

EXHIBIT 24

UNITED STATES INTERNATIONAL TRADE COMMISSION

Washington, D.C.

In the Matter of

**CERTAIN MOBILE COMMUNICATIONS
AND COMPUTER DEVICES AND
COMPONENTS THEREOF**

Inv. No. 337-TA-704

**ORDER NO. 18: CONSTRUING THE TERMS OF THE ASSERTED CLAIMS OF
THE PATENTS AT ISSUE**

(July 30, 2010)

connection object representing the links between specific source object events and receiver objects, along with the receiver object method it needs to invoke the dispatch change event.”

(*Id.*) Nokia further asserts that both the specification and the dependent claims confirm that the connection information resides in the connection object. (RMIB at 100-101; RMRB at 40 (“This is consistent with the specification, which describes that the connection object dispatches notifications to the appropriate method of the notification receiver. That the connection information is stored in the connection object is further confirmed by the language used in the dependent claims, which refer to ‘the connection information *in the* connection object.’” (emphasis original)).)

Nokia objects to Apple’s construction, arguing that it “merely rearranges the words within the phrase in dispute,” and as a result, fails to provide any guidance as to the meaning of “connection information representing a first object’s interest in, and an associated object method for, receiving notification of a change to a second object.” (RMIB at 101.) Nokia disputes Apple’s contention that because “the ‘registration’ step requires that the connection information be registered ‘using’ (claims 41 and 42) or ‘with’ (claim 1) a connection object,” the “connection information need not be present with the object.” (RMRB at 41.) In rebuttal, Nokia argues that “[t]he fact that the connection object must be used to perform the registration step suggests that the connection information is part of that object, a fact that the dependent claims assume and that the prosecution history explicitly requires.” (RMRB at 41.)

Staff supports Nokia’s construction. Staff states that the registration step recited in the asserted independent claims requires that the connection information must be registered “with” or “using” the connection object. (SMIB at 83.) This, Staff claims, indicates that “the connection information is indeed contained within the connection object.” (*Id.*) Staff also

asserts that the dependent claims confirm that the connection information is stored in the connection object. (SMIB at 83; SMRB at 33 (stating, “the dependent claims confirm that the connection information of the corresponding independent claims must indeed be stored ‘in the’ connection object regardless of whether that connection information is registered ‘with’ or ‘using’ the connection object.”).)

The main difference between the parties’ proposed constructions is whether the connection information must be stored *in* a connection object. The undersigned agrees with Nokia and Staff that the connection information must indeed be stored in a connection object, finding this to be consistent with the prosecution history, the specification, and the claims. Apple’s arguments to the contrary are unavailing.

During prosecution, the applicant explicitly stated that the “‘connection information’ is contained within ‘connection objects.’” (08/15/01 Resp. to Office Action at 8 (stating, “‘Connection information’ is contained within ‘connection objects’ The connection objects, in turn, have more specialized information about which of the events generated by a source object are of particular interest to each of the receiver objects for which it is responsible.”).) The specification provides additional support for Nokia’s and Staff’s construction for it establishes that the “connection information” resides in the connection object and that the receiver object method is part of the connection information. (*See, e.g.*, ’354 patent at 11:14-18 (“For each connection registered with the notifier as interested in the notification, at function block 1860, the connection is asked to dispatch the notification. In turn, at function block 1870, the connection dispatches the notification to the appropriate method of the notification receiver.”).) The dependent claims further confirm that the “connection information” is stored in the connection object because dependent claims 2, 3, 5-10, 44-47, and 50 all refer to the “connection

information *in the* connection object,” regardless of whether that connection information is registered “with” or “using” the connection object. (*Id.* at claims 2, 3, 5-10, 44-47, and 50.)¹⁸

Accordingly, the undersigned construes the term “connection information representing the first/receiver object’s interest in, and an associated object method for, receiving notification of a change to a second/source object” to mean “***information, stored in a connection object, indicating specific source object events in which a receiver object is interested and the receiver object method that should receive notification.***”

c) “connection object”¹⁹

The term “connection object” appears in independent claims 1, 41, and 42, as well as dependent claims 2-4, 7, and 8, of the ’354 patent. The parties disagree on the proper claim construction, and construe the term as follows:

Apple’s Proposed Construction	Nokia’s Proposed Construction	Staff’s Construction
Plain meaning. In the event the court disagrees, the construction should be “object containing a method for providing notifications from the second object to the first object.”	Object containing methods for dispatching notifications from the notifier object to the specific receiver objects that have identified to the connection object an interest in specific source object events.	<i>See</i> Nokia’s proposed construction. NOTE: The Staff has indicated it would not be opposed to replacing the “notifier object” in Nokia’s proposed construction with simply “notifier.”

Apple asserts that its proposed construction is supported by both the claims and the specification. (CMIB at 70.) Apple contends that Nokia’s construction, on the other hand, seeks to read in a “notifier object,” which Apple claims, is improper for three reasons. First, Apple argues that Nokia’s proposed construction would exclude the preferred three-method embodiment by injecting a fourth object, *i.e.*, a “notifier object,” to handle notifications. (CMIB

¹⁸ The undersigned agrees with Staff that the “dependent claims do more than simply refer to the use of connection information in the connection object. Instead, they clarify that connection information is actually taken from the connection object itself, and thus must be stored within the connection object.” (*See* SMRB at 33, fn. 35.)

¹⁹ The parties agree that the terms “first object” and “second object” can be construed as “receiver object” and “source object,” respectively. (JC at App. D.)