

EXHIBIT A

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Attorneys for Plaintiff and
Counterclaim-Defendant Apple Inc.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

15 APPLE INC., a California corporation,

16 Plaintiff,

17 v.

18 SAMSUNG ELECTRONICS CO., LTD., a
19 Korean business entity, SAMSUNG
ELECTRONICS AMERICA, INC., a New York
20 corporation, and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC, a
21 Delaware limited liability company,

22 Defendants.

Civil Action No. 11-CV-01846-LHK

**PLAINTIFF AND
COUNTERCLAIM-DEFENDANT
APPLE INC.'S PRELIMINARY
CLAIM CONSTRUCTIONS
PURSUANT TO PATENT L.R. 4-2**

1 SAMSUNG ELECTRONICS CO., LTD., a
2 Korean business entity, SAMSUNG
3 ELECTRONICS AMERICA, INC., a New York
4 corporation, and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC, a
Delaware limited liability company, a California
corporation,

5 Counterclaim-Plaintiff,

6 v.

7 APPLE INC., a California corporation,

8 Counterclaim-Defendants.

9
10 **PLAINTIFF AND COUNTERCLAIM-DEFENDANT APPLE INC.'S PRELIMINARY
CLAIM CONSTRUCTIONS PURSUANT TO PATENT LOCAL RULE 4-2**

11 **I. INTRODUCTION**

12 Pursuant to the Northern District of California's Patent Local Rule 4-2 and the Court's
13 Minute Order and Case Management Order (Dkt. No. 187), Plaintiff and Counterclaim-Defendant
14 Apple Inc. ("Apple") hereby provides its preliminary claim constructions for the proposed terms
15 identified by Apple on October 17, 2011, and the proposed terms identified by Samsung
16 Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung Telecommunications
17 America, LLC (collectively, "Samsung") on October 24, 2011. In addition, for the proposed
18 terms that are governed by 35 U.S.C. § 112(6), Apple identifies the corresponding structures,
19 acts, or materials corresponding to those terms' functions.

20 Apple bases these constructions upon its current knowledge, understanding, and belief as
21 to the facts and information available as of this date. As Apple has not yet completed its
22 investigation, collection of information, or discovery relating to this action, it expressly reserves
23 the right to supplement, amend, and/or otherwise modify these preliminary claim constructions.
24 Apple also reserves the right to modify and amend these constructions and to supplement the
25 intrinsic and extrinsic evidence supporting its constructions in light of Samsung's belated
26 identification of its proposed terms for construction.

27 Together with its preliminary claim constructions, and in accordance with Patent Local
28 Rule 4-2(b), Apple is producing extrinsic evidence supporting its claim constructions, bearing

1 Bates numbers APLNDC-WH-A 0000009635 - APLNDC-WH-A 0000009798. In accordance
2 with the parties' agreement, the exchange of extrinsic evidence from expert witnesses has been
3 deferred until the submission of the Patent Local Rule 4-3 Joint Claim Construction Statement.
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