

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

HBCU MESSAGING US LP,

*Plaintiff,*

v.

APPLE, INC.

*Defendants.*

C.A. No. 1:24-cv-1199-ADA

**JURY TRIAL DEMANDED**

**HBCU MESSAGING US LP'S PROPOSED CONSTRUCTIONS**

Pursuant to the April 9, 2025, Agreed Scheduling Order (Dkt. No. 49), Plaintiff HBCU Messaging US LP (“HBCU”) hereby discloses the following proposed terms, constructions, and where applicable extrinsic evidence for the claim terms found in claim terms of the U.S. Patent No. 8,918,127 (the “127 patent”), U.S. Patent No. 11,012,827 (the “827 patent”), U.S. Patent No. 11,089,450 (the “450 patent”), U.S. Patent No. 11,653,182 (the “182 patent”), U.S. Patent No. 11,653,183 (the “183 patent”), U.S. Patent No. 11,991,600 (the “600 patent”), and U.S. Patent No. 11,991,601 (the “601 patent”).

<b>HBCU’s Proposed Patent Claim Terms</b>	<b>HBCU’s Proposed Construction of its Proposed Patent Claim Terms</b>	<b>Extrinsic Evidence</b>
<p>“bearer”</p> <p>(’127 Patent, claims 1 and 11)  (’827 Patent, claims 1, 2, 28)  (’182 Patent claims 14, 15, 29, 30) (’183 Patent claims 1, 6, 7, 12, 14, 20) (’600 Patent claims 1, 13, 21, 29) (’601 Patent claim 12)</p>	<p>A protocol for transmitting data including SMS, packet-switched, GSM SS7, HSDPA, WCDMA, CDMA2000, or GPRS</p>	
<p>“cellular core network”</p> <p>(’127 Patent, claims 1 and 11)  (’600 Patent, claims 5 and 16)</p>	<p>A network responsible for: routing voice, data, and multimedia traffic between mobile devices and a wider network; maintaining a database of subscriber information; providing access to a short message service center (SMSC) or multimedia message (MMS) server; and providing Internet access to one or more mobile devices via at least mobile operator base stations</p>	
<b>Apple’s Proposed Patent Claim Terms</b>	<b>HBCU’s Proposed Construction of Apple’s Proposed Patent Claim Terms</b>	<b>Extrinsic Evidence</b>
<p>“wherein...when”</p> <p>(’127 and ’182 patents)</p>	<p>Plain and ordinary meaning</p>	
<p>“third party provider”</p> <p>(’827, ’600, and ’601 patents)</p>	<p>Plain and ordinary meaning</p>	

HBCU reserves the right to amend the foregoing statement if warranted by further investigation of relevant evidence. HBCU further reserves the right to amend its statement in response to any terms identified and constructions offered by Apple.

Dated: August 15, 2025

Respectfully submitted,

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By: /s/ Timothy Devlin

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all counsel of record via electronic mail.

*/s/ Timothy Devlin*  
Timothy Devlin