

# EXHIBIT G

**Apple v. Motorola**  
**Proposed Constructions for SDFL Patents**

<u>Patent</u>	<u>Term</u>	<u>Proposed Construction</u>
'006	“data units not sent from the host to the communication unit”	“data units present at the host and not sent to the communication unit”
'531	“wireless network”	“a network in which the communication server is connected to both the host device and the client communication unit through a completely wireless path”
'531	“virtual session”	“a mode of communication between two devices that involves the commitment of communication resources only on an event-driven basis but in which both devices are in possession of and have stored information about the other on an ongoing basis”
'531	“filtered data unit”	“one of a subset of data units at the host device that are selected for download to the client communication unit based on having passed a filter”
'531	“subsequent filtered data unit”	<i>See</i> proposed construction of “filtered data unit.” “Subsequent” has its plain and ordinary meaning
'119	“responsive to receiving the second message, transmitting a third message”	“upon receiving the second message, automatically transmitting a third message”
'119	“indicative of the second status”	“descriptive of the changed status”
'987	“the antenna . . . is disposed between an outside surface of the housing and the at least a portion of the user interface”	“the entire antenna is placed between the outside surface of the receiver’s case and the portion of the user interface surrounded by the antenna”
'987	“substantially planar and detachable cover . . . for concealing the antenna”	“a detachable cover shaped as a substantially flat sheet for concealing the entire antenna”
'737	“authorization element . . . for obtaining usage authorization for utilizing software in the portable communication device, in which the authorization element generates an external authorization request, and in which the authorization element communicates with the fixed portion to obtain the usage authorization”	<p>Under § 112 ¶ 6, the function is “obtaining usage authorization for utilizing software in the portable communication device, in which the authorization element generates an external authorization request, and in which the authorization element communicates with the fixed portion to obtain the usage authorization.”</p> <p>The corresponding structure is: processor 308, secure polynomial 311, transmitter controller 336, secure checksum calculator 338 and sender 340; the processor programmed to perform the disclosed algorithm including calculating a secure checksum on the software for which authorization is sought, creating a request containing the checksum, the software name and the software size, and transmitting the encrypted request.</p>

		Alternative construction, if § 112, ¶ 6 does not apply: “an external authorizer algorithm, including a radio authorizer algorithm, a transmitter controller algorithm, a secure checksum calculator algorithm that uses a secure polynomial, and a sender algorithm”
'737	“address identifying the portable communication device”	“a number used to direct messages that uniquely identifies a portable communication device”
'646/'116	“Determi[ning][es] whether [a] device . . . is a video device” / “Detect[ing][s] . . . a display device”	Apple believes that these phrases should be construed separately as follows: <u>Determin[ing][es]...</u> Plain and ordinary meaning applies or, in the alternative: “determine whether a device is or is not capable of displaying video”  <u>Detect[ing][s]...</u> Plain and ordinary meaning applies or, in the alternative: “detecting a device capable of displaying”
'646/'116	“Modifying the allocation of display space” / “a portion of the display space to be modified”	Apple believes that these phrases should be construed separately as follows: <u>Modifying...</u> Plain and ordinary meaning applies or, in the alternative: “allocating or deallocating display space”  <u>...a portion of...</u> Plain and ordinary meaning applies or, in the alternative: “a part of the display space to be allocated or deallocated”
'560	“Interface generator”	Plain and ordinary meaning applies or, in the alternative: “that which generates a listing interface”
'509/'456	“Interface generation means”	Apple believes that these phrases should be construed separately as follows: <u>'509</u> Under § 112 ¶ 6, the function is “causing an A/V display to display an interface.” The corresponding structure is: a combination of the CPU module 62, which receives the data stream of program listings, the system memory 65, which stores the section of the program listings most relevant to the user, A/V processor 77, which is “used to manipulate, process, render, mix, and otherwise rearrange digital data into coherent audio-visual displays,” and A/V connect module 66, which “provides a graphic overlay function that superimposes an A/V signal from the video encoder 78 against another A/V signal” that allows “both signals to be simultaneously displayed on the TV.”  <u>'456</u> Under § 112 ¶ 6, the function is “causing an A/V display to selectively display a program listing.”

		The corresponding structure is: a combination of the CPU module 62, which receives the data stream of program listings, the system memory 65, which stores the section of the program listings most relevant to the user, A/V processor 77, which is “used to manipulate, process, render, mix, and otherwise rearrange digital data into coherent audio-visual displays,” and A/V connect module 66, which “provides a graphic overlay function that superimposes an A/V signal from the video encoder 78 against another A/V signal” that allows “both signals to be simultaneously displayed on the TV.”
'560/'509/'456	“Listing interface”	Plain and ordinary meaning applies or, in the alternative: “an interactive interface for listing A/V program information”
'509/'456	“Listing means” / “Listing interface means”	<p>Apple believes that these phrases should be construed separately as follows:</p> <p><u>'509</u>  Under § 112 ¶ 6, the function is “causing an A/V display to selectively display a program listing that contains listing information related to A/V programs viewable on the A/V display.”  The corresponding structure is: a combination of the CPU module 62, which receives the data stream of program listings, the system memory 65, which stores the section of the program listings most relevant to the user, A/V processor 77, which is “used to manipulate, process, render, mix, and otherwise rearrange digital data into coherent audio-visual displays,” and A/V connect module 66, which “provides a graphic overlay function that superimposes an A/V signal from the video encoder 78 against another A/V signal” that allows “both signals to be simultaneously displayed on the TV.”</p> <p><u>'456</u>  Under § 112 ¶ 6, the function is “causing an A/V display to selectively display a program listing.”  The corresponding structure is: a combination of the CPU module 62, which receives the data stream of program listings, the system memory 65, which stores the section of the program listings most relevant to the user, A/V processor 77, which is “used to manipulate, process, render, mix, and otherwise rearrange digital data into coherent audio-visual displays,” and A/V connect module 66, which “provides a graphic overlay function that superimposes an A/V signal from the video encoder 78 against another A/V signal” that allows “both signals to be simultaneously displayed on the TV.”</p>
'560/'509/'456	“Controller in communication with” / “Control means in communication with”	<p>Apple believes that these phrases should be construed separately as follows:</p> <p><u>'560</u>  Plain and ordinary meaning applies or, in the alternative: “controller that sends commands to”</p>

		<p><u>'509</u> Under § 112 ¶ 6, the function is “sending commands to the transceiver to allow a user to selectively display multiple levels of information on an A/V display.” The corresponding structure is: remote control 60 or equivalent structure.</p> <p><u>'456</u> Under § 112 ¶ 6, the function is “sending commands to the transceiver to allow a user to display A/V programs on an A/V display.” The corresponding structure is: remote control 60 or equivalent structure.</p>
'849	“Gesture”	Plain and ordinary meaning applies or, in the alternative: “a motion of the object/appendage making contact with the touch screen”
'849	“Moving an unlock image”	“causing an unlock image to change position over time via continuous contact with the touch screen”