

Exhibit 30

to Motorola's Opening Claim Construction Brief

July 28, 2011

Disputed Claim Phrase	Motorola's Proposed Construction	Apple Proposed Construction
<i>moving an unlock image</i>	“Translating the unlock image from one portion of the coordinate space of the touch-sensitive display to another”	Ordinary meaning, or in the alternative, “causing an unlock image to change position over time via continuous contact with the touch screen”
<i>gesture</i>	“A motion of the object / appendage making contact with the touch screen display”	Plain and ordinary meaning applies, or in the alternative, “a motion of the object / appendage making contact with the touch-screen”
<p><i>Determi[ning][es] whether [a] device . . . is a video device</i></p> <p><i>Detect[ing][s] . . . a display device</i></p>	“Having the device manager, which is an operating system component and not a device driver, specifically determine that the device is a video display device”	<p>Apple believes that these phrases should be construed separately as follows: Determi[ni]ng[es]... Plain and ordinary meaning applies or, in the alternative: “determine whether a device is or is not capable of displaying video”</p> <p>Detect[ing][s]... Plain and ordinary meaning applies or, in the alternative: “detecting a device capable of displaying”</p>
<p><i>"modifying the allocation of display space"</i></p> <p><i>"a portion of the display space to be modified"</i></p>	<p>“Changing the allotment of the global coordinate space available for use by display devices”</p> <p>“An allotment of the global coordinate space, available for use by display devices, to be changed</p>	<p>Plain and ordinary meaning applies or, in the alternative: “allocating or deallocating display space”</p> <p>Plain and ordinary meaning applies or, in the alternative: “a part of the display space to be allocated or deallocated”</p>
<i>listing means / listing interface means</i>	<i>Corresponding Function:</i> Causing the A/V display to selectively display one level of the multiple levels of information related to an audio-visual program, that level containing a list of information (including at least	<p>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 selectively display a program</p>

	<p>channel numbers, channel names, and titles) about the viewable audio-visual programs</p> <p><i>Corresponding Structure:</i> A central processing unit (CPU), a system bus; an A/V decoder; a wireless control unit; a system memory unit; an A/V memory unit; a memory and bus controller; an A/V encoder; a highspeed digital A/V bus; an A/V processor; one or more tuners/demodulators, wherein one tuner/demodulator reads and displays a current program from one of the channels received; additional tuners/demodulators (or the same tuner/demodulator, used in alternation) to read and display data from the side-band channels in picture-in-picture (pip) windows; a remote control device including a transmitter for transmitting signals to the audio-visual system; and software applications that generate picture-in-picture windows, program listing information, program recording, and other interactive functions.</p>	<p>listing that contains listing information related to A/V programs viewable on the A/V display.”</p> <p>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></p> <p>Under § 112 ¶ 6, the function is “causing an A/V display to selectively display a program listing.”</p> <p>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,</p>
--	---	--

		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.”
<i>Listing Interface</i>	A software application executing on the CPU causing the A/V display to selectively display one level of the multiple levels of information related to an audio-visual program, that level containing a list of information (including at least channel numbers, channel names, and/or titles) about the viewable audio-visual programs	Plain and ordinary meaning applies or, in the alternative: “an interactive interface for listing A/V program information”
<i>Controller in communication with</i>	A hand-held remote control containing a transmitter for transmitting signals wirelessly to the transceiver.	Apple believes that these phrases should be construed separately as follows: <u>'560</u> Plain and ordinary meaning applies or, in the alternative: “controller that sends commands to”
<i>Control means in communication with</i>	This element is subject to U.S.C. § 112 ¶ 6. <i>Corresponding Structure:</i> A hand-held remote control containing a transmitter. See, e.g., Abstract; col. 8:42-46. <i>Corresponding Function:</i> transmitting signals wirelessly to the transceiver	<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. <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.
<i>“Data Units Not Being Sent From The Host To The Communications Unit”</i>	Ordinary meaning – the phrase requires no construction.	“data units present at the host and not sent to the communication unit”
<i>“filtered data unit”</i>	Plain meaning; or “a data unit that has been filtered”	“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”
<i>“wireless network”</i>	Ordinary meaning – this term requires no construction, but in the alternative; “two or more devices whose interconnection(s) is implemented, at least in part, without the use of wires”	“a network in which the communication server is connected to both the host device and the client communication unit through a completely wireless path”
<i>“responsive to receiving the second message, transmitting a third message”</i>	Ordinary meaning – this phrase requires no construction.	"upon receiving the second message, automatically transmitting a third message”
<i>“indicative of the second status”</i>	Ordinary meaning – this phrase requires no construction, but in the alternative, "providing an indication of the second status"	“descriptive of the changed status”
<i>“the antenna . . . is disposed between an outside surface of the housing and the at least a portion of the user interface”</i>	Ordinary meaning – this phrase requires no construction, but in the alternative, "the antenna . . . is arranged between an exposed surface of the housing and at least a portion on 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”
<i>“address identifying the portable communication device”</i>	“Ordinary meaning – this term requires no construction, but in the alternative, some reference uniquely identifying the portable communication device”	"a number used to direct messages that uniquely identifies a portable communication device”