

Exhibit B
Parties' P.R. 4-3(b) Disclosure of Parties' Respective Proposed Constructions

Location in Claims	Claim Term	Plaintiff's Construction	Defendants' Construction
'518 Patent (claims 45 and 46)	"image vector entity"	"a format of information representing an image to be displayed which includes a shape-designating statement used to draw the shape of a real entity at the specified position."	No construction necessary / plain and ordinary meaning.
'518 Patent (claims 45 and 46)	The specific order in which the recited limitations are to be performed.	No construction necessary, the claim elements are not limited to certain order of performance.	The limitations occur in the order recited in the claims.
'413 Patent (claim 64)	"means for selecting a basic map in accordance with said map identification of the RII"	<p>Function: "selecting a basic map in accordance with said map identification of the RII."</p> <p>Structure: "a software program running on a general purpose microprocessor (controller as shown in FIGS. 20A-B) for selecting a basic map using a map identifier."</p>	<p>Function: "selecting a basic map in accordance with said map identification of the RII"</p> <p>Structure: No corresponding structure, and therefore invalid as indefinite.</p>

Porto Technology Co. Ltd. v. Apple Inc. et al., No. 2:15-cv-00457 (E.D. Tex. 2015)
(Lead Consolidated Case)

<p>'413 Patent (claim 64)</p>	<p>“means for producing a route-information containing image in accordance with said BM and said RII, said route information-containing image representing at least one path to a specific location”</p>	<p>Function: “producing a route-information containing image in accordance with said BM and said RII, said route information-containing image representing at least one path to a specific location.”</p> <p>Structure: “a software program running on a general purpose microprocessor (controller as shown in FIGS. 20A-B) for creating a route-information containing image based on the BM and RII.”</p>	<p>Function: “producing a route-information containing image in accordance with said BM and said RII, said route information-containing image representing at least one path to a specific location”</p> <p>Structure: No corresponding structure, and therefore invalid as indefinite.</p>
<p>'413 Patent (claim 79)</p>	<p>“time-variant data in section-wise” / “designating an attribute of said component based on the time-variant data of said TVI in section-wise”</p>	<p>Plain and ordinary meaning, no construction necessary.</p>	<p>Indefinite.</p>