

Proxense LLC v. Apple, Inc., 6:24-cv-00143-ADA

Proxense’s Proposed Constructions

Patent Claims	Apple’s Proposed Terms, Phrases or Clauses	Proxense’s Proposed Construction
’730 claims 1, 8 ’954 patent, claim 1	“persistently storing biometric data of the user and a plurality of codes and other data values comprising a device ID code uniquely identifying the integrated device and a secret decryption value ... to a storage element” / “stores biometric data of a user and a plurality of codes and other data values comprising a device ID code uniquely identifying the integrated device and a secret decryption value ... to the memory”	Adopt the Court’s prior construction in <i>Proxense v. Samsung</i> : No construction needed; plain and ordinary meaning
’730 claims 1, 8 ’954 claim 1 ’905 claim 1	“access message”	Adopt the Court’s prior construction in <i>Proxense v. Samsung</i> : A signal or notification enabling or announcing access
’730 claim 8	“a verification unit, in communication with the memory, receives scan data from a biometric scan for comparison against the biometric data, and if the scan data matches the biometric data, wirelessly sends one or more codes from the plurality of codes and the other data values for authentication by an agent that is a third- party trusted authority possessing a list of device ID codes uniquely identifying legitimate integrated devices”	No construction needed; plain and ordinary meaning beyond any terms that the Court previously construed in <i>Proxense v. Samsung</i> .

'730 claims 1, 8 '954 claim 1 '905 claim 1 '989 claim 1	“device ID code” / “ID code” / “identification (ID) code”	Adopt the Court’s prior construction in <i>Proxense v. Samsung</i> : A unique code identifying a device
'730 claims 1, 8 '954 claim 1	“tamper proof format”	Adopt the Court’s prior construction in <i>Proxense v. Samsung</i> : No construction needed; plain and ordinary meaning
'042 patent claims 1, 6 '188 patent claims 1, 3, 4, 7	“hybrid device”	Adopt the Court’s prior construction in <i>Proxense v. Samsung</i> : A device comprising an integrated personal digital key (PDK) and an integrated receiver-decoder circuit.
'042 patent claim 1 '188 patent claim 1	“A hybrid device comprising”	Plain and ordinary meaning. No construction necessary beyond adopting the Court’s prior construction of “hybrid device” in <i>Proxense v. Samsung</i> .
'042 patent claims 1, 6 '188 patent claim 1	“personal digital key (PDK)”	Adopt the Court’s prior construction in <i>Proxense v. Samsung</i> : An operably connected collection of elements including an antenna and a transceiver for communicating with a RDC and a controller and memory for storing information particular to a user

'042 patent claims 1, 6	“receiver-decoder circuit (RDC)”	Adopt the Court’s prior construction in <i>Proxense v. Samsung</i> :
'188 patent claims 1, 3		A component or collection of components, capable of wirelessly receiving data in an encrypted format and decoding the encrypted data for processing