

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

NOKIA CORPORATION, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 APPLE INC., )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

APPLE INC., )  
 )  
 Counterclaim-Plaintiff, )  
 )  
 v. )  
 )  
 NOKIA CORPORATION and NOKIA INC., )  
 )  
 Counterclaim-Defendants. )  
 \_\_\_\_\_ )

CIVIL ACTION NO. 10-CV-249

**JURY TRIAL DEMANDED**

**APPLE INC.’S MOTION FOR  
CLAIM CONSTRUCTION OF CERTAIN DISPUTED TERMS**

Defendant and Counterclaim-Plaintiff Apple Inc. (“Apple”) hereby moves for construction of the seven disputed claim terms set forth below. As grounds for this motion, Apple states that construction of each term listed below is necessary to resolve a disputed issue concerning infringement or invalidity, as detailed fully in Apple’s accompanying Memorandum in Support of Motion for Claim Construction.

Apple also requests a hearing on its proposed constructions of the disputed claim terms from Nokia’s asserted patents, for all the reasons set forth in Apple’s accompanying Memorandum in Support of Motion for Claim Construction.

**I. Disputed Terms from Nokia's Asserted Patents**

**A. U.S. Patent No. 6,317,083**

<b><u>Disputed Claim Term</u></b>	<b><u>Apple's Proposed Construction</u></b>
feed section extending from the reference plane to the lamina and coupled to the reference plane and the lamina	two conductors that each extend from the reference plane to the lamina

**B. U.S. Patent No. 6,348,894**

<b><u>Disputed Claim Term</u></b>	<b><u>Apple's Proposed Construction</u></b>
radio frequency antenna is integrated into the system connector / resonating region is integrated into the system connector	the radio frequency antenna, as distinct from the telephone antenna, is part of the system connector in that it is mounted on the same insulating block that the system connection pins are mounted on /  the resonating region of a radio frequency antenna, as distinct from the telephone antenna, is part of the system connector in that it is mounted on the same insulating block that the system connection pins are mounted on

**C. U.S. Patent No. 6,603,431**

<b><u>Disputed Claim Term</u></b>	<b><u>Apple's Proposed Construction</u></b>
antenna assembly space / space	space that contains the antenna assembly (antenna, ground plane, and raising component)

**D. U.S. Patent No. 7,558,696**

<b><u>Disputed Claim Term</u></b>	<b><u>Apple's Proposed Construction</u></b>
<p>position method selection device</p>	<p>This term is governed by 35 U.S.C. § 112 ¶ 6.</p> <p>The claimed function is to centrally manage a use of one or more positioning methods for more than one application.</p> <p>The corresponding structure disclosed in the specification is a device that includes an interface to two or more applications; an interface to two or more positioning methods; a register that stores parameters provided by the applications or the user describing the quality of the positioning data requested, and that stores parameters provided by the positioning methods describing the quality of the positioning data provided; and a controller that implements a decision-making algorithm. The decision-making algorithm selects, for each application, a positioning method whose parameter(s) correspond best with the parameter(s) requested by the application or the user.</p>

**E. U.S. Patent No. 7,532,680**

<b><u>Disputed Claim Term</u></b>	<b><u>Apple's Proposed Construction</u></b>
<p>variable gain [power amplifier/amplifier/circuit]</p>	<p>[power amplifier/amplifier/circuit] that modifies an input signal based on a gain value to produce an output signal, where the gain value can be varied over a continuous range of values</p>

<u>Disputed Claim Term</u>	<u>Apple's Proposed Construction</u>
variable gain means	<p>This term is governed by 35 U.S.C. § 112 ¶ 6.</p> <p>The claimed function is accomplishing a variable gain (i.e., modifying an input signal based on a gain value to produce an output signal, where the gain value can be varied over a continuous range of values).</p> <p>The corresponding structure disclosed in the specification is an RF attenuator that receives an automatic level control signal.</p>

**F. U.S. Patent No. 5,752,172**

<u>Disputed Claim Term</u>	<u>Apple's Proposed Construction</u>
variable gain driver amplifier	driver amplifier that modifies an input signal based on a gain value to produce an output signal, where the gain value can be varied over a continuous range of values

**II. Disputed Terms from Apple's Asserted Patents**

**A. U.S. Patent No. 5,612,719**

<u>Disputed Claim Term</u>	<u>Apple's Proposed Construction</u>
pointer	any mechanism or device for pointing to a particular location on a screen of a computer display, including a finger or stylus

**Dated:** December 17, 2010

By:  /s/ Dominic E. Massa  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2010, a copy of the foregoing document was caused to be served upon all counsel of record through the ECF System.

/s/Allyson J. Portney  
Allyson Portney