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Exhibit A-1

Google's Proposed Claim Constructions for U.S. Patent No. 5,838,551

Term	Proposed Construction(s)	Supporting Evidence
"extending across substantially the whole area within the confines of the edges of the substrate" [Google]	Indefinite If not indefinite: "extending across the substrate area other than perforations to provide insulating clearance"	This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase.
Antecedent basis construction	as .	
"the board" [Google & Rockstar]	Indefinite	This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase.

Exhibit A-2
Google's Proposed Claim Constructions for U.S. Patent No. 6,037,937

Term	Proposed Construction(s)	Supporting Evidence
"control tool function" [Google]	"navigation function"	The specification of the '937 patent, including the 1:15-17; 2:5-11, 2:18-30; 3:22-25; 3:32-35; 4:50-53; 4:58-59; 5:9-6:38 and Figs. 7A-11B and corresponding text.
		The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein.
		GOOG-NDCA-13-5933-CC-00000077- 00000081
		GOOG-NDCA-13-5933-CC-00000109- 00000111
		GOOG-NDCA-13-5933-CC-00000125- 00000144
		GOOG-NDCA-13-5933-CC-00000145- 00000168
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '937 patent.
"physical viewing area" [Rockstar]	"display area"	The specification of the '937 patent, including the 3:25-31; 4:22-53; 4:56-5:12; 5:27-33 and Figs. 7A-11B and corresponding text.
		The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art

Term	Proposed Construction(s)	Supporting Evidence
		references cited therein.
		GOOG-NDCA-13-5933-CC-00000077-
		00000081
		GOOG-NDCA-13-5933-CC-00000109-
		00000111
		GOOG-NDCA-13-5933-CC-00000125-
		00000144
		GOOG-NDCA-13-5933-CC-00000145- 00000168
		00000108
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction to practice of the asserted claims of the '937
		patent.
"manipulable area portion"	"portion of the physical viewing area where	The specification of the '937 patent,
[Rockstar]	displayed content information is subject to manipulation"	including the 3:25-31; 4:50-60; 5:9-26; 5:27-33 and Figs. 7A-11B and corresponding text.
	manipulation	33 and Figs. /A-11B and corresponding text.
		The prosecution history of the '937 patent,
		including Jan. 22, 1999 Amendment, June
		16, 1999 Amendment, and prior art references cited therein.
		Total meeting and another.
		GOOG-NDCA-13-5933-CC-00000077-
		00000081
		GOOG-NDCA-13-5933-CC-00000109- 00000111
		GOOG-NDCA-13-5933-CC-00000125-
		00000144
		GOOG-NDCA-13-5933-CC-00000145-
		00000168

Term	Proposed Construction(s)	Supporting Evidence
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '937
	D	patent.
"determining if the user input selects the control tool" [Rockstar]	Plain meaning	The specification of the '937 patent, including the 5:14-19; 5:27-35; 6:35-38 and Figs. 7A-11B and corresponding text.
		The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein.
		GOOG-NDCA-13-5933-CC-00000077- 00000081
		GOOG-NDCA-13-5933-CC-00000109-
		00000111
		GOOG-NDCA-13-5933-CC-00000125-
		00000144
		GOOG-NDCA-13-5933-CC-00000145-
		00000143- 00000168
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '937 patent.
"permitting the at least one control tool function to be activated when the user input	"enabling the at least one control tool function to be activated once the user input selects the control tool"	The specification of the '937 patent, including the 5:14-19; 5:27-35; 5:40-44 and Figs. 7A-11B and corresponding text.
does select the control tool"	("control tool function" used as construed above)	6
[Google]		The prosecution history of the '937 patent,
		including Jan. 22, 1999 Amendment, June
		16, 1999 Amendment, and prior art
		references cited therein.

Term	Proposed Construction(s)	Supporting Evidence
"user input" [Rockstar]	Plain meaning See below – antecedent basis for "user input" is "user input" in the "receiving" limitation of claim 1, or the "means for receiving" limitation of claim 13	GOOG-NDCA-13-5933-CC-00000077- 00000081 GOOG-NDCA-13-5933-CC-00000109- 00000111 GOOG-NDCA-13-5933-CC-00000125- 00000144 GOOG-NDCA-13-5933-CC-00000145- 00000168 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '937 patent. The specification of the '937 patent, including the 3:25-31; 4:22-40; 4:50-60; 5:9-12; 5:27-33 and Figs. 3A-11B and corresponding text. The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000077- 00000081 GOOG-NDCA-13-5933-CC-00000125- 00000111 GOOG-NDCA-13-5933-CC-00000125- 00000144 GOOG-NDCA-13-5933-CC-00000145- 00000168 Any additional documents cited or relied

Term	Proposed Construction(s)	Supporting Evidence
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '937
66		patent.
"receiving a user input to the physical viewing area corresponding to the manipulable area portion and the representation of the	"receiving a user input to the display area where the representation of the control tool overlays the manipulable area portion"	The specification of the '937 patent, including 3:25-31; 4:22-40; 4:50-60; 4:65-5:12; 5:27-33 and Figs. 3A-11B and corresponding text.
control tool" [Rockstar]		The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein.
		GOOG-NDCA-13-5933-CC-00000077- 00000081
		GOOG-NDCA-13-5933-CC-00000109-
		00000111
		GOOG-NDCA-13-5933-CC-00000125-
		00000144
		GOOG-NDCA-13-5933-CC-00000145- 00000168
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '937 patent.
"means for providing a	Subject to § 112, ¶ 6	The specification of the '937 patent,
manipulable area portion in a		including 5:9-14, 5:29-33, Figures 3A-3B, 8,
physical viewing area, said	Function : providing a manipulable area portion in a	10A-10C and corresponding text.
manipulable area portion having at least one	physical viewing area, said manipulable area portion having at least one manipulation function associated	The prosecution history of the '027 potent
manipulation function	therewith	The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June
associated therewith"	uicicwitti	16, 1999 Amendment, and prior art
[Google & Rockstar]	Structure : LCD 472 and memory 440 storing, and	references cited therein.

Term	Proposed Construction(s)	Supporting Evidence
	feature processor 430 executing, program 510 which performs the algorithm disclosed at 5:9-14, 5:29-33, Figures 3A-3B, 8, 10A-10C.	GOOG-NDCA-13-5933-CC-00000077- 00000081 GOOG-NDCA-13-5933-CC-00000109- 00000111 GOOG-NDCA-13-5933-CC-00000125- 00000144 GOOG-NDCA-13-5933-CC-00000145- 00000168 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '937
"means for displaying a representation of a control tool overlaying the manipulable area portion, said control tool having at least one control tool function associated therewith" [Google & Rockstar]	Subject to § 112, ¶ 6 Function: displaying a representation of a control tool overlaying the manipulable area portion, said control tool having at least one control tool function associated therewith Structure: LCD 472 and memory 440 storing, and feature processor 430 executing, program 510 and navigation program 530, which perform the algorithm disclosed at 5:9-16; 5:40-6:34, Figures 7A-7B, 8, 9A-9C, 10A-10C, 11A-11B.	patent. The specification of the '937 patent, including 5:9-16; 5:40-6:34, Figures 7A-7B, 8, 9A-9C, 10A-10C, 11A-11B and corresponding text. The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000077-00000081 GOOG-NDCA-13-5933-CC-00000109-0000111 GOOG-NDCA-13-5933-CC-00000125-00000144 GOOG-NDCA-13-5933-CC-00000145-00000168 Any additional documents cited or relied upon by Rockstar in support of any

Term	Proposed Construction(s)	Supporting Evidence
		contention of earlier conception or reduction to practice of the asserted claims of the '937 patent.
"means for receiving a user input to the physical viewing area corresponding to the manipulable area portion and the representation of the control tool" [Google & Rockstar]	Function: receiving a user input to the physical viewing area corresponding to the manipulable area portion and the representation of the control tool Structure: LCD 472 with an analog touch screen panel 474 and analog controller 460, memory 440 and feature processor 430, where analog controller 460 scans touch screen overlay 474 while feature processor 430 refreshes LCD 472 and memory 440 stores, and feature processor 430 executes, program 510 and touchscreen program 520, which perform the algorithm disclosed at 4:65-5:8, Figures 3A-3B, 4, 6, 8, 10A-10C.	The specification of the '937 patent, including 4:65-5:8, Figures 3A-3B, 4, 6, 8, 10A-10C and corresponding text. The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000077-00000081 GOOG-NDCA-13-5933-CC-00000109-00000111 GOOG-NDCA-13-5933-CC-00000125-00000144 GOOG-NDCA-13-5933-CC-00000145-00000168 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '937 patent.
"means for determining if the user input selects the control tool" [Google & Rockstar]	Subject to § 112, ¶ 6 Function: determining if the user input selects the control tool	The specification of the '937 patent, including 5:16-19 and corresponding text. The prosecution history of the '937 patent, including Jan. 22, 1000 Amendment, June 1997.
	Structure : LCD 472 with an analog touch screen panel 474 and analog controller 460, memory 440 and feature processor 430, where analog controller 460 scans touch screen overlay 474 while feature processor 430 refreshes LCD 472 and memory 440	including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000077-00000081

Term	Proposed Construction(s)	Supporting Evidence
	stores, and feature processor 430 executes, program	GOOG-NDCA-13-5933-CC-00000109-
	510 and touchscreen program 520, which perform	00000111
	the algorithm disclosed at 5:16-19.	GOOG-NDCA-13-5933-CC-00000125-
		00000144
		GOOG-NDCA-13-5933-CC-00000145- 00000168
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '937 patent.
"means for activating the at least one manipulation function	Subject to § 112, ¶ 6	The specification of the '937 patent, including 5:16-19, 5:27-33.
when the user input does not select the control tool or permitting the at least one control tool function to be activated when the user input does select the control tool"	Function: activating the at least one manipulation function when the user input does not select the control tool or permitting the at least one control tool function to be activated when the user input does select the control tool	The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein.
[Google & Rockstar]	Structure : Memory 440 storing, and feature processor 430 executing, program 510 and	GOOG-NDCA-13-5933-CC-00000077- 00000081
	navigation program 530, which perform the algorithm disclosed at 5:16-19, 5:27-33.	GOOG-NDCA-13-5933-CC-00000109- 00000111
		GOOG-NDCA-13-5933-CC-00000125- 00000144
		GOOG-NDCA-13-5933-CC-00000145- 00000168
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '937 patent.
"means for receiving a subsequent user input selecting	Subject to § 112, ¶ 6	The specification of the '937 patent, including 5:40-6:24, Figures 9A-9C, 10A-

Term	Proposed Construction(s)	Supporting Evidence
a predetermined portion of the control tool, after at least one control tool function is permitted to be activated" [Rockstar]	Function: receiving a subsequent user input selecting a predetermined portion of the control tool, after at least one control tool function is permitted to be activated Structure: LCD 472 with an analog touch screen panel 474 and analog controller 460, memory 440 and feature processor 430, where analog controller 460 scans touch screen overlay 474 while feature processor 430 refreshes LCD 472 and memory 440 stores, and feature processor 430 executes, program 510, touchscreen program 520 and navigation program 530, which perform the algorithm disclosed at 5:40-6:24, Figures 9A-9C, 10A-10C, 11A-11B.	10C, 11A-11B and corresponding text. The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000077-00000081 GOOG-NDCA-13-5933-CC-00000109-00000111 GOOG-NDCA-13-5933-CC-00000125-00000144 GOOG-NDCA-13-5933-CC-00000145-00000168 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '937 patent.
"means for activating the function of changing a display of information in response to the subsequent user input" [Rockstar]	Function: activating the function of changing a display of information in response to the subsequent user input Structure: LCD 472 with an analog touch screen panel 474 and analog controller 460, memory 440 and feature processor 430, where analog controller 460 scans touch screen overlay 474 while feature processor 430 refreshes LCD 472 and memory 440 stores, and feature processor 430 executes, program 510, touchscreen program 520 and navigation program 530, which perform the algorithm disclosed at 5:40-6:24, Figures 9A-9C, 11A-11B.	The specification of the '937 patent, including 5:40-6:24, Figures 9A-9C, 11A-11B and corresponding text. The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000077-00000081 GOOG-NDCA-13-5933-CC-00000109-00000111 GOOG-NDCA-13-5933-CC-00000125-00000144

Term	Proposed Construction(s)	Supporting Evidence
		GOOG-NDCA-13-5933-CC-00000145- 00000168
"wherein the means for displaying a representation of the control tool includes displaying arrows indicating direction" [Rockstar]	Subject to § 112, ¶ 6 Function: displaying arrows indicating direction Structure: LCD 472 and memory 440 storing, and feature processor 430 executing, program 510 and navigation program 530, which perform the algorithm disclosed at 5:40-63, 6:11-20, Figures 7A-7B, 8, 9A-9C, 10A-10C, 11A-11B	Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '937 patent. The specification of the '937 patent, including 5:40-63, 6:11-20, Figures 7A-7B, 8, 9A-9C, 10A-10C, 11A-11B and corresponding text. The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000077-00000081 GOOG-NDCA-13-5933-CC-00000109-00000111 GOOG-NDCA-13-5933-CC-00000125-00000144 GOOG-NDCA-13-5933-CC-00000145-00000168 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '937 patent.
"wherein the means for displaying the representation of	Subject to § 112, ¶ 6	The specification of the '937 patent, including 5:22-26, Figures 8, 10A-10C and
the control tool includes	Function: displaying an opaque representation of	corresponding text.
displaying an opaque	the control tool	

Term	Proposed Construction(s)	Supporting Evidence
representation of the control tool" [Rockstar]	Structure: LCD 472 and memory 440 storing, and feature processor 430 executing, program 510 and navigation program 530, which perform the algorithm disclosed at 5:22-26, Figures 8, 10A-10C.	The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000077-00000081 GOOG-NDCA-13-5933-CC-00000109-00000111 GOOG-NDCA-13-5933-CC-00000125-00000144 GOOG-NDCA-13-5933-CC-00000145-00000168 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '937
"wherein the means for displaying the representation of the control tool includes displaying a virtually transparent representation of the control tool" [Rockstar]	Subject to § 112, ¶ 6 Function: displaying a virtually transparent of the control tool Structure: LCD 472 and memory 440 storing, and feature processor 430 executing, program 510 and navigation program 530, which perform the algorithm disclosed at 5:19-22, 6:25-31.	patent. The specification of the '937 patent, including 5:19-22, 6:25-31. The prosecution history of the '937 patent, including Jan. 22, 1999 Amendment, June 16, 1999 Amendment, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000077-00000081 GOOG-NDCA-13-5933-CC-00000109-00000111 GOOG-NDCA-13-5933-CC-00000125-00000144 GOOG-NDCA-13-5933-CC-00000145-00000168

Term	Proposed Construction(s)	Supporting Evidence
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '937
		patent.

Exhibit A-3
Google's Proposed Claim Constructions for U.S. Patent No. 6,128,298

Term	Proposed Construction(s)	Supporting Evidence
"filter node"	"communications device which assigns its own	The specification of the '298 patent,
[Google]	public IP address and a unique port value to each	including the Abstract; cols. 1:5-20; 1:26-67;
	concurrent IP session between public and private nodes"	2:37-52; 2:65-3:50; 4:32-43; 4:57-6:28; 7:65-8:11; 8:21-65 and Figs. 1-2 and
	nodes	accompanying text.
		The prosecution history of the '298 patent,
		including April 22, 1999 Office Action; July
		15, 1999 Declaration and Exhibits; October
		7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art
		references cited therein.
		September 9, 2014 Deposition of Bruce
		Wootton
		September 10, 2014 Deposition of William
		Colvin
		RKS_NDCA_0160464-0160468
		RKS_NDCA_0160512-0160514
		RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288
		RRS_INDCA_0001263-0001266
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '298 patent.
"in correlation with"	"indexed by"	The specification of the '298 patent,
[Google]		including the Abstract; cols. 2:65-3:51; 2:32-
		51; 4:32-44 and 5:37-6:28.
		The prosecution history of the '298 patent,

Term	Proposed Construction(s)	Supporting Evidence
		including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, Amendment and Reply, and prior art references cited therein.
		September 9, 2014 Deposition of Bruce Wootton
		September 10, 2014 Deposition of William Colvin
		RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514
		RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '298 patent.
"maintaining, by the filter node" [Google]	"storing, by the filter node, in a lookup table indexed by filter node port value"	The specification of the '298 patent, including the Abstract; cols. 2:65-3:51; 2:32-51; 4:32-44 and 5:37-6:28.
		The prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art references cited therein.
		September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin

Term	Proposed Construction(s)	Supporting Evidence
		RKS_NDCA_0160464-0160468
		RKS_NDCA_0160512-0160514
		RKS_NDCA_0001289-0001299
		RKS_NDCA_0001285-0001288
"maintaining the source information taken from the outgoing data packet in correlation with a unique value representing a port of the filter node" [Google]	"storing the source information taken from the outgoing data packet in a lookup table indexed by filter node port value"	
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '298
		patent.

Term	Proposed Construction(s)	Supporting Evidence
"maintaining the source address taken from the data	"storing the source address taken from the data packet in a lookup table indexed by filter node port	The specification of the '298 patent, including the Abstract; cols. 2:65-3:51; 2:32-
packet"	value"	51; 4:32-44 and 5:37-6:28.
[Google]		The prosecution history of the '298 patent,
		including April 22, 1999 Office Action; July
		15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000
		Amendment and Reply, and prior art
		references cited therein.
		September 9, 2014 Deposition of Bruce Wootton
		September 10, 2014 Deposition of William
		Colvin
		RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514
		RKS_NDCA_0001289-0001299
		RKS_NDCA_0001285-0001288
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction to practice of the asserted claims of the '298
		patent.
"means for receiving from the first network, a data packet	Subject to § 112, ¶ 6	This term is indefinite. No portion of the specification or file history renders it
having destination information,	This claim term is indefinite under 35 U.S.C. § 112 ¶	definite. Google will rely on the entire
which includes a destination address and a destination port,	2.	specification and file history to show that this phrase is indefinite, and to rebut Rockstar's
corresponding to a node in the	If the Court determines that the term is not indefinite, then the term should be construed as	arguments regarding this phrase.
second network and having source information, which	follows, in light of the disclosures in the	To the extent not indefinite, Google
includes a source address and a	specification most closely related to the function (which Google contends are insufficient to render	identifies the specification of the '298 patent, including 7:59–8:8, 8:52-60, Fig. 2 and
source port, corresponding to a node in the first network"	the claim definite under 35 U.S.C. § 112 ¶ 2):	corresponding text.

Term	Proposed Construction(s)	Supporting Evidence
(claim 27)		
[Google & Rockstar]	Function: receiving from the first network, a data packet having destination information, which includes a destination address and a destination port, corresponding to a node in the second network and having source information, which includes a source address and a source port, corresponding to a node in the first network.	To the extent not indefinite, Google identifies the prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art references cited therein.
	Structure: Ethernet hardware interfaces, packet drivers 30 and 32, and IP handler 38 of IP filter 12, as disclosed at 7:59–8:8, 8:52-60 and Fig. 2.	September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514 RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '298
"means for receiving from the	Subject to § 112, ¶ 6	This term is indefinite. No portion of the
first network, a data packet having a destination address corresponding to a node in the second network" (claim 31) [Google & Rockstar]	This claim term is indefinite under 35 U.S.C. § 112 ¶ 2. If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2): Function: receiving from the first network, a data	specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase. To the extent not indefinite, Google identifies the specification of the '298 patent, including 7:59–8:8, 8:52-60, Fig. 2 and corresponding text. To the extent not indefinite, Google

Term	Proposed Construction(s)	Supporting Evidence
	packet having a destination address corresponding to a node in the second network. Structure: Ethernet hardware interfaces, packet drivers 30 and 32, and IP handler 38 software of IP filter 12, as disclosed at 7:59–8:8, 8:52-60 and Fig. 2.	identifies the prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art references cited therein. September 9, 2014 Deposition of Bruce
		Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514 RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '298 patent.
"means for maintaining the source information taken from the outgoing data packet in correlation with a unique value representing a port of the filter node" (claim 27) [Google & Rockstar]	Subject to § 112, ¶ 6 This claim term is indefinite under 35 U.S.C. § 112 ¶ 2. If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2):	This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase. To the extent not indefinite, Google identifies the specification of the '298 patent, including 2:65-3:2, 3:10-11, 3:33-37, 4:32-37 and 5:38-6:23.
	Function: maintaining source information taken from the data packet with a unique port value.	To the extent not indefinite, Google identifies the prosecution history of the '298 patent, including April 22, 1999 Office

Term	Proposed Construction(s)	Supporting Evidence
	Structure:	Action; July 15, 1999 Declaration and
	Address translation 40 software of IP filter 12, as	Exhibits; October 7, 1999 Office Action;
	disclosed at 8:9-11 and Fig. 2. Within software,	February 25, 2000 Amendment and Reply,
	lookup table for TCP packets indexed by filter node port value and lookup table for UDP packets indexed	and prior art references cited therein.
	by filter node port value, as disclosed at 2:65-3:2,	September 9, 2014 Deposition of Bruce
	3:10-11, 3:33-37, 4:32-37, 5:38-6:23.	Wootton
		September 10, 2014 Deposition of William
		Colvin
		RKS_NDCA_0160464-0160468
		RKS_NDCA_0160512-0160514
		RKS_NDCA_0001289-0001299
		RKS_NDCA_0001285-0001288
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction to practice of the asserted claims of the '298
		patent.
"means for maintaining the	Subject to § 112, ¶ 6	This term is indefinite. No portion of the
source address taken from the		specification or file history renders it
data packet" (claim 31)	This claim term is indefinite under 35 U.S.C. § 112 ¶	definite. Google will rely on the entire
[Google & Rockstar]	2.	specification and file history to show that this
	If the Count determines that the town is not	phrase is indefinite, and to rebut Rockstar's
	If the Court determines that the term is not indefinite, then the term should be construed as	arguments regarding this phrase.
	follows, in light of the disclosures in the	To the extent not indefinite, Google
	specification most closely related to the function	identifies the specification of the '298 patent,
	(which Google contends are insufficient to render	including 2:65-3:2, 3:10-11, 3:33-37, 4:32-37
	the claim definite under 35 U.S.C. § 112 ¶ 2):	and 5:38-6:23.
	Function: maintaining the source address taken	To the extent not indefinite, Google
	from the data packet.	identifies the prosecution history of the '298
		patent, including April 22, 1999 Office
	Structure:	Action; July 15, 1999 Declaration and
	Address translation 40 software of IP filter 12, as	Exhibits; October 7, 1999 Office Action;

Term	Proposed Construction(s)	Supporting Evidence
	disclosed at 8:9-11 and Fig. 2. Within software,	February 25, 2000 Amendment and Reply,
	lookup table for TCP packets indexed by filter node	and prior art references cited therein.
	port value and lookup table for UDP packets indexed by filter node port value, as disclosed at 2:65-3:2,	September 9, 2014 Deposition of Bruce
	3:10-11, 3:33-37, 4:32-37, 5:38-6:23.	Wootton
		September 10, 2014 Deposition of William
		Colvin
		RKS_NDCA_0160464-0160468
		RKS_NDCA_0160512-0160514
		RKS_NDCA_0001289-0001299
		RKS_NDCA_0001285-0001288
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '298 patent.
" C 1 · · · · · · · · · · · · · · · · · ·	Subject to § 112, ¶ 6	This term is indefinite. No portion of the
"means for replacing in the data packet the source address	з подости з 112, д с	specification or file history renders it
with an address of the filter	This claim term is indefinite under 35 U.S.C. § 112 ¶	definite. Google will rely on the entire
node and the source port with	2.	specification and file history to show that this
the filter node port value"	If the Court determines that the term is not	phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase.
(claim 27) / "means for	indefinite, then the term should be construed as	arguments regarding this phrase.
replacing, in the data packet, the source address with an	follows, in light of the disclosures in the	To the extent not indefinite, Google
address of the filter node,	specification most closely related to the function	identifies the specification of the '298 patent,
wherein the source address	(which Google contends are insufficient to render	including 2:65-3:2, 3:10-11, 3:33-37, 4:32-37
includes a source port number	the claim definite under 35 U.S.C. § 112 ¶ 2):	and 5:38-6:23.
and the address of the filter	Function: replacing in the data packet the source	To the extent not indefinite, Google
node includes a port number of the filter node" (claim 31)	address with an address of the filter node and the	identifies the prosecution history of the '298
die inter node (ciaini 31)	source port with the filter node port value.	patent, including April 22, 1999 Office
[Google & Rockstar]	Cture et cono	Action; July 15, 1999 Declaration and
	Structure: Address translation 40 software of IP filter 12, as	Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply,
	disclosed at 8:9-11 and Fig. 2. Within software,	and prior art references cited therein.

Term	Proposed Construction(s)	Supporting Evidence
	lookup table for TCP packets indexed by filter node port value and lookup table for UDP packets indexed by filter node port value, as disclosed at 2:65-3:2, 3:10-11, 3:33-37, 4:32-37, 5:38-6:23.	September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514 RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288 Any additional documents cited or relied upon by Rockstar in support of any
"means for sending to the second network, the data packet having the replaced	Subject to § 112, ¶ 6 This claim term is indefinite under 35 U.S.C. § 112 ¶ 2.	contention of earlier conception or reduction to practice of the asserted claims of the '298 patent. This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this
source information, whereby that packet is routed according to its destination information to the corresponding second network node" (claim 27) / "means for sending to the second network the data packet having the replaced source	If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2):	phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase. To the extent not indefinite, Google identifies the specification of the '298 patent, including 7:59–8:8, 8:52-60, Fig. 2 and accompanying text.
address, whereby that packet is routed to the corresponding second network node" (claim 31) [Google & Rockstar]	Function: sending to the second network, the data packet having the replaced source information, whereby that packet is routed according to its destination information to the corresponding second network node Structure: Ethernet hardware interfaces, packet drivers 30 and	To the extent not indefinite, Google identifies the prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art references cited therein.
	32, and IP handler 38 software of IP filter 12, as	September 9, 2014 Deposition of Bruce

Term	Proposed Construction(s)	Supporting Evidence
	disclosed at 7:59–8:8, 8:52-60 and Fig. 2.	Wootton
		September 10, 2014 Deposition of William
		Colvin
		RKS_NDCA_0160464-0160468
		RKS_NDCA_0160512-0160514
		RKS_NDCA_0001289-0001299
		RKS_NDCA_0001285-0001288
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '298
"means for replacing, in the	Subject to § 112, ¶ 6	This term is indefinite. No portion of the
data packet, the destination	Subject to § 112, ¶ 0	specification or file history renders it
information with the particular	This claim term is indefinite under 35 U.S.C. § 112 ¶	definite. Google will rely on the entire
source information"	2.	specification and file history to show that this
(claim 28)	If the Count determines that the town is not	phrase is indefinite, and to rebut Rockstar's
[Google & Rockstar]	If the Court determines that the term is not indefinite, then the term should be construed as	arguments regarding this phrase.
	follows, in light of the disclosures in the	To the extent not indefinite, Google
	specification most closely related to the function	identifies the specification of the '298 patent,
	(which Google contends are insufficient to render	including 2:65-3:2, 3:10-11, 3:33-37, 4:32-37
	the claim definite under 35 U.S.C. § 112 ¶ 2):	and 5:38-6:23.
	Function: replacing, in the data packet, the	To the extent not indefinite, Google
	destination information with the particular source	identifies the prosecution history of the '298
	information.	patent, including April 22, 1999 Office
		Action; July 15, 1999 Declaration and
	Structure: Address translation 40 software of IP filter 12, as	Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply,
	disclosed at 8:9-11 and Fig. 2. Within software,	and prior art references cited therein.
	lookup table for TCP packets indexed by filter node	prior are references ened arerein.
	port value and lookup table for UDP packets indexed	September 9, 2014 Deposition of Bruce
	by filter node port value, as disclosed at 2:65-3:2,	Wootton
	3:10-11, 3:33-37, 4:32-37, 5:38-6:23.	September 10, 2014 Deposition of William

Proposed Construction(s)	Supporting Evidence
	Colvin
	RKS_NDCA_0160464-0160468
	RKS_NDCA_0160512-0160514
	RKS_NDCA_0001289-0001299
	RKS_NDCA_0001285-0001288
Subject to § 112, ¶ 6 This claim term is indefinite under 35 U.S.C. § 112 ¶ 2. If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2): Function: receiving from the second network, a data packet having the address of the filter node as the destination address. Structure: Ethernet hardware interfaces, packet drivers 30 and 32, and IP handler 38 software of IP filter 12, as disclosed at 7:59–8:8, 8:25-35, 8:61-65 and Fig. 2.	Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '298 patent. This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase. To the extent not indefinite, Google identifies the specification of the '298 patent, including 7:59–8:8, 8:25-35, 8:61-65, Fig. 2 and accompanying text. To the extent not indefinite, Google identifies the prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art references cited therein. September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468
	Subject to § 112, ¶ 6 This claim term is indefinite under 35 U.S.C. § 112 ¶ 2. If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2): Function: receiving from the second network, a data packet having the address of the filter node as the destination address. Structure: Ethernet hardware interfaces, packet drivers 30 and 32, and IP handler 38 software of IP filter 12, as

Term	Proposed Construction(s)	Supporting Evidence
		RKS_NDCA_0160512-0160514
		RKS_NDCA_0001289-0001299
		RKS_NDCA_0001285-0001288
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction to practice of the asserted claims of the '298
		patent.
"means for correlating the	Subject to § 112, ¶ 6	This term is indefinite. No portion of the
destination port of the		specification or file history renders it
destination information in the	This claim term is indefinite under 35 U.S.C. § 112 ¶	definite. Google will rely on the entire
data packet to particular source information being maintained"	2.	specification and file history to show that this phrase is indefinite, and to rebut Rockstar's
(claim 28)	If the Court determines that the term is not	arguments regarding this phrase.
[Google & Rockstar]	indefinite, then the term should be construed as	angumento regularing una pinuaci
	follows, in light of the disclosures in the	To the extent not indefinite, Google
	specification most closely related to the function	identifies the specification of the '298 patent,
	(which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2):	including 2:65-3:2, 3:10-11, 3:33-37, 4:32-37 and 5:38-6:23.
	the claim definite under 35 O.S.C. § 112 $\frac{1}{4}$ 2).	and 5.36-0.23.
	Function: correlating the destination port of the	To the extent not indefinite, Google
	destination information in the data packet to	identifies the prosecution history of the '298
	particular source information being maintained.	patent, including April 22, 1999 Office
	Structure:	Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action;
	Address translation 40 software of IP filter 12, as	February 25, 2000 Amendment and Reply,
	disclosed at 8:9-11 and Fig. 2. Within software,	and prior art references cited therein.
	lookup table for TCP packets indexed by filter node	
	port value and lookup table for UDP packets indexed	September 9, 2014 Deposition of Bruce
	by filter node port value, as disclosed at 2:65-3:2, 3:10-11, 3:33-37, 4:32-37, 5:38-6:23.	Wootton
	3.10 ⁻ 11, 3.33 ⁻ 31, 1 .32 ⁻ 31, 3.30 ⁻ 0.23.	September 10, 2014 Deposition of William
		Colvin
		RKS_NDCA_0160464-0160468
		RKS_NDCA_0160512-0160514
		RKS_NDCA_0001289-0001299

Term	Proposed Construction(s)	Supporting Evidence
		RKS_NDCA_0001285-0001288
"means for sending to the first network the data packet having the replaced destination information, whereby that packet is routed according to its destination information to the corresponding first network node" (claim 28) [Google & Rockstar]	Subject to § 112, ¶ 6 This claim term is indefinite under 35 U.S.C. § 112 ¶ 2. If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2): Function: sending to the first network the data packet having the replaced destination information, whereby that packet is routed according to its destination information to the corresponding first network node. Structure: Ethernet hardware interfaces, packet drivers 30 and 32, and IP handler 38 software of IP filter 12, as disclosed at 7:59–8:8, 8:25-35, 8:61-65 and Fig. 2.	Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '298 patent. This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase. To the extent not indefinite, Google identifies the specification of the '298 patent, including 7:59–8:8, 8:25-35, 8:61-65, Fig. 2 and accompanying text. To the extent not indefinite, Google identifies the prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art references cited therein. September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514 RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288

Term	Proposed Construction(s)	Supporting Evidence
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '298
	0.110	patent.
"means for ignoring a data	Subject to § 112, ¶ 6	This term is indefinite. No portion of the
packet received from the	This also to the indefinite and a 25 H C C & 112 ff	specification or file history renders it
second network, if the	This claim term is indefinite under 35 U.S.C. § 112 ¶	definite. Google will rely on the entire
destination port of the destination information in that	2.	specification and file history to show that this phrase is indefinite, and to rebut Rockstar's
data packet can not be	If the Court determines that the term is not	arguments regarding this phrase.
correlated to the maintained	indefinite, then the term should be construed as	arguments regarding this phrase.
source information" (claim 29)	follows, in light of the disclosures in the	To the extent not indefinite, Google
[Google & Rockstar]	specification most closely related to the function	identifies the specification of the '298 patent,
[Soogie et resembler]	(which Google contends are insufficient to render	including 6:19-23, 8:9-11, Fig. 2 and
	the claim definite under 35 U.S.C. § 112 ¶ 2):	accompanying text.
		1 7 6
	Function: ignoring a data packet received from the	To the extent not indefinite, Google
	second network, if the destination port of the	identifies the prosecution history of the '298
	destination information in that data packet can not be	patent, including April 22, 1999 Office
	correlated to the maintained source information.	Action; July 15, 1999 Declaration and
		Exhibits; October 7, 1999 Office Action;
	Structure:	February 25, 2000 Amendment and Reply,
	Address translation 40 software of IP filter 12, as	and prior art references cited therein.
	disclosed at 6:19-23, 8:9-11 and Fig. 2.	September 9, 2014 Deposition of Bruce
		Wootton
		September 10, 2014 Deposition of William
		Colvin
		RKS_NDCA_0160464-0160468
		RKS_NDCA_0160512-0160514
		RKS_NDCA_0001289-0001299
		RKS_NDCA_0001285-0001288
		Any additional documents cited or relied
		upon by Rockstar in support of any

Term	Proposed Construction(s)	Supporting Evidence
		contention of earlier conception or reduction to practice of the asserted claims of the '298 patent.
"means for storing the source information from the data packet as an entry in a lookup table, and wherein the filter node port value correlating to the source information constitutes an index into the table for that entry" (claim 30) [Google]	This claim term is indefinite under 35 U.S.C. § 112 ¶ 2. If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2): Function: storing the source information from the data packet as an entry in a lookup table, and wherein the filter node port value correlating to the source information constitutes an index into the table for that entry. Structure: Address translation 40 software of IP filter 12, as disclosed at 8:9-11 and Fig. 2. Within software, lookup table for TCP packets indexed by filter node port value and lookup table for UDP packets indexed by filter node port value, as disclosed at 2:65-3:2, 3:10-11, 3:33-37, 4:32-37, 5:38-6:23.	This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase. To the extent not indefinite, Google identifies the specification of the '298 patent, including 2:65-3:2, 3:10-11, 3:33-37, 4:32-37 and 5:38-6:23. To the extent not indefinite, Google identifies the prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art references cited therein. September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514 RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '298

Term	Proposed Construction(s)	Supporting Evidence
		patent.
"means for receiving a return packet from the second network, responsive to the data packet having the replaced source information" (claim 31) [Google & Rockstar]	Subject to § 112, ¶ 6 This claim term is indefinite under 35 U.S.C. § 112 ¶ 2. If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2): Function: receiving a return packet from the second network, responsive to the data packet having the replaced source information. Structure:	This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase. To the extent not indefinite, Google identifies the specification of the '298 patent, including 7:59–8:8, 8:25-35, 8:61-65, Fig. 2 and accompanying text. To the extent not indefinite, Google identifies the prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action;
"means for replacing, in the	Ethernet hardware interfaces, packet drivers 30 and 32, and IP handler 38 software of IP filter 12, as disclosed at 7:59–8:8, 8:25-35, 8:61-65 and Fig. 2. Subject to § 112, ¶ 6	February 25, 2000 Amendment and Reply, and prior art references cited therein. September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514 RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '298 patent. This term is indefinite. No portion of the

Term	Proposed Construction(s)	Supporting Evidence
return packet, the destination address with the maintained source address" (claim 31) [Google & Rockstar]	This claim term is indefinite under 35 U.S.C. § 112 ¶ 2. If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2):	specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase. To the extent not indefinite, Google identifies the specification of the '298 patent, including 2:65-3:2, 3:10-11, 3:33-37, 4:32-37 and 5:38-6:23.
	Function: replacing, in the return packet, the destination address with the maintained source address. Structure: Address translation 40 software of IP filter 12, as disclosed at 8:9-11 and Fig. 2. Within software, lookup table for TCP packets indexed by filter node port value and lookup table for UDP packets indexed by filter node port value, as disclosed at 2:65-3:2, 3:10-11, 3:33-37, 4:32-37, 5:38-6:23.	To the extent not indefinite, Google identifies the prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art references cited therein. September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514 RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '298 patent.
"means for sending to the first network the return packet	Subject to § 112, ¶ 6	This term is indefinite. No portion of the specification or file history renders it

Term	Proposed Construction(s)	Supporting Evidence
having the replaced destination address, whereby that packet is routed to the corresponding the first network node" (claim 31) [Google & Rockstar]	This claim term is indefinite under 35 U.S.C. § 112 ¶ 2. If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2): Function: sending to the first network the return packet having the replaced destination address, whereby that packet is routed to the corresponding the first network node. Structure: Ethernet hardware interfaces, packet drivers 30 and 32, and IP handler 38 software of IP filter 12, as disclosed at 7:59–8:8, 8:25-35, 8:61-65 and Fig. 2.	definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase. To the extent not indefinite, Google identifies the specification of the '298 patent, including 7:59–8:8, 8:25-35, 8:61-65, Fig. 2 and accompanying text. To the extent not indefinite, Google identifies the prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art references cited therein. September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514 RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288 Any additional documents cited or relied upon by Rockstar in support of any contention of orgalize concention or reduction
"means for buffering further data packets received from the	Subject to § 112, ¶ 6	contention of earlier conception or reduction to practice of the asserted claims of the '298 patent. This term is indefinite. No portion of the specification or file history renders it
first network while waiting for the return packet"	This claim term is indefinite under 35 U.S.C. § 112 ¶ 2.	definite. Google will rely on the entire specification and file history to show that this

Term	Proposed Construction(s)	Supporting Evidence
(claim 32)		phrase is indefinite, and to rebut Rockstar's
[Google & Rockstar]	If the Court determines that the term is not	arguments regarding this phrase.
	indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2):	To the extent not indefinite, Google identifies the specification of the '298 patent, including 3:52-62, 8:9-11, Fig. 2 and accompanying text.
	Function: buffering further data packets received from the first network while waiting for the return packet. Structure:	To the extent not indefinite, Google identifies the prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action;
	Address translation 40 software of IP filter 12, as disclosed at 3:52-62, 8:9-11 and Fig. 2.	February 25, 2000 Amendment and Reply, and prior art references cited therein.
		September 9, 2014 Deposition of Bruce Wootton
		September 10, 2014 Deposition of William
		Colvin
		RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514
		RKS_NDCA_0001289-0001299
		RKS_NDCA_0001285-0001288
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '298 patent.
"means for controlling means	Subject to § 112, ¶ 6	This term is indefinite. No portion of the
(b) through (g) on an individual basis for processing	This claim term is indefinite under 35 U.S.C. § 112 ¶	specification or file history renders it definite. Google will rely on the entire
the further packets, if any, that	2.	specification and file history to show that this
were buffered"		phrase is indefinite, and to rebut Rockstar's
(claim 32)		arguments regarding this phrase.

Term	Proposed Construction(s)	Supporting Evidence
[Google & Rockstar]	If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2):	To the extent not indefinite, Google identifies the specification of the '298 patent, including 3:52-62, 8:9-11, Fig. 2 and accompanying text.
	Function: controlling means (b) through (g) on an individual basis for processing the further packets, if any, that were buffered. Structure: Address translation 40 software of IP filter 12, as	To the extent not indefinite, Google identifies the prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art references cited therein.
	disclosed at 3:52-62, 8:9-11 and Fig. 2.	September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514 RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '298 patent.
"ignoring" [Google]	"dropping"	The specification of the '298 patent, including cols. 2:53-57; 3:10-51; 5:30-6:61; 7:11-38; 8:25-35.
		The prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000

Term	Proposed Construction(s)	Supporting Evidence
		Amendment and Reply, and prior art
		references cited therein.
		September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514 RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction
		to practice of the asserted claims of the '298
Antecedent basis constructions	<u></u>	patent.
"the source address taken from the data packet" [Google]	Indefinite	This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase.
"the public node network" [Google]	Indefinite	This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase.
Order of steps of method clain	ns	
Order of steps of claims 11,	11.1 must occur before 11.2.	The specification of the '298 patent,
14, 15, 19, 23, 24	11.2 must occur after 11.1 and before 11.3.	including Abstract; 1:26-35; 2:65-3:62; 5:1-
[Google]	11.3 must occur after 11.2 and before 11.4.	7:36; 8:21-65.

Term	Proposed Construction(s)	Supporting Evidence
Term	Proposed Construction(s) 11.5 must occur after 11.4 and before 11.6. 11.7 must occur after 11.6 and before 11.8. 11.8 must occur after 11.7. 14.1 must occur after 14.2. 14.2 must occur after 14.1 and before 14.3. 14.3 must occur after 14.2 and before 14.4. 14.4 must occur after 14.3 and before 14.5. 14.5 must occur after 15.3. 15.3 must occur after 15.2 and before 15.4. 15.4 must occur after 15.3 and before 15.5. 15.5 must occur after 15.4. 19.1 must occur after 19.1 and before 19.3. 19.3 must occur after 19.2 and before 19.4. 19.5 must occur after 19.4 and before 19.6. 19.7 must occur after 19.6 and before 19.8. 19.8 must occur after 19.7 and before 19.9. 19.9 must occur after 19.8 and before 19.10. 19.10 must occur after 19.9 and before 19.11. 19.11 must occur after 19.10 and before 19.11. 19.12 must occur after 19.11 and before 19.13. 19.13 must occur after 19.12 and before 19.14. 19.14 must occur after 19.12 and before 19.14.	The prosecution history of the '298 patent, including April 22, 1999 Office Action; July 15, 1999 Declaration and Exhibits; October 7, 1999 Office Action; February 25, 2000 Amendment and Reply, and prior art references cited therein. September 9, 2014 Deposition of Bruce Wootton September 10, 2014 Deposition of William Colvin RKS_NDCA_0160464-0160468 RKS_NDCA_0160512-0160514 RKS_NDCA_0001289-0001299 RKS_NDCA_0001285-0001288 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '298 patent.
	19.14 must occur after 19.13. 23.1 must occur before 23.2. 23.2 must occur after 23.1 and before 23.3. 23.3 must occur after 23.2 and before 23.4. 23.5 must occur after 23.4 and before 23.6. 23.7 must occur after 23.6 and before 23.8. 23.8 must occur after 23.7 and before 23.9. 23.9 must occur after 23.8 and before 23.10. 23.10 must occur after 23.9 and before 23.11. 23.11 must occur after 23.10 and before 23.12.	

Term	Proposed Construction(s)	Supporting Evidence
	23.12 must occur after 23.11 and before 23.13.	
	23.13 must occur after 23.12.	
	24.1 must occur before 24.2.	
	24.2 must occur after 24.1 and before 24.3.	
	24.3 must occur after 24.2 and before 24.4. 24.5 must occur after 24.4 and before 24.6.	
	24.7 must occur after 24.6 and before 24.8.	
	24.8 must occur after 24.7.	

<u>Exhibit A-4</u>

Google's Proposed Claim Constructions for U.S. Patent No. 6,333,973

Term	Proposed Construction(s)	Supporting Evidence
"pending message" [Google]	message awaiting download from a network services provider	The specification of the '973 patent, including cols. 2:7-23, 4:1-7, 7:7-8:10, 8:52-65, claim 27, and Figs. 1, 3, 5-7 and accompanying text.
		The prosecution history of the '973 patent, including February 11, 1999 Office Action, May 7, 1999 Amendment & Remarks, March 30, 2000 Office Action, June 29, 2000 Amendment & Remarks, September 11, 2000 Office Action, February 12, 2001 Amendment & Remarks, and prior art references cited therein.
		GOOG-NDCA-13-5933-CC-00000001- 00000003
		GOOG-NDCA-13-5933-CC-00000006- 00000008
		GOOG-NDCA-13-5933-CC-00000085- 00000091
		GOOG-NDCA-13-5933-CC-00000095- 00000100
		GOOG-NDCA-13-5933-CC-00000122- 00000124
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '973 patent.
"notification message" (as used in the phrases "notification	message notifying the user of a pending message	The specification of the '973 patent, including cols. 7:7-8:10, 8:27-45, and Figs.

Term	Proposed Construction(s)	Supporting Evidence
messages corresponding to pending messages") (claims 1, 8, 21) [Google]	("pending message" as construed above)	1-5, 7 and accompanying text. The prosecution history of the '973 patent, including February 11, 1999 Office Action, May 7, 1999 Amendment & Remarks, July 16, 1999 Office Action, November 12, 1999 Amendment & Remarks, December 10, 1999 Office Action, March 30, 2000 Office Action, June 29, 2000 Amendment & Remarks, September 11, 2000 Office Action, February 12, 2001 Amendment & Remarks, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000001-00000003 GOOG-NDCA-13-5933-CC-00000006-00000008 GOOG-NDCA-13-5933-CC-000000085-00000091 GOOG-NDCA-13-5933-CC-00000095-00000100 GOOG-NDCA-13-5933-CC-00000122-00000124 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '973 patent.
"retrieving" [Google]	downloading from the network services provider	The specification of the '973 patent, including cols. 1:40-46, 10:3-65, claim 27, and Figs. 1-5, 7, 11-12 and accompanying text. The prosecution history of the '973 patent, including February 11, 1999 Office Action,

Term	Proposed Construction(s)	Supporting Evidence
		May 7, 1999 Amendment & Remarks, March 30, 2000 Office Action, June 29, 2000 Amendment & Remarks, September 11, 2000 Office Action, February 12, 2001 Amendment & Remarks, and prior art references cited therein.
		GOOG-NDCA-13-5933-CC-00000001- 00000003 GOOG-NDCA-13-5933-CC-00000006- 00000008 GOOG-NDCA-13-5933-CC-00000085- 00000091 GOOG-NDCA-13-5933-CC-00000095- 00000100 GOOG-NDCA-13-5933-CC-00000122- 00000124
"wherein the notification messages are received from an interface with independent	wherein the notification messages are received from an element of the network services provider having independent connections with different bandwidths	Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '973 patent. The specification of the '973 patent, including cols. 3:48-5:8, 5:14-62, 7:7-8:10, claim 27, and Figs. 1-5 and accompanying
connections with different bandwidths for [the] different types of pending messages" [Google]	for the different types of pending messages ("notification message" as construed above)	text. The prosecution history of the '973 patent, including February 11, 1999 Office Action, May 7, 1999 Amendment & Remarks, July 16, 1999 Office Action, November 12, 1999 Amendment & Remarks, December 10, 1999 Office Action, March 30, 2000 Office Action, June 29, 2000 Amendment & Remarks, September 11, 2000 Office Action,

Term	Proposed Construction(s)	Supporting Evidence
		January 9, 2001 Interview Summary &
		Attachment, February 12, 2001 Amendment
		& Remarks, April 6, 2001 Office Action,
		May 29, 2001 Amendment & Remarks, June
		8, 2001 Notice of Allowability & Reasons
		for Allowance, and prior art references cited
		therein.
		GOOG-NDCA-13-5933-CC-00000001-
		00000003
		GOOG-NDCA-13-5933-CC-00000006-
		0000008
		GOOG-NDCA-13-5933-CC-00000085-
		0000091
		GOOG-NDCA-13-5933-CC-00000095-
		00000100
		GOOG-NDCA-13-5933-CC-00000122-
		00000124
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '973
		patent.
"wherein the notification	wherein the notification messages are received from	The specification of the '973 patent,
messages are received from an	an element of the network services provider having	including cols. 3:48-5:8, 5:14-62, 7:7-8:10,
interface with independent	independent connections with different bandwidths	claim 27, and Figs. 1-5 and accompanying
connections with different	for the different types of the plurality of message	text.
bandwidths for the different	senders	The prosequition history of the '072 notant
types of the plurality of message senders" [Google]	("notification message" as construed above)	The prosecution history of the '973 patent, including February 11, 1999 Office Action,
incosage schucts [Google]	(notification nicssage as construct above)	May 7, 1999 Amendment & Remarks, July
		16, 1999 Office Action, November 12, 1999
		Amendment & Remarks, December 10, 1999
		Office Action, March 30, 2000 Office
		Action, June 29, 2000 Amendment &

Term	Proposed Construction(s)	Supporting Evidence
		Remarks, September 11, 2000 Office Action,
		January 9, 2001 Interview Summary &
		Attachment, February 12, 2001 Amendment & Remarks, April 6, 2001 Office Action,
		May 29, 2001 Amendment & Remarks, June
		8, 2001 Notice of Allowability & Reasons
		for Allowance, and prior art references cited
		therein.
		GOOG-NDCA-13-5933-CC-00000001-
		00000003
		GOOG-NDCA-13-5933-CC-00000006-
		00000008
		GOOG-NDCA-13-5933-CC-00000085-
		00000091
		GOOG-NDCA-13-5933-CC-00000095-
		00000100
		GOOG-NDCA-13-5933-CC-00000122-
		00000124
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '973
"means for automatically	Governed by 35 U.S.C. § 112 ¶ 6	The specification of the '973 patent,
receiving notification messages	35 0.5.C. § 112 ₁₁ 0	including cols. 1:40-46, 2:7-23, 3:48-5:8,
corresponding to pending	Function:	5:14-62, 7:7-8:10, 8:27-45, 8:52-65, 10:3-65,
messages of different types, the	1) automatically receiving notification messages	claim 27, and Figs. 1-5, 7, 11-12 and
notification messages including	corresponding to pending messages of different	accompanying text.
information regarding the source of each of the pending	types and including information regarding the source of each of the pending messages and the type of each	The prosecution history of the '973 patent,
messages and the type of each	of the pending messages, from an interface with	including February 11, 1999 Office Action,
of the pending messages,	independent connections with different bandwidths	May 7, 1999 Amendment & Remarks, July
wherein each of the notification	for the different types of pending messages; and	16, 1999 Office Action, November 12, 1999
messages is automatically sent	2) automatically sending each of the notification	Amendment & Remarks, December 10, 1999

Term	Proposed Construction(s)	Supporting Evidence
to the user when one of the pending messages is initially received and wherein the notification messages are received from an interface with independent connections with different bandwidths for the different types of pending messages" [Google / Rockstar]	messages to the user when one of the pending messages is initially received Structure: Antenna 3100 and GSM radio 3210 of FIG. 3, the Global System for Mobile Communication (GSM) switching fabric in block 1800 of FIG. 1; and the interface at the network service provider in block 5100 of FIG. 5 and elements connected to it, as disclosed in 7:1-8:9.	Office Action, March 30, 2000 Office Action, June 29, 2000 Amendment & Remarks, September 11, 2000 Office Action, January 9, 2001 Interview Summary & Attachment, February 12, 2001 Amendment & Remarks, April 6, 2001 Office Action, May 29, 2001 Amendment & Remarks, June 8, 2001 Notice of Allowability & Reasons for Allowance, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000001-00000003 GOOG-NDCA-13-5933-CC-00000006-00000008 GOOG-NDCA-13-5933-CC-000000085-00000091 GOOG-NDCA-13-5933-CC-00000095-00000100 GOOG-NDCA-13-5933-CC-00000122-00000124 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction
"means for determining a	Subject to § 112, ¶ 6	to practice of the asserted claims of the '973 patent. This term is indefinite. No portion of the
message type of the pending messages from the information corresponding to the received notification messages" [Google / Rockstar]	This claim term is indefinite under 35 U.S.C. § 112 ¶ 2. If the Court determines that the term is not indefinite, then the term should be construed as	specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase.
	follows, in light of the disclosures in the specification most closely related to the function	To the extent not indefinite, Google identifies the specification of the '973 patent,

Term	Proposed Construction(s)	Supporting Evidence
	(which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2):	including cols. 5:50-6:2 and 8:27-35, and Figs. 1-5, 7 and accompanying text.
	Function: determining a message type of the pending messages from the information corresponding to the received notification messages Structure: Feature processor 3300, memory 3400, and Message Center 6100 software of Device 1100 performing the alleged algorithm as disclosed in 5:50-6:2 and 8:27-35.	GOOG-NDCA-13-5933-CC-00000001- 00000003 GOOG-NDCA-13-5933-CC-00000006- 00000008 GOOG-NDCA-13-5933-CC-00000085- 00000091 GOOG-NDCA-13-5933-CC-00000095- 00000100 GOOG-NDCA-13-5933-CC-00000122- 00000124
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '973 patent.
"means for associating a message type indicator with each of the received notification messages based on the determined message type" [Google / Rockstar]	Subject to § 112, ¶ 6 This claim term is indefinite under 35 U.S.C. § 112 ¶ 2. If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2):	This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase. To the extent not indefinite, Google identifies the specification of the '973 patent, including cols. 5:50-6:2, 8:27-35, and 8:40-45, and Figs. 1-5, 7 and accompanying text.
	Function: associating a message type indicator with each of the received notification messages based on the determined message type	GOOG-NDCA-13-5933-CC-00000001- 00000003 GOOG-NDCA-13-5933-CC-00000006- 00000008

Term	Proposed Construction(s)	Supporting Evidence
	Structure: Feature processor 3300, memory 3400, and Message	GOOG-NDCA-13-5933-CC-00000085- 00000091
	Center 6100 software of Device 1100 performing the alleged algorithm as disclosed in 5:50-6:2 and 8:27-	GOOG-NDCA-13-5933-CC-00000095- 00000100
	35, and 8:40-45.	GOOG-NDCA-13-5933-CC-00000122- 00000124
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '973 patent.
"means for receiving a selection of one of the pending messages based on the entries	Governed by 35 U.S.C. § 112 ¶ 6 Function:	The specification of the '973 patent, including cols. 5:50-6:54, 8:27-65, and Figs. 1-5, 7 and accompanying text.
in the single selectable list" [Google / Rockstar]	receiving a selection of one of the pending messages based on the entries in the single selectable list	GOOG-NDCA-13-5933-CC-00000001- 00000003
	Structure: Feature processor 3300, memory 3400, display module 3700 with an analog touch screen overlay or	GOOG-NDCA-13-5933-CC-00000006- 00000008
	hard keys, analog controller 3600, and Message Center 6100 software of Device 1100 performing the	GOOG-NDCA-13-5933-CC-00000085- 00000091
	algorithm as disclosed in 5:50-6:54 and 8:27-65.	GOOG-NDCA-13-5933-CC-00000095- 00000100
		GOOG-NDCA-13-5933-CC-00000122- 00000124
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '973 patent.
"means for retrieving [manipulating] the selected pending message for viewing	Governed by 35 U.S.C. § 112 ¶ 6 Function:	The specification of the '973 patent, including cols. 1:40-46, 2:7-23, 3:48-5:8, 5:14-62, 7:7-8:10, 8:27-45, 8:52-65, 10:3-65,

Term	Proposed Construction(s)	Supporting Evidence
and manipulation by the user." [Google / Rockstar]	retrieving the selected pending message for viewing and manipulation by the user	claim 27, and Figs. 1-5, 7, 11-12 and accompanying text.
	Structure: Antenna 3100 and GSM radio 3210 of FIG. 3, as disclosed in 9:54-60, 10:18-25, and 10:48-56.	The prosecution history of the '973 patent, including February 11, 1999 Office Action, May 7, 1999 Amendment & Remarks, July 16, 1999 Office Action, November 12, 1999 Amendment & Remarks, December 10, 1999 Office Action, March 30, 2000 Office Action, June 29, 2000 Amendment & Remarks, September 11, 2000 Office Action, January 9, 2001 Interview Summary & Attachment, February 12, 2001 Amendment & Remarks, April 6, 2001 Office Action, May 29, 2001 Amendment & Remarks, June 8, 2001 Notice of Allowability & Reasons for Allowance, and prior art references cited therein.
		GOOG-NDCA-13-5933-CC-00000001- 00000003 GOOG-NDCA-13-5933-CC-00000006- 00000008 GOOG-NDCA-13-5933-CC-00000085- 00000091 GOOG-NDCA-13-5933-CC-00000095- 00000100 GOOG-NDCA-13-5933-CC-00000122- 00000124
"means for accessing an	Governed by 35 U.S.C. § 112 ¶ 6	Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '973 patent. The specification of the '973 patent,

Term	Proposed Construction(s)	Supporting Evidence
Term external mail server" [Google / Rockstar]		including cols. 1:40-46, 2:7-23, 3:48-5:8, 5:14-62, 7:7-8:10, 8:27-45, 8:52-65, 10:3-65, claim 27, and Figs. 1-5, 7, 11-12 and accompanying text. The prosecution history of the '973 patent, including February 11, 1999 Office Action, May 7, 1999 Amendment & Remarks, July 16, 1999 Office Action, November 12, 1999 Amendment & Remarks, December 10, 1999 Office Action, March 30, 2000 Office Action, June 29, 2000 Amendment & Remarks, September 11, 2000 Office Action, January 9, 2001 Interview Summary & Attachment, February 12, 2001 Amendment & Remarks, April 6, 2001 Office Action,
		0000003 GOOG-NDCA-13-5933-CC-00000006- 00000008 GOOG-NDCA-13-5933-CC-00000085- 00000091 GOOG-NDCA-13-5933-CC-00000095-
		00000100 GOOG-NDCA-13-5933-CC-00000093- 00000124 Any additional documents cited or relied
		upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '973

Term	Proposed Construction(s)	Supporting Evidence
		patent.
selected pending message from the external mail server" [Google / Rockstar]	Governed by 35 U.S.C. § 112 ¶ 6 Function: retrieving the selected pending message from the external mail server Structure: Antenna 3100 and GSM radio 3210 of FIG. 3 performing the algorithm as disclosed in 9:54-10:2, 10:18-30, and 10:48-56	The specification of the '973 patent, including cols. 31:40-46, 2:7-23, 3:48-5:8, 5:14-62, 7:7-8:10, 8:27-45, 8:52-65, 10:3-65, claim 27, and Figs. 1-5, 7, 11-12 and accompanying text. The prosecution history of the '973 patent, including February 11, 1999 Office Action, May 7, 1999 Amendment & Remarks, July 16, 1999 Office Action, November 12, 1999 Amendment & Remarks, December 10, 1999 Office Action, March 30, 2000 Office Action, June 29, 2000 Amendment & Remarks, September 11, 2000 Office Action, January 9, 2001 Interview Summary & Attachment, February 12, 2001 Amendment & Remarks, April 6, 2001 Office Action, May 29, 2001 Amendment & Remarks, June 8, 2001 Notice of Allowability & Reasons for Allowance, and prior art references cited therein. GOOG-NDCA-13-5933-CC-00000001-00000003 GOOG-NDCA-13-5933-CC-000000085-00000091 GOOG-NDCA-13-5933-CC-000000095-00000100 GOOG-NDCA-13-5933-CC-000000122-

Term	Proposed Construction(s)	Supporting Evidence
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '973
		patent.
"means for associating a message type indicator with	Subject to § 112, ¶ 6	This term is indefinite. No portion of the specification or file history renders it
each of the received	This claim term is indefinite under 35 U.S.C. § 112 ¶	definite. Google will rely on the entire
notification messages based on	2.	specification and file history to show that
the message type of the		this phrase is indefinite, and to rebut
corresponding pending message" [Google / Rockstar]	If the Court determines that the term is not indefinite, then the term should be construed as	Rockstar's arguments regarding this phrase.
[follows, in light of the disclosures in the	To the extent not indefinite, Google
	specification most closely related to the function	identifies the specification of the '973 patent,
	(which Google contends are insufficient to render	including cols. 5:50-6:2, 8:27-35, and 8:40-
	the claim definite under 35 U.S.C. § 112 ¶ 2):	45, and Figs. 1-5, 7 and accompanying text.
	Function:	GOOG-NDCA-13-5933-CC-00000001-
	associating a message type indicator with each of the	00000003
	received notification messages based on the message type of the corresponding pending message	GOOG-NDCA-13-5933-CC-00000006- 00000008
		GOOG-NDCA-13-5933-CC-00000085-
	Structure:	00000091
	Feature processor 3300, memory 3400, and Message Center 6100 software of Device 1100 performing the	GOOG-NDCA-13-5933-CC-00000095-
	alleged algorithm as disclosed in 5:50-6:2 and 8:27-	00000100
	35, and 8:40-45.	
	33, and 6.40-43.	GOOG-NDCA-13-5933-CC-00000122- 00000124
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '973
		patent.
Order of steps of method claim		
Order of steps of claim 8	8.1 must occur before 8.2.	The specification of the '973 patent, including 7:30-8:10, 8:35-9:5, 9:54-10:2,

Term	Proposed Construction(s)	Supporting Evidence
	8.2 must occur before 8.3.	10:18-30, 10:48-56, and Figs. 1-12 and
		accompanying text.
	8.3 must occur before 8.4.	GOOG-NDCA-13-5933-CC-00000001-
	8.4 must occur before 8.5.	00000003
	8.4 must occur before 8.3.	GOOG-NDCA-13-5933-CC-00000006-
	8.5 must occur before 8.6.	00000008
		GOOG-NDCA-13-5933-CC-00000085- 00000091
		GOOG-NDCA-13-5933-CC-00000095-
		00000100
		GOOG-NDCA-13-5933-CC-00000122-
		00000124
		00000124
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '973
		patent.
Order of steps of claim 13	13.1 must occur before 13.2.	The specification of the '973 patent,
Order of steps of claim 13	13.1 must occur before 13.2.	including 7:30-8:10, 8:35-9:5, 9:54-10:2,
		10:18-30, 10:48-56, and Figs. 1-12 and
		accompanying text.
		G00GNDG4 12 5022 GG 0000001
		GOOG-NDCA-13-5933-CC-00000001-
		00000003
		GOOG-NDCA-13-5933-CC-00000006-
		00000008
		GOOG-NDCA-13-5933-CC-00000085-
		00000091
		GOOG-NDCA-13-5933-CC-00000095-
		00000100
		GOOG-NDCA-13-5933-CC-00000122-

Term	Proposed Construction(s)	Supporting Evidence
		00000124
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '973 patent.
Order of steps of claim 33	33.1 must occur before 33.2.	The specification of the '973 patent, including 7:30-8:10, 8:35-9:5, 9:54-10:2,
	33.2 must occur before 33.3.	10:18-30, 10:48-56, and Figs. 1-12 and accompanying text.
		GOOG-NDCA-13-5933-CC-00000001- 00000003
		GOOG-NDCA-13-5933-CC-00000006- 00000008
		GOOG-NDCA-13-5933-CC-00000085- 00000091
		GOOG-NDCA-13-5933-CC-00000095- 00000100
		GOOG-NDCA-13-5933-CC-00000122- 00000124
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '973 patent.

Exhibit A-5
Preliminary Claim Constructions for U.S. Patent No. 6,463,131

Term	Proposed Construction(s)	Supporting Evidence
"communication event" [Rockstar]	voice or data	The specification of the '131 patent, including cols. 1:14-18, 1:62-2:6, 2:20-40, 3:19-4:47, 6:23-7:31, 7:48-8:12, and Figs. 1-3 and accompanying text.
		The prosecution history of the '131 patent, including September 11, 2001 Office Action, December 11, 2001 Amendment & Remarks, and prior art references cited therein.
		The prosecution history of U.S. Patent No. 6,122,348, including September 3, 1999 Office Action, November 9, 1999 Amendment & Remarks, and prior art references cited therein.
		September 24, 2014 Deposition of Marilyn French-St. George
		RKS_NDCA_0199589-0199593 GOOG-NDCA-13-5933-CC-00000085- 00000091 GOOG-NDCA-13-5933-CC-00000095- 00000100
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '131 patent.

Term	Proposed Construction(s)	Supporting Evidence
"incoming communication event" [Google]	voice or data to be transferred to a user's terminal device	The specification of the '131 patent, including cols. 1:14-18, 1:62-2:6, 2:20-40, 3:19-4:47, 6:23-7:31, 7:48-8:12, and Figs. 1-3 and accompanying text.
		The prosecution history of the '131 patent, including September 11, 2001 Office Action, December 11, 2001 Amendment & Remarks, and prior art references cited therein.
		The prosecution history of U.S. Patent No. 6,122,348, including September 3, 1999 Office Action, November 9, 1999 Amendment & Remarks, and prior art references cited therein.
		September 24, 2014 Deposition of Marilyn French-St. George RKS_NDCA_0199589-0199593 GOOG-NDCA-13-5933-CC-00000085- 00000091 GOOG-NDCA-13-5933-CC-00000095- 00000100
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '131 patent.
"sending the user" / "to be sent to the user" [Google]	transferring to the user's terminal device / to be transferred to the user's terminal device	The specification of the '131 patent, including Abstract, 1:14-18, 1:39-50, 1:62-2:6, 2:20-40, 3:19-4:32, 4:49-5:13, 6:16-8:41, and Figs. 1-3 and accompanying text. The prosecution history of the '131 patent,

Term	Proposed Construction(s)	Supporting Evidence
		including September 11, 2001 Office Action, December 11, 2001 Amendment & Remarks, and prior art references cited therein.
		The prosecution history of U.S. Patent No. 6,122,348, including September 3, 1999 Office Action, November 9, 1999 Amendment & Remarks, and prior art references cited therein.
		September 24, 2014 Deposition of Marilyn French-St. George
		RKS_NDCA_0199589-0199593 GOOG-NDCA-13-5933-CC-00000085-
		00000091
		GOOG-NDCA-13-5933-CC-00000095-
		00000100
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '131 patent.
"notification" (as used in the	an alert before transferring the incoming	The specification of the '131 patent,
phrases "selecting a notification based on the characteristic" and	communication event	including cols. 6:16-8:41, and Figs. 2-3 and accompanying text.
"the selected notification")	("an incoming communication event" as construed	
(claims 1, 3, 4, 5, 7, 8)	above)	September 24, 2014 Deposition of Marilyn
[Google]		French-St. George
		RKS_NDCA_0199589-0199593 GOOG-NDCA-13-5933-CC-00000085-
		00000091
		GOOG-NDCA-13-5933-CC-00000095-
		00000100

Term	Proposed Construction(s)	Supporting Evidence
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '131 patent.
"further notification information" [Google]	more information that is not the actual message or further message information	The specification of the '131 patent, including cols. 6:16-8:41, and Figs. 2-3 and accompanying text. The prosecution history of the '131 patent, including December 11, 2001 Amendment & Remarks, January 29, 2002 Office Action, April 29, 2002 Amendment & Remarks, and May 14, 2002 Notice of Allowability and Reasons for Allowance, and prior art references cited therein. September 24, 2014 Deposition of Marilyn French-St. George RKS_NDCA_0199589-0199593 GOOG-NDCA-13-5933-CC-000000085-00000091 GOOG-NDCA-13-5933-CC-000000095-00000100 Any additional documents cited or relied
		upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '131 patent.
"receiving a selection from the user indicating a format for delivery of further notification information" [Google]	receiving from the user a choice from among two or more formats for the transmission of further notification information to a terminal device ("further notification information" as construed	The specification of the '131 patent, including 2:33-36, 3:55-64, 4:19-32, 5:4-8, 6:16-8:41, and Figs. 2-3 and accompanying text.

Term	Proposed Construction(s)	Supporting Evidence
	above)	The prosecution history of the '131 patent,
		including December 11, 2001 Amendment
		& Remarks, January 29, 2002 Office Action, April 29, 2002 Amendment & Remarks, and
		May 14, 2002 Notice of Allowability and
		Reasons for Allowance, and prior art
		references cited therein.
		Total meters.
		The prosecution history of U.S. Patent No.
		6,122,348, including September 3, 1999
		Office Action, November 9, 1999
		Amendment & Remarks, and prior art
		references cited therein.
		September 24, 2014 Deposition of Marilyn
		French-St. George
		RKS_NDCA_0199589-0199593
		GOOG-NDCA-13-5933-CC-00000085-
		0000091
		GOOG-NDCA-13-5933-CC-00000095-
		00000100
		00000100
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '131
"means for determining a	Subject to § 112, ¶ 6	patent. This term is indefinite. No portion of the
characteristic of the	Subject to § 112, ¶ 0	specification or file history renders it
communication event"	This claim term is indefinite under 35 U.S.C. § 112	definite. Google will rely on the entire
[Google]	¶ 2.	specification and file history to show that
[и	this phrase is indefinite, and to rebut
	If the Court determines that the term is not	Rockstar's arguments regarding this phrase.
	indefinite, then the term should be construed as	
	follows, in light of the disclosures in the	To the extent not indefinite, Google
	specification most closely related to the function	identifies the specification of the '131

Term	Proposed Construction(s)	Supporting Evidence
	(which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2): Function: determining a characteristic of a	patent, including 1:14-18, 1:62-2:6, 2:20-40, 3:19-4:47, 4:60-5:21, 6:16-47, 6:23-7:31, 7:48-8:12 and Figs. 1-3 and accompanying text.
	Structure: Server 115 executing alleged algorithms of communication software 170 in FIG. 1 as disclosed in 6:22-32.	The prosecution history of the '131 patent, including September 11, 2001 Office Action, December 11, 2001 Amendment & Remarks, and prior art references cited therein.
		The prosecution history of U.S. Patent No. 6,122,348, including September 3, 1999 Office Action, November 9, 1999 Amendment & Remarks, and prior art references cited therein.
		September 24, 2014 Deposition of Marilyn French-St. George RKS_NDCA_0199589-0199593 GOOG-NDCA-13-5933-CC-00000085- 00000091 GOOG-NDCA-13-5933-CC-00000095- 00000100
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '131 patent.
"means for selecting a notification based on the characteristic" [Google]	Subject to § 112, ¶ 6 This claim term is indefinite under 35 U.S.C. § 112 ¶ 2.	This term is indefinite. No portion of the specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut Rockstar's arguments regarding this phrase.

Term	Proposed Construction(s)	Supporting Evidence
	If the Court determines that the term is not indefinite, then the term should be construed as follows, in light of the disclosures in the specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2): Function: selecting a notification based on the characteristic Structure: Server 115 executing alleged algorithms of communication software 170 in FIG. 1 as disclosed in 6:22-32.	To the extent not indefinite, Google identifies the specification of the '131 patent, including 3:24-37, 4:60-5:21, 6:16-47, and Figs. 1-2 and accompanying text. September 24, 2014 Deposition of Marilyn French-St. George RKS_NDCA_0199589-0199593 GOOG-NDCA-13-5933-CC-00000085-00000091 GOOG-NDCA-13-5933-CC-00000095-00000100
"means for sending the user the selected notification" [Google / Rockstar]	Governed by 35 U.S.C. § 112 ¶ 6 Function: sending the user the selected notification	Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '131 patent. The specification of the '131 patent, including 1:14-18, 1:39-50, 1:62-2:6, 2:20-40, 3:19-4:32, 4:49-5:21, 6:16-8:41, and Figs. 1-3 and accompanying text.
	Structure: Server 115 and communication software 170 in FIG. 1 as disclosed in 6:22-32.	The prosecution history of the '131 patent, including September 11, 2001 Office Action, December 11, 2001 Amendment & Remarks, and prior art references cited therein.
		The prosecution history of U.S. Patent No. 6,122,348, including September 3, 1999 Office Action, November 9, 1999 Amendment & Remarks, and prior art references cited therein.

Term	Proposed Construction(s)	Supporting Evidence
		September 24, 2014 Deposition of Marilyn
		French-St. George
		RKS_NDCA_0199589-0199593
		GOOG-NDCA-13-5933-CC-00000085-
		00000091
		GOOG-NDCA-13-5933-CC-00000095-
		00000100
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '131 patent.
"means for receiving a selection from the user indicating a format for delivery of further notification information regarding the communication	Governed by 35 U.S.C. § 112 ¶ 6 Function: receiving a selection from the user indicating a format for delivery of further notification information regarding the	The specification of the '131 patent, including 2:33-36, 3:24-37, 3:55-64, 4:19-32, 4:60-5:21, 6:16-8:41, and Figs. 1-3 and accompanying text.
event" [Google / Rockstar]	communication event Structure: Server 115 executing algorithms of communication software 170 in FIG. 1 as disclosed in 6:39-7:10.	The prosecution history of the '131 patent, including December 11, 2001 Amendment & Remarks, January 29, 2002 Office Action, April 29, 2002 Amendment & Remarks, and May 14, 2002 Notice of Allowability and Reasons for Allowance, and prior art references cited therein.
		The prosecution history of U.S. Patent No. 6,122,348, including September 3, 1999 Office Action, November 9, 1999 Amendment & Remarks, and prior art references cited therein.
		September 24, 2014 Deposition of Marilyn French-St. George RKS_NDCA_0199589-0199593 GOOG-NDCA-13-5933-CC-00000085-

Term	Proposed Construction(s)	Supporting Evidence
		00000091
		GOOG-NDCA-13-5933-CC-00000095-
		00000100
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction to practice of the asserted claims of the '131
		patent.
"means for allowing the further	Subject to § 112, ¶ 6	This term is indefinite. No portion of the
notification information		specification or file history renders it
regarding the communication	This claim term is indefinite under 35 U.S.C. § 112	definite. Google will rely on the entire
event to be sent to the user in the selected format" [Google /	¶ 2.	specification and file history to show that this phrase is indefinite, and to rebut
Rockstar	If the Court determines that the term is not	Rockstar's arguments regarding this phrase.
Rocksturj	indefinite, then the term should be construed as	Rockstar 5 arguments regarding and pinase.
	follows, in light of the disclosures in the	To the extent not indefinite, Google
	specification most closely related to the function	identifies the specification of the '131
	(which Google contends are insufficient to render	patent, including 2:33-36, 3:24-37, 3:55-64,
	the claim definite under 35 U.S.C. § 112 \P 2):	4:19-32, 4:60-5:21, 5:42-50 and 6:16-8:41, and Figs. 1-3 and accompanying text.
	Function: allowing the further notification	and rigs. 1-3 and accompanying text.
	information regarding the communication event to	The prosecution history of the '131 patent,
	be sent to the user in the selected format	including December 11, 2001 Amendment
		& Remarks, January 29, 2002 Office Action,
	Structure: Server 115 in FIG. 1 executing the	April 29, 2002 Amendment & Remarks, and
	alleged software algorithm disclosed in 5:42-50 and 7:12-19.	May 14, 2002 Notice of Allowability and Reasons for Allowance, and prior art
	7.12-17.	references cited therein.
		The prosecution history of U.S. Patent No.
		6,122,348, including September 3, 1999
		Office Action, November 9, 1999 Amendment & Remarks, and prior art
		references cited therein.
		G . 1 . 24 . 2014 B
		September 24, 2014 Deposition of Marilyn

Term	Proposed Construction(s)	Supporting Evidence
		French-St. George
		RKS_NDCA_0199589-0199593
		GOOG-NDCA-13-5933-CC-00000085-
		00000091
		GOOG-NDCA-13-5933-CC-00000095- 00000100
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '131 patent.
"means for selecting includes a	Subject to § 112, ¶ 6	This term is indefinite. No portion of the
choice between at least a tactile alert and a nontactile alert" [Rockstar]	This claim term is indefinite under 35 U.S.C. § 112 ¶ 2.	specification or file history renders it definite. Google will rely on the entire specification and file history to show that this phrase is indefinite, and to rebut
	If the Court determines that the term is not indefinite, then the term should be construed as	Rockstar's arguments regarding this phrase.
	follows, in light of the disclosures in the	To the extent not indefinite, Google identifies the specification of the '131
	specification most closely related to the function (which Google contends are insufficient to render the claim definite under 35 U.S.C. § 112 ¶ 2):	patent, including 3:24-37, 4:60-5:21, 6:16-47, and Figs. 1-2 and accompanying text.
	Function: selecting a notification from amongst the	September 24, 2014 Deposition of Marilyn
	choices of at least a tactile alert and a nontactile	French-St. George
	alert, based on the characteristic	RKS_NDCA_0199589-0199593
	Structure: Server 115 executing alleged algorithms	GOOG-NDCA-13-5933-CC-00000085-
	of communication software 170 in FIG. 1 as	00000091
	disclosed in 6:22-32.	GOOG-NDCA-13-5933-CC-00000095- 00000100
		Any additional documents cited or relied
		upon by Rockstar in support of any contention of earlier conception or reduction

Term	Proposed Construction(s)	Supporting Evidence
		to practice of the asserted claims of the '131 patent.
Order of steps of method cla	aims	
Order of steps of claim 5	5.1 must occur before 5.2.5.2 must occur before 5.3.5.3 must occur before 5.4.5.4 must occur before 5.5.	The specification of the '131 patent, including 6:16-7:41 and accompanying text. September 24, 2014 Deposition of Marilyn French-St. George RKS_NDCA_0199589-0199593 GOOG-NDCA-13-5933-CC-00000085-00000091 GOOG-NDCA-13-5933-CC-00000095-00000100 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction
		to practice of the asserted claims of the '131 patent.

-61- CASE NO. 13-CV-5933-CW JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT UNDER PATENT LOCAL RULE 4-3—EXHIBIT A

<u>Exhibit A-6</u>

Google's Proposed Claim Constructions for U.S. Patent No. 6,765,591

Proposed Construction(s)	Supporting Evidence
a collection of displayed ranges of VPN sub- elements that are made available for each selected VPN element without requiring user input or preprogrammed series of dialogs	Google identifies the specification of the '591 patent, including cols. 2:32-35; 8:3-36; 8:37-41; 9:23-25; 10:49-67 and Figs. 21-24, 28, 30, 31 and corresponding text. The prosecution history of the '591 patent, including October 10, 2001 Office Action, April 9, 2002 Response and Amendment, and July 8, 2002 Allowance, and prior art references cited therein. Sept. 9, 2014 Deposition of James Milillo Sept. 30, 2013 Deposition of Matthew Poisson Oct. 4, 2014 Deposition of Melissa Desroches U.S. Ser. No. 09/285,133, entitled "Bulk Configuring a Virtual Private Network", filed Apr. 2, 1999, U.S. Ser. No. 09/285,558, entitled "Links for Configuring a Virtual Private Network", filed Apr. 2, 1999; and U.S. Ser. No. 09/285,550, entitled "Monitoring a Virtual Private Network", filed Apr. 2, 1999. Configuring and Maintaining Networks with Optivity NET Configurator 2.1 Manual, Bay Networks, October 1998. The New Oak™ Communications Extranet Access Switch Administrator's Guide
	a collection of displayed ranges of VPN sub- elements that are made available for each selected VPN element without requiring user input or

PRIORART-00142280-00142569 PRIORART-00119124-00120153 PRIORART-00118560-00119123 POISSON_EDTX_0000081-00000017 POISSON_EDTX_0000018-0000061 POISSON_EDTX_0000062-0000066 POISSON_EDTX_0000092-0000103 POISSON_EDTX_0000092-0000103 POISSON_EDTX_00000352-0000368 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000390-0000410 POISSON_EDTX_0000390-0000410 POISSON_EDTX_000037-0001242 POISSON_EDTX_001037-0001242 POISSON_EDTX_00104843-001242 POISSON_EDTX_00104843-00169- 0000484 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000169- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.	Term	Proposed Construction(s)	Supporting Evidence
PRIOR ART-00118560-0019123 POISSON_EDTX_0000001-00000017 POISSON_EDTX_00000018-0000041 POISSON_EDTX_0000067-0000066 POISSON_EDTX_0000067-0000091 POISSON_EDTX_0000092-0000103 POISSON_EDTX_0000092-0000103 POISSON_EDTX_0000053-0000260 POISSON_EDTX_0000353-0000368 POISSON_EDTX_0000369-0000389 POISSON_EDTX_0000369-0000389 POISSON_EDTX_0000369-0000341 POISSON_EDTX_0000390-0000410 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0001247-0001242 POISSON_EDTX_00024843-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 0000034 GOOG-NDCA-13-5933-CC-00000369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			PRIORART-00142280-00142569
POISSON_EDTX_0000018-0000041 POISSON_EDTX_0000018-0000041 POISSON_EDTX_0000018-0000066 POISSON_EDTX_0000067-0000091 POISSON_EDTX_0000002-0000103 POISSON_EDTX_00000104-0000173 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0000411-0000432 POISSON_EDTX_000443-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000169- 00000361 GOOG-NDCA-13-5933-CC-00000185- 00001361 GOOG-NDCA-13-5933-CC-000001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0000018-0000041 POISSON_EDTX_0000042-0000066 POISSON_EDTX_0000007-0000091 POISSON_EDTX_00000067-0000091 POISSON_EDTX_00000104-00000103 POISSON_EDTX_0000104-0000173 POISSON_EDTX_0000253-0000260 POISSON_EDTX_0000359-0000368 POISSON_EDTX_0000359-0000369 POISSON_EDTX_0000359-0000410 POISSON_EDTX_0000391-0000410 POISSON_EDTX_00001237-0001242 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0001237-0001242 POISSON_EDTX_00024843-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 00000934 GOOG-NDCA-13-5933-CC-00000485- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0000042-0000066 POISSON_EDTX_0000067-0000091 POISSON_EDTX_00000103 POISSON_EDTX_00000104-0000173 POISSON_EDTX_0000253-0000260 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000369-0000389 POISSON_EDTX_0000369-0000410 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0004843-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 00000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0000067-0000091 POISSON_EDTX_00000102-00001103 POISSON_EDTX_0000104-0000173 POISSON_EDTX_0000104-0000173 POISSON_EDTX_0000352-0000260 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000352-0000389 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0024843-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 00001361 GOOG-NDCA-13-5933-CC-000001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0000092-0000103 POISSON_EDTX_0000104-0000173 POISSON_EDTX_0000363-0000260 POISSON_EDTX_0000352-0000260 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000369-0000389 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0001237-000124859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 00000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0000104-0000173 POISSON_EDTX_0000253-0000260 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000390-0000410 POISSON_EDTX_0000390-0000410 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0001237-0001069- 00000484 GOOG-NDCA-13-5933-CC-00000169- 00000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-000001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0000253-0000260 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000369-0000410 POISSON_EDTX_0000390-0000410 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0001237-0001242 POISSON_EDTX_00024843-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 00000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000369-0000389 POISSON_EDTX_0000390-0000410 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0024843-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 0000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0000369-0000389 POISSON_EDTX_0000390-0000410 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0001237-0001242 POISSON_EDTX_00024843-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 0000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0000390-0000410 POISSON_EDTX_0000411-0000432 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0024843-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 00000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0000411-0000432 POISSON_EDTX_0001237-0001242 POISSON_EDTX_0024843-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 0000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0001237-0001242 POISSON_EDTX_0024843-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 00000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
POISSON_EDTX_0024843-0024859 GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 0000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
GOOG-NDCA-13-5933-CC-00000169- 00000484 GOOG-NDCA-13-5933-CC-00000485- 00000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
00000484 GOOG-NDCA-13-5933-CC-00000485- 00000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
GOOG-NDCA-13-5933-CC-00000485- 00000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			0000 NDCH 13 3733 CC 00000107
00000934 GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			00000484
GOOG-NDCA-13-5933-CC-00000935- 00001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			GOOG-NDCA-13-5933-CC-00000485-
O0001361 GOOG-NDCA-13-5933-CC-00001369- 00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			00000934
GOOG-NDCA-13-5933-CC-00001369-00001412 Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			GOOG-NDCA-13-5933-CC-00000935-
Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			00001361
upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.			
to practice of the asserted claims of the '591 patent.			upon by Rockstar in support of any
			to practice of the asserted claims of the '591
	"properties dialogs"		Google identifies the specification of the

Term	Proposed Construction(s)	Supporting Evidence
[Google]	Displays based on one selected virtual private network element that receives user input to alter the properties of the selected element	'591 patent, including cols. 2:24-29; 8:3-17, 10:49-67 and Figs. 21-27, 29 and corresponding text.
	properties of the selected element	The prosecution history of the '591 patent, including October 10, 2001 Office Action, April 9, 2002 Response and Amendment, and July 8, 2002 Allowance, and prior art references cited therein.
		Sept. 9, 2014 Deposition of James Milillo Sept. 30, 2013 Deposition of Matthew Poisson Oct. 4, 2014 Deposition of Melissa Desroches
		U.S. Ser. No. 09/285,133, entitled "Bulk Configuring a Virtual Private Network", filed Apr. 2, 1999, U.S. Ser. No. 09/285,558, entitled "Links for Configuring a Virtual Private Network", filed Apr. 2, 1999; and U.S. Ser. No. 09/285,550, entitled "Monitoring a Virtual Private Network", filed Apr. 2, 1999.
		Configuring and Maintaining Networks with Optivity NET Configurator 2.1 Manual, Bay Networks, October 1998. The New Oak TM Communications Extranet Access Switch Administrator's Guide
		PRIORART-00141808-00142265 PRIORART-00142280-00142569 PRIORART-00119124-00120153 PRIORART-00118560-00119123 POISSON_EDTX_0000001-0000017 POISSON_EDTX_0000018-0000041

Term	Proposed Construction(s)	Supporting Evidence
		POISSON_EDTX_0000042-0000066
		POISSON_EDTX_0000067-0000091
		POISSON_EDTX_0000092-0000103
		POISSON_EDTX_0000104-0000173
		POISSON_EDTX_0000253-0000260 POISSON_EDTX_0000352-0000368
		POISSON_EDTX_0000332-0000308 POISSON_EDTX_0000369-0000389
		POISSON_EDTX_0000399-0000410
		POISSON_EDTX_0000411-0000432
		POISSON_EDTX_0001237-0001242
		POISSON_EDTX_0024843-0024859
		GOOG-NDCA-13-5933-CC-00000169-
		00000484
		GOOG-NDCA-13-5933-CC-00000485-
		00000934
		GOOG-NDCA-13-5933-CC-00000935-
		00001361
		GOOG-NDCA-13-5933-CC-00001369- 00001412
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction to practice of the asserted claims of the '591
		patent.
"wizard"	Dialogs that guide the user through a process in	Google identifies the specification of the
[Google]	order to perform a task	'591 patent, including cols. 2:55-56; 5:15-
		17; 5:18-21; 8:3-17; 10:49-67; Figs. 5-13
		and corresponding text.
		The prosecution history of the '591 patent,

Term	Proposed Construction(s)	Supporting Evidence
		including October 10, 2001 Office Action, April 9, 2002 Response and Amendment, and July 8, 2002 Allowance, and prior art references cited therein.
		Sept. 9, 2014 Deposition of James Milillo Sept. 30, 2013 Deposition of Matthew Poisson Oct. 4, 2014 Deposition of Melissa Desroches
		U.S. Ser. No. 09/285,133, entitled "Bulk Configuring a Virtual Private Network", filed Apr. 2, 1999, U.S. Ser. No. 09/285,558, entitled "Links for Configuring a Virtual Private Network", filed Apr. 2, 1999; and U.S. Ser. No. 09/285,550, entitled "Monitoring a Virtual Private Network", filed Apr. 2, 1999.
		Configuring and Maintaining Networks with Optivity NET Configurator 2.1 Manual, Bay Networks, October 1998. The New Oak TM Communications Extranet Access Switch Administrator's Guide
		PRIORART-00141808-00142265 PRIORART-00142280-00142569 PRIORART-00119124-00120153 PRIORART-00118560-00119123 POISSON_EDTX_0000001-0000017
		POISSON_EDTX_0000018-0000041 POISSON_EDTX_0000042-0000066 POISSON_EDTX_0000067-0000091 POISSON_EDTX_0000092-0000103 POISSON_EDTX_0000104-0000173 POISSON_EDTX_0000253-0000260

Term	Proposed Construction(s)	Supporting Evidence
		POISSON_EDTX_0000352-0000368
		POISSON_EDTX_0000369-0000389
		POISSON_EDTX_0000390-0000410
		POISSON_EDTX_0000411-0000432
		POISSON_EDTX_0001237-0001242
		POISSON_EDTX_0024843-0024859
		GOOG-NDCA-13-5933-CC-00000169-
		00000484
		GOOG-NDCA-13-5933-CC-00000485-
		00000934
		GOOG-NDCA-13-5933-CC-00000935-
		00001361
		GOOG-NDCA-13-5933-CC-00001369- 00001412
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '591 patent.
"managing a virtual private	Administering a virtual private network	Google identifies the specification of the
network"	Private not well and the second private not well.	'591 patent, including Abstract; cols. 1:34-
[Google]		54; 2:30-41; 2:63-64; 3:6-20; 3:37-42; 5:18-
		29; 5:42-60; 6:43-48; 6:49-52; 7:51-66; 8:3-
		29; 10:49-67 and Figs. 1, 5-13, 14-15, 32, 39
		and corresponding text.
		The prosecution history of the '591 patent,
		including October 10, 2001 Office Action,
		April 9, 2002 Response and Amendment,
		and July 8, 2002 Allowance, and prior art

Term	Proposed Construction(s)	Supporting Evidence
		references cited therein.
		Sept. 9, 2014 Deposition of James Milillo Sept. 30, 2013 Deposition of Matthew Poisson Oct. 4, 2014 Deposition of Melissa Desroches
		U.S. Ser. No. 09/285,133, entitled "Bulk Configuring a Virtual Private Network", filed Apr. 2, 1999, U.S. Ser. No. 09/285,558, entitled "Links for Configuring a Virtual Private Network", filed Apr. 2, 1999; and U.S. Ser. No. 09/285,550, entitled "Monitoring a Virtual Private Network", filed Apr. 2, 1999.
		Configuring and Maintaining Networks with Optivity NET Configurator 2.1 Manual, Bay Networks, October 1998. The New Oak TM Communications Extranet Access Switch Administrator's Guide
		PRIORART-00141808-00142265 PRIORART-00142280-00142569 PRIORART-00119124-00120153 PRIORART-00118560-00119123 POISSON_EDTX_0000001-0000017 POISSON_EDTX_0000018-0000041 POISSON_EDTX_0000042-0000066 POISSON_EDTX_0000067-0000091 POISSON_EDTX_0000092-0000103 POISSON_EDTX_0000104-0000173 POISSON_EDTX_0000253-0000260
		POISSON_EDTX_0000253-0000200 POISSON_EDTX_0000352-0000368 POISSON_EDTX_0000369-0000389 POISSON_EDTX_0000390-0000410

Term	Proposed Construction(s)	Supporting Evidence
		POISSON_EDTX_0000411-0000432
		POISSON_EDTX_0001237-0001242 POISSON_EDTX_0024843-0024859
		GOOG-NDCA-13-5933-CC-00000169-
		00000484
		GOOG-NDCA-13-5933-CC-00000485-
		00000934
		GOOG-NDCA-13-5933-CC-00000935-
		00001361
		GOOG-NDCA-13-5933-CC-00001369- 00001412
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '591 patent.

<u>Exhibit A-7</u>
Google's Proposed Claim Constructions for U.S. Patent No. 6,937,572

Term	Proposed Construction(s)	Supporting Evidence
"call"	a telephony session such as a voice, video, or chat	The specification of the '572 patent,
[Google]	session	including the Abstract; cols. 1:7-67; 2:3-27;
		2:45-4:38 and Fig. 1 and accompanying text
		The prosecution history of the '572 patent, including May 24, 2004 Office Action; September 23, 2004 Interview Request; October 1, 2004 Amendment & Response to Office Action; November 24, 2004 Office Action; March 2, 2005 Amendment and Response after Final Office Action; February 28, 2005 Examiner Interview Summary Record, and prior art references cited therein.
		September 13, 2014 Deposition of Brian
		Egan
		EGAN_NDCA_0000023-0000029
		EGAN_EDTX_0000018-0000022 RKS_NDCA_0161248-0161249
		EGAN NDCA 0000001-0000004
		GOOG-NDCA-13-5933-CC-0000009-
		00000023
		GOOG-NDCA-13-5933-CC-00000024-
		00000032
		GOOG-NDCA-13-5933-CC-00000033-
		00000044
		GOOG-NDCA-13-5933-CC-00000045-
		00000055
		GOOG-NDCA-13-5933-CC-00000056-
		0000070
		GOOG-NDCA-13-5933-CC-00000082-

Term	Proposed Construction(s)	Supporting Evidence
		0000084
		GOOG-NDCA-13-5933-CC-00000092-
		0000094
		GOOG-NDCA-13-5933-CC-00000112-
		00000114
		GOOG-NDCA-13-5933-CC-00000115-
		00000117
		GOOG-NDCA-13-5933-CC-00000118-
		00000121
		GOOG-NDCA-13-5933-CC-00001362-
		00001365
		GOOG-NDCA-13-5933-CC-00001366-
		00001368
		GOOG-NDCA-13-5933-CC-00001413-
		00001417
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '572 patent.
"call trace" [Google]	feature permitting tracing of a call (path/route that call takes place on)	The specification of the '572 patent, including the Abstract; cols. 1:7-67; 2:3-27;
[8]	rans rans rans rans	2:45-4:38 and Fig. 1 and accompanying text
	("call" used as construed above)	
		The prosecution history of the '572 patent,
		including May 24, 2004 Office Action; September 23, 2004 Interview Request;
		October 1, 2004 Amendment & Response to
		Office Action; November 24, 2004 Office
		Action; March 2, 2005 Amendment and
		Response after Final Office Action; February
		28, 2005 Examiner Interview Summary
		Record, and prior art references cited therein.

Term	Proposed Construction(s)	Supporting Evidence
		G
		September 13, 2014 Deposition of Brian
		Egan
		EGAN_NDCA_0000023-0000029
		EGAN_EDTX_0000018-0000022
		RKS_NDCA_0161248-0161249
		EGAN_NDCA_0000001-0000004
		GOOG-NDCA-13-5933-CC-00000009-
		00000023
		GOOG-NDCA-13-5933-CC-00000024-
		00000032
		GOOG-NDCA-13-5933-CC-00000033-
		00000044
		GOOG-NDCA-13-5933-CC-00000045-
		00000055
		GOOG-NDCA-13-5933-CC-00000056-
		00000070
		GOOG-NDCA-13-5933-CC-00000082-
		00000084
		GOOG-NDCA-13-5933-CC-00000092-
		00000094
		GOOG-NDCA-13-5933-CC-00000112-
		00000114
		GOOG-NDCA-13-5933-CC-00000115-
		00000117
		GOOG-NDCA-13-5933-CC-00000118-
		00000121
		GOOG-NDCA-13-5933-CC-00001362-
		00001365
		GOOG-NDCA-13-5933-CC-00001366-
		00001368
		GOOG-NDCA-13-5933-CC-00001413-
		00001417

Term	Proposed Construction(s)	Supporting Evidence
"call trace information"	information provided by a call trace	Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '572 patent. The specification of the '572 patent
"call trace information" [Google]	information provided by a call trace ("call trace" and "call" used as construed above)	The specification of the '572 patent, including the Abstract; cols. 1:7-67; 2:3-27; 2:45-4:38 and Fig. 1 and accompanying text The prosecution history of the '572 patent, including May 24, 2004 Office Action; September 23, 2004 Interview Request; October 1, 2004 Amendment & Response to Office Action; November 24, 2004 Office Action; March 2, 2005 Amendment and Response after Final Office Action; February 28, 2005 Examiner Interview Summary Record, and prior art references cited therein. September 13, 2014 Deposition of Brian Egan EGAN_NDCA_0000023-0000029 EGAN_EDTX_0000018-0000022 RKS_NDCA_0161248-0161249 EGAN_NDCA_0000001-0000004 GOOG-NDCA-13-5933-CC-000000000000000000000000000000000
		00000023 GOOG-NDCA-13-5933-CC-00000024- 00000032 GOOG-NDCA-13-5933-CC-00000033- 00000044 GOOG-NDCA-13-5933-CC-00000045- 00000055 GOOG-NDCA-13-5933-CC-00000056-

Term	Proposed Construction(s)	Supporting Evidence
		0000070
		GOOG-NDCA-13-5933-CC-00000082-
		0000084
		GOOG-NDCA-13-5933-CC-00000092-
		0000094
		GOOG-NDCA-13-5933-CC-00000112-
		00000114
		GOOG-NDCA-13-5933-CC-00000115-
		00000117
		GOOG-NDCA-13-5933-CC-00000118-
		00000121
		GOOG-NDCA-13-5933-CC-00001362-
		00001365
		GOOG-NDCA-13-5933-CC-00001366-
		00001368
		GOOG-NDCA-13-5933-CC-00001413-
		00001417
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '572
"network compatible device"	device capable of making or receiving a call on a	patent. The specification of the '572 patent,
[Google & Rockstar]	packet-switched network	including the Abstract; cols. 1:7-67; 2:3-27;
[Google & Rockstar]	packet switched network	2:45-4:38 and Fig. 1 and accompanying text
	("call" used as construed above)	The state of the s
		The prosecution history of the '572 patent,
		including May 24, 2004 Office Action;
		September 23, 2004 Interview Request;
		October 1, 2004 Amendment & Response to Office Action; November 24, 2004 Office
		Action; March 2, 2005 Amendment and
		Response after Final Office Action; February
		28, 2005 Examiner Interview Summary

Term	Proposed Construction(s)	Supporting Evidence
		Record, and prior art references cited therein.
		September 13, 2014 Deposition of Brian
		Egan
		EGAN_NDCA_0000023-0000029
		EGAN_EDTX_0000018-0000022
		RKS_NDCA_0161248-0161249
		EGAN_NDCA_0000001-0000004
		GOOG-NDCA-13-5933-CC-00000009-
		00000023
		GOOG-NDCA-13-5933-CC-00000024-
		00000032
		GOOG-NDCA-13-5933-CC-00000033-
		00000044
		GOOG-NDCA-13-5933-CC-00000045-
		00000055
		GOOG-NDCA-13-5933-CC-00000056-
		0000070
		GOOG-NDCA-13-5933-CC-00000082-
		00000084
		GOOG-NDCA-13-5933-CC-00000092-
		00000094
		GOOG-NDCA-13-5933-CC-00000112-
		00000114
		GOOG-NDCA-13-5933-CC-00000115-
		00000117
		GOOG-NDCA-13-5933-CC-00000118-
		00000121
		GOOG-NDCA-13-5933-CC-00001362-
		00001365
		GOOG-NDCA-13-5933-CC-00001366-
		00001368
		GOOG-NDCA-13-5933-CC-00001413-

Term	Proposed Construction(s)	Supporting Evidence
		00001417
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '572 patent.
"end point device"	device being traced by the network-compatible	The specification of the '572 patent,
[Google & Rockstar]	device	including the Abstract; cols. 1:7-67; 2:3-27;
5		2:45-4:38 and Fig. 1 and accompanying text
		The prosecution history of the '572 patent,
		including May 24, 2004 Office Action;
		September 23, 2004 Interview Request;
		October 1, 2004 Amendment & Response to Office Action; November 24, 2004 Office
		Action; March 2, 2005 Amendment and
		Response after Final Office Action; February
		28, 2005 Examiner Interview Summary
		Record, and prior art references cited therein.
		September 13, 2014 Deposition of Brian
		Egan
		EGAN_NDCA_0000023-0000029
		EGAN_EDTX_0000018-0000022
		RKS_NDCA_0161248-0161249
		EGAN_NDCA_0000001-0000004
		GOOG-NDCA-13-5933-CC-00000009-
		00000023
		GOOG-NDCA-13-5933-CC-00000024-
		00000032
		GOOG-NDCA-13-5933-CC-00000033-
		00000044
		GOOG-NDCA-13-5933-CC-00000045-
		00000055

Term	Proposed Construction(s)	Supporting Evidence
		GOOG-NDCA-13-5933-CC-00000056-
		0000070
		GOOG-NDCA-13-5933-CC-00000082-
		0000084
		GOOG-NDCA-13-5933-CC-00000092-
		0000094
		GOOG-NDCA-13-5933-CC-00000112-
		00000114
		GOOG-NDCA-13-5933-CC-00000115-
		00000117
		GOOG-NDCA-13-5933-CC-00000118-
		00000121
		GOOG-NDCA-13-5933-CC-00001362-
		00001365
		GOOG-NDCA-13-5933-CC-00001366-
		00001368
		GOOG-NDCA-13-5933-CC-00001413-
		00001417
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '572 patent.
"logging the call trace information" [Rockstar]	"recording call trace information over time"	The specification of the '572 patent, including cols. 1:47-50; 3:26-28 and 3:46-52.
[ROCKStat]		The prosecution history of the '572 patent, including May 24, 2004 Office Action; September 23, 2004 Interview Request; October 1, 2004 Amendment & Response to Office Action; November 24, 2004 Office Action; March 2, 2005 Amendment and Response after Final Office Action; February

Term	Proposed Construction(s)	Supporting Evidence
		28, 2005 Examiner Interview Summary
		Record, and prior art references cited therein.
		G . 1 12 2014 D
		September 13, 2014 Deposition of Brian
		Egan
		EGAN_NDCA_0000023-0000029
		EGAN_EDTX_0000018-0000022
		RKS_NDCA_0161248-0161249
		EGAN_NDCA_0000001-0000004
		GOOG-NDCA-13-5933-CC-00000009-
		00000023
		GOOG-NDCA-13-5933-CC-00000024-
		00000032
		GOOG-NDCA-13-5933-CC-00000033-
		00000044
		GOOG-NDCA-13-5933-CC-00000045-
		00000055
		GOOG-NDCA-13-5933-CC-00000056-
		0000070
		GOOG-NDCA-13-5933-CC-00000082-
		0000084
		GOOG-NDCA-13-5933-CC-00000092-
		0000094
		GOOG-NDCA-13-5933-CC-00000112-
		00000114
		GOOG-NDCA-13-5933-CC-00000115-
		00000117
		GOOG-NDCA-13-5933-CC-00000118-
		00000121
		GOOG-NDCA-13-5933-CC-00001362-
		00001365
		GOOG-NDCA-13-5933-CC-00001366-
		00001368

Term	Proposed Construction(s)	Supporting Evidence
_		GOOG-NDCA-13-5933-CC-00001413-
		00001417
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '572 patent.
"storing the call trace	Plain meaning	The specification of the '572 patent,
information"	-	including cols. 1:47-50; 3:26-28; 3; 46-52;
[Rockstar]		4:8-32 and Fig. 1 and accompanying text.
		The prosecution history of the '572 patent,
		including May 24, 2004 Office Action;
		September 23, 2004 Interview Request;
		October 1, 2004 Amendment & Response to
		Office Action; November 24, 2004 Office
		Action; March 2, 2005 Amendment and Response after Final Office Action; February
		28, 2005 Examiner Interview Summary
		Record, and prior art references cited therein.
		September 13, 2014 Deposition of Brian
		Egan
		EGAN_NDCA_0000023-0000029
		EGAN_EDTX_0000018-0000022
		RKS_NDCA_0161248-0161249
		EGAN_NDCA_0000001-0000004
		GOOG-NDCA-13-5933-CC-00000009-
		00000023
		GOOG-NDCA-13-5933-CC-00000024-
		00000032
		GOOG-NDCA-13-5933-CC-00000033-
		00000044
		GOOG-NDCA-13-5933-CC-00000045-

Term	Proposed Construction(s)	Supporting Evidence
		0000055
		GOOG-NDCA-13-5933-CC-00000056-
		0000070
		GOOG-NDCA-13-5933-CC-00000082-
		0000084
		GOOG-NDCA-13-5933-CC-00000092-
		0000094
		GOOG-NDCA-13-5933-CC-00000112-
		00000114
		GOOG-NDCA-13-5933-CC-00000115-
		00000117
		GOOG-NDCA-13-5933-CC-00000118-
		00000121
		GOOG-NDCA-13-5933-CC-00001362-
		00001365
		GOOG-NDCA-13-5933-CC-00001366-
		00001368
		GOOG-NDCA-13-5933-CC-00001413-
		00001417
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '572 patent.
"generating a request for call	making a query for call trace information by a	The specification of the '572 patent,
trace information" [Google]	network compatible device	including the Abstract; cols. 1:7-67; 2:3-27; 2:45-4:38 and Fig. 1 and accompanying text.
[0 -]	("call," "call trace," and "call trace information"	
	used as construed above)	The prosecution history of the '572 patent,
		including May 24, 2004 Office Action;
		September 23, 2004 Interview Request;
		October 1, 2004 Amendment & Response to
		Office Action; November 24, 2004 Office

Term	Proposed Construction(s)	Supporting Evidence
		Action; March 2, 2005 Amendment and
		Response after Final Office Action; February
		28, 2005 Examiner Interview Summary
		Record, and prior art references cited therein.
		September 13, 2014 Deposition of Brian
		Egan
		EGAN_NDCA_0000023-0000029
		EGAN_EDTX_0000018-0000022
		RKS_NDCA_0161248-0161249
		EGAN_NDCA_0000001-0000004
		GOOG-NDCA-13-5933-CC-00000009-
		00000023
		GOOG-NDCA-13-5933-CC-00000024-
		0000032
		GOOG-NDCA-13-5933-CC-00000033-
		0000044
		GOOG-NDCA-13-5933-CC-00000045-
		00000055
		GOOG-NDCA-13-5933-CC-00000056-
		0000070
		GOOG-NDCA-13-5933-CC-00000082-
		0000084
		GOOG-NDCA-13-5933-CC-00000092-
		00000094
		GOOG-NDCA-13-5933-CC-00000112-
		00000114
		GOOG-NDCA-13-5933-CC-00000115-
		00000117
		GOOG-NDCA-13-5933-CC-00000118-
		00000121
		GOOG-NDCA-13-5933-CC-00001362-
		00001365

Term	Proposed Construction(s)	Supporting Evidence
		GOOG-NDCA-13-5933-CC-00001366-
		00001368
		GOOG-NDCA-13-5933-CC-00001413-
		00001417
		Any additional documents cited or relied upon by Rockstar in support of any contention of earlier conception or reduction to practice of the asserted claims of the '572 patent.
Order of steps of method cla		TTI 10 1 (570
Order of steps of claim 17	17.1 must occur before 17.2 17.2 must occur before 17.3 17.3 must occur before 17.4 17.4 must occur before 17.5	The specification of the '572 patent, including the Abstract; 2:3-28; 3:10-25; 3:40-52; 4:25-38.
		The prosecution history of the '572 patent, including May 24, 2004 Office Action; September 23, 2004 Interview Request; October 1, 2004 Amendment & Response to Office Action; November 24, 2004 Office Action; March 2, 2005 Amendment and Response after Final Office Action, and prior art references cited therein.
		September 13, 2014 Deposition of Brian Egan EGAN_NDCA_0000023-0000029 EGAN_EDTX_0000018-0000022 RKS_NDCA_0161248-0161249 EGAN_NDCA_0000001-0000004 GOOG-NDCA-13-5933-CC-00000009-00000023 GOOG-NDCA-13-5933-CC-000000024-00000032 GOOG-NDCA-13-5933-CC-00000033-

Term	Proposed Construction(s)	Supporting Evidence
		00000044
		GOOG-NDCA-13-5933-CC-00000045-
		00000055
		GOOG-NDCA-13-5933-CC-00000056-
		0000070
		GOOG-NDCA-13-5933-CC-00000082-
		00000084
		GOOG-NDCA-13-5933-CC-00000092-
		00000094
		GOOG-NDCA-13-5933-CC-00000112-
		00000114
		GOOG-NDCA-13-5933-CC-00000115-
		00000117
		GOOG-NDCA-13-5933-CC-00000118-
		00000121
		GOOG-NDCA-13-5933-CC-00001362-
		00001365
		GOOG-NDCA-13-5933-CC-00001366-
		00001368
		GOOG-NDCA-13-5933-CC-00001413-
		00001417
		Any additional documents cited or relied
		upon by Rockstar in support of any
		contention of earlier conception or reduction
		to practice of the asserted claims of the '572
		patent.