Mirror Worlds, LLC v Apple, Inc.
Civil Action No. 6:08-cv-88 (LED)

EXHIBIT B: DISPUTED TERMS IN MIRROR WORLDS' AND APPLE'S PATENTS

DISPUTED TERMS IN MIRROR WORLDS' PATENTS

CLAIMS	CLAIM TERM, PHRASE, OR CLAUSE	MIRROR WORLDS' PROPOSED CONSTRUCTION	APPLE'S PROPOSED CONSTRUCTION
'227-1, 13, and 25	"data unit"	"a collection of data of significance to the user that the user considers as a unit."	"an item of information of significance to the user that the user considers as a unit (*e.g.*, an email, picture, voice mail, software program, reminder or calendar item)"
'227-1, 13, 25; '313-1; '427-1, 20-24, 25, 37-39; and '999-1	"stream"	In the '227, '313 and '427 patents: "a time-ordered collection of data units, or documents, unbounded in number, in which the time associated with a data unit can be in the past, present or future, and the location of file storage is transparent to the user" In the '999 patent: "a time-ordered collection of information assets, unbounded in number, in which the time associated with an information asset can be in the past, present or future, and the location of file storage is transparent to the user"	"a time-ordered sequence of documents that functions as a diary of a person or an entity's electronic life and that is designed to have three main portions: past, present and future"
'227-1, 13, 25; and '313-2	"main stream"	"a stream of each data unit, or document, received by or generated by the computer system"	"a stream which stores every data unit, or document, received by or generated by the computer system"
'227-1, 13, 25; '313-2	"substream"	"a subset of data units, or documents, yielded by a filter on	"a stream that is a subset of data units, or documents, yielded by a

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and 11		a stream, the filter identifying certain documents within the stream"	filter on a stream, the filter identifying certain documents within the stream"
'999-1	"time-ordered stream"	"a displayed stream in which the elements are arranged in time order"	same as "stream"
'427-1	"stream-based operating system"	"an operating system that includes support for streams"	"a non-hierarchical operating system in which, as each document is presented to the operating system, the document is placed according to a time indicator in the sequence of documents already stored relative to the time indicators of the stored documents"
'313-1; and '427-25	"document stream operating system"	same as "stream-based operating system"	same as "stream-based operating system"
'227-1, 13, and 25	"timestamp to identify"	"a time-based identifier"	"a date and time value that uniquely identifies each document"
'227-1, 13, and 25	"including each data unit according to the timestamp in the respective chronological indicator in the main stream"	No construction is necessary. However, if the Court rules that one is necessary, Mirror Worlds proposes the following construction: "including each data unit in the main stream, ordered according to the time stamp in the respective chronological indicator"	"storing each document in the main stream, in the location required by its identifying timestamp"
'227-20 '227-29; '313-1, 9; '427-5, 13, 22, 29 and	"abbreviated form" "abbreviated version(s)"	No construction is necessary. However, if the Court rules that one is necessary, Mirror Worlds proposes the following construction:	"a shortened version of the content to be displayed from the data unit or document"

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37		"a form or version that is less than the full form or version"	
'427-8 and 16	"controlling" operating system	"an operating system that utilizes subsystems from another operating system"	"an operating system that controls another operating system"
'313-1, 9; '427-1 and 8	"archiving"	"copying documents to a secondary storage medium"	"moving from immediately-accessible storage to long-term storage"
'313-1, 9; '427-1, 8, and 16	"glance views"	"an abbreviated presentation of a document"	"a different graphical representation of a document that appears when a document representation is touched by the cursor or pointer and provides additional information about the document"
'313-1, 9; '427-1, 10, 18, and 25	"receding foreshortened stack"	"a representation of a stack that uses perspective to create the illusion of increasing distance from the viewpoint implied by the image"	"a stack where the document representations get smaller, and appear farther from the surface of the screen, toward the bottom of the stack"
'427-1 and 8	"archiving the documents and indicators in consistent format for selective retrieval"	This term is readily understood and no construction is necessary. However, if the Court rules that one is necessary, Mirror Worlds proposes the following construction: "archiving documents and indicators in a consistent format that enables uniform selective retrieval of the documents."	"archiving the documents and indicators in a consistent format rather than the diverse formats appearing in conventional directors and subdirectories of files"
'427-7, 15, 24, 31, and 39	"complex analysis"	"analysis involving the form, content and/or type of a document"	"analysis of the content of a document that allows selection of important words, pictures, and/or sounds in the document"
'999-1	"enterprise information	"a system that manages information for an enterprise or	"a system with a client-server architecture, a multi-computer,

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	management system"	organization"	multi-node, high volume server, and a number of clients in the order of hundreds, rather than tens"
'999-1	"document object model"	"a consistent structure containing information about information assets of diverse types, created by diverse software"	"a consistent structure containing information about information assets of diverse types, created by diverse software, that includes items such as summary, type of document, owner, permissions, keywords, command options, timestamp, index, etc."
'227-1 and 25	"means for generating a main stream of data units...the main stream for receiving each data unit received by or generated by the computer system"	Mirror Worlds asserts that sufficient structure is recited in the element "means for generating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "a main stream of data units ... for receiving each data unit received by or generated by the computer system" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for generating," then: The recited <u>function</u> is generating a main stream of data units. The <u>corresponding structure</u> is computer hardware and executable code implementing a main stream of data units, and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). The recited <u>function</u> is generating a main stream of data units...the main stream for receiving each data unit received by or generated by the computer system. The <u>corresponding structure</u> is computer hardware and software that creates a main stream by linking every existing document in a computer system according to the uniquely identifying timestamp in the document's chronological indicator using a data structure that can be examined and to the extent possible manipulated by many processes simultaneously, and that supports the block-at-the-end operation (and structural equivalents).
'227-1 and	"means for	Mirror Worlds asserts that	This is a means-plus-function

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25	generating … at least one substream"	sufficient structure is recited in the element "means for generating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "at least one substream ...for containing data units only from the main stream" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for generating," then: The recited <u>function</u> is generating at least one substream. The <u>corresponding structure</u> is computer hardware and executable code implementing substreams, and equivalents thereof.	limitation subject to § 112(6). The recited <u>function</u> is generating at least one substream … each substream for containing data units only from the main stream. The <u>corresponding structure</u> is computer hardware and software that runs a search of a stream using a boolean attribute-and keyword expression or a 'chronological expression' and generates another stream having the results of the search, using a data structure that can be examined and to the extent possible manipulated by many processes simultaneously, and that supports the block-at-the-end operation (and structural equivalents).
'227-1	"means for receiving data units from other computer systems"	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is receiving data units from other computer systems. The <u>corresponding structure</u> is computer hardware and executable code that receives data units from other computer systems over a network connection, and equivalents thereof.	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is receiving data units from other computer systems. The <u>corresponding structure</u> is computer hardware and software for receiving data from other computer systems through electronic mail, World Wide Web, the Internet, or copying from steams in another computer system (and structural equivalents).

CLAIMS	CLAIM TERM, PHRASE, OR CLAUSE	MIRROR WORLDS' PROPOSED CONSTRUCTION	APPLE'S PROPOSED CONSTRUCTION
'227-1	"means for generating data units by the computer system"	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is generating data units by the computer system. The <u>corresponding structure</u> is executable code that creates data units, and equivalents thereof.	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is generating data units by the computer system. The <u>corresponding structure</u> is computer hardware running conventional UNIX applications such as emacs, xv, and ghostview (and structural equivalents), or software that creates documents by either cloning an existing document and adding it to the main stream, or creating a new empty document and adding it to the main stream (and structural equivalents).
'227-1	"means for selecting a timestamp to identify each data unit"	Mirror Worlds asserts that sufficient structure is recited in the element "means for selecting" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "a timestamp to identify each data unit" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for selecting," then: The parties agree that the recited <u>function</u> is selecting a timestamp to identify each data unit. The <u>corresponding structure</u> is executable code that selects the timestamp for a data unit based on the present time or a time	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is selecting a timestamp to identify each data unit. There is no <u>corresponding structure</u>. This limitation is indefinite.

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		designated by the user, and equivalents thereof.	
'227-1	"means for associating each data unit with at least one chronological indicator having the respective timestamp"	Mirror Worlds asserts that sufficient structure is recited in the element "means for associating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "each data unit" "timestamp" "chronological indicator having a respective timestamp" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for associating," then: The parties agree that the recited <u>function</u> is associating each data unit with at least one chronological indicator having a respective timestamp. The <u>corresponding structure</u> is executable code implementing the main stream, and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). In 227-1, the parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is associating each data unit with at least one chronological indicator having the respective timestamp. The <u>corresponding structure</u> is computer hardware and software that associates a separate chronological indicator with every document received or generated by the computer system and puts the uniquely identifying timestamp for that document into the chronological indicator (and structural equivalents).
'227-25	"means for associating each data unit with at least one chronological indicator having a respective timestamp which identifies the data unit"	Mirror Worlds asserts that sufficient structure is recited in the element "means for associating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "each data unit" "timestamp" "chronological indicator having a respective timestamp" If, however, the court determines	This is a means-plus-function limitation subject to § 112(6). In '227-25, the recited <u>function</u> is associating each data unit with at least one chronological indicator having a respective timestamp which identifies the data unit. There is no <u>corresponding structure</u>.

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		that 35 U.S.C. § 112, ¶ 6 applies to the "means for associating," then: The recited <u>function</u> is associating each data unit with at least one chronological indicator having a respective timestamp. The <u>corresponding structure</u> is executable code implementing the main stream, and equivalents thereof.	This limitation is indefinite.
'227-1, 25	"means for including each data unit according to the timestamp in the respective chronological indicator in the main stream"	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is including each data unit according to the timestamp in the respective chronological indicator in the main stream. The <u>corresponding structure</u> is executable code implementing the main stream, and equivalents thereof.	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is including each data unit according to the timestamp in the respective chronological indicator in the main stream. The <u>corresponding structure</u> is computer hardware and software that adds every document received or generated by the computer system into a main stream according to the uniquely identifying timestamp in the document's chronological indicator using a data structure that can be examined and to the extent possible manipulated by many processes simultaneously, and that supports the block-at-the-end operation (and structural equivalents).
'227-1 and 25	"means for maintaining the main stream and the substreams as	The parties agree that this is a means-plus-function limitation subject to § 112(6).	The parties agree that this is a means-plus-function limitation subject to § 112(6).

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	persistent streams"	The recited function is maintaining the main stream and the substreams as persistent streams. The corresponding structure is executable code that dynamically updates the main stream and executable code that dynamically updates substreams, and equivalents thereof.	The recited function is maintaining the main stream as a persistent stream. The corresponding structure is computer hardware and software that adds every document received or generated by the computer system into a main stream according to the uniquely identifying timestamp in the document's chronological indicator using a data structure that can be examined and to the extent possible manipulated by many processes simultaneously, and that supports the block-at-the-end operation (and structural equivalents). The recited function is maintaining the substreams as persistent streams. The corresponding structure is computer hardware and software that act as a filter by examining each new document that enters the main stream using the search criteria from each substream that has been created and not destroyed and that adds documents that match those search criteria to the appropriate stream (and structural equivalents).
'227-6	"means for displaying alternative versions of the content of the	Mirror Worlds asserts that sufficient structure is recited in the element "means for displaying" to take this element outside the constraints of 35	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited function

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	"data units"	U.S.C. § 112, ¶ 6. "alternative versions of the content of the data units" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for displaying," then: The parties agree that the recited <u>function</u> is displaying alternative versions of the content of the data units. The <u>corresponding structure</u> is browse cards/glance views, and equivalents thereof.	is displaying alternative versions of the content of the data units. The <u>corresponding structure</u> is computer hardware and software that displays the X Window System window shown in Fig. 1, including specifically the alternative version of a document shown as 100, which was created using 'header stripping' to identify the first non-trivial words in a document, or using complex analysis that identifies the 'most important' words, pictures, and/or sounds in the document (and structural equivalents).
'227-9	"means for archiving a data unit associated with a timestamp older than a specified time point while retaining the respective chronological indicator and/or a data unit having a respective alternative version of the content of the archived data unit"	Mirror Worlds asserts that sufficient structure is recited in the element "means for archiving" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "archiving a data unit associated with a timestamp older than a specified time point" "retaining the respective chronological indicator and/or a data unit having a respective alternative version of the content of the archived data unit" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for archiving," then: The parties agree that the recited <u>function</u> is archiving a data unit	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is archiving a data unit associated with a timestamp older than a specified time point while retaining the respective chronological indicator and/or a data unit having a respective alternative version of the content of the archived data unit. The <u>corresponding structure</u> is computer hardware and software that monitors remaining disk space, and when available space is low, automatically moves all documents older than some date from immediately accessible storage to cheaper, long-term storage, after asking the user to insert diskettes or other storage

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		associated with a timestamp older than a specified time point while retaining the respective chronological indicator and/or a data unit having a respective alternative version of the content of the archived data unit. The <u>corresponding structure</u> is computer hardware and executable code implementing archiving of data units, and equivalents thereof.	media if necessary (and structural equivalents).
'227-10	"means for operating on any of the streams using a set of operations selected by a user"	Mirror Worlds asserts that sufficient structure is recited in the element "means for operating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "a set of operations selected by a user" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for operating," then: The parties agree that the recited <u>function</u> is operating on any of the streams using a set of operations selected by a user. The <u>corresponding structure</u> is executable code implementing user selectable operations on streams, and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is means for operating on any of the streams using a set of operations selected by a user. The <u>corresponding structure</u> is computer hardware running software which is capable of performing any of the "new," "clone," "transfer," "find," "summarize," copy, merge, print, and freeze operations on a stream (and structural equivalents).
'227-11	"means to generate substreams from existing substreams"	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is to generate substreams from existing	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is to generate

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		substreams. The corresponding structure is executable code implementing incremental substreams, and equivalents thereof.	substreams from existing substreams. The corresponding structure is computer hardware running software that runs a search of a substream using a Boolean attribute-and-keyword expression or a 'chronological expression' and generates another stream having the results of the search, using a data structure that can be examined and to the extent possible manipulated by many processes simultaneously, and that supports the block-at-the-end operation (and structural equivalents).
'227-12	"means for generating a data unit comprising an alternative version of the content of another data unit"	Mirror Worlds asserts that sufficient structure is recited in the element "means for generating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "a data unit comprising alternative versions of the content of the data units" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for generating," then: The parties agree that the recited function is generating a data unit comprising an alternative version of the content of another data unit. The corresponding structure is executable code implementing alternative versions of data units, and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited function is generating a data unit comprising an alternative version of the content of another data unit. The corresponding structure is computer hardware and software that creates an alternative version of a document for use in archiving that remains in the computer system when the another document has been archived (and structural equivalents).

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'227-12	"means for associating the alternative version data unit with the chronological indicator of the another data unit."	Mirror Worlds asserts that sufficient structure is recited in the element "means for associating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "alternative version data unit with the chronological indicator of the another data unit" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for associating," then: The parties agree that the recited <u>function</u> is associating the alternative version data unit with the chronological indicator of the another data unit. The <u>corresponding structure</u> is executable code implementing alternative versions of data units, and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is associating the alternative version data unit with the chronological indicator of the another data unit. The <u>corresponding structure</u> is computer hardware and software that takes the chronological indicator associated with the another document and associates it with the alternative version data unit for use in archiving (and structural equivalents).
'227-25	"means for representing one or more data units of a selected stream on a display device as document representations ... the order of appearance of each data representation on the display device determined by	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is representing one or more data units of a selected stream on a display device as document representations, each document representation including the timestamp and the order of appearance of each data representation on the display device determined by the timestamp of the respective data unit). The <u>corresponding structure</u> is	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is representing one or more data units of a selected stream on a display device as document representations, each document representation including the timestamp and the order of appearance of each data representation on the display device determined by the timestamp of the respective data unit).

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	the timestamp of the respective data unit"	the graphical stream view, and equivalents thereof.	The corresponding structure is computer hardware and software that displays the X Windows System window shown in Fig. 1 and creates the necessary document representations (and structural equivalents).
'227-25	"means for selecting which data units are represented on the display device by selecting one of the document representations and displaying document representations corresponding to data unit having timestamps within a range of a timepoint"	Mirror Worlds asserts that sufficient structure is recited in the element "means for selecting" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "document representations" "data units" "timestamps" "range of a timepoint" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for selecting," then: The parties agree that the recited function is selecting which data units are represented on the display device by selecting one of the document representations and displaying document representations corresponding to data units having timestamps within a range of a timepoint. The corresponding structure is the graphical stream view , and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited function is selecting which data units are represented on the display device by selecting one of the document representations and displaying document representations corresponding to data units having timestamps within a range of a timepoint. There is no corresponding structure. This phrase is indefinite.
'227-25	"means for selecting one or more of the document representations	Mirror Worlds asserts that sufficient structure is recited in the element "means for selecting" to take this element outside the constraints of 35	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112,

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	with a pointing device so that the data units represented by the selected document representations are further displayed with a second document representation comprising an alternative version of the respective data unit"	U.S.C. § 112, ¶ 6. "document representations" "pointing device" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for selecting," then: The parties agree that the recited function is selecting one or more of the document representations with a pointing device so that the data units represented by the selected document representations are further displayed with a second document representation comprising an alternative version of the respective data unit. The <u>corresponding structure</u> is the graphical stream view, and equivalents thereof.	¶ 6 applies, the recited <u>function</u> is selecting one or more of the document representations with a pointing device so that the data units represented by the selected document representations are further displayed with a second document representation comprising an alternative version of the respective data unit. The <u>corresponding structure</u> is computer hardware, including a mouse and a video display screen, and software that (1) creates a 'glance' view of documents using header-stripping to include the first non-trivial words of the document, or using complex analysis to include the most important words, pictures and/our sounds, (2) receives input from the mouse and displays a mouse pointer on the display device so that the user can slide the mouse pointer over the displayed document representations; and (3) that displays the glance view of a document in response to the mouse pointer selecting that document by touching its document representation.
'427-1, 8, 16, and 25	"document organizing facility"	"software that organizes documents"	Document organizing facility is a means-plus-function limitation subject to § 112(6). Recited functions and structure are set forth below. Alternatively, if the Court finds this is not a means-plus-function limitation, Apple proposes the

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			following construction: "the portion of a stream-based operating system whose purpose is to organize documents" In '427-1 and '427-8, the recited <u>functions</u> are: (a) receiving documents created by diverse applications in diverse formats specific to the respective applications; (b) automatically associating [respective] selected indicators with the received documents; (c) automatically archiving the documents and indicators in consistent format for selective retrieval; and (d) automatically creating information specifying respective glance views of said documents and respective document representations of said documents. There is no <u>corresponding structure</u>. This phrase is indefinite.
			In '427-16, the recited <u>functions</u> are: (a) associating selected indicators with received or created documents; and (b) creating information specifying glance views of the respective documents and information specifying document representations of the respective documents. There is no <u>corresponding</u>

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			structure.
			This phrase is indefinite.
			In '427-25, the recited <u>functions</u> are: (a) associating chronological indicators with documents received from diverse applications in diverse formats; and (b) creating information specifying glance views of the respective documents and information specifying document representations of respective documents. There is no <u>corresponding structure</u>. This phrase is indefinite.

DISPUTED TERMS IN APPLE'S PATENT

CLAIMS	CLAIM TERM, PHRASE, OR CLAUSE	MWT'S PROPOSED CONSTRUCTION	APPLE'S PROPOSED CONSTRUCTION
'101-5	"means for displaying a graphical iconic representation of a collection of said first plurality of documents"	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is displaying a graphical iconic representation of a collection of said first plurality of documents. The <u>corresponding structure</u> is executable code that displays the icon representing a collection of documents (*i.e.*, pile), and equivalents thereof.	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is displaying a graphical iconic representation of a collection of said first plurality of documents. The <u>corresponding structure</u> is software and a video display screen, such as a video (CRT) display monitor or a liquid crystal display, coupled to a system bus that receives commands and data from a processor, and structural equivalents.
'101-5	"means for displaying a first indicia of a first document of said collection by selecting a first position from said graphical iconic representation"	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is displaying a first indicia of a first document of said collection by selecting a first position from said graphical iconic representation. The <u>corresponding structure</u> is executable code that initiates browsing of a pile after the cursor has been positioned over the iconic graphical representation of the collection of documents (pile) for a predetermined period of time and displays a first indicia of a first document of the collection (pile) by selecting a first position on	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is displaying a first indicia of a first document of said collection by selecting a first position from said graphical iconic representation. The <u>corresponding structure</u> is software and (a) a video display screen, such as a video (CRT) display monitor or a liquid crystal display, coupled to a system bus that receives commands and data from a processor, and structural equivalents; and (b) an I/O controller to control signals received from a keyboard and/or

CLAIMS	CLAIM TERM, PHRASE, OR CLAUSE	MWT'S PROPOSED CONSTRUCTION	APPLE'S PROPOSED CONSTRUCTION
		the icon representing the collection, and equivalents thereof.	a cursor control device and structural equivalents.
'101-5	"means for displaying in series a second indicia of a second document and a third indicia of a third document by positioning said cursor first on a second position on said graphical iconic representation next on a third position on said graphical iconic representation"	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is displaying in series a second indicia of a second document and a third indicia of a third document by positioning said cursor first on a second position on said graphical iconic representation next on a third position on said graphical iconic representation. The <u>corresponding structure</u> is executable code that displays in series a second indicia of a second document and a third indicia of a third document by positioning a cursor first on a second position on the icon representing the collection (pile) and next on a third position on the icon representing the collection (pile), and equivalents thereof.	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is displaying in series a second indicia of a second document and a third indicia of a third document by positioning said cursor first on a second position on said graphical iconic representation next on a third position on said graphical iconic representation. The <u>corresponding structure</u> is software and (a) a video display screen, such as a video (CRT) display monitor or a liquid crystal display, coupled to a system bus that receives commands and data from a processor, and structural equivalents; and (b) an I/O controller to control signals received from a keyboard and/or a cursor control device (such as mouse, graphic tablet, touch tablets, trackballs, pen input mechanisms, or touch screens) and structural equivalents.
'101-1, 5, 9	"a graphical iconic representation of a collection of said first plurality of documents"	"a small static picture representing a collection of documents"	"a collection of two or more document icons displayed together"