs. 2C, 2D, 2E, 9, 10; 6:11-34: 10:1-12; 12:64-13:24 **Extrinsic Evidence** Deposition of Steven Christensen 10/26/11 at 54:25-56:23; 130:5-131:1; 178:18-24, Exhibit 978 (APLNDC-X0000002323)

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 6,493,002		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"the first window region implemented in a window layer that appears on top of application programming windows that may be generated"	The first window and the plurality of independent display areas are never obscured by any portion of any application windows that are generated or capable of being generated.	**Intrinsic Evidence** Fig. 2A; 6:41-52; June 28, 2000 Response to Final Office Action, at 3 (APLNDC00028084); June 6, 2001 Appeal Brief, *passim*. **Extrinsic Evidence** Deposition of Steven Christensen 10/26/11 at 23:7-24:2, 42:9-43:18, 75:8-19, 126:11-127:22; Exhibit 978 (APLNDC-X0000002323)
"means for positioning a cursor on a data display screen" (Claim 26) "means for positioning a cursor on said data display screen" (Claim 39) Identified by Samsung and Apple	**Function**: positioning a cursor on a data display screen **Structure**: trackpad, trackball, mouse (7:2-3). The means plus function claims are indefinite as to any remaining structures (e.g. "stylus" and "cursor function keys") for failing to disclose these structures in sufficient detail.	**Intrinsic Evidence** Fig. 9; 5:2-4; 7:2-3; 7:20-23; 10:1-12; 12:40-13:13; 15:60-61; 15:65-67: 16:2-6; 20:30-31. **Extrinsic Evidence** Deposition of Steven Christensen 10/26/11 at 116:25-117:8; 118:6-119:12; 130:18-131:1
"means for creating an operating environment for a plurality of individual programming modules associated with different application programs that provide status and/or	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: creating an operating	

U.S. Patent No. 6,493,002		
Claim Term	**Proposed Construction**	**Supporting Evidence**
control functions" (Claims 26, 39) Identified by Samsung and Apple	environment for a plurality of individual programming modules associated with different application programs that provide status and/or control functions **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	
"means for executing at least one of the plurality of individual programming modules to generate information for display in one of the plurality of display areas in the first window region" (Claim 26) Identified by Samsung and Apple	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: executing at least one of the plurality of individual programming modules to generate information for display in one of the plurality of display areas in the first window region **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	

U.S. Patent No. 6,493,002		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"means for generating user sensitive graphics for display in at least one data display area" (Claim 39) Identified by Apple	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: generating user sensitive graphics for display in at least one data display area **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	
"means for determining when said at least one data display area has been selected by the user" (Claim 39) Identified by Samsung and Apple	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: determining when said at least one data display area has been selected by the user **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 6,493,002		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"means for initiating a response from said at least one of the plurality of programming modules" (Claim 39) Identified by Samsung and Apple	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: initiating a response from said at least one of the plurality of programming modules **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	
"means for window generation and control" (Claim 50) Identified by Samsung "means for indicia generation coupled to the data display screen to execute at least one of the plurality of individual programming modules to generate information for	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: window generation and control to create an operating environment for a plurality of individual programming modules associated with different application programs that provide status and/or control functions **Structure**: none disclosed.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 6,493,002		
Claim Term	**Proposed Construction**	**Supporting Evidence**
display in one of the plurality of display areas in the first window region" (Claim 50) Identified by Apple	Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	
"means for indicia generation" (Claim 50) Identified by Samsung "means for indicia generation coupled to the data display screen to execute at least one of the plurality of individual programming modules to generate information for display in one of the plurality of display areas in the first window region" (claim 50) Identified by Apple	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: indicia generation coupled to the data display screen to execute at least one of the plurality of individual programming modules to generate information for display in one of the plurality of display areas in the first window region **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,469,381		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"electronic document" (all claims) Identified by Samsung.	Information that is visually represented on a screen that has a defined set of boundaries.	**Intrinsic Evidence** '381 Patent at 23:7-13; 26:56-62; 27:7-12; 30:11-17; 30:18-26; 31:9-16; 32:20-23; 32:42-44; 33:26-32; Figures 8A-D; Figure 9; Figures 10A-C; Figure 11; Figures 12A-C; Figures 13A-C; Figures 15A-E. **Extrinsic Evidence** Deposition of Bas Ording, 8/9/11, Transcript at 20:18-21:3. Deposition of Ravin Balakrishnan, 8/16/11, Transcript at 27:13-28:18; 161:13-163:2; 147:16-158:22; Exhibit 104. Deposition of Andries Van Dam, 9/14/11, Transcript at 38:7 - 39:3; 118:10-17; 126:2-15. Declaration of Andries Van Dam in Support of Samsung's Opposition to Apple's Motion for Preliminary Injunction, 8/22/11, ¶¶ 45, 47, 49, 52, 53.
"an edge of the electronic document" (claims 1, 19, 20) "the edge of the electronic	A boundary of the electronic document that distinguishes it from another electronic document, other content, or a background area.	**Intrinsic Evidence** '381 Patent at 3:4-18; 21:23-34; 27:25-39; 28:34-47; 30:48-59; Figures 8A-8D; Figure 10B.

U.S. Patent No. 7,469,381		
Claim Term	**Proposed Construction**	**Supporting Evidence**
document" (claims 1, 16, 17, 18, 19, 20) "the edge of the document" (claims 1, 13, 14, 16) "an edge of the document" (claim 11) Identified by Samsung.		**Extrinsic Evidence** Deposition of Bas Ording, 8/9/11, Transcript at 20:18-21:3; 27:13- 28:18; 161:13-163:2. Deposition of Ravin Balakrishnan, 8/16/11, Transcript at 147:16-158:22; Exhibit 104. Deposition of Andries Van Dam, 9/14/11, Transcript at 38:7 - 39:3; 118:10-17; 126:2-15. Declaration of Andries Van Dam in Support of Samsung's Opposition to Apple's Motion for Preliminary Injunction, 8/22/11, ¶¶ 45, 47, 49, 52, 53.
"first direction" (claims 1, 5, 10, 11, 12, 16, 17, 18, 19, 20) Identified by Samsung.	A specific angle of translation.	**Intrinsic Evidence** '381 Patent at 15:16-19; 20:60-67; 21:1-11; 24:10-12; 24:33-36; 26:37-45; 27:12-17; 29:21-40; Figures 8A-8C. **Extrinsic Evidence** Declaration of Jeffrey Johnson in Support of Samsung's Opposition to Apple's Motion for Preliminary Injunction, 8/22/11, ¶ 24.
"displaying an area beyond the edge of the document" (claim 1)	Visually showing the area beyond the boundary of the document by emitting light or illuminating the area beyond the boundary of the	**Intrinsic Evidence** '381 Patent at 3:4-8; 3:41-46; 4:17-20; 8:3-14; 9:39-41; 10:1-4; 10:8-22; 12:20-26; 15:29-36; 18:29-31; 22:36-57; 31:4-6.

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,469,381		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"displaying an area beyond the edge of the electronic document" (claim 17, 18) "displaying an area beyond an edge of the electronic document" (claims 19, 20) Identified by Samsung.	document.	**Extrinsic Evidence** Definition of "display." *American Heritage Dictionary*, Third Edition, 1996. Definition of "display." *Mc-Graw-Hill Electronics Dictionary*, Sixth Edition, Neil Sclater and John Markus, 1997. *Tex. Digital Sys. v. Telegenix, Inc.,* 308 F.3d 1193, 1210 (Fed. Cir. 2002); *Honeywell Int'l., Inc. v. United States,* 609 F.3d 1292, 1299 (Fed. Cir. 2010). Declaration of Jeffrey Johnson in Support of Samsung's Opposition to Apple's Motion for Preliminary Injunction, 8/22/11, ¶¶ 48-50, 55. Deposition of Ravin Balakrishnan, 8/16/11, Transcript at 112:11-15; 124:7-125:12.
"beyond the edge of the document" (claim 1) "beyond the edge of the electronic document" (claims 17, 18)	Next to (and not behind or underneath) the boundary of the document.	**Intrinsic Evidence** '381 Patent at 26:25-31. **Extrinsic Evidence** Definition of "beyond." *Webster's Third New International Dictionary of the English Language Unabridged*, 2002.

U.S. Patent No. 7,469,381		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"beyond an edge of the electronic document" (claims 19, 20) Identified by Samsung.		
instructions for displaying a first portion of an electronic document (claim 19)	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: displaying a first portion of an electronic document. **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	
instructions for detecting a movement of an object on or near the touch screen display (claim 19)	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: detecting a movement of an object on or near the touch screen display	

U.S. Patent No. 7,469,381		
Claim Term	**Proposed Construction**	**Supporting Evidence**
	Structure: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	
instructions for translating the electronic document displayed on the touch screen display in a first direction to display a second portion of the electronic document, wherein the second portion is different from the first portion, in response to detecting the movement (claim 19)	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: translating the electronic document displayed on the touch screen display in a first direction to display a second portion of the electronic document. **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	
instructions for displaying an area beyond an edge of the electronic document and displaying a third portion of the electronic	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,469,381		
Claim Term	**Proposed Construction**	**Supporting Evidence**
document, wherein the third portion is smaller than the first portion, in response to the edge of the electronic document being reached while translating the electronic document in the first direction while the object is still detected on or near the touch screen display (claim 19)	**Function**: displaying an area beyond an edge of the electronic document and displaying a third portion of the electronic document. **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	
instructions for translating the electronic document in a second direction until the area beyond the edge of the electronic document is no longer displayed to display a fourth portion of the electronic document, wherein the fourth portion is different from the first portion, in response to detecting that the object is no longer on or near the touch screen display (claim 19)	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: translating the electronic document in a second direction until the area beyond the edge of the electronic document is no longer displayed to display a fourth portion of the electronic document. **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,469,381		
Claim Term	**Proposed Construction**	**Supporting Evidence**
display a first portion of an electronic document (claim 20)	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: displaying a first portion of an electronic document. **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	
detect a movement of an object on or near the touch screen display (claim 20)	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: detecting a movement of an object on or near the touch screen display. **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	
translate the electronic	Subject to § 112 ¶ 6.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,469,381		
Claim Term	**Proposed Construction**	**Supporting Evidence**
document displayed on the touch screen display in a first direction to display a second portion of the electronic document, wherein the second portion is different from the first portion, in response to detecting the movement (claim 20)	This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: translating the electronic document displayed on the touch screen display in a first direction to display a second portion of the electronic document. **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	
display an area beyond an edge of the electronic document and display a third portion of the electronic document, wherein the third portion is smaller than the first portion, if the edge of the electronic document is reached while translating the electronic document in the first direction while the object is still detected on or near the touch screen	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: displaying an area beyond an edge of the electronic document and displaying a third portion of the electronic document. **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,469,381		
Claim Term	**Proposed Construction**	**Supporting Evidence**
display (claim 20)	description.	
translate the electronic document in a second direction until the area beyond the edge of the electronic document is no longer displayed to display a fourth portion of the electronic document, wherein the fourth portion is different from the first portion, in response to detecting that the object is no longer on or near the touch screen display (claim 20)	Subject to § 112 ¶ 6. This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function. **Function**: translating the electronic document in a second direction until the area beyond the edge of the electronic document is no longer displayed to display a fourth portion of the electronic document. **Structure**: none disclosed. Alternatively, if this term is not subject to § 112 ¶ 6, the claim is invalid for lack of written description.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,844,915		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"scrolling a window having a view associated with the event object" (all claims)	sliding a window in a direction corresponding to the direction of the user input over a view that is stationary relative to the window	**Intrinsic Evidence** '915 Patent at 1:39-47, 2:1-10, 5:25-47.
means for receiving, through a hardware device, a user input on a touch-sensitive display of the apparatus, the user input is one or more input points applied to the touch-sensitive display that is integrated with the apparatus (claim 15 and all dependent claims from it)	Subject to § 112 ¶ 6. **Function**: receiving, through a hardware device, a user input on a touch-sensitive display of the apparatus. **Corresponding structure**: input device 2954 as described in col. 19:23-34.	**Intrinsic Evidence** '915 Patent at 19:23-34.
means for creating an event object in response to the user input (claim 15 and all dependent claims from it)	Subject to § 112 ¶ 6. *This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function.* **Function**: creating an event object in response to the user input. **Corresponding structure**: none	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,844,915		
Claim Term	**Proposed Construction**	**Supporting Evidence**
	disclosed.	
means for determining whether the event object invokes a scroll or gesture operation (claim 15 and all dependent claims from it)	Subject to § 112 ¶ 6. *This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function.* **Function**: determining whether the event object invokes a scroll or gesture operation. **Corresponding structure**: none disclosed.	
means for issuing at least one scroll or gesture call based on invoking the scroll or gesture operation (claim 15 and all dependent claims from it)	Subject to § 112 ¶ 6. *This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function.* **Function**: issuing at least one scroll or gesture call. **Corresponding structure**: none disclosed.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,844,915		
Claim Term	**Proposed Construction**	**Supporting Evidence**
means for responding to at least one scroll call, if issued, by scrolling a window having a view associated with the event object (claim 15 and all dependent claims from it)	Subject to § 112 ¶ 6. *This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function.* **Function**: responding to at least one scroll call, if issued, by scrolling a window having a view associated with the event object. **Corresponding structure**: none disclosed.	
means for responding to at least one gesture call, if issued, by scaling the view associated with the event object based on receiving the two or more input points in the form of the user input (claim 15 and all dependent claims from it)	Subject to § 112 ¶ 6. *This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function.* **Function**: responding to at least one gesture call, if issued, by scaling the view associated with the event object based on receiving the two or more input points in the form of the user input	

U.S. Patent No. 7,844,915		
Claim Term	**Proposed Construction**	**Supporting Evidence**
	Corresponding structure: none disclosed.	
means for rubberbanding a scrolling region (claim 16)	Subject to § 112 ¶ 6. *This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function.* **Function**: rubberbanding a scrolling region displayed within the window by a predetermined maximum displacement. **Corresponding structure**: none disclosed.	
means for attaching scroll indicators to a content edge of the window (claim 17)	Subject to § 112 ¶ 6. *This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function.* **Function**: attaching scroll indicators to a content edge of the window **Corresponding structure**: none	

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U.S. Patent No. 7,844,915		
Claim Term	**Proposed Construction**	**Supporting Evidence**
	disclosed.	
means for attaching scroll indicators to the window edge (claim 18)	Subject to § 112 ¶ 6. *This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function.* **Function**: attaching scroll indicators to the window edge. **Corresponding structure**: none disclosed.	
means for responding to at least one gesture call…by rotating a view associated with the event object (claim 20)	Subject to § 112 ¶ 6. *This limitation is indefinite. The specification does not disclose an algorithm to perform the recited function.* **Function**: responding to at least one gesture call by rotating a view associated with the event object **Corresponding structure**: none disclosed.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,853,891		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"the first window has been displayed independently from a position of a cursor on the screen" Identified by Samsung.	there is a mouse pointer or a similar icon that is controlled by a mouse, track ball, or touch pad visible on the screen and the user's movement of the mouse pointer or similar icon does not affect the location of the first window	**Intrinsic Evidence** *See, e.g.*, U.S. Patent No. 7,853,891 at 1:41-46; 1:55-62; 2:13-20; 3:8-12; 7:26-31; 9:9-13. *See also, e.g.*, Amendment dated June 15, 2006 (application no. 10/193,573) at 23; Amendment dated March 4, 2010 (application no. 12/012,384) at 22; US 2003/0016253 (Aoki), Abstract. **Extrinsic Evidence** Deposition testimony of Imran Chaudhri, 10/14/2011, 81:8-84:4. Deposition testimony of Christensen, 10/26/2011, 118:13-119:12.
"starting a timer" Identified by Samsung	initiation of a timekeeping process that begins at a predetermined value and counts down until zero	**Intrinsic Evidence** *See, e.g.*, U.S. Patent No. 7,853,891 at Abstract; Figures 12, 13, and 14; 2:22-24; 2:28-31; 2:30-37; 2:49-50 5:65-6:1; 6:21-25; 7:11-20; 8:6-15; 8:23-25; 9:47-49. **Extrinsic Evidence** Deposition testimony of Imran Chaudhri, 10/14/2011, 70:10-16, 71:3-17.
"closing the first window" Identified by Samsung.	Plain and ordinary meaning.	
"in response to a	in response to the timer reaching a	*See* "starting a timer."

U.S. Patent No. 7,853,891		
Claim Term	**Proposed Construction**	**Supporting Evidence**
determination that the timer expired" Identified by Samsung.	zero value	
"any input from a user input device" Identified by Samsung.	Indefinite under 35 U.S.C. § 112 ¶ 2.	**Extrinsic Evidence** Deposition testimony of Imran Chaudhri, 10/14/2011, 71:18-78:19.
"translucent" Identified by Samsung.	neither opaque nor transparent and allows for the underlying window to be visible	**Intrinsic Evidence** *See, e.g.*, U.S. Patent No. 7,853,891 at Abstract; Figure 12, 14 and 15; 2:31-41; 2:52-56; 3:15-21; 3:37-43; 6:3-5; 8:6-15; 9:13-15. **Extrinsic Evidence** Deposition testimony of Imran Chaudhri, 10/14/2011, 86:12-100:19.
"closing the first window without user input" Identified by Samsung.	Plain and ordinary meaning.	
"means for displaying a first window" (Claim 51) Identified by Samsung.	**Function**: displaying a first window **Structure**: *Indefinite. There is no structure that performs the claimed*	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,853,891		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"means for displaying a first window" (Claim 70) Identified by Samsung and Apple. "means for displaying a first window in response to receiving a first input from a user input device of the digital processing system" (Claim 51) Identified by Apple	*function.*	
"means for starting a timer" (Claims 51, 71) Identified by Samsung and Apple.	**Function**: starting a timer **Structure**: *Indefinite. There is no structure that performs the claimed function.*	
"means for closing the first window" (Claim 51) Identified by Samsung.	**Function**: closing a first window **Structure**: *Indefinite. There is no structure that performs the claimed function.*	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,853,891		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"means for closing the first window in response to a determination that the timer expired" (Claim 51) Identified by Apple		
"means for fading out an image of the first window" (Claims 55, 74) Identified by Samsung and Apple.	**Function**: fading out an image of a first window **Structure**: *Indefinite. There is no structure that performs the claimed function.*	
"means for determining a position on a display of the digital processing system independent of a position of a cursor on the display" (Claim 64) Identified by Samsung and Apple.	**Function**: determining a position on a display of the digital processing system independent of a position of a cursor on the display **Structure**: *Indefinite. There is no structure that performs the claimed function.*	
"means for restarting the timer" (Claim 66)	**Function**: restarting a timer **Structure**: *Indefinite. There is no structure that performs the claimed*	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,853,891		
Claim Term	**Proposed Construction**	**Supporting Evidence**
Identified by Samsung. "means for restarting the timer in response to receiving a second input for the first window (Claim 66) Identified by Apple	*function.*	
"means for determining whether or not a condition is met" (Claim 73) Identified by Samsung and Apple	**Function**: determining whether or not a condition is met **Structure**: *Indefinite. There is no structure that performs the claimed function.*	
"means for closing the first window without user input" Identified by Apple	**Function**: determining whether or not a condition is met **Structure**: *Indefinite. There is no structure that performs the claimed function.*	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,663,607		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"glass member" (claim 10) Identified by Apple.	Plain and ordinary meaning.	
"capacitive monitoring circuitry" (claim 1) Identified by Samsung.	**Function**: detect changes in charge coupling between a plurality of first conductive lines and a plurality of second conductive lines **Structure**: capacitive sensing circuit 230 including a multiplexer with a plurality of independent input channels for receiving signals from each of a plurality of sensing points at the same time, the capacitive sensing circuit sequentially driving one driving line at a time until all the driving lines have been driven and capactively sensing all intersecting sensing lines in parallel	**Intrinsic Evidence** *See, e.g.*, U.S. Patent No. 7,663,607 at 17:12-35; 17:66–18:39; 13:38-49.

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,864,163		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"substantially centered" (Claims 2, 49, 50, 51, and 52 and all dependent claims from them)	Indefinite.	
"instructions for displaying at least a portion of a structured electronic document on the touch screen display" (claim 50 and all dependent claims from it)	This term is indefinite under 35 U.S.C. § 112 ¶ 2 because there is insufficient structure disclosed in the specification that corresponds to this means-plus-function clause under 35 U.S.C. § 112 ¶ 6. **Function**: displaying at least a portion of a structured electronic document on the touch screen display **Corresponding Structure**: None disclosed.	
"means for displaying at least a portion of a structured electronic document on the touch screen display" (claim 52 and all dependent claims from it)	**Function**: displaying at least a portion of a structured electronic document on the touch screen display **Corresponding Structure**: Figs. 1A and 1B, boxes 112, 103, 102, and 132.	**Intrinsic Evidence** '163 Patent at Figure 1A, Figure 1B, 2:30-35, 7:13-18, 7:40-49, 10:62-2, 14:20-21.
"instructions for detecting a first gesture at a location	This term is indefinite under 35 U.S.C. § 112 ¶ 2 because there is	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,864,163		
Claim Term	**Proposed Construction**	**Supporting Evidence**
on the displayed portion of the structured electronic document" (claim 50 and all dependent claims from it)	insufficient structure disclosed in the specification that corresponds to this means-plus-function clause under 35 U.S.C. § 112 ¶ 6. **Function**: detecting a first gesture at a location on the displayed portion of the structured electronic document **Corresponding Structure**: None disclosed.	
"means for detecting a first gesture at a location on the displayed portion of the structured electronic document" (claim 52 and all dependent claims from it)	**Function**: detecting a first gesture at a location on the displayed portion of the structured electronic document **Corresponding Structure**: Figs. 1A and 1B, boxes 112, 103, 102, and 130.	**Intrinsic Evidence** '163 patent at Figures 1A, 1B, 7:13-18, 7:40-49, 7:61-8:4, 10:31-61.
"instructions for determining a first box in the plurality of boxes at the location of the first gesture" (claim 50 and all dependent claims from it)	**Function**: determining a first box in the plurality of boxes at the location of the first gesture. **Corresponding Structure**: Steps 6014-6018 in Fig. 6A.	**Intrinsic Evidence** '163 Patent at Figure 6A, 15-29.
"means for determining a first box in the plurality of boxes at the location of the	**Function**: determining a first box in the plurality of boxes at the location	*See* "instructions for determining a first box in the plurality of boxes at the location of the first gesture" (claim 50 and all

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,864,163		
Claim Term	**Proposed Construction**	**Supporting Evidence**
first gesture" (claim 52 and all dependent claims from it)	of the first gesture **Corresponding Structure**: Steps 6014-6018 in Fig. 6A.	dependent claims from it).
"instructions for enlarging and translating the structured electronic document so that the first box is substantially centered on the touch screen display" (claim 50 and all dependent claims from it)	This term is indefinite under 35 U.S.C. § 112 ¶ 2 because there is insufficient structure disclosed in the specification that corresponds to this means-plus-function clause under 35 U.S.C. § 112 ¶ 6. **Function**: Indefinite. **Corresponding Structure**: None disclosed.	
"means for enlarging and translating the structured electronic document so that the first box is substantially centered on the touch screen display" (claim 50 and all dependent claims from it)	This term is indefinite under 35 U.S.C. § 112 ¶ 2 because there is insufficient structure disclosed in the specification that corresponds to this means-plus-function clause under 35 U.S.C. § 112 ¶ 6. **Function**: Indefinite. **Corresponding Structure**: None disclosed.	
"instructions for, while the	This term is indefinite under 35	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,864,163		
Claim Term	**Proposed Construction**	**Supporting Evidence**
first box is enlarged, detecting a second gesture on a second box other than the first box" (claim 50 and all dependent claims from it)	U.S.C. § 112 ¶ 2 because there is insufficient structure disclosed in the specification that corresponds to this means-plus-function clause under 35 U.S.C. § 112 ¶ 6. **Function**: While the first box is enlarged, detecting a second gesture on a second box other than the first box **Corresponding Structure**: None disclosed	
"means for, while the first box is enlarged, detecting a second gesture on a second box other than the first box" (claim 52 and all dependent claims from it)	**Function**: While the first box is enlarged, detecting a second gesture on a second box other than the first box **Structure**: Fig. 1A and 1B, boxes 112, 103, 102, and 130.	*See* "means for detecting a first gesture at a location on the displayed portion of the structured electronic document" (claim 52)
"instructions for, in response to detecting the second gesture, translating the structured electronic document so that the second box is substantially centered on the touch screen display" (claim 50	This term is indefinite under 35 U.S.C. § 112 ¶ 2 because there is insufficient structure disclosed in the specification that corresponds to this means-plus-function clause under 35 U.S.C. § 112 ¶ 6.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,864,163		
Claim Term	**Proposed Construction**	**Supporting Evidence**
and all dependent claims from it)	**Function**: Indefinite **Corresponding Structure**: None disclosed.	
"means for, in response to detecting the second gesture, translating the structured electronic document so that the second box is substantially centered on the touch screen display" (claim 52 and all dependent claims from it)	This term is indefinite under 35 U.S.C. § 112 ¶ 2 because there is insufficient structure disclosed in the specification that corresponds to this means-plus-function clause under 35 U.S.C. § 112 ¶ 6. **Function**: Indefinite **Corresponding Structure**: None disclosed.	

U.S. Patent No. 7,920,129		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"substantially electrically isolate" (claims 3, 12, 19, 22, 24-26) Identified by Samsung.	Indefinite under 35 U.S.C. § 112 ¶ 2.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 6,928,604		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"input data frame" (claims 1,6,10, 17-18, 20-22, 24) Identified by Apple.	Plain and ordinary meaning.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,050,410		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"bit reverse method" (claim 4) Identified by Apple.	A method of reversing a binary bit sequence.	**Intrinsic Evidence** 5:42-53
"means for receiving an information bit stream and for outputting an output stream including an information bit stream, a first parity stream, and a second parity stream, by encoding the information bit stream" (claim 55) Identified by Apple.	**Function**: receiving an information bit stream; outputting an output stream including an information bit stream, a first parity stream, and a second parity stream, by encoding the information bit stream **Structure**: an encoder as shown in figures 2 and 3	**Intrinsic Evidence** Abstract; 3:14-19; Figs. 2 and 3
"means for performing an interleaving operation in response to the output stream and outputting an interleaved stream" (claim 55)	**Function**: performing an interleaving operation in response to the output stream and outputting an interleaved stream **Structure**: an interleaver as shown in figure 2	**Intrinsic Evidence** Abstract; 1:64-65; Figure 2

U.S. Patent No. 7,050,410		
Claim Term	**Proposed Construction**	**Supporting Evidence**
Identified by Apple.		
"means for creating at least one radio frame in response to the interleaved stream" (claim 55) Identified by Apple.	**Function**: creating at least one radio frame in response to the interleaved stream **Structure**: a radio frame segmenter as shown in figure 2	**<u>Intrinsic Evidence</u>** 1:65-67; 7:9-10; Figs. 1 and 2
"means for separating the at least one radio frame into a separate information bit stream, a first separate parity stream, and a second separate parity stream" (claim 55) Identified by Apple.	**Function**: separating the at least one radio frame into a separate information bit stream, a first separate parity stream, and a second separate parity stream **Structure**: a demultiplexer as shown in figure 2	**<u>Intrinsic Evidence</u>** Abstract; 4:36-49; 4:54-57; Fig. 2
"means for bypassing the separate information bit stream and for puncturing a part of the first and second separate parity streams according to a given rate matching rule"	**Function**: bypassing the separate information bit stream and puncturing a part of the first and second separate parity streams according to a given rate matching rule **Structure**: a rate matcher as shown	**<u>Intrinsic Evidence</u>** Abstract; 3:32-35; 16:42-54; Fig. 2

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,050,410		
Claim Term	**Proposed Construction**	**Supporting Evidence**
(claim 55) Identified by Apple.	in figure 2	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,069,055		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"means for storing Greenwich mean time (GMT) information for each of a plurality of cities" (claim 1) Identified by Apple.	**Function**: Storing Greenwich mean time (GMT) information for each of a plurality of cities. **Structure**: Memory.	**Intrinsic Evidence** Figure 1, items 111-113; Col. 2, lines 23-35.
"means for receiving a reference time from a signal received from a remote system" (claim 1) Identified by Apple.	**Function**: receiving a reference time from a signal received from a remote system. **Structure**: An antenna.	**Intrinsic Evidence** Fig. 1, item 124; Col. 2, line 51.
"means for counting a duration of time that elapses from when said reference time is acquired" (claim 1) Identified by Apple.	**Function**: counting a duration of time that elapses from when said reference time is acquired. **Structure**: A controller.	**Intrinsic Evidence** Fig. 1, item 110; Col. 3, lines 2-4.
"means for selecting at least one of said plurality of cities and automatically calculating a local time of said selected city" (claim	**Function**: selecting at least one of said plurality of cities and automatically calculating a local time of said selected city.	**Intrinsic Evidence** Col. 4, lines 20-22.

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,069,055		
Claim Term	**Proposed Construction**	**Supporting Evidence**
1) Identified by Apple.	**Structure**: A controller programmed to detect user input.	
"means for outputting said local time" (claim 1) Identified by Apple.	**Function**: outputting said local time. **Structure**: A display.	**Intrinsic Evidence** Fig. 1, item 123; Col. 3, lines 1-2.

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,200,792		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"first/second deinterleaver" (claims 11-16) Identified by Apple.	Plain and ordinary meaning.	
"symbol" (claims 11, 14) Identified by Apple.	Plain and ordinary meaning.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,362,867		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"primary scrambling code" (claims 25, 26, 27 and 30) Identified by Apple.	a scrambling code that differentiates a base-station from other base-stations in the system.	**Intrinsic Evidence** 1:23-25, 1:29-37, 1:48-2:1; Request for Reconsideration (June 7, 2007) at 3-4.
"means for delaying at least one of the primary scrambling codes and secondary scrambling code to produce Q-channel components" (claim 30) Identified by Apple.	**Function**: delaying at least one of the primary scrambling codes and secondary scrambling code to produce Q-channel components **Structure**: an adder, register or delay element as shown in figures 2, 4, 7, 8, 10, and 11	**Intrinsic Evidence** *See* '867 Patent at 3:14-17, 3:64-67, 8:48-50, 10:2-19 , 11:42-52, 12:4-6 , 13:2-4; Figures 2, 4, 7, 8, 10 and 11

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,386,001		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"radio frame matcher" (claims 1-7, 9-12, and 14-16) Identified by Apple.	Software and/or hardware that segments received data frames into radio frames and sequentially outputs the segmented radio frames.	**Intrinsic Evidence** *See* U.S. Patent No. 7,386,001 ("'001 Patent") at 3:43-64

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,447,516		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"gain scaling unit" (claim 15) Identified by Apple.	Plain and ordinary meaning.	

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)

U.S. Patent No. 7,675,941		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"header inserter" (claim 10) Identified by Apple.	Plain and ordinary meaning.	
"one-bit field setter" (claim 10) Identified by Apple.	Plain and ordinary meaning.	
"LI inserter" (claims 10 and 13) Identified by Apple.	Plain and ordinary meaning.	
"header and LI remover" (claim 15) Identified by Apple.	Plain and ordinary meaning.	
"reassembler" (claim 15) Identified by Apple.	Plain and ordinary meaning.	

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U.S. Patent No. 7,698,711		
Claim Term	**Proposed Construction**	**Supporting Evidence**
"applet" (claims 1, 9, 17) Identified by Apple.	A small application designed to run within another program.	**Intrinsic Evidence** Col. 3, lines 10-14. **Extrinsic Evidence** Applet : a small application designed to run within another program. Wiley Electrical and Electronics Engineering Dictionary, 2004.

SAMSUNG'S PATENT LOCAL RULE 4-2 DISCLOSURES (EXHIBIT A)