Exhibit 25

From:	Haskett, Christine [HaskettCS@cov.com]
Sent:	Friday, June 03, 2011 7:44 PM
To:	Richard Erwine
Cc:	Moto-Apple-662-WI; AppleCov; 'Cherensky, Steven'; 'Ho, Jill'; Weiswasser, Elizabeth; Rosenthal, Danielle; 'Watkins, Robert'
Subject:	Apple/Motorola: Proposed claim constructions (Wisconsin)
Attachments:	Apple Proposed WDWI Constructions - 6.3.11.DOC

Rich,

Per the parties' agreement, please find attached Apple's proposed constructions for the 27 claim terms selected by the parties earlier this week. As discussed, we will meet and confer at 9am Pacific on Monday morning to see if there are constructions we can agree on, or to find out if there is a way to adjust proposed constructions to bring us in line with each other or further focus the disputes. We will then finalize the list of 10 Apple patent terms and 6 Motorola patent terms for briefing, by noon Pacific on Monday.

Please let me know if you will set up a call-in number for the Monday call, or if you would like us to do so. Thanks.

Christine

Christine Saunders Haskett | COVINGTON & BURLING LLP
One Front Street, San Francisco, CA 94111
Tel: 415.591.7087 | Fax: 415.955.6587
chaskett@cov.com | www.cov.com

This message is from a law firm and may contain information that is confidential or legally privileged. If you are not the intended recipient, please immediately advise the sender by reply e-mail that this message has been inadvertently transmitted to you and delete this e-mail from your system. Thank you for your cooperation.

Apple v. Motorola
Proposed Constructions for WDWI Patents
Apple, Inc. v. Motorola Inc., et al., Case No. 3:10-CV-00662-bbc (W.D. WI)

RE 39,486 & 5,929,852

Claim Term	Apple's Proposed Construction
software component architecture	arrangement of software components

6,424,354

Claim Term	Apple's Proposed Construction
connection information	a representation of the [first/receiver] object's interest in, and an associated object method for, receiving notification of a change to a [second/source] object

6,343,263

Claim Term	Apple's Proposed Construction
device handler	software associated with an interface device that sets up data flow paths, and also presents data and commands from the data managers to a real-time data processing engine
realtime services	data handling in realtime

6,275,983

Claim Term	Apple's Proposed Construction
during runtime	while running or executing

5,969,705

Claim Term	Apple's Proposed Construction
events for controlling said user interface display	information regarding the status of the operations performed by the background process for the foreground process that is used to control the user interface display

6,946,647

Claim Term	Apple's Proposed Construction
analyzer server	a program routine(s) that receives data, uses patterns to detect structures in the data, and links actions to the detected structure
linking actions to the detected structures	linking detected structures to computer subroutines that cause the CPU to perform a sequence of operations on the particular structures to which they are linked

5,915,131

Claim Term	Apple's Proposed Construction
activation models	code that defines the runtime environment for a family of Input/Output services and its plug-ins

Claim Term	Apple's Proposed Construction
storing means for storing a specific set of events of which said at least one event consumer is to be informed	Function: Storing a specific set of events of which said at least one event consumer is to be informed. Structure: Combination of: (1) subscription matrix as shown in Figs. 2 and 4 as element 330, and as described in the '337 patent specification col. 7:61-65 and 8:6-35; (2) event queues as shown in Figs. 2 and 4 as element 320, and as described in the '337 patent specification col. 6:59-65 and 7:26-60; and (3) event kind headers as shown in Figs. 2 and 4 as element 331, and as described in the '337 patent specification, col. 8:61-9:4. OR: (1), (2) and (3) above, and (4) a sequential consumer database as shown in Fig. 2 as element 350 and Fig. 5b, and as described in the '337 patent specification col. 7:65-8:5 and 8:36-55.
distributor means for receiving the event from the control means and directing said control means to distribute an appropriate event to an appropriate event consumer	Function: receiving the event from the control means and directing said control means to distribute an appropriate event to an appropriate event consumer. Structure: Combination of: (1) distributor(s) as shown in Fig. 2 as element 340, programmed to perform step 624 in Fig. 9C and corresponding description at col. 9:7-19 (2) an API which allows filtering each consumer who has subscribed to that kind of event. *See, e.g.*, col. 19:25-19:47.

5,519,867

Claim Term	Apple's Proposed Construction
means for storing said executable program logic in an object-oriented class library	Function: storing said executable program logic in an object-oriented class library Structure: An object-oriented class library that can be modified independently of the application programs. *See, e.g.*, Fig. 4; 7:2-6; 9:40-42.

5,481,721

Claim Term	Apple's Proposed Construction
dynamic binding	binding messages to the actual methods to be invoked during runtime
operating system based message	Plain and ordinary meaning

5,455,599

Claim Term	Apple's Proposed Construction
modeling layer object	a graphic object in the modeling layer that encapsulates both geometry and appearance
means for capturing state information and rendering information at the grafport object	Function: capturing state information and rendering information at the grafport object Structure: polymorphic cache. *See, e.g.*, 9:56-58

7,479,949

Claim Term	Apple's Proposed Construction
heuristic	one or more rules to be applied to data to assist in drawing inferences from that data

6,493,002

Claim Term	Apple's Proposed Construction
programming module	code that performs a function

6,175,559

Claim Term	Apple's Proposed Construction
preamble sequence	a signal that is sent by the transmitter prior to the transmission of the information-bearing signal
outer code	a code that consists of multiple repetitions of a sequence of chips, and that is common for all handset transmitters

5,490,230

Claim Term	Apple's Proposed Construction
a frame of information	a time period of speech data, having no overlapping subframes with respect to the next time period of speech data
long term energy value for [the/a] frame of information	the total energy for the current frame of speech
receiving	obtaining via transmission
extracting from [the recovered signal/the speech coded information] at least one parameter	taking a transmitted value out of the [speech signal/speech coded information]

5,319,712

Claim Term	Apple's Proposed Construction
transmit overflow sequence number	a number that is updated within the transmitter when the packet sequence number rolls over, but is not communicated to the receiver
network layer	a network layer of the Open Systems Interconnection ("OSI") model

5,572,193

Claim Term	Apple's Proposed Construction
transmitting . . . from the subscriber unit to the communication system	transmitting from a mobile or portable unit over a cellular radio telephone system