

# Exhibit A

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October 17, 2011

**VIA ELECTRONIC MAIL**

Jason R. Bartlett  
Morrison Foerster  
425 Market Street  
San Francisco, Ca 94105

Re: *Apple Inc. v. Samsung*, Case No. 11-CV-01846-LHK (N.D. Cal.)

Dear Jason:

Pursuant to Patent Local Rule 4-1(a), below is Samsung's list of claim terms for possible construction by the Court. Samsung believes it will not be necessary for the parties to ask the Court to construe many of the terms on the list because we should be able to agree as to the proper construction, and in many instances, the ordinary meaning of the term may appropriately be applied. However, we have included all of these terms out of an abundance of caution so the parties can meet and confer and determine where there are issues. Samsung also reserves its right to identify and request construction of additional terms should disputes regarding the meaning of any terms arise in the future. All terms listed below that include the term "means" should be governed by 35 U.S.C. § 112(6).

We suggest that the parties meet and confer this week in an effort to narrow their respective lists of terms prior to the Patent Local Rule 4-2 and 4-3 exchanges and submissions. Please let us know when Apple is available.

Very truly yours,



Todd M. Briggs

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## SAMSUNG'S LIST OF CLAIM TERMS

### *Apple Patents*

#### '828 Patent

- “proximity image representing a scan of a plurality of electrodes”
- “proximity image”
- “plurality of electrodes”
- “a plurality of touch-sensing electrodes arranged on the substrate”
- “contact tracking and identification module”
- “segmenting each proximity image into one or more pixel groups that indicate significant proximity”
- “segment the proximity image into one or more pixel groups”
- “proximity”
- “each pixel group representing proximity of a distinguishable hand part or other touch object”
- “mathematically fitting an ellipse to at least one of the pixel groups”
- “a calibration module operatively coupled to the electronic scanning hardware and adapted to construct a proximity image having a plurality of pixels corresponding to the touch-sensing electrodes”
- “adapted to”
- “ellipse parameters”
- “transmitting one or more ellipse parameters as a control signal to an electronic or electromechanical device”
- “transmit one or more ellipse parameters as a control signal to an electronic or electromechanical device”
- “host communication interface”
- “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 touchsensing electrodes”
- “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”
- “means for fitting an ellipse to at least one of the pixel groups”

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- “means for fitting an ellipse to at least one of the pixel groups in a plurality successive proximity images”
- “means for tracking a change in one or more ellipse parameters through a plurality of timesequence proximity images”

#### ‘891 Patent

- “a digital processing system”
- “window”
- “starting a timer”
- “closing the first window “
- “in response to a determination that the timer expired”
- “any input from a user input device”
- “cursor”
- “translucent”
- “fading”
- “restarting the timer”
- “application”
- “capable of being displayed on the digital processing system under the first window”
- “being visible under the first window on a screen”
- “closing the first window without user input”
- “wherein the first window has been displayed independently from a position of a cursor on the screen”
- “means for displaying a first window”
- “means for starting a timer”
- “means for closing the first window”
- “means for fading out an image of the first window”
- “means for determining a position on a display of the digital processing system independent of a position of a cursor on the display”
- “means for restarting the timer”
- “means for determining whether or not a condition is met”

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'002 Patent

- “computer-controlled display system”
- “interactive”
- “processor”
- “cursor”
- “window generation and control logic”
- “operating environment”
- “programming module”
- “application program”
- “status and/or control functions”
- “display areas”
- “independently displayed and independently active”
- “the first window region and the plurality of independent display areas implemented in a window layer that appears on top of application programming windows that may be generated”
- “associated with one of the plurality of individual programs”
- “independent display areas”
- “window layer”
- “appears on top of application programming windows”
- “sensitive to user input”
- “message-based communication”
- “interactive display activity”
- “control strip”
- “variably sized”
- “control information”
- “always appears in front”
- “implemented in a private window layer”
- “means for positioning a cursor on a data display screen”
- “means for creating an operating environment for a plurality of individual programming modules associated with different application programs that provide status and/or control functions”

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- “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”
- “means for determining when said at least one data display area has been selected by the user”
- “means for initiating a response from said at least one of the plurality of programming modules”
- “means for window generation and control”
- “means for indicia generation”

### ‘381 Patent

- “displaying a first portion of an electronic document”
- “in response to detecting the movement, 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 an 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: displaying an area beyond the edge of the document”
- “displaying a third portion of the electronic document, wherein the third portion is smaller than the first portion”
- “in response to detecting that the object is no longer on or near the touch screen display, 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”
- “a web page”
- “a digital image”
- “a word processing, spreadsheet, email or presentation document”
- “the electronic document includes a list of items”
- “translating in the first direction prior to reaching an edge of the document has an associated speed of translation that corresponds to a speed of movement of the object”
- “wherein translating the document in the second direction is a damped motion”
- “wherein changing from translating in the first direction to translating in the second direction until the area beyond the edge of the document is no longer displayed makes the

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edge of the electronic document appear to be elastically attached to an edge of the touch screen display or to an edge displayed on the touch screen display”

- “wherein translating in the first direction prior to reaching the edge of the electronic document has a first associated translating distance that corresponds to a distance of movement of the object prior to reaching the edge of the electronic document”
- “wherein displaying an area beyond the edge of the electronic document comprises translating the electronic document in the first direction for a second associated translating distance, wherein the second associated translating distance is less than a distance of movement of the object after reaching the edge of the electronic document”
- “wherein translating in the first direction prior to reaching the edge of the electronic document has a first associated translating speed that corresponds to a speed of movement of the object”
- “wherein displaying an area beyond the edge of the electronic document comprises translating the electronic document in the first direction at a second associated translating speed, wherein the second associated translating speed is slower than the first associated translating speed”
- “one or more programs”
- “instructions for displaying a first portion of an electronic document”
- “instructions for detecting a movement of an object on or near the touch screen display”
- “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”
- “instructions for displaying an area beyond an edge of the electronic document and displaying a third portion of the electronic 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”
- “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”
- “instructions”
- “which when executed by a device with a touch screen display, cause the device to”
- “display a first portion of an electronic document”

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- “translate 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”
- “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 display”
- “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”

#### ‘607 Patent

- “detect multiple touches or near touches that occur at a same time”
- “a first layer”
- “transparent capacitive sensing medium”
- “transparent [first/second] conductive lines”
- “electrically isolated”
- “transverse”
- “capacitive monitoring circuitry”
- “detect changes in charge coupling between the first conductive lines and the second conductive lines”
- “transparent touch panel”
- “recognizing multiple touch events that occur...at a same time”
- “pixilated image”
- “multipoint sensing arrangement”
- “simultaneously detect and monitor the touch events”
- “glass member”
- “transparent conductive layer”
- “substantially perpendicular”
- “sensor integrated circuits”
- “substantially parallel”



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- “substantially perpendicular”
- “mutual capacitive sensing medium”
- “virtual ground charge amplifier”

#### ‘163 Patent

- “structured electronic document”
- “plurality of boxes of content;” “plurality of boxes;” “first box;” “second box;”
- “determining/[e] a first box in the plurality of boxes at the location of the first gesture”/“a first box in the plurality of boxes at the location of the first gesture is determined”
- “enlarging/[e] and translating/[e] the structured electronic document so that the first box is substantially centered on the touch screen display”/“the structured document is enlarged and translated so that the first box is substantially centered on the touch screen display”
- “while the first box is enlarged”
- “translating/[e] the structured electronic document so that the second box is substantially centered on the touch screen display”/ “the electronic document is translated so that the second box is substantially centered on the touch screen display”
- “expanding the first box so that the width of the first box is substantially the same as the width of the touch screen display”
- “means for displaying at least a portion of a structured electronic document on the touch screen display”
- “means for detecting a first gesture at a location on the displayed portion of the structured electronic document”
- “means for determining a first box in the plurality of boxes at the location of the first gesture”
- “means for enlarging and translating the structured electronic document so that the first box is substantially centered on the touch screen display”
- “means for, while the first box is enlarged, detecting a second gesture on a second box other than the first box”
- “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”

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'915 Patent

- “event object”
- “associated with an event object”
- “scroll”
- “gesture”
- “predetermined position in relation to the user input”
- “view”
- “window”
- “responding to at least one scroll call, if issued, by scrolling a window having a view associated with the event object based on an amount of a scroll with the scroll stopped at a predetermined position in relation to the user input”
- “means for receiving...a user input on a touch-sensitive display...”
- “means for creating an event object...”
- “means for determination whether the event object invokes a scroll or gesture operation”
- “means for issuing at least one scroll or gesture call based on invoking...[the] operation”
- “means for responding to at least one scroll call...by scrolling a window having a view associated with the event object”
- “means for responding to at least one gesture call...by scaling the view associated with the event object”
- “means for rubberbanding a scrolling region”
- “means for attaching scroll indicators to a content edge of the window”
- “means for attaching scroll indicators to the window edge”
- “means for responding to at least one gesture call...by rotating a view associated with the event object”

'129 Patent

- “wherein the minimum width of the second set of traces is substantially greater than the maximum width of the first set of traces at least at an intersection of the first and second sets of traces to provide shielding for the first set of traces”
- “one or more widths including a maximum width”
- “one or more widths including a minimum width”
- “the minimum width”

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- “substantially greater”
- “the maximum width”
- “to provide shielding for the first set of traces”
- “sensors”
- “to substantially electrically isolate the first set of traces from a liquid crystal display (LCD)”
- “to provide shielding for the sense traces”
- “drive traces are widened as compared to the sense traces to substantially cover the second layer”
- “adjacent to”
- “modulated Vcom signal”
- “to substantially electrically isolate the sense traces from a liquid crystal display (LCD)”
- “to substantially electrically isolate the first set of sense traces from a liquid crystal display (LCD)”
- “substantially constant width”
- “spatially separated”

### *Samsung Patents*

#### ‘604 Patent

- “input data frames of variable size”
- “super frame”
- “interleaving address mapper”
- “determined,” “determining,” “determined,” and “predetermined”

#### ‘516 Patent

- “total transmit power required for transmission of the channels”

#### ‘460 Patent

- “portable composite communication terminal”
- “functions as both a portable phone and a camera”

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- “sub-mode”
- “performing a portable phone function”
- “displaying”
- “scroll keys”
- “transmitting the address of the other party and a message received through a user interface”
- “transmitting . . .the image displayed on the display”

#### ‘893 Patent

- “switching”
- “displaying a single image file”
- “reproduction mode”
- “photographing mode”
- “newly photographed image”
- “irrespective of the duration”
- “first displaying again only the single image file”
- “identifying the image file that is being displayed”
- “index value”
- “reading the memory to retrieve the index value”
- “setting a flag”
- “setting a bookmark”
- “reset state”
- “determining if the index value is in a reset state”
- “mode-switching operation”
- “stored-image display mode”
- “controller”
- “unique file index value”
- “digital camera processor”
- “microcontroller”
- “mode-switching actuator”

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- “directional actuator”
- “file index memory”

#### ‘055 Patent

- “selecting one of said plurality of cities”
- “reference time”
- “scrolling through said list to select a desired one of said plurality of cities”
- “remote system”

#### ‘871 Patent

- “data corresponding to the selected function”
- “search type selection screen”
- “division mode selection”
- “receives a request function”
- “window division function”
- “display device”

#### ‘711 Patent

- “application module including at least one applet”
- “music background play object”
- “interface for music play”
- “standby mode”
- “controller for generating a music background play object”