

Further, the portion of the antenna Motorola contends may be disposed within the housing is not the antenna, but contact terminals 201 and 202 (yellow). *Id.* at 3:7-8 (“The pager antenna is coupled to the pager receiver circuitry via terminals 201 and 202 . . . ”). Figure 3 provides another illustration of the contact terminals 201 and 202 (yellow) and the pager antenna 212 (red). It is through these contact terminals 201 and 202 that the external pager antenna 212 attaches to the pager receiver circuitry. It is these contact terminals 201 and 202 that may be disposed in the housing.

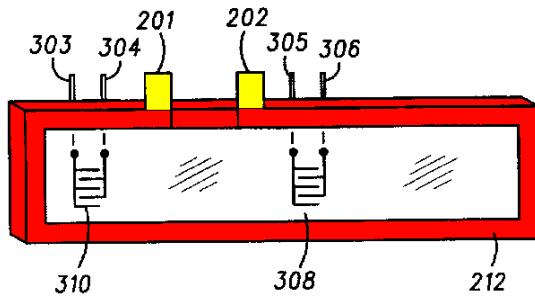


FIG. 3

The ’987 patent further confirms that the *entire* pager antenna is *outside* the housing. The specification teaches: “The first preferred location of the pager antenna 212 is disposed *outside* the shielded portion 204 of the front housing 102”

See id. at 3:26-34. The title of the patent reads: “Receiver having concealed *external* antenna.”

The abstract states: “The pager antenna 212 is located *outside* the housing (102, 104)” *See id.* at abstract. Nowhere in the ’987 patent is any portion of the claimed antenna described as being inside the housing.

For these reasons and those set forth in Apple’s opening brief, the Court should construe the limitation, “the antenna . . . is disposed between an outside surface of the housing and the at least a portion of the user interface,” as referring to the *entire* antenna.

(2) The Patentee Narrowed the Meaning of “Housing” to the “Receiver’s Case” During Prosecution

Motorola cites nothing to support its contention that construing the “housing” to mean the “receiver’s case” would introduce an ambiguous term. Motorola Br. at 46. This is likely